

Final Complex Transformation
Supplemental Programmatic
Environmental Impact Statement

Volume III, Part 2 of 2

Comment Response Document

October 2008

Prepared by:

National Nuclear Security Administration
U.S. Department of Energy



Mattison, Caleb

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Levens, Matthew

From: Caleb Mattison [caleb.mattison@gmail.com]
Sent: Thursday, March 27, 2008 2:08 PM
To: Complex2030
Subject: Nuclear Program Comments

Caleb Mattison
506 E Broadway St Apt 3
Decorah, IA 52101-1949

March 27, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy

Hello,

116A I am strongly opposed to the manufacturing and development of new nuclear weapons. At best, deactivating and retiring our nuclear warheads would begin to diffuse the worldwide nuclear threat and the need for any country to possess them. At worst, we would build more and amplify the need for other countries to ramp up.

21J I understand their are plans to modify nuclear facilities to aid in the ease of rebuilding our arsenal, as well as a project to produce more nuclear warheads.

21J We need to be the global leaders in disbanding and diminishing nuclear weapons programs. (Cont.) It's downright hypocritical for us to fortify our program as we criticize Iran and other countries for developing theirs.

Please consider my comments.

Sincerely,

Caleb Mattison

PC_829

Maufer, Thomas

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Levens, Matthew

From: Thomas Maufer [tmaufer@gmail.com]
Sent: Friday, April 25, 2008 9:02 PM
To: Complex2030
Subject: Reject "Complex Transformation" plan to build nuclear weapons

Thomas Maufer
350 Sharon Park Dr.
Menlo Park, CA 94025-6849

April 25, 2008

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

Dear Theodore Wyka:

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

116A

We need fewer nukes, not more nukes. Ronald Reagan was quite effective at working toward disarmament and we need to keep going in that direction.

21J 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,

Thomas Maufer

PC_1556

Maxwell, Mary

Page 1 of 1

PC_51

5825 Harvey Blvd
Cincinnati OH 45233
February 4, 2008

Mr. Theodore Wyka
Complex Transformation SPEIS Document Mgr.
U.S. Department of Energy
1000 Independence Ave. S.W.
Washington DC 20585

Dear Mr. Wyka:

I and countless other U.S. citizens strongly oppose the DOE's plans for a new bomb complex. We think of the consequences for our children. A new weapons complex does not make us more secure. It makes us greater targets. Other nations only try to compete rather than give up. Mutual destruction assured, with neither wisdom nor sanity in evidence.

A new weapons complex does not make us more secure. It makes us greater targets. Other nations will only try to compete better than give up. Mutual destruction assured, with neither wisdom nor sanity in evidence.

We need to listen to statements like Gorbachev and Kissinger's sanity and Nunn and Perry, who seek a goal of a world without nuclear weapons.

Please do with you.
Sincerely,

Mary Maxwell
Associate
Sisters of Charity of Cincinnati

116A

213A.1

31U

420

Maxwell, Mary

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Levens, Matthew

themaxwells@fuse.net
Thursday, February 07, 2008 10:49 AM
Complex2030
the Draft SPEIS

PC_763

Dear Mr. Wyka:

I and countless other U.S. citizens strongly oppose the DOE's plans for a new bomb complex. We think of the consequences for our children. A new weapons complex does not make us more secure. It makes us greater targets. Other nations only try to compete rather than give up. Mutual destruction assured, with neither wisdom nor sanity in evidence.

Listen to our statesmen like Kissinger, Schultz and Nunn and Perry, who favor a world without nuclear weapons.

Sincerely,

Mary Maxwell
Associate, Sisters of Charity of Cincinnati

May, Elizabeth

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May, Elizabeth

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Levens, Matthew

From: elizabethmay@gmail.com
Sent: Monday, March 31, 2008 1:03 PM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

PC_869

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

Dear Mr. Wyka,

While I am far from deserving a title of "scientist", I do have common sense and the ability to recognize problems on my horizons.

Though I am far from any sort of professional expert on the subject, I do understand the impact of the DOE's latest plans for our nations nuclear weapons program.

I couldn't say it better nor agree more than this quote from William Hartung:

"The Department of Energy's (DOE) plan to build new nuclear weapons and invest in new bomb factories is provocative, premature, and unnecessary -- not to mention a massive waste of taxpayer dollars.

It is provocative because it will spur nuclear proliferation

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

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

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."

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.

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.

Instead of recreating the capacity to produce new, unnecessary nuclear weapons, the DOE should focus on shrinking the still-over-sized 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,
Elizabeth May

4413 Owendale Dr.
Benbrook, TX 76116

PC_869

Mayes, Melanie

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Page 1 of 2

PC_2047

Levens, Matthew

From: m mayes [mailto:mamayes5@yahoo.com]
 Sent: Wednesday, April 30, 2008 2:06 PM
 To: Complex2030
 Subject: NNSA draft EIS on transformation of US nuclear weapons complex

4/30/2008

To: complextransformation@nnsa.doe.gov

Re: NNSA draft EIS on transformation of US nuclear weapons complex

Herein are my comments regarding the National Nuclear Security Administration's draft programmatic environmental impact statement on the transformation of the US nuclear weapons complex. In the NNSA's draft, four alternative futures are envisioned—each of them would continue the production of nuclear weapons in Oak Ridge through the Stockpile Life Extension Program as well as provide support for the production of new nuclear weapons through the "Reliable Replacement Warheads;" (RRW) regime. None of these alternatives are acceptable, for a variety of reasons entailed below. Instead I recommend that we cease ALL production and refurbishment of nuclear weapons, regardless of how the semantics are manipulated. Advocates, and this EIS, tend to claim that since we are "refurbishing", we are not actually "producing" new weapons. These semantic adjustments are completely dishonest. ANY change to our weapons stockpile is a blatant extension of our nuclear weapons capabilities and therefore constitutes weapons production in violation of a number of existing treaties to which we are party.

First, there is no overall vision or plan for the post-cold-war era. Congress iterated this position during last year's budget process, by refusing to fund a number of activities until a new Nuclear Posture Review, which sets U.S. nuclear policy and includes a force structure assessment, is prepared.

Second, I am an environmental scientist working on the substantial, remaining legacy of cold war weapons production at DOE sites. What we have learned over the years is that there is really no safe way to dispose of materials generated as a result of weapons production. This environmental lesson is something that is never taken into account as we discuss plans for nuclear weapons. We need to fix the problems that currently exist before creating new ones.

Third, folks in the Oak Ridge, TN, area tend to focus on jobs associated with nuclear weapons production. They don't realize that clean-up of current environmental legacy and disposition of current weapons also creates jobs. Oak Ridge workers would be better utilized in trying to solve these problems first. Subsequently, they could be put to work on more important issues, energy production and conservation.

Most importantly, this draft attempts to skirt the entire issue by claiming that the RRW and Stockpile Life Extensions programs are not production of new weapons. This assertion is entirely false. When we "refurbish", "extend", and modify our current weapons stockpiles, we are sending a very clear signal to the rest of the world to continue, and in fact, escalate, the nuclear arms race. In essence, we are giving "rogue states," such as Iran, Pakistan, North Korea the ammunition to justify to their own people and the world their need to develop their own weapons. The fact that we threaten Iran and North Korea (but not Pakistan (yet) or Israel (never)) because they wish to develop nuclear weapons is blatant hypocrisy that is obvious to the world. Please, stop providing these states with the intellectual ammunition to pursue their inherently dangerous production of nuclear weapons. It puts the US and the rest of the world at grave risk.

1/70

2/2J

3/1C

4/14M

5/7J

6/9B

7/1J

5/19/2008

2-714

Mayes, Melanie

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PC_2047

[This position was publicly advocated in January 2007 by Henry Kissinger, George Shultz, Sam Nunn and Williams Perry in an op-ed piece in The Wall Street Journal which said, "We endorse the goal of a world free of nuclear weapons and working energetically on the actions required to achieve that goal." These folks are not "doves" they are "hawks" who have spent their careers in awareness of our stockpile and using its power to influence world geopolitical dynamics. On January 15, 2008, these leaders published a second op-ed in The Wall Street Journal. They reported on the response to their previous article, saying they received strong support from a list that includes Mikhail Gorbachev, British foreign secretary Margaret Beckett, Madeleine Albright, Richard Allen, James Baker III, Samuel Berger, Zbigniew Brzezinski, Warren Christopher, William Cohen, Lawrence Eagleburger, Robert McNamara, Colin Powell, Margaret Thatcher and others. They realize that we violate years of treaties and promises to the rest of the world to STOP nuclear weapons production and DISPOSE of stockpiled weapons. The NNSA should take their concerns, and mine, seriously. Please do not pursue ANY changes to the weapons stockpiles (unless it involves disposition) without a serious discussion of its implications and violations of a number of existing treaties. This is exactly what the current draft EIS does, and exactly why it should be summarily rejected.

Sincerely

Melanie A. Mayes, PhD
 214 E Springdale Ave
 Knoxville TN 37917

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8/16A

5/19/2008

October 2008

McArthur, Steve

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PC_1866

Levens, Matthew

From: Steve McArthur [stevenmcArthur@aol.com]
Sent: Sunday, March 30, 2008 10:54 PM
To: Complex2030
Subject: Their needs to be a reassessment of the direction the US is taking with respect to Disarmament

Dear Sirs,
I would like to voice my opposition to the alternatives offered and offer one of my own. At this time in history it is imperative that the United States be the leader in disarming and moving to a "no nukes" position in the world community so that we may lead the world away from the ultimate destruction that will be the result of any nuclear exchange. Money should be used to moth ball and disarm the nuclear war heads we have stockpiled and begin to show the world that we feel as a free country that Nuclear bombs are not the answer but are part of the problem we face as we move away from war as an sane alternative and recognize our mutual interdependence and use the funds to erase poverty and starvation that grips 3 billion people on our planet at this time because of the "misguided" policies of the world powers to arm not feed the people. Peace and Justice are tied up together and can not be achieved without both being present. Please move away from building more and "new" weapons and move toward solving the underlying problems of our time how to live on the planet without blowing ourselves up or starving half the world so the top 10 % can live with too much thalach is killing them from "obesity and gluttony". WE need true leadership at this time in our history and more and newer bombs is not the way. Feed the hungry, clothe the naked, provide health care to the sick and help build a world of peace and social justice. The new armaments proposed are a theft from the children of the future and a poor excuse for freedom from fear and want. Sincerely, Steve McArthur

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1

McBride, Martin

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Levens, Matthew

PC_2056

From: Martin McBride [Martin@thesecretcitystore.com]
Sent: Thursday, April 10, 2008 5:44 PM
To: Complex2030
Subject: COMMENT ON DRAFT SPEIS FOR COMPLEX TRANSFORMATION; NEED FOR A NUCLEAR TERRORISM ANALYSIS

Attachments: image001.gif



image001.gif (5 KB)

Ted,

My comment letter on the Draft SPEIS for Complex Transformation is shown below.

Thanks much---

Martin

Martin McBride
(865) 482- 5386
Oak Ridge, Tennessee

954 W. Outer Drive
Oak Ridge, TN 37830

April 10, 2008
Theodore A. Wyka
Complex 2030 SPEIS Document Manager
Office of Transformation
US Department of Energy
NA-10.1
1000 Independence Avenue, SW
Washington DC 20585

Subject: COMMENT ON DRAFT SPEIS FOR COMPLEX TRANSFORMATION; NEED FOR A NUCLEAR TERRORISM ANALYSIS

Dear Ted:

I wrote the Department of Energy on January 16, 2007 to suggest that DOE's Draft Supplemental Programmatic Environmental Impact Statement (SPEIS) for Transforming the Weapons Complex analyze the effect of planned consolidation on the level of nuclear terrorist threat against the Complex. Unfortunately, although traditional security threats were addressed in the resulting SPEIS, the document did not appear to address nuclear terrorism.

Nuclear terrorism fundamentally differs from traditional security threats in that mitigation can only be achieved by lowering a site's attractiveness to nuclear terrorists. Protective features, such as DOE guard forces and security hardware, can do very little to blunt a nuclear terrorist attack.

Another important difference from traditional security threats is the fact that factors

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13A.1

1

McBride, Martin

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11
13A.1
(cont)
outside a DOE reservation, such as the presence of a large adjacent American site to nuclear terrorist attack. Sites dramatically increase the attractiveness of a DOE site to nuclear terrorist attack. Sites such as Sandia (which sits next to Albuquerque) are therefore inherently more-attractive to nuclear terrorist attack than sites such as Los Alamos (which sits next to a much smaller American community.)

213D
When one considers that the primary cause of the infamous Pearl Harbor attack was the over-consolidation of the Pacific Fleet, the seriousness of this issue becomes apparent. In 1941, over-consolidation created a target for America's enemies that was too good to pass up. DOE needs to avoid creating a similar, very-dangerous nuclear terrorist vulnerability in today's world.

213D
(cont)
Beyond the incredible environmental devastation that a nuclear terrorist attack on the Weapons Complex would bring, such an attack could also destroy vital portions of this nation's nuclear technical capability. It is essential that during consolidation, sufficient strategic redundancy be maintained within the Weapons Complex to: (1) lessen the likelihood of a nuclear terrorist attack and (2) reduce the consequences of such an attack.

313A
This certainly does not imply that consolidation can not (or should not) be considered. Consolidation represents an important potential cost savings to taxpayers and needs to be actively pursued by DOE. It is just that the impact on the nuclear terrorist threat against DOE sites needs to be carefully considered and planned-for in any such consolidation.

4113B
To deal with this issue, the SPEIS should:
* Establish criteria to judge the attractiveness and consequence of a nuclear terrorist attack on the Weapons Complex and
* Evaluate consolidation options against these considerations---to ensure that the resulting complex is not over-consolidated and vulnerable to attack. Note that instances of over-consolidation can be addressed by incorporating added strategic redundancy across the Complex.

Thank you very much for considering this input. Please feel free to contact me at (865) 482-5386 if I can be of further assistance.

Martin McBride, Ph.D.
Retired Director of Nuclear Safety,
Department of Energy

McBurney, Ruth

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Levens, Matthew PC_716

From: Ruth McBurney [northwester3@aol.com]
Sent: Wednesday, January 16, 2008 12:35 PM
To: Complex2030
Subject: Citizen Comment regarding SPEIS, Complex Transformation

116A; 29H
Mr. Wyka:
We do NOT need new nuclear warheads. Please don't waste my money building more. Thank you.

Ruth McBurney
47 Pine St.
Hoboken, NJ 07432

Mccally, Michael

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PC_964

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. Theodore Wyka,

I write to submit the following public comment on the Draft Complex Transformation PEIS on behalf of Physicians for Social Responsibility (PSR).

Physicians for Social Responsibility was founded in 1961 by doctors concerned about the health consequences of nuclear weapons. Independent studies beginning in the 1960s by physicians and experts from other disciplines have repeatedly demonstrated that the production, use, and testing of nuclear weapons creates environmental health hazards leading to significantly increased human morbidity and mortality. This independent research has often challenged the assumptions underlying information made available to the American public by the U.S. Government regarding nuclear weapons and has contributed to the advancement of the scientific knowledge in this area of vital importance to public policy. My comments today will be based on this independent research conducted over several decades by PSR.

I. The proposed Complex Transformation program endangers the environment and human life and health.

Since the Manhattan Project began, hundreds of thousands of nuclear weapons workers have been exposed to ionizing radiation. In 2000, the government was forced to admit that workers had been harmed by activities at DOE and other facilities, and those deemed injured were to be offered financial and other compensation.

Last summer, the Rocky Mountain News reported on the basis of government figures that “[t]he U.S. nuclear weapons program has sickened 36,500 Americans and killed more than 4,000.”¹ These numbers reflect only those individuals that have been approved for government compensation. However, there are countless people that have been exposed and made sick from low-level ionizing radiation for nuclear bomb testing and radiation plumb leaks from weapons facilities.

The DOE PEIS Report for the Complex Transformation 2030 program fails to adequately report to the true environmental and human health impacts of this plan. There are several problems in the analysis that gives a false impression that this program will have limited impact. First, risk estimates are calculated for each alternative at each site for each potential exposure separately (waste exposure, water exposure, air emissions). It is clear that a person receives a cumulative dose of radiation from all sources concurrently and that to handle each exposure risk separately in the final risk estimate for cancer results in a much lower risk calculation. While a collective

¹ Ann Inese, “U.S. nuke work afflicted 36,500 Americans,” *Rocky Mountain News*, August 31, 2007, available at: http://www.rockymountainnews.com/drmn/local/article0,1299,DRMN_15_568694,00.html

Mccally, Michael

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114.K.3
(cont)

risk is calculated for the general population this is a risk estimate that reflects the risk from radiation exposures through locally produced food. Again this is dealing with risks attributed to various exposure media separately. Ultimately this inappropriate methodology leads to the final risk estimates for latent cancers to appear much more trivial than the true risk.

Second, the U.S. government still estimates the health risk of low levels of ionizing radiation using “reference man” characteristics. Many people living near proposed Complex 2030 sites do not have the anatomical and physiological characteristics of an average individual as defined for a “reference man.” In particular, infants, children, pregnant women, immune compromised and other chronically ill persons would be affected differently by radiation exposure than people who fit the “reference man” criteria. This point clearly demonstrates that vulnerable populations will not be adequately protected from radiation released from various environmental media.

Third, it is clear that the DOE has accepted an unacceptable level of exposure for both the workers and the surrounding communities to each proposed site. As the report states that acceptable and safe amount of radiation exposure to neighboring communities is 5 REMs or 0.05 Sievert per year. The most recent committee report (BEIR VII) calculated the expected cancer risk from a singular exposure of 0.1 Sievert.² The committee found that in a lifetime approximately 42 out of 100 people will be diagnosed with cancer and one cancer out of these 100 people could result from a single exposure to 0.1 Sievert of low-level radiation above background.³

Even more compelling are the results of the largest cohort study of the cancer risk among radiation workers that used exposure and health data from 15 countries that included over 5.2 million person years of follow-up. This rigorous investigation found that the excess relative risk for all cancers excluding leukemia to be statistically compatible with but higher than the Beir VII risk estimate used to set the assumptions of cancer risk for this DOE PEIS report. Most notably this landmark study found that all of the increase in deaths from all causes and all cancers resulted in from doses of less than 0.05 Sievert or 5 REM, which is the set US standard for annual exposure.⁴ This reinforces the assumption that there is no safe exposure level to radiation in which we would not expect to see an observable effect.

The health risks for workers and residents should be the context in which NNSA considers its Complex 2030 plans. The government should not consider the production of new nuclear weapons while we are still struggling to address past risks to the health of those living near or working in the weapons complex. It critical that the health consequences of the proposed Complex Transformation 2030 Program be the central consideration for NNSA PEIS report. The final PEIS ought to include a human health risk assessment to takes into account the newest research of health effects at varying levels of radiation exposure, characterizes of risk for sensitive populations and for every activity on each proposed Complex 2030 site. Since these

² This report was sponsored by the U.S. Departments of Defense, Energy and Homeland Security, The U.S. Regulatory Commission, and the Environmental Protection Agency.

³ Committee to Assess Health Risks from Exposure to Low Levels of Ionizing Radiation, National Research Council, *Health Risks from Exposure to Low Levels of Ionizing Radiation: BEIR VII-Phase 2*, National Academies of Sciences, 2006. Available at http://books.nap.edu/catalog.php?record_id=11340

⁴ Curtis et al (2007). The 15-Country Collaborative study of cancer risk among radiation workers in the nuclear industry: Estimates of radiation-related cancer risks. *Radiation Research*; **167**: 396-416.

214.K.4

314.K.1

414.K.2

114.K.3
(cont)214.K.4
(cont)

Mccally, Michael

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Mccally, Michael

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issues are not addressed in the current PEIS this report is not adequate for demonstrating safety of the Complex 2030 plan.

1. The assumed national security benefits of the proposed Complex Transformation program do not balance its environmental and public health dangers.

The Complex Transformation proposal assumes that the development of a "responsive infrastructure" for nuclear weapons production will contribute to U.S. national security. This assumption has not been tested in several important ways.

First, the relationship between nuclear deterrence and U.S. national security is unclear. There is no evidence to suggest that nuclear weapons deter terrorism, the principle national security threat to the United States. Overwhelming nuclear superiority did not protect us from September 11th and offers no identifiable advantage against terrorist supporters in Afghanistan. To the extent that terrorism attempts to provoke American reactions that will incense the world against us, threatening to use nuclear weapons for indiscriminate mass destruction empowers terrorists. Without specification of *who* is being deterred from *what*, there is no way to assess the value of nuclear deterrence for U.S. national security.

Second, the contribution of the future nuclear weapons use or testing to U.S. national security is dubious at best. Independent research demonstrates that the use of a single nuclear weapon could kill tens to hundreds of thousands of civilians and that nuclear explosive testing has already caused 80,000 cancers and 17,000 deaths in the United States. Without any specification of the national security benefit to be derived from the use or testing of nuclear weapons, the principle product of Complex Transformation, the relative value of these benefits cannot be compared to the environmental costs.

Third, U.S. partners in the 1968 Treaty on the Non-Proliferation of Nuclear Weapons (NPT) have consistently argued that the production of new nuclear weapons is inconsistent with U.S. obligations under the NPT and the necessary context for stable nuclear nonproliferation. On the other hand, nuclear proliferation is a major identifiable danger to U.S. national security and the impact of eroding the confidence of our Treaty partners in our compliance bears careful review. Complex Transformation is a major step in the direction of new nuclear weapons production and the likely reaction of our NPT partners to this proposal bears directly on its national security benefit.

The argument that Complex Transformation is needed to maintain future capacity is a red herring designed to lower the standard of proof that additional nuclear weapons production will add value to U.S. national security. Independent analysis by the JASONs suggests that decades of service remain in the existing plutonium "pits" produced for the legacy arsenal and there is a growing consensus, subscribed to even by Henry Kissinger, that the most appropriate future number of nuclear weapons is zero. There is no substantial reason to believe that the Complex Transformation proposal will contribute to the national security.

513.A.1

617.M.1

314.K.1 (cont)

711.F

815.C.1

916.A.1

103.A

2. Much wider expert input and public deliberation is necessary to assess the underlying assumptions and full environmental impact of the proposed Complex Transformation program.

This hearing process is insufficient to evaluate the environmental impact of the proposed Complex Transformation program. New studies are needed on the medical, public health, and climate impacts of the life cycle of the Complex Transformation proposal, specifically including the prospective testing and use of the nuclear weapons it will produce.

New research in 2007 by Professors O.B. Toon of the University of Colorado at Boulder and Alan Robock of Rutgers University demonstrates, even a limited, regional nuclear war – such as between India and Pakistan – would have globally significant climatic effects. Dr. Ira Helfand of Physicians for Social Responsibility has argued that these global climate effects would lead to famine and disease claiming more than one billion human lives around the world.

These new conclusions are both relevant to the environmental impact of the Complex Transformation proposal and important to national and global security, but they do not constitute a sufficient basis on which to evaluate the full environmental impact of the future U.S. nuclear arsenal that is the inevitable product of the Complex Transformation proposal under consideration.

Physicians for Social Responsibility specifically requests that:

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 be conducted.
2. The future role of nuclear deterrence and nuclear weapons in support of U.S. national security be articulated by the U.S. Department of Energy with appropriate support from other departments and agencies.
3. The U.S. Department of Energy 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, and
4. That the U.S. Department of Energy abandon the effort to redevelop nuclear weapons production capabilities as costly, destabilizing, unnecessary and unhealthy and 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 seriously considering these concerns and comments.

Sincerely,

617.M.1 (cont)

112.A

122.A.2

617.M.1 (cont)

1314.K.5

103.A (cont)

1414.K.6

158.B.1

Mccally, Michael

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Michael McCally, M.D., Ph.D.
Executive Director, Physicians for Social Responsibility

Mccarthy, Judith

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PC_1406

Levens, Matthew

From: Judith McCarthy [lascrucesjm@jdl.com]
Sent: Tuesday, April 15, 2008 5:26 PM
To: Complex2008
Subject: New Nuclear Weapons

Judith McCarthy
2930 Claude Dove Dr., Apt. 1
Las Cruces, NM 88011-4870

April 15, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

116A. I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons. I also oppose plants to modify nuclear facilities across the country. Why in this age, are we trying to rebuild our nuclear arsenal, when not so long ago the goal of most major countries was nuclear disarmament? Why should we ask other countries to refrain from developing nuclear arsenals when we are trying to increase our own capacity for building nuclear weapons? After all, we're the only country that ever dropped atomic bombs on another country. I have read a lot about the atomic bomb, which was developed and tested in NM, where I now live. Oppenheimer, one of the creators of the bomb, never recovered, physically or mentally from it's use. Gen. Eisenhower, Admiral Nimitz, and other officers in the Pacific, deplored it's use, believing it was unnecessary precedent-setting, to the disadvantage of America.

30A. 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,

Judith McCarthy
575 521-1521

Mccarthy, Michael

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PC_656

Levens, Matthew

From: Michael McCarthy [mccpax@comcast.net]
Sent: Thursday, March 13, 2008 4:36 PM
To: Complex2030
Subject: not in favor

116A Bear mr D'Agostino, please reconsider making another nuclear complex or refurbishing an old one do we need more nuclear weapons which will only, in the long run, completely ruin our environment. please . i am not in favor of the new complex. thank you, andrea patnes-mcc

Mccarthy, Susann

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PC_2122

Levens, Matthew

From: Susann McCarthy [susann@iaosnet.com]
Sent: Wednesday, April 30, 2008 11:27 AM
To: Complex2030
Subject: SPEIS- NO to nuclear pit production at LANL

Dear Mr. Theodor Wyrka,

110B; I am a 27 year resident of Taos, New Mexico. I have experienced the atmospheric consequences of LANL's failures of safety precaution in water, air and soil. My native American and Spanish-American neighbors have experienced these same dire effects of proximity to LANL and its toxic waste materials and military production agendas. These dangerous toxicities, sources of illness and death among us, and suffered a millionfold by the people on whom we visit the war and destruction for which these plutonium pits are to be prepared. What are we thinking?!

410B Los Alamos is an incredible facility for a redirection of purpose that would be of service to our nation. We face planetary conditions of exceptional consequences for all beings, brought about largely by human activity. The importance of existing facilities like Los Alamos for addressing transformation of our energy sources and uses can't be overestimated.

54A Therefore, I believe that a "No Action Alternative" in regards to the current proposed Complex Transformation s the only respectful and sensible option. It is unwise for the NNSA to embark on this project when a new President will be able to reframe our focus through a new Nuclear Posture Review.

67J We need "Fence to fence cleanup" up there on Los Alamos! This is the action alternative requested by the New Mexico Environment Department. Please respect the rights to life, liberty and pursuit of happiness for our children and children's children--to the seventh generation, the descendants whom wise Six Nations tribes thought about when making important decisions. Let us begin to be so wise when making momentous decisions that will affect not only our own seventh generation, but all species.

Respectfully,
Susann McCarthy
P O Box 1591
Taos, New Mexico 87571

Mccartt, Debra

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Mccartt, Debra

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PC_98

DEBRA McCARTT
MAYOR



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.

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.

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 receiving non-destructive weapon/pit surveillance with the existing Weapons Engineering and Testing Lab and the new Weapons Surveillance Facility, receiving updated IIE machining and production facilities, and consolidating weapon and pit storage with a new underground storage facility located in Zone 12 of the plant.

115A;

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35D.1;

410F

NO BOM (E) AMARILLO, TEXAS 79109 (P) TELEPHONE (806) 738-8111

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.

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(cont.)

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.

65D

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 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.

115A
(cont.)

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, rebated, or eliminated.

115A
(cont.)

Yours truly,

Debra McCartt, Mayor
City of Amarillo, Texas

Mccaughan, Renda

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PC_1842

Levens, Matthew

From: Renda Mccaughan [rendaandpete@yahoo.com]
Sent: Friday, March 28, 2008 10:07 AM
To: Complex2030
Subject: Building new nuclear weapons

Renda Mccaughan
5713 Whitehall Walk
Dunwoody, GA 30338-2656

March 28, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

I live in Georgia, and am a Quaker, opposed in general to all war, but in particular to any nuclear weapons. The US should destroy the bombs we now own, not build plants to produce plutonium pits for more nuclear weapons!
Or make plans to modify nuclear facilities across the country to make it easier to rebuild our nuclear arsenal! We would be sending a contradictory message to other countries, where we are strongly urging them NOT to make nuclear bombs. And here we are, increasing our own capacity to build new nuclear weapons. It just doesn't make sense. Please, stop all such plans right now.

Sincerely,

Renda L. Mccaughan
770-730-0872

16A

Mcclendon, Joby

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PC_1390

Levens, Matthew

From: Joby McClendon [smtacolica@yahoo.com]
Sent: Tuesday, February 19, 2008 10:3 PM
To: Complex2030
Subject: No nukes

Joby McClendon
8207 Canoga Ave.
Austin, TX 78724-5772

February 19, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

The president of the United States is, yet again, being hypocritical in his request for new nuclear armaments.

He attacked Iraq to prevent nuclear weapons, he wants to attack Iran to prevent nuclear weapons, he insists on sanctioning N. Korea for having nuclear weapons.

In the very same breath, he insists that Americans must spend more billions of dollars on rebuilding our own extravagant nuclear weapons arsenal.

Why do we need more weapons of mass destruction? We already have more than enough to destroy the entire world more than once.

Please tell him "no". Those billions of dollars he wants to spend on more nuclear arms are desperately needed for our social programs in this country, the programs we pay taxes to support.

"No" to militarism and might over right. "Yes" to peace and gentle prosperity.
Sincerely,

Joby McClendon
512-535-3315

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39B

410A

McClintic, Bruce

Page 1 of 1

PC_827

Levens, Matthew

From: Bruce F McClintic [mailto:bfm@clint.com]
Sent: Thursday, March 27, 2008 2:17 PM
To: Complex2030
Subject: Oppose Nukes!

Bruce F McClintic
1275 Dana
Palo Alto, CA 94301-3112

March 27, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

116A I urge you to oppose any proposals to build new nukes, or to take steps which will facilitate new nuclear weapons.

21B Instead, please push legislation to disarm and destroy the huge ugly cold war nukes we have in the US and abroad.

Sincerely,

Bruce F. McClintic
6503251962

Mccollum, Zoe

Page 1 of 1

PC_1648

Levens, Matthew

From: mczoe@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,

113A We don't need any more nuclear weapons. We have plenty to use as a threat.

29H The manufacture of weaponry is bankrupting our country. So simple, STOP IT!

314M3 We haven't even found a safe way YET of disposing of nuclear waste for use as a power source.

49B Instead of spending money on nuclear we could be cleaning up our atmosphere and our oceans and cooperating with nations worldwide in that effort.

5140 Air and water do not stay in one country's back yard but move about eg. China's air pollution blowing over to California.

616A Complex Transformation puts far too much emphasis on re-creating the unnecessary nuclear bomb capability in the future.

71F 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.

616A (cont) The DOE could focus on shrinking the still-oversized nuclear weapons complex and setting an example for the world in armament reduction.

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,
Zoe McCollum
20171 Sealpoint Lane, #105
Huntington Beach, CA 92646

cc:
Senator Dianne Feinstein
Senator Barbara Boxer
Representative Dana Rohrabacher

McCook, Patsy

Page 1 of 1

McCormick, Patricia

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PC_298

PATSY MCCOOK
6 LAUREL DRIVE
OLD LYME, CT 06377-1462
PHONE AND FAX 860-434-3972
DMCCOOR2@AOL.COM

17 March 2008

Theodore Wilk
Complex Transformation
SPEIS Document Manager
Office of Transportation NA-10.1
Department of Energy
1000 Independence Avenue, S.W.
Washington, DC 20585

Re: Comment on plan to develop Complex Transformation

Dear Mr. Wilk,

I understand that the Bush Administration is planning to spend \$150 billion to build a facility, known as Complex Transformation, that could produce as many as 125 new nuclear warheads a year. In my opinion, if the United States expects nations like Iran, North Korea, and Saudi Arabia to give up their weapons programs, we should be leading the way in abolishing nuclear weapons. Building a new bomb plant sends the wrong message to the rest of the world.

Thank you for your attention to this comment.

Sincerely,
Patsy McCook

cc: Representative Joseph Courtney
Senator Christopher Dodd
Senator Joseph Lieberman

114.1

2/4/17, 2008
PC_27

Mr. Theodore Styken
Complex Transformation SPEIS Document Mgr.
US Dept. of Energy
1000 Independence Ave. SW
Washington, DC 20585

Dear Mr. Styken,
The US Govt. is obliged to pursue complete nuclear disarmaments in spite of the Bush Administration's refusal to honor our 1970 promise to do so in the Non-proliferation Treaty.

It is scandalous that we, the most powerful nation in the world ^{are} threatening planet Earth + her people by the development of "Complex Transformation". I am ashamed to be a citizen of a country which starves the poor to pay for nuclear weapons.

Sincerely
Patricia McCormick

11F
219E:
316A

Mccooy, David
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Mccooy, David
Page 2 of 58

April 30, 2008

George Allen
Complex 2030 SEIS Project Lead
Office of Transformation, U.S. Department of Energy
NA-101
1000 Independence Ave. SW
Washington, D.C. 20585
George.Allen@nrsa.doe.gov

Theodore A. Wyka,
Complex 2030 SEIS Document Manager
Office of Transformation, U.S. Department of Energy
NA-101
1000 Independence Ave. SW
Washington, D.C. 20585
Theodore.Wyka@nrsa.doe.gov

**Citizen Action Comments for Imaginary Deterrence --
The Draft Complex Transformation Supplemental
Programmatic Environmental Impact Statement
(Bombplex SPEIS)**

Citizen Action New Mexico offers the following comments regarding the Bombplex SPEIS. Citizen Action represents over 1,000 persons in Albuquerque and greater New Mexico that support clean up of nuclear weapons legacy waste and non-production and non-proliferation of nuclear weapons. All earlier scoping comments and email communications of Citizen Action are included herein by reference.

This SPEIS should be tabled until a new Nuclear Policy Review process has been implemented. The SPEIS is less an environmental impact statement and more a political statement and effort to mandate production of new unnecessary plutonium pits.

A ninety-day public comment extension for review of the SPEIS should have been granted by NNSA instead of the pathetic extension of 20 days. In addition to reasons previously furnished to NNSA for an extension, NNSA has refused to provide documents for Free Freedom of Information (FOIA) requests filed on November 15 and 16, 2006 submitted to NNSA by Citizen Action. All FOIA requests of Citizen Action that have not been answered by NNSA are included herein by reference. The pattern and practice of unlawful delay and failure to provide responses to those FOIAs by NNSA prevents Citizen Action from full participation in this SPEIS administrative proceeding related to the operations and activities of Sandia National Laboratories (SNL) as part of the complex of national nuclear weapons laboratories. A federal District Court decision in Citizen Action's favor against the NNSA cites this unlawful delay and is incorporated herein by reference. (<http://www.radfreem.org/pages/ge-2008mar31a.pdf>).

11-C

21-E

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3/2.H.1

Issuance of the SPEIS should be delayed until such time that NNSA has provided the documents for the ten FOIAs. Among the purposes of the National Environmental Policy (NEPA) is to provide an opportunity for public involvement. That purpose has been fully defeated for Citizen Action by NNSA refusal to address our FOIA requests. The purpose has also been defeated for the public by refusal to grant an extension of time for public comment.

**MAINTAINING APPROXIMATELY 2,000 NUCLEAR WEAPONS
AT KIRTLAND AIR FORCE BASE IS INCOMPATIBLE WITH
ESSENTIAL USAGE FOR THE CITY OF ALBUQUERQUE AND
NUCLEAR WEAPONS SHOULD BE IMMEDIATELY
REMOVED IN ADDITION TO REMOVAL OF SPECIAL NUCLEAR
MATERIAL AT SANDIA NATIONAL LABORATORY.**

SPEIS must consider Command and Control breakdowns against a lack of safeguards for US politicians or military officials illegally ordering use of nuclear weapons against foreign nations and/or against segments of the US population. On August 30, 2007, a B-52 transporting six stealth AGM-129 Advanced Cruise Missiles, armed with a W-80-1 nuclear warhead, were destined for the Middle East via Keesler Air Force Base in Louisiana, probably as a result of illegal orders by Vice President Cheney.

http://community.freespeech.org/lost_b_52_nuke_cruise_missiles_were_on_way_to_mideast_for_attack_on_iran

It would be the environmental and human health effects of a direct unauthorized crash or crash by a maximally armed fighter airplane with a rogue pilot from Kirtland Air Force Base or a large commercial airliner upon the nuclear weapons stockpile maintained at Kirtland Air Force Base or any and all other critical facilities at Sandia or other facilities within the Bombplex?

513E.2;
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the SPEIS, NNSA fails to consider the environmental consequences for the inability to maintain the necessary control of domestic or foreign nuclear weapons. Four secret nuclear missile parts were mistakenly sent to Taiwan, an error that went unnoticed for more than 18 months. "This is about the trust and confidence of the American people and the stewardship of the most dangerous weapons in the world," said Geoff Morrell, the tagon's press secretary. <http://www.thehedge.com/re.aspx?re=28b12fed-1144-4784-3-99eb2b53fb4b>

613F
(cont);
713E.3

NNSA should question in the first instance whether it actually even possesses the competency to rationally present the environmental impacts associated with the Complex transformation. The analysis should be performed by an independent group due to the initial bias of NNSA.

413.E
(cont)

2

9/13E (cont)
NNSA has failed in the SPEIS to consider its own incompetence to manage the Complex changes in preventing security breaches that could allow nuclear secrets to fall into enemy hands or provide sensitive information about its employees that could provide further defeat of security. Blackmailing employees for nuclear secrets is always a possibility. The firing of Linton Brooks for security breaches at LANL is notable after hundreds of classified documents were removed from a LANL and later found by police during a drug investigation at a Los Alamos mobile home.

"WASHINGTON (Reuters) - A computer hacker got into the U.S. agency that guards the country's nuclear weapons stockpile and stole the personal records of at least 1,500 employees and contractors, a senior U.S. lawmaker said on Friday.

"The target of the hacker, the National Nuclear Security Administration, is the latest agency to reveal that sensitive private information about government workers was stolen.

"The incident happened last September but top Energy Department officials were not told about it until this week, prompting the chairman of the House of Representatives Energy and Commerce Committee to demand the resignation of the head of the NNSA."

Only days after the Energy Department revealed that hackers had stolen personal data on 1,502 employees in the agency's National Nuclear Security Administration, officials at the department's Hanford site disclosed Monday that police recently found a 10-year-old document containing personal data about some 4,000 Hanford employees in a home in Yakima, Wash.
http://www.vsinfl.net/index_2.php?option=com_content&do_pdf=1&id=77

The ongoing incompetence of the NNSA is further indicated by Section 3117 of the House version of the FY 2007 Defense Authorization Act that "would consolidate the counterintelligence programs of the Department of Energy and the National Nuclear Security Administration under the Department of Energy."

Although the SPEIS claims that those SNM will be removed from Sandia it is clear that NNSA intends to continue transporting and providing SNM to Sandia for experiments and testing. The SPEIS has not described the reasons for and the environmental impacts that will be associated with continued using special nuclear material for testing and experiments at Sandia. The potential for human exposure and environmental accidents, waste disposal and terrorist activities associated with continued use of SNM at Sandia must be described. Since the SPEIS claims SNM will be removed from Sandia and no analysis for continued use is made, Citizen Action objects and insists that no further SNM should be held at Sandia for any purposes whatsoever.

9/14.K.15
The Defense Nuclear Facilities Safety Board found in report of Mar 18, 2005 that Sandia did not have adequate safety bases in place for managing SNM:

"2.2.5 Sandia National Laboratories

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Sandia National Laboratories are located primarily in Albuquerque, New Mexico. Major defense nuclear facilities at Sandia, most of which are located at Technical Area V at the New Mexico site, include the Annular Core Research Reactor, Hot Cell Facility, Gamma Irradiation Facility, and Pulsed Reactor Facility.

9/14K15 (cont)
"In September 2004, the Board issued a letter questioning the adequacy of safety bases at Sandia. A subsequent self assessment performed by the Sandia Site Office revealed that the site did not have a currently approved safety basis for onsite transportation of hazard category 3 or higher materials. As an interim measure, the site office issued an authorization policy and imposed compensatory controls while an adequate safety basis could be developed. In addition, the site office commissioned an independent review of the safety bases for nuclear facilities, to be conducted in December 2004."

"5.4.1 At Sandia National Laboratories, independent review teams confirmed systematic weaknesses identified by the Board in the safety analyses for its nuclear facilities. In response, NNSA and the laboratory have postponed start-up activities and reallocated resources to correct the deficiencies in the safety analyses of the dynamic nuclear facilities.

"5.5.2 In March 2004, the Board conducted on-site reviews of the staffing levels and training of DOE's facility representatives at the Pantex, Sandia, and Los Alamos Site offices. The Board found that both staffing and training were inadequate in all three offices, and so informed NNSA in a letter dated May 14, 2004. Responding on July 13, 2004, the NNSA Administrator agreed that action was needed at all NNSA sites to strengthen the facility representative program."

10/14W10
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.

11/14A.1
12/14.E.12
The NNSA SPEIS claim that there are no prime farmlands in the vicinity of LANL is wrong. Before the Atomic Energy Commission arrived on the Pajanto 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 and the diversion and/or contamination of the water from availability and quality for agricultural activities into the future.

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.

4

Mcco, David

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Mcco, David

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13/2K27	<p>Although NNSA's Reich Office of Active Propaganda of its Propaganda Ministry closely follows the teachings of its mentor, Eberhard Taubert, the Animal Farm terminology in the SPEIS becomes a bit much at times. The "Distributed Centers for Excellence" and "Consolidated Centers for Excellence" are actually Centers for Extermination, and should be identified as such by NNSA. The "Greenfield Consolidated Plutonium Center" should be labeled the "Scorched Earth Plutonium Center."</p>
14/16A1	<p>Once again, the NNSA has changed the title of the SPEIS document from "Complex 2030" to "Complex Transformation." ("Bombplex"). Whatever euphemisms are chosen by NNSA, the truth cannot be hidden that NNSA is the main participant in the greatest threat to planetary human existence in history. NNSA is a conspirator to violate the terms of Article VI of the Non-Proliferation Treaty. The Bombplex SPEIS should set forth how much safer world inhabitants and the environment would be if all members of the NNSA were tried before the World Court and incarcerated as war criminals for continuing to plan crimes against humanity.</p>
15/6C6	<p>The Joint Test Assemblies program should be abandoned and the weapons simply dismantled without playing with them further at the Tonopah Test Range. It is not clear that this activity would or not be continued if TTR is moved to White Sands. No analysis is provided by NNSA for the cost savings of the "dismantlement of weapons only" option. No analysis of how this continued operation aids the pursuit of non-proliferation.</p>
16/10H1	<p>The storage of 22 metric tons of plutonium at the SRS K-Area, is not appropriately analyzed for its potential environmental consequences. When will the plutonium be moved, how will it be utilized? To put this information in a footnote rather than full sized print is another evasion by NNSA. The option of consolidating all plutonium at one site without multiple transportation routes from LLNL should be considered.</p>
17/7B1	<p>Additionally 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 from nanoclusters. Thus the risk analysis for plutonium exposure of the public and the environment is defective.</p>
18/14K10	<p>What the National Nuclear Security Administration (NNSA) does best is to avoid answering the most important environmental and social questions that should be considered for any meaningful evaluation or debate on creating a new generation of nuclear weapons. The health and environmental effects of many future decades of radioactive and hazardous waste contamination for the production as well as the use of the nuclear bombs to be constructed is not evaluated as it should be. Nuclear Winter must be addressed.</p>
20/2K28	<p>The Draft SPEIS makes the incorrect legal assumption that the Atomic Energy Act (AEA) and the Nuclear Posture Review essentially compel the NNSA to proceed with continuing the "core competencies to design, manufacture, and maintain nuclear weapons." This is NNSA legal swill with no citation to any portion of the</p>

11/C (cont)	<p>Atomic Energy Act (AEA) or the National Nuclear Security Administration Act that actually compel or order the design and production of nuclear weapons. The President may make such a determination, she could just as easily not make a design/production decision. It is not certain that future presidents will make such a determination and the option that there may not be any such design or production must remain and be presented as a viable option as the No Production Alternative. A future nuclear posture review could well preclude continued design and manufacture of nuclear weapons.</p>
21/701	<p>Given the fact that the AEA does not compel further design and production of nuclear weapons, the obvious alternative of "No Production, Only Reduction" must be considered as a reasonable alternative. Maintaining an infrastructure for production and actual production are two separate considerations.</p> <p>While it is necessary to assure the safety of and reduce the existing stockpile of nuclear weapons, neither the AEA nor the National Nuclear Security Administration Act compels the continued design and manufacture of nuclear weapons. Nothing in the Bombplex SPEIS is presented that contradicts this. The refusal to consider a non-production, dismantlement only program as an environmental alternative for the US nuclear weapons stockpile and the weapons complex as a whole is nothing other than a political ploy taken by the NNSA to continue perpetrating a huge money making scheme and welfare program for bomb makers by the military industrial complex. The failure to consider the No Production alternative and its comparative environmental impacts and costs is a violation of the NEPA.</p>
22/81	<p>The financial costs of maintaining the current stockpile and building the new facilities necessary to accomplish the reorganized Complex are not set forth. Consolidating nuclear weapons manufacturing work in Los Alamos and Oak Ridge, Tenn will add more than \$1 billion per year in short-term construction spending to the federal budget by 2012, according to an analysis by a federal contractor. Nor are the decommissioning and decontamination costs set forth for buildings that will no longer be used by the Complex. Any funds available to NNSA must be used for environmental cleanup.</p>
14/16A1 (cont)	<p>Maintaining Nuclear Deterrence as a goal for the Bombplex laboratories, as will be discussed further below, is a fantasy concocted during the last century that is no justification for continued nuclear weapons production. This Imaginary Deterrence presented by the design and development of new nuclear weapons fails to meet realistic National Security requirements given the nature and type of global threats that the United States has created for itself with its pursuit of illegal wars, political assassinations and aggressive, war-mongering posture among the nations of the world to grant Democracy at the point of a gun by U.S. Neocons seeking planetary and military space supremacy over diminishing petroleum and mineral resources.</p>
23/5C1	<p>NNSA fails to set forth any facts to justify continuing design and production of pits based on its assertion that "other issues associated with pits, other than the aging of plutonium materials, would never arise." Well, just what are those other issues that NNSA fails to present and is so proud of?</p>

Mcco, David

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14 14E12 (cont)	<p>NNSA fails to address the growing and widespread contamination of groundwater from the legacy wastes of SNL and Kirtland Air Force Base. Attachment 3 below addresses the inadequacy of a soil cover and soil gas monitoring wells planned for the Mixed Waste Landfill at Sandia to protect human health or the environment.</p>
24 14F1	<p>From an environmental perspective the "other issues" that NNSA fails to address with respect to continuing pit production is that the Los Alamos National Laboratory (LANL) facilities slated for the continued production are in a known earthquake zone with at least three earthquakes that have occurred during the Holocene period. The Defense Nuclear Facilities Safety Board has called attention to the fact that the current TA-55 production building is both unsafe and has an earthquake fault beneath the facility. The building is unsafe for future and continuing use. The existing administration building at LANL cannot withstand the earthquake that could occur for the region. The proposed Modern Pit Facility would be placed within the Pajarito Fault system that laces the entire LANL site. The facility fails to take into account known ground acceleration forces in either its design or construction. The SPEIS must analyze total failure of the existing CMR and CMRR under construction in the event of earthquakes. Fires and explosions along with the building breach and release of all radioactive and hazardous materials must be considered.</p>
25 14N6	<p>NNSA is required to examine the environmental consequences of the maximum accident event at the TA-55 facility and the planned CMRR facility for pit production at LANL under its maximum pit production scenario.</p>
26 14K13	<p>LANL already is contaminating drinking water wells in Los Alamos and with plutonium in Santa Fe along with contaminating the entire Rio Grande River system with radionuclides.</p>
27 14J6	<p>LANL has spread radionuclides and would continue to accelerate the spread of hazardous contamination to a 57,000 person low income and minority populace in violation of all principles of Environmental Justice.</p>
28 14K1	<p>NNSA fails to heed President Executive Order 13045 for the Protection of Children. <i>The Lancet</i>, Britain's best-known medical journal, published a scientific paper which shows that mothers living within 3 km (nearly 2 miles) of a hazardous waste landfill site are one third more likely to have babies with birth defects. Numerous hazardous waste landfills that include radioactive and mixed hazardous waste exist at LANL, and Sandia National Laboratories and other National weapons laboratories with no consideration given to the protection of surrounding communities and the increased sensitivity of fetuses and young children to the environmental impact of those facilities release of hazardous and radioactive contaminants.</p>
29 14O1	<p>No consideration is given for the cumulative risks for additional body burden from all future weapons making activities in New Mexico coupled with existing risks from past operations. Moreover, NNSA has failed to consider the combined pollution to the New</p>

Mcco, David

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29 14O1 (cont)	<p>Mexico operation of two national laboratories, LANL and Sandia National Laboratories within a 60 mile distance from each other along with the WIPP transportation route, planned increases in uranium mining and processing and operation of commercial nuclear reactors under the Global Nuclear Energy Partnership (GNEP).</p>
29 5C1 (cont)	<p>The NNSA fails to set forward the continuing environmental contamination that will result on a sliding scale of 200 pits to be produced annually. NNSA does not describe how many pits it plans to produce by say 2020 or any other date. This is all political decision making that could be easily undone by the next Administration and should not be decided until some national law makers have a chance to examine the preposterous proposals of an outgoing Bush Administration that will commit over a trillion dollars to weapons production and maintenance.</p>
19 7M1 (cont)	<p>How can the NNSA, with a straight face, present an environmental impact statement when it apparently has no idea of how many pits are necessary to produce? And how could the necessity of producing up to 200 or 1,000 pits per year even be considered a rational number when there are currently 20,000 or more surplus pits that could be utilized? NNSA fails to provide any discussion of the existing number of pits that are currently available and the expected longevity of the pits and ability to gain further use from those pits. Further, NNSA fails to consider the number of existing pits in relation to the goals of stockpile reduction and non-proliferation.</p>
14 16A1 (cont)	<p>The Bombplex SPEIS fails to consider the most fundamental environmental issue involved in the design and production of a nuclear weapon: the environmental consequences such as Nuclear Winter from the exchange of nuclear weapons or the singular use of a nuclear weapon. That's no surprise because the NNSA sees an environmental analysis as a mere procedural hurdle on the road to amassing vast sums of money for itself while the rest of the nation suffers lack of medical care, poor education, a decaying infrastructure, unsafe ports, borders and coastlines. A mere Supplement, not even a full environmental impact statement, is deemed sufficient by NNSA for a trillion dollar production of nuclear weapons of which the United States and the world already have too many.</p>
<p>The NNSA administrators come mainly from the East and see the West, especially New Mexico and Nevada, as their playground for designing, dumping, testing, blowing up nuclear bombs, and putting lots of plutonium, hexavalent chromium, and hundreds of other hazardous and radioactive compounds into our air and water while they receive six figure salaries for destroying the environment. The lack of environmental cleanup is ignored by NNSA and the reduction of budgets for cleanup as well. A regional and national conflict of interest exists that results in serious environmental injustice and inequities not recognized or addressed by the NNSA. NNSA representatives are content to poison the low income minority communities of the western United States environment while they reside on the East Coast away from the downwind dangers of contamination.</p>	

Some issues that the NNSA refuses to acknowledge as issues for Bombplex SPEIS are the following:

- The need for and proliferation of nuclear weapons.
- The need for a long term energy policy.
- The need for a nuclear test ban treaty and arms control agreements.
- The credibility and accountability of the DOE. (That's certainly not an issue- NNSA knows they are high paid liars.)
- The need for safe nuclear waste storage facilities. (Not an issue because all of the DOE sites leak like crazy and NNSA doesn't know how to make them safe.)
- The need to resolve excavation and remediation of existing sites. (NNSA just covers them with dirt and makes wildlife recreation areas for you and your children!)
- The effect of future nuclear weapon production on cleanup efforts and contamination.
- The location of new high level waste repositories after the Waste Isolation Pilot Plant (WIPP) fills up, necessary from increased high level waste.
- The past lies and failures of DOE to clean up the extraordinary toxic contamination at every site in the U.S. the DOE has touched. DOE is the King Midas of nuclear contamination.
- Whether the Complex should operate. (The termination of bomb maker welfare programs should be ended).
- The unacceptable environmental effects, and the moral, ethical, bio-psychic conduct of participation in designing, building, testing and more nuclear weapons of mass destruction.

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(cont)

For further issues that the DOE should address see pp. 4-20 through 4-21 of the Implementation Plan, February, 1992, DOE/EIS-01611P. All issues in all pages of that document are herein incorporated by reference as issues which the NNSA should address.

The Supplemental EIS must consider the environmental impacts of Reliable Replacement Warhead that will be caused by reprocessing, proliferation and terrorist acts using the nuclear materials either as bombs or dirty bombs.

NNSA's Fantasy of Deterrence

The NNSA must consider that it hasn't been deterring anybody these days – with North Korea, Israel and Iran as leading examples. US National Security is so poor that the US "accidentally" ships components for nuclear missiles to countries like Taiwan. Any industrialized nation has the technical capability to develop nuclear weapons within several years if the decision to do so were made. Nations already possessing substantial nuclear technology such as commercial nuclear power plants and arms industries could do so in no more than a year or two. Australia, Canada, Japan, Germany and the Netherlands would be quick candidates for developing nuclear weapons. Venezuela, as a leading oil producer has declared its interest in nuclear weapons, Brazil and Argentina both maintain civilian nuclear programs and are capable of developing weapons programs, if desired.

14176A1
(cont)

http://www.ecc.nps.navy.mil/events/freemint/NuclearWeaponsProliferation2016Jul06_rpt.a.sp

Deterrence only exists when one can't go down to Mall-Wart and get the same type of weapon the next fellow has. The secrets are all out thanks to the U.S. Pakistani ally and our own spread of nuclear technology and information. A nation state needs only to acquire the materials necessary to build a nuclear weapon. The U.S makes sure that non-signatories to the Non-Proliferation Treaty, like India, and Israel can get nuclear materials through commercial reactor programs or smuggled from our national laboratories.

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(cont)

"Deterrence" means keeping nuclear weapons around to remind ourselves that we shouldn't really use them. It is an illusion to feel safe and powerful because we have something with which to frighten ourselves and our international neighbors. The U.S. is a terrific success story in frightening other nations who would now like to have the weapons to protect themselves from us and frighten us back. That's called proliferation.

Then there are those lazy cheaters who don't want to trouble to make a bomb. They just want to steal one of our bombs or steal some of the special nuclear materials to make a dirty bomb. <http://news.bbc.co.uk/1/hi/world/europe/1441091.stm> Opportunities for theft of special nuclear materials exist from security problems. Human vigilance is never perfect. Los Alamos National Laboratories currently has 300 kilograms of plutonium missing from inventory records. NNSA should account for where that Plutonium has gone. NNSA lacks competence even for a bean counting function and must take that into account in the SPEIS.

<http://usgovinfo.about.com/od/consumerawareness/a/missingpluto.htm>
http://query.nytimes.com/gst/fullpage.html?res=9C07E0D7133AF931A2575BC0A9649C8B63&_r=TopReference/Times%20Topics/Organizations/Los%20Alamos%20Natio nal%20Laboratory Classified documents are already a fungible currency to pay for methamphetamine at LANL. <http://abcnews.go.com/Health/story?id=3177289> Why does NNSA now want to begin producing up to 200 plutonium pits a year at LANL? Is it because NNSA has no reliable well monitoring network to detect contamination moving in the groundwater to the Rio Grande. That way, if the plutonium goes missing, LANL can just claim it's just in New Mexico's drinking water? NNSA must explain the missing plutonium inventories existing at LANL.
<http://mexicomexico.wordpress.com/2007/07/10/media-event-plutonium-hazardous-radioactivity-found-in-nm-water-plant-s-dust-as-domenici-celebrates-new-plutonium-warhead-certification/>

How Safe Have We Really Made Ourselves?

- None of the US nuclear weapons arsenal deterred the attack on 9/11 of the World Trade Center and the Pentagon. Nor will future such attacks using lower levels of technology be deterred by the presence of a U.S. arsenal of ~10,000 nuclear warheads, ~5,000 of which are currently deployable.
- We spent \$20 billion on the Manhattan Project through 1945.
- We built 65,700 nuclear missiles from 1951 to the present.
- The peak number of nuclear warheads and bombs in 1966 was 32,193.

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- The Army requested 151,000 nuclear weapons in 1956 and 1957.
- We had 925 uranium mines operating in 1955. (The miners are still dying which the SPEIS must address).
- New Mexico has the largest number of nuclear weapons, over 1,900 by latest count.
- The EIS Supplement fails but must take into account the cost of legal fees to be paid by the DOE to fight lawsuits by contaminated workers and private citizens which totaled \$97,000,000 just from 1990 to 1995. The cost of the Radiation Exposure and Compensation Act of 1990 totaled \$2.25,000,000 for over 6,000 approved claims through 1998.
- The total cost of the aircraft nuclear propulsion program- \$7 billion. Total number of nuclear powered aircraft built- zero. They did build a hangar.
- More than 75 secret Presidential Facilities built for use during and after a nuclear war.
- Volume of radioactive waste from weapons activities: 104,000,000 cubic meters.
- Number of designated targets in 1995 is 2500.
- Number of US nuclear bombs lost in accidents and never recovered: 11 As a result of accidents, some 51 nuclear warheads were lost into sea (44 Soviet and 7 U.S. However, at least one Soviet warhead was recovered). Also, seven nuclear reactors (5 Soviet and 2 U.S.) from three Soviet and two U.S. nuclear-powered submarines have been lost at sea due to accidents. Another 19 nuclear reactors from nuclear-powered vessels have been deliberately dumped at sea (18 Soviet and 1 U.S.). I'll bet Osama is looking for them right now.
- By the way, the Supplemental EIS needs to consider all these categories of costs and insults to the environment. Plus, how many accidents and environmental releases will there be while NNSA is making all the new plutonium pits?

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No one is safer now that we have all these useless, but expensive, arms. Why did we think we needed so many? Did we prevent Russia, China, Britain, France, India, Pakistan, North Korea, Israel, or the next candidate, Iran, from acquiring the atomic bomb? Will we prevent the driving force to obtain nuclear weapons by making a whole new generation of the weapons?

What is the timeline for destroying the existing 10,000 weapons while we make over 2,200 new nuclear weapons? What are the costs of maintaining the current arsenal of nuclear weapons while we build the new line of weapons and the facilities necessary to produce those weapons? What are the future decommissioning and decontamination costs for those new facilities that the taxpayer will be stuck with?

Existing contamination at Sandia National Laboratories

Section E-4 of the Bombplex, SPEIS for Sandia National Laboratory takes credit for data from surface water monitoring and groundwater monitoring that are in fact based on groundwater monitoring wells that do not monitor the "groundwater" (as defined either by the Consent Order of April 29, 2004 or 40 CFR 260.10). Many monitor wells are positioned so that they are not near the point of compliance (the boundaries) for many of

12|14E12
(cont)

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the identified 268 sites where radionuclides and Resource Conservation and Recovery Act (RCRA) hazardous wastes have been dumped.

The Bombplex SPEIS fails to consider the risk of the total amount of contaminants at Sandia because Sandia itself cannot identify the amount of total contamination it has dumped. Groundwater contamination currently exceeds regulatory limits. (Table E-4-1). Many of the monitoring wells at Sandia have corroded well screens and must be replaced. The corrosion of the stainless steel well screens hides knowledge of contamination. Some 30 of 50 wells at Sandia are defective and need replacement or to be plugged and abandoned. Drilling fluids were used to install many of the monitoring wells and that further prevents detection of contamination of the groundwater at Sandia. Sandia has failed to analyze the water in drinking water wells for the City of Albuquerque for the Contaminants of Concern that have been dumped at Sandia from 50 years of operations of laboratories waste streams. Remediation and well monitoring is non-existent for numerous Solid Waste Management Units (SWMUs) at Sandia that have collectively dumped billions of gallons of contaminated liquid wastes above the aquifer. (See Attachment 1 Citizen Action Comments on 26 SWMUs incorporated herein by reference).

12|14E12
(cont)

The Sandia Mixed Waste Landfill is a nuclear toxic cesspool loaded with over 700,000 cu. ft. of over 40 different radionuclides, volatile organics, and heavy metals sitting over the Albuquerque aquifer. (See Attachment 2 incorporated herein by reference). Sandia Labs refuses to responsibly remediate the wastes but prefers to allow the toxic wastes to leach out like Love Canal into the air and water of Albuquerque. Sandia has dumped billions of gallons of radioactively contaminated waste water above Albuquerque's drinking water aquifer from hundreds of other dumps. When will Sandia become a responsible part of the Albuquerque community and clean its radioactive cesspools up? When will Sandia install a well monitoring system that meets the requirements of the Resource Conservation and Recovery Act? When will Sandia comply with RCRA and obtain permits for many of its unpermitted facilities? Numerous facilities are regulated units that are closing without the RCRA required post-closure permits. (See Attachment 2 incorporated herein by reference). Sandia dumped radioactive in over 30 primitive "Yardholes" and has no proposal to clean up those locations.

Sandia Labs has a site-wide environmental impact statement that is nine years old. Sandia is refusing to issue a supplement to that inadequate EIS even though Sandia now admits that it is going to engage in the Expanded Operations option at the lab.

Sandia Labs has extremely little air monitoring so that the public has no real idea what they are breathing. NNSA refuses to answer Citizen Action's FOIA request regarding sources for contamination at Sandia and the existing air monitoring stations at Sandia. Increased tritium releases from neutron generator production will result at Sandia. When is Sandia going to join the other laboratories in the weapons complex and provide real time air monitoring for radionuclide release? Sandia plans to expose the public to open air burning of High Explosives contaminants at the Thermal Treatment Facility which is nothing more than an open air burn pan that will release unknown radionuclides, heavy

33|14D2

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3314D2 (cont)	metals and volatile organic compounds into residential Albuquerque. Maintaining open air burning at Sandia is irresponsible and incompatible with the surrounding and rapidly increasing residential use and development. Open air high explosives testing will be performed at other Sandia locations and the contaminants for those tests have not been provided as per Citizen Action FOIA request.
34I2B	The anticipated expanded operations and environmental consequences at Sandia need to be explained by the NNSA Supplemental EIS. For that matter, the NNSA should write a full-blown Programmatic Environmental Impact Statement itself instead of regurgitating the refuse from its last PEIS. NNSA will be required to do that by the courts anyway, so NNSA could just save the taxpayer some money by doing so now.
35I14O3	The role that Sandia will play in certifying new plutonium pits has not been described. Cumulative Water impacts for all of the Complex laboratories are not analyzed. Usage must be analyzed individually and cumulatively and for each of the various alternatives including the No Production, Only Reduction alternative which must be added to the Supplemental EIS. Loss of groundwater resources and the contamination of those resources due to increased contamination from Complex changes must be analyzed. Provision of the volumes of water that will be contaminated with levels of radiation and hazardous waste from prior and future activities must be analyzed for human health and the environment.
36I14E14	Expanded activities at Sandia related to expanded nuclear weapons production will increase water consumption to 555.3M gal/yr., an 11 percent increase over the 1999 EIS estimates. This comes at a time of groundwater shortages for Albuquerque during population growth that will pass well over a million inhabitants. There are water shortages predicted for Albuquerque and much of the western US in a time of drought and future declines in water resources due to global warming. How much water will it take to process or reprocess the additional weapons building operations at LANL and Sandia? Where will LANL obtain the additional water allotment necessary for its activities and what will be the environmental effects on the surrounding low income minority communities for traditional agricultural and domestic water usage? What is the amount of residential development that cannot take place due to future expanded laboratory taking of water resources?
37I6B	Dare we ask how many millions of gallons of water Sandia and LANL will cumulatively radioactively contaminate along with all the other hazardous wastes from weapons operations? NNSA should provide the levels of contaminants that we'll be eating in our broccoli and lettuce and other agricultural products grown from radioactively contaminated water and soil. What will be the increase in production of neutron generator and tubes and the increased potential for tritium releases for production for the various alternatives to air and water at Sandia? What are the potential tritium releases from accidents at the Neutron Generator

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38I10G1	Facility including but not limited to fires, explosions airplane crashes (there is a nearby commercial airport and Kirtland Air Force Base).
What will be the level of water production and the associated contamination?	
What will be the increase in Explosive components testing and the release of toxic contaminants to air and water?	
Epidemiologic studies must be implemented along with air monitoring and a RCRA approved well monitoring system at Sandia to provide for knowledge of increased public exposure to contaminants in the air and water from increased Bomblex activities at Sandia.	
Is Sandia still planning to add new, yet-to-be-designed reactors to the Sandia Pulsed Reactor facility with operating levels to increase to over 200 tests a year to support the Bomblex? What risk to the public?	
Name each facility and describe what will be the increased level of radioactive and hazardous waste releases from each facility at Sandia that will be involved in the new Bomblex transformation? What risk to the public?	
Will the current Hazardous Waste Management Facility be able to handle the increased quantities of RCRA hazardous waste up from 53,123 Kilos and infrastructure related wastes of up to 175, 000 kilos per year?	
How much additional RCRA and radioactive waste will be generated above current levels by the Transformed Complex?	
39I14M3	Does NNSA anticipate that it will be operating its thermal treatment unit and what toxic pollutants will that put in Albuquerque's air?
When and how will these facilities be decontaminated, especially considering the possible scenario of Kirtland Air Force Base closure?	
Does NNSA have an agreement from Kirtland Air Force Base to contaminate the base and to continue to store and use SNM at Sandia?	
40I2I	The SPEIS Section E.5.1 lines 37-45 states: "the need for pumping groundwater would be substantially reduced to approximately 730,000 acre-feet per year by 2060." The figure 730,000 acre-feet per year is incorrect when compared to the USGS projections. A telephone call made by Citizen Action to the City of Albuquerque water utility authority confirms that the figure is incorrect by a very large margin of error. Also, the current aquifer usage for the City of Albuquerque is not provided by section E.5.1. The draw down on the aquifer for SNL should be provided. The volume of water that will be contaminated by radionuclides or hazardous waste from Complex related operations must

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be provided. The entire SPEIS is riddled with mistakes and must be redrafted and resubmitted to the public.

Sincerely,

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Attachment 1

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Before the New Mexico Environment Department

February 8, 2008

Citizen Action Comments Re: Sandia National Laboratories (SNL), New Mexico
March 2006 Request for Corrective Action Complete No Further Action (NFA)
Status

(Class III Permit Modification March 2006)

Citizen Action is opposed, with a few exceptions, to the list of 26 Solid Waste Management Units (SWMUs) proposed for No Further Action (NFA) at Sandia National Laboratories (SNL or Sandia). Citizen Action requests an evidentiary public hearing in this matter because NMED/SNL originally asserted that this is a Class III Permit Modification (March 2006) to the SNL Resource Conservation Recovery Act (RCRA) Part B Permit.¹ Now the above caption is stated as a request for Corrective Action Complete, but the fact remains that the RCRA Part B Permit must be modified to accomplish this action. The Consent Order for the closure of the SWMUs does not meet the requirements of 40 CFR 270.1(c)(7) for an enforceable document. The SWMUs are actually for the most part "regulated units" that must be closed under the requirements of 40 CFR Part 264 Subparts F and G with well monitoring network requirements in place.

The numerous SWMUs at Sandia include locations where billions of gallons of liquid wastes were disposed of into engineered cisterns, seepage ponds, infiltration trenches, drainlines, etc. The SWMUs are toxic chemical and radioactive waste legacy left from the production of nuclear weapons. Sandia wishes to leave the contamination in place above the most productive portion of Albuquerque's precious drinking water aquifer.

Indeed, the groundwater may already be contaminated but is unnotified because of Sandia's failure to install the reliable networks of monitoring wells that are required by federal law, the laws of New Mexico and Department of Energy Orders.

These SWMUs contain some of the most dangerous contaminants on the planet. There exists no technical basis for the placement of these SWMUs for No Further Action status. In most cases, DOE/SNL can only speculate as to the volume of hazardous wastes, radionuclides and the total volume of liquids that may have been

¹ Citizen Action disagrees that Module IV is a part of the SNL RCRA Part B permit.

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discharged into septic systems, seepage pits. Statistical knowledge of contaminant population is not acceptable to show that a site has been fully characterized with respect to Contaminants of Concern (COCs). The vertical and horizontal extent of contamination must be measured with properly installed well monitoring networks at the SWMUs.

The 26 dumps that are currently proposed for No Further Action (NFA) status individually and collectively pose danger to the health of Albuquerque's residents from solvents, metals and radionuclides they will drink, inhale and ingest from the ground water, air and soil. In order to qualify for NFA status it must be shown that there are no releases. This cannot be demonstrated for the SWMUs at issue.

Many of the SWMUs were designed to dispose of hundreds of thousands of gallons of liquid radioactive and hazardous wastes on a daily basis from Sandia's research laboratories and nuclear reactors.

Many of the unlined, unmonitored SWMUs are described as septic systems with tanks and drain fields. The septic systems carried far more danger than human excrement. A short list of what Sandia plans to leave above Albuquerque's drinking water without groundwater monitoring or remediation are cyanide, hexavalent chromium, arsenic, selenium, cadmium, beryllium, solvents like acetone, toluene, methylene chloride, TCE, PCE, high explosives compounds, dozens of radionuclides like tritium, U-235, U-238 and many others radionuclides that are not disclosed, but certainly include isotopes of Plutonium, Americium, Strontium-90, Cesium-137 and others.

During their operating lifetimes, individual SWMUs received discharges of liquid wastes that could annually amount to tens of millions of gallons, but the amounts are most often not provided. Collectively, billions of gallons of toxic radioactive liquid waste has been discharged beneath Sandia without groundwater monitoring networks in place to investigate movement of the contaminants to the groundwater beneath the locations of the SWMUs.

NMED was cognizant in 1997 of the need for groundwater characterization:

"Over 20-30 year periods, the larger discharge rates reported for some of these smaller septic systems appear to be sufficient to drive contaminated liquids to the [ground]water. Additionally, a number of small septic systems are located in canyon or pediment areas where the unsaturated zone is made up chiefly of permeable gravel, sand, and potentially permeable fractured bedrock, and where groundwater is relatively shallow. There is certainly potential in these cases that hazardous constituents such as VOCs and cyanide) can cause ground water to become contaminated to unacceptable levels."
 "Therefore, HRMB will not approve NFA status for any septic system without ground-water characterization..."

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The volume of liquid discharges and true nature of the contaminants in these SWMUs are not presented. The dismal absence of record keeping for the liquid discharges demands that groundwater well monitoring networks be provided for the SWMUs.

Unfortunately, adequate characterization of the groundwater has not been achieved for most of the 26 SWMUs. The potential for groundwater contamination from the enormous annual liquid discharges stretching over 50 years is required to be monitored by 40 CFR 264.90-.100 (Subpart F) for closure of these facilities because Sandia is seeking a Part B RCRA Permit. The SWMUs show statistically significant evidence of contamination but lack both detection and compliance monitoring programs required under RCRA 40 CFR 264 Subpart F.

Where monitoring wells do exist they are most often very distant from the SWMU that is to be monitored. In one instance, contamination from a SWMU was "watched for" by a monitoring well TJA-6 that was upgradient from SWMU 46! Monitoring wells must be at the release sites to measure contamination at the various SWMUs. A specific network of monitoring wells is necessary at the location of each SWMU. Monitoring wells can not be claimed for SWMUs that exist at other locations distant from the release. The monitoring wells have to be close to the release for early detection. That is also required by DOE Orders.

The descriptions of the SWMUs are too vague for the public to determine whether the proposed NFAs are safe. Generally, the Fact Sheet fails to present information such as: exact types of Contaminants of Concern (COCs) and their volumes; the locations of drain fields on maps; the depth of septic tanks, seepage pits, piping, and drain systems; the positions of monitoring wells if they exist; drilling methods; type of well construction; depth to ground water; statistical water sampling data; direction of the flow of groundwater at the SWMU locations; volumes of waste water and the wastes discharged. Typical descriptions of the COCs gives no breakdown for the types of "radionuclides" that are at the various SWMUs. Apparently, Sandia has no intention of protecting the public from radionuclide contamination. DOE Order 450.1 is ignored.

Often, the NFA status relies upon the collection of soil and septic samples at the current time from the SWMU sites that have no bearing on the hazardous wastes that were released over five decades of use and which may already have reached groundwater or have plumes on the way. The knowledge of groundwater contamination does not exist because the required well monitoring networks to detect contamination are not in place.

Sandia's claims of "characterization" and "remediation" in compliance with state and federal regulations for many of the 26 SWMUs can be viewed at a minimum as gross public deception.

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The information provided in the SNL Fact Sheet is quite deficient. The supporting documentation for the SWMUs should have been provided in electronic format or made physically available in Albuquerque.

Sandia is ignoring the importance of compliance with DOE Orders for protection of the public from radioactive contamination. The DOE seeks authorization from NMED to leave the wastes in place at the various SWMUs. If authorization for NFA status is given by NMED, Sandia will never address the protection of the public from the radionuclides contained at the SWMU sites. NMED should file a complaint with the New Mexico Attorney General, the DOE Inspector General and the US Attorney that DOE is failing to comply with DOE Orders 5400.5, 450.1. Sandia has made the claim that it is in compliance with DOE Orders in other documents for closure requirements under DOE Orders. (Corrective Measures Study for the Mixed Waste Landfill May 21, 2003). No such compliance in fact exists.

There is no regulatory authority under RCRA for the SNL RCRA Draft Permit to now include the SWMUs as a part of the RCRA Draft Permit. Neither do the SWMUs qualify for inclusion in the RCRA Draft Permit. Most of the SWMUs were in operation in December 1988 after the September 1988 EPA declaration in the Federal Register that Mixed Waste Landfills would have to comply with Part A and Part B permitting requirements once their State was authorized to regulate mixed waste. The SWMUs received both mixed waste and hazardous waste during the period July 26, 1982 to December 1988 making them "regulated units" under 40 CFR 270.1 and 40 CFR 264.90. On or about July 25, 1990, New Mexico received its authority to regulate mixed waste. SNL never submitted a RCRA Part A application or a Part B application for the SWMUs within the 12 month time period required at the latest by July 25, 1991.

Under the provisions of RCRA, the SWMUs lost or lacked interim status for operation. Owners of land disposal units were required to submit a Part B permit application within one year after the state's radioactive mixed waste authorization or lose interim status. NMED gained status mixed waste authorization on July, 25, 1990. The SWMUs did not submit a Part B application within one year of that date and lost interim status. The SWMUs was required to immediately close by either clean closure, submitting a post-closure plan, or a document in lieu thereof because it did not maintain interim status and lost interim status if it had it at all. None of this was accomplished and the SWMUs remain as illegally operating units to the present time without a closure plan, post-closure plan and in non-compliance with the provisions of 40 CFR 264 Subpart F. The SWMUs are still required to close under the provisions of 40 CFR 270.1.

The SWMUs requires closure, a post-closure plan and a post-closure permit or an enforceable document "in lieu thereof." Post-closure plans must be provided for the SWMUs because they are not clean closed. (40 CFR 264.118, 265.118(e)(1) and (2)). No closure by removal or decontamination has been demonstrated for the SWMUs.

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Sandia should furnish the regulatory history of each SWMU. Many of the "SWMUs" were actually "regulated units" as landfills under 40 CFR 270.1 (c) that operated to receive liquid or solid hazardous wastes after July 26, 1982.² 40 CFR 260.1 defines a landfill as "a disposal facility or part of a facility where hazardous waste is placed in or on land and which is not a pile, a land treatment facility, a surface impoundment, an underground injection well, a salt dome formation, a salt bed formation, an underground mine, a cave, or a corrective action management unit."³

At least by 1 year after 7/25/90, when NMED obtained HSWA authority, these regulated units were required to be included on a Part B RCRA Permit application. Otherwise these regulated units were required to clean close or submit a post-closure permit or obtain documents in lieu thereof. (40 CFR 270.1 (c)(7)). There is no evidence in the record here that Sandia complied with RCRA permit requirements or that NMED enforced permit or post closure requirements for these SWMUs. Closure of the "SWMUs" under corrective action (40 CFR 264.101) is an evasion of the clean closure or post-closure permit requirement for these regulated units. Long-Term Monitoring and Maintenance requirements are also being evaded by Sandia by reliance upon the SWMU designation of Module IV that was not effective until 1993.

Generally, the decision to close the 26 SWMUs as needing No Further Action (NFAs) is based on risk assessments that are riddled with insufficient data and instead are statistical manipulation of standards of risk. Albuquerque's residents require "residential" standard for the quality of their drinking water. Instead, the 26 SWMUs along with possibly hundreds of other SWMUs closed in the past, threaten air, soil and water with the "industrial" standard. The industrial standard leaves the toxic and radioactive wastes in place in the center of a major metropolis of over 600,000 persons. Toxics like polychlorinated biphenyls (PCBs), cyanide, arsenic, mercury, beryllium, depleted uranium, cadmium, hexavalent chromium (Erin Brokovich), lead, toluene, trichloroethene (TCE), tetrachloroethene (PCE), acetone, benzene and dozens of radionuclides of undisclosed types are present.

The industrial standard leaves everyone, especially children, at higher risks of cancer, disease, and birth defects. Sandia has failed to consider the operation of Executive Order

² The regulated units would include SWMUs: #4 (operation until 1992); #9 (occupied until 1988); #52 (operation until 1992); #91 (operation until 1991); #101 (operation until 1994); #138 (1991); #140 (1991); #147 (1991); #149 (1993); #150 (1980s operation); #154 (1993); #161 (1993); #196 (1989); #233 (1993); #234 (unit early 1990s); #1090 (unit early 1990s); #1094 (still active- RCRA permit in place?); #1116 (still active).

³ 40 CFR 260.10 "Disposal means the discharge, deposit, injection, dumping, spilling, leaking, or placing of any solid waste or hazardous waste into or on any land or water so that such solid waste or hazardous waste or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.

"Disposal facility means a facility or part of a facility, at which hazardous waste is intentionally placed into or on any land or water, and at which waste will remain after closure. The term disposal facility does not include a corrective action management unit into which remediation wastes are placed."

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13045 that requires federal agencies "to identify and assess environmental health risks and safety risks that may disproportionately affect children."

The industrial level proposed for cleanup of the Sandia SWMUs amounts to leaving the wastes in place and allowing the public to bear the costs of disease and family tragedy.

The SWMUs are considered in piecemeal fashion without performing a full risk assessment to present and assess overall risks to the public, workers and environment from cumulative operations at the release sites for air, soil and groundwater pathways.

The proposed industrial standard of cleanup for many of the SWMUs does not recognize that the sole source drinking water aquifer beneath SNL must provide a residential standard of drinking water. All SWMUs should be remediated to at least the residential standard to protect Albuquerque's drinking water from the cumulative risks of these many areas.

RCRA identifies high levels of contamination measured in the boreholes of SWMUs as "Statistically Significant Evidence of Contamination." 40 CFR §264.98 requires for SWMUs with "statistically significant evidence of contamination" a Detection Monitoring Program must be put into place with the following pertinent parts:

"(2) The owner or operator must determine whether there is statistically significant evidence of contamination at each monitoring well as the compliance point within a reasonable period of time after completion of sampling. The Regional Administrator will specify in the facility permit what period of time is reasonable, after considering the complexity of the statistical test and the availability of laboratory facilities to perform the analysis of ground-water samples."

"(g) If the owner or operator determines pursuant to paragraph (f) of this section that there is statistically significant evidence of contamination for chemical parameters or hazardous constituents specified pursuant to paragraph (a) of this section at any monitoring well at the compliance point, he or she must:

(1) Notify the Regional Administrator of this finding in writing within seven days. The notification must indicate what chemical parameters or hazardous constituents have shown statistically significant evidence of contamination;"

"(4) Within 90 days, submit to the Regional Administrator an application for a permit modification to establish a compliance monitoring program meeting the requirements of §264.99. The application must include the following information:

(i) An identification of the concentration of any appendix IX constituent detected in the ground water at each monitoring well at the compliance point;

(ii) Any proposed changes to the ground-water monitoring system at the facility necessary to meet the requirements of §264.99;"

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1. **SWMU 4 -- LWDS Surface Impoundments/Liquid Disposal System** consisted of 3 SWMUs that operated from 1963 to 1992 receiving 12,000,000 gallons of

radioactive effluent that also contained 17 RCRA listed metals and PCBs, and 9 Volatile Organic Compounds (VOCs) and 7 Semi-volatile Organic Compounds (SVOCs). Coolant water was discharged from the SERF reactor. Coolant water discharges have a history of being contaminated by hexavalent chromium which was present at SWMU 4. PCBs were identified in the southwest corner of Impoundment 2.

2. Especially high values for Beryllium were measured (4.9 mg/kg). The wastes from 1963 to 1967 were pumped to a drainfield, but that is not identified on Figure 3. The drainfield collapsed and wastes were then sent to surface impoundments which are SWMU 4. SWMU 4 disposal site operated illegally by receiving known RCRA listed hazardous waste without obtaining a RCRA permit. A post-closure permit is necessary. The surface impoundments operated from 1967 to 1992. These

impoundments required RCRA permits. A single monitoring well LWDS-MW2 was installed in 1992 ~150 ft from the center of the impoundments, but no discussion of the direction of groundwater travel, well construction, development information or monitoring data for SWMU 4 is provided in the December 2007 Fact Sheet/Statement of Basis (SNL March 2006 Request for Corrective Action Complete (No Further

Action) Status. The monitoring well does not meet the requirements for point of compliance as described in recent letters from James Bearzi, Chief of NMED

Hazardous Waste Bureau. The well has a stainless-steel well screen that is no doubt corroded and not capable of detection of contamination at present. No monitoring wells are at the release site for contamination at SWMU 52. A specific network of monitoring wells is necessary at the location of SWMU 52. Monitoring wells can not

be claimed for SWMU 52 that exist at other location distant from the release. The monitoring wells have to be close to the release for early detection. A monitoring network compliant with the requirements of 40 CFR 264.90-100 is required to be installed at SWMU 4 with at least one upgradient and three down gradient wells.

Human and ecological risks are not acceptable to release this SWMU for NFA status.

2. **SWMU 5, LWDS Drainfield** The drainfield is also known as Tank 3. It operated from 1962-1967 and collapsed. It contains VOCs, SVOCs, RCRA metals and radionuclides. SWMU 5 has not been properly investigated for contamination as it must be because SNL is applying for a RCRA permit. A monitoring well TAV-MW6

exists within the boundaries of SWMU 5. The construction of the MW6 is not provided and no data is presented for the well. The MW6 cannot be found in Figure 4.6 Site Map showing Drainfield Monitoring Well. The flow direction of groundwater is not provided. An earlier well, LWDS-MW1 installed in 1992,

supposedly shows evidence of releases from the site. The Trichloroethene (TCE) was above the EPA Maximum Contaminant Level (MCL) in water samples collected from well LWDS-MW1. MW1 is also not identified as to its location in the Fact Sheet. Cobalt-60 and Cesium-137 were found in drainfield sampling.

3. **SWMU 46, Old Acid Waste Line Outfall** was an outfall discharge point covering 2.5 acres that connected to several buildings that dumped wastewater into three 700 ft long unlined, earthen ditches. There is no reason for SWMU 46 to be qualified for No

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Further Action status at this time. The site has not been properly studied for the remedy decision.

The years of operation of SWMU 46 were from 1948 through late 1974. The location is on the northern rim of the Tijeras Arroyo. The depth to groundwater at this location is critical but not stated. The amounts of discharge during the entire period of operation is not provided. In the 1960s, an estimated **130,000 gallons per day** were discharged into the ditches including VOCs, SVOCs, RCRA metals and radionuclides. The actual amount of discharge of liquid waste should be calculated. 130,000 gallons per day discharge for one year is **48,000,000 gallons per year**. How many years did this continue? What total volume of contaminated waste water was disposed of? What quantity of contaminants were released?

The current condition of the ditches is not sufficiently described nor are they characterized for the wastes in each ditch. The types and amounts of RCRA wastes within the 3 ditches have only been sparsely sampled. Only soil-vapor sampling at two Vapor Wells has been conducted and groundwater monitoring is required due to the significant evidence of contamination present at SWMU 46. There is a claim of a monitoring well TJA-6 but that well cannot be located for SWMU 46 on Figure 5. Direction of groundwater flow is not indicated either. The single groundwater monitoring well, TJA-6 is claimed for SWMU 46, but no information about the construction details, depth of the well or sampling data is provided in the fact sheet.

TJA-6 is greater than 500 ft from SWMU 46 and thus not at the point of compliance for SWMU 46. No data for VOCs is presented from TJA-6. The well is upgraded to the direction of the flow of groundwater because it lies to the south of SWMU 46. Groundwater flow direction is not provided on Figure 18. RCRA requires one upgradient and three downgradient monitoring wells at the point of compliance for SWMU 46. Nor are the locations of where the septic tanks were or the location of the drain fields or the direction for the flow of groundwater is provided on Figure 5. TJA-6 is claimed to be part of the Tijeras Arroyo Groundwater (TAG) monitoring, however the location and details of the TAG well monitoring network is not provided on Figure 5. Nor is there any indication that the TAG network is at the point of compliance for SWMU 46.

The contaminants identified contained mercury compounds, cyanide, 17 VOCs including high levels of Trichlorethene (TCE) in soil gas 115 ft below ground surface, SVOCs, PCBs, RCRA metals, and radionuclides. No RCRA background well with 3 downgradient monitoring wells are in place as required. Abbreviation VCA is used but not in the Table of Abbreviations. September 1994 soil samples were for a storm run-off ditch and did not address the acid waste line discharges. TCE levels from soil vapor sampling at 30 ft depth in 1998 were at 55 ppb by volume. According to another NMED report, Henry's Law predicts a concentration of TCE contamination in groundwater of > 100 ppb, more than 20 times higher than the Maximum Contaminant Level (MCL) for drinking water standards. Soil Vapor sampling from April 2001 through March 2002 showed enormous concentration levels of TCE at levels up to 46,000 ppbv at a depth of 115 ft. These high values are alarming and require serious investigation of contamination in groundwater. At LANL for MDA H measurement of TCE at 2.6 ppb, NMED

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demand a remedy of complete encapsulation. One wonders how NMED can even dream of releasing this SWMU for NFA status with this level of TCE contamination and no groundwater monitoring network in place. This is significant evidence of contamination of the groundwater. A monitoring network compliant with the requirements of 40 CFR 264.90-100 is required to be installed at SWMU 46 with at least one upgradient and three down gradient wells. This is especially critical given the enormous amount of liquid discharge on a daily basis that was present at SWMU 46. Cancer risks for residential land-use are unacceptable. Human health and ecological risks are not acceptable to release this SWMU for NFA status. A RCRA Compliance Groundwater monitoring program is required for SWMU 46, which lacks investigation of contamination at the groundwater, as defined in the Consent Order.

4. SWMU 49, Building 9820 Drains, Lurance Canyon contains RCRA constituents including VOCs, SVOCs, metals, hexavalent chromium, cyanide, High Explosive (HE) residues and radionuclides. There is inadequate characterization of SWMU 49 and it should not be provided NFA status. Potential surface contamination from explosives testing was not included as part of the assessment activities as it should be. The volumes of discharges from a former trailer used as a darkroom and Bldg. 9820 are not described for the period of operation (also undescribed) of the site. Although the site was supposedly selected for groundwater monitoring. Monitoring well CYN-MW5 is remotely located over 1350 ft from SWMU 49. There is no compliance with the requirement for well monitoring at the RCRA point of compliance. Flow direction of the groundwater is not indicated so one can not determine that MW5 was placed correctly. No background monitoring well is present. Even though the monitoring well is too distant from SWMU 49, CYN-MW5 detected **hexavalent chromium** at a level that exceeded the approved regulatory background concentration level. All Barium and one hexavalent chromium concentration exceeded NMED background values. This was statistically significant evidence of contamination and monitoring wells should have been placed at the site of SWMU 49 for detection monitoring at the point of compliance. Contrary to DOE/SNL's assertion, SWMU 49 has not been characterized or remediated in accordance with state and/or federal regulations. The required monitoring has not been performed and there has been no remediation whatsoever.

5. SWMU 52, Liquid Waste Disposal System (LWDS) Holding Tanks consists of holding tanks, piping (SWMU 52), a drainfield (SWMU 5) and two surface impoundments (SWMU 4). The tanks were designed to receive liquid wastes from the Sandia Engineering Reactor Facility (SERF) main reactor, experimental facilities, and support facilities. From 1963 until 1971, the system received approximately 19,000,000 gallons of waste water contaminated with approximately 35 curies of radionuclides. Non-radionuclide discharges to the surface impoundments continued until 1992. Contaminants include radionuclides, organic solvents, heavy metals and PCBs. No monitoring wells are at the release site for contamination at SWMU 52. A specific network of monitoring wells is necessary at the location of SWMU 52. Monitoring wells can not be claimed for SWMU 52 that exist at other location distant from the release. The monitoring wells have to be close to the release for early

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detection. The volume of wastes discharged by the LWDS during the years 1971 until 1992 is not described. The total years of operation for the LWDS is not described in the Fact Sheet. The actual sources of the discharges are not described neither for the tanks or the surface impoundment. The tanks, drainfield, and surface impoundment received radioactive and RCRA wastes including mercury, VOCs and SVOCS, without logs to record nature, amounts, frequency and activity measurements. The age and ASME qualifications and condition of the tanks is not provided. Surface impoundments operating to receive waste after July 26, 1982 were required to have a RCRA Part B permit. SWMU 52 must be closed as a landfill under 40 CFR 264 Subpart N along with the tanks and collapsed drainfield which constitute landfills.

Eight RCRA listed metals (arsenic, barium, beryllium, cadmium, total chromium, copper, nickel and vanadium) exceeded background values. No statement is provided as to the margin of exceedance. Three VOCs and two SVOCS were detected in soil samples. The amounts detected are not provided. TCE has been detected at the site at concentrations from 12 to 16 ppb along with other organic contaminants, but the extent of the vertical contamination cannot be known unless monitoring wells are installed at the location. Tritium and Thorium-232 exceed background levels. All this is significant evidence of contamination requiring groundwater compliance monitoring under 40 CFR 90-100. No groundwater wells are in place as required. A monitoring network compliant with the requirements of 40 CFR 264.90-100 is required to be installed at SWMU 52 with at least one upgradient and three down gradient wells. The assertions that the site has been characterized and remediated are fatuous. Cancer risks for residential land-use are unacceptable. Human and ecological risks are not acceptable to release this SWMU 52 for NFA status. SWMU must be characterized and have groundwater monitoring at the dumpsite.

6. **SWMU 68, Old Burn Site.** The 6.5 acre site is poorly described for the numbers of tests that were performed, the volume and types of wastes produced, and the amounts of contaminated water disposed of at the site over 14 years of operation from 1965 to 1978. Although some remediation activities have been conducted for radiological constituents, the RCRA Facility Investigation confirmatory sampling methods and results are not presented with respect to how sampling was accomplished, where it was performed, and depth of sampling. There were pool fire tests conducted at this site. Water remaining after the burns was drained to the southwest of the facility. Beryllium, depleted uranium, thorium and magnesium was present in some of the weapons tested. Four soil samples taken in 1989 (Table A-1 p. A3) show the presence of Pu-238, Pu-239 and Am-241, Sr-90, K-40, Cs-137, Ba, Pb, As and Be. Removal for lead was performed but the possible presence of transuramics left at the site is not discussed. The site is above the acceptable risk value for residential use. The groundwater pathway for contamination was not considered. Groundwater depth is estimated to be 123 ft bgs. An appropriate network of monitoring wells must be installed at SWMU 68. Wind, surface run-off, food chain uptake and transformation/degradation with ingestion, inhalation and dermal-direct gamma exposure are all possible. No data exists on the food chain uptake although numerous

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contaminants are cited for bioaccumulation at VII.2.1. Only modeling has been performed without collection of field data and the HQs for plants exceeded unity for arsenic, barium, thallium and vanadium. A HI of 56 was modeled for the deer mouse. At VII.3.5 it is stated that "Many uncertainties are associated with the characterization of ecological risks at SWMU 68." The uncertainties include assumptions and the use of maximum measured concentrations to evaluate exposure and risk. All this contradicts the statement by SNL that risks are expected to be low for this site.

The coverage for RCRA contaminants beneath the site is less than persuasive given that six VOCs and five SVOCS were detected but without data respecting the levels and the depth of contamination. Jet petroleum-4 fuel was used for burn tests. Is a plume of jet fuel present in the regional aquifer from spills or dumping excess fuel? The fact that excess cancer risks are unacceptable for residential use requires that the details from investigation be more fully presented to the public. Although "predictions" of risk to the deer mouse are considered there is no field data presented for either plants or animals for actual exposure. This site should be more fully characterized including a network of groundwater monitoring for possible RCRA contamination that may exist beneath the site due to continuous volumes of water being released during testing events.

7. **SWMU 91, Lead Firing Site** conducted testing from 1962 through the late 1980s releasing a large mass of lead as part of the testing. This 20 acre site disposed of wastes into 1) the Test Trench Disposal Area 2) the Southern Burial Area and 3) the Northern Burial Area. This 20 acre site amounts to multiple landfills operating to receive waste after July 26, 1982 that was required to have a RCRA Part B permit. SWMU 91 must be closed as a landfill under 40 CFR 264 Subpart N as a landfill. Numerous burial sites exist within the 20 acre dump. Groundwater monitoring is required as part of that closure. The number of tests performed involving the masses and types of material are not provided. The mass of duffing materials used in the tests needs to be quantified.

The lead, arsenic, beryllium, cadmium, selenium, silver, barium and chromium were detected "above background values." It must be presented how far above background values all of the RCRA metals were detected. No subsurface testing has been performed below a depth of 5 ft although contamination with RCRA metals and radionuclides such as U-235, U-238 Cs-137, Thorium-232 have been detected in these samples. Contamination must be investigated at depths greater than 5 ft as tests were conducted in a trench 6 to 8 ft deep. Testing and monitoring at greater depths is required under RCRA to determine if groundwater contamination is present. The travel of the fine particulates of RCRA metals and radionuclides into the air pathway should be, but is not considered. Figure 10 does not provide the proximity to lands that are offsite of SNL. Figure 10 shows no sampling locations at the site of SWMU 91. Testing of the offsite lands to the west and south should be required due to the proximity of this site and the lengthy period of explosive operations that volatilized numerous RCRA metals and radionuclides and may have resulted in off-facility deposits. The ecological risks stated for SWMU 91 are not based on factual field data from plants and animals. The proximity of five other

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SWMUs should be examined as to the potential for enhanced migration of contaminants and cumulative risk from all the five SWMUs. Cumulative risks from the five SWMUs in close proximity need to be considered. Cancer risks for residential land-use are unacceptable and need to be quantified for all the contaminants identified and remaining at the site. SNL is contaminating water to be used for residential purposes at an industrial level of contamination at SWMU

8. **SWMU 101, Building 9926 Explosive Contaminated Sumps and Drains** in the Coyote Test Field area had 3 seepage pits and a dry well that operated from 1967 to 1991. This is a RCRA regulated unit without monitoring wells. The volume of liquid discharges to the sumps and drains from Building 9926 and the explosive room in Building 9926A need to be described by volume of liquid wastes or the amount of the contaminants. Distance to groundwater is not described for the location. "Seepage pits" are present. The nearest groundwater monitoring well is ~0.7 mi southwest of the site. But the direction of the flow of groundwater "is believed to be" generally to the west northwest in the vicinity of this site. The dump received RCRA contaminants illegally without a RCRA permit. SWMU 101 must have network of monitoring wells put in place because releases have been identified that include VOCs, SVOCs, cyanide, chromium and selenium. Methanol, TCE, toluene, acetone and isopropyl alcohol, hydrochloric, nitric and sulfuric acid along with high explosive compounds were handled. Operational records were not available. High levels of PCE was identified in soil gas. Tritium is above background levels although the amount is not described. U-235 and U-238 are above background levels. Groundwater monitoring has not been performed to further characterize the possible movement of this contaminant. The depth of soil samples has been shallow to no more than 26 ft. Testing has been at a sparse number of locations. The information presented for soil sampling only says what was tested for - not the levels that were found. A monitoring network compliant with the requirements of 40 CFR 264.90-.100 is required to be installed at SWMU 101 with at least one upgradient and three down gradient wells. Significant evidence of contamination is present for PCE. Estimates of the risks at SWMU 101 cannot be properly estimated given the lack of RCRA required well monitoring. The ecological risks stated for SWMU 101 are not based on factual field data from plants and animals. Human and ecological risks are not acceptable to release this SWMU for NFA status because there is insufficient data to characterize the site.

9. **SWMU 116, Building 9990 Septic System** in the Coyote Test Field does not identify the use of Bldg. 9990 and the volume of waste water and quantities of contaminants that discharged. Bldg. 9990 operated from 1971 to ~1994 and discharged RCRA metals, hexavalent chromium, cyanide, PCBs, High Explosive compounds, VOCs, SVOCs and radionuclides to a septic tank and seepage pits. SWMU 116 has a groundwater monitoring well CTF-MW1 that is 500 ft from SWMU 116. CTF-MW1 is too far for the point of compliance for a monitoring well. Although the monitoring well is 500 ft from the SWMU to the south samples show that selenium was detected in seven of eight groundwater samples above background levels. No background well is present for SWMU 116. No flow direction is indicated on the Fig. 1.3 to determine if CTF-MW1 is downgradient from SWMU 116. No RCRA well

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monitoring network of 1 upgradient and 3 down gradient is in place despite the significant evidence of contamination, especially given that selenium could be entering the groundwater beneath the SWMU. The claim that risk is acceptable is unsupported given the lack of a RCRA well monitoring network to characterize the contamination in the groundwater at SWMU 116. Human and ecological risks are not acceptable to release this SWMU for NFA status.

10. **SWMU 138, Building 6630 Septic System.** SWMU 138 received RCRA metals, High Explosive compounds, VOCs, SVOCs and radionuclides from its construction in 1959 until ~1991. The SWMU has not been adequately characterized for NFA status. Since it received hazardous waste after July 26, 1982 a RCRA permit was required but not obtained for SWMU 138. SWMU 138 is required to close with a post-closure permit. The aqueous discharges from Bldg. 6630 are not described for volume or types of waste constituents. Septic Tank sampling detected PCBs. Soil sampling was only conducted to a depth of 16.5 ft. The soil samples detected three VOCs, three SVOCs three RCRA metals above approved background levels. Although "statistically significant evidence of contamination was detected at SWMU 138, no groundwater monitoring has been conducted for the site although compliance monitoring is required under RCRA. The claim that risk is acceptable is unsupported given the lack of a RCRA well monitoring network to characterize the contamination in the groundwater at SWMU 138. Human and ecological risks are not acceptable to release this SWMU for NFA status.

11. **SWMU 140, Building 9965 Septic System, Septic Tanks, and Drainfields** The abandoned drain systems and seepage pit and drywell are not described as to depth. The volume of discharges to the areas are not described. The drain systems and seepage pit and drywell received RCRA hazardous waste without obtaining a permit. No well monitoring has been provided as should be because significant evidence of contamination exists at the site. Four VOCs, cyanide, three RCRA metals and U-235 and U-238 were detected in soil samples. Septic tank sampling identified VOCs (TCE), pesticides, cyanide, oil and grease. Well monitoring with upgradient and downgradient monitoring wells are needed at both the locations of the seepage pit and the drywell. The two sites are separated by approximately 125 ft. The data to evaluate risk is not present. The five assessment investigations do not provide the necessary knowledge to characterize nature and extent at the site for potential or existing contamination of the groundwater.

12. **SWMU 147, Building** RCRA metals, VOCs, HE were received by this site from 1959 to the late 1980s during the period that a permit was required to operate. Three drainfields were present. There are no monitoring wells present. The amount of liquid discharge is not provided. The long period of use indicates that substantial contamination was received for liquid waste and could have entered the groundwater at this location. Collecting septic samples at this time has no bearing on the wastes that were released over several decades of use. The depth to the groundwater is not stated. The sampling was done at shallow levels. Most of the data is over a decade old and does not include necessary groundwater monitoring data.

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The claim that risk is acceptable is unsupported given the lack of a RCRA well monitoring network to characterize the contamination in the groundwater at SWMU 147. Human and ecological risks are not acceptable to release this SWMU for NFA status.

13. SWMU 149, Building 9930 Septic System

operated from 1961 to ~1993. Discharge volumes are not provided. This was a RCRA regulated unit and needs to close under post-closure requirements. Contaminants of concern are VOCs, SVOCs, High Explosive compounds, RCRA metals, hexavalent chromium, cyanide and radionuclides. Tritium was detected above background values. Most data collected is from 1994. A groundwater monitoring well CTF-MW3 is installed more than 300 ft away from SWMU 149 as shown by Figure 18. MW3 is not at the RCRA point of compliance. MW3 detected five VOCs, RCRA metal selenium, cyanide. The levels of detection for the five VOCs are not provided. The data necessary to evaluate risk for SWMU 149 is not provided. Compliance monitoring is necessary because contaminants were detected and the well is 300ft away. It is unknown if well MW3 is downgradient of SWMU 149. Even if downgradient, the distance of the monitoring well MW3 from SWMU 149 is too great. No basis exists for providing NFA status.

14. SWMU 150, Building 9939/9939A Septic System, Septic Tanks and Drainfields

operated from 1974 to the early 1990s. Discharge volumes for liquid waste are not provided in the Fact Sheet. A Work Plan for Bldg. 9939A stated that estimated effluent discharge rates ranged from 20 to 400 gallons per day. Assuming a 5 day-per-week, 50 week-per-year operation, the total amount of effluent discharged from the facility would have ranged from 80,000 to 1,600,000 gallons. (Responses to Comments January 1997, p. 12) This was a RCRA regulated unit and needs to close under post-closure requirements. No monitoring wells exist at the site. Depth to groundwater is not provided for the location. Contaminants of concern are RCRA metals, PCBs VOCs, SVOCs, and radionuclides. Four VOCs were detected in soil samples, but no data is provided for the detection levels. "A deep sample was not collected from the seepage pit. (The maximum sample depth was only 8 ft) or the drainfield (the maximum sampling depth was only 4 ft." (Responses to Comments January 1997, p. 13). Ground water monitor wells need to be installed at this site. The nearest groundwater monitoring well, CTF-MW2 is approximately 1,950 ft northwest of the site. (Risk Assessment Report for DSS SWMU 150, p. 2-1). The data for SWMU is over a decade old. Monitoring well data needs to be provided before closure of SWMU 150. A septic leachate plume considered to exist was not investigated for its extent. No information is provided for the radionuclides detected.

The claim that risk is acceptable is unsupported given the lack of a RCRA well monitoring network to characterize the contamination in the groundwater at SWMU 150.

15. SWMU 154, Building 9960 Septic System, Septic Tanks and Drainfields

SWMU 154 is located in the Coyote Test Field and operated between 1965 and ~1993. SWMU is a regulated unit and requires a post-closure permit. This was a drain system for high level explosives waste that included approximately six seepage pits. A March 1,

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2006 NMED notice RE: Fee Assessment and Notice of Approval states that a new seepage pit was discovered next to SWMU 154 showing high concentrations of high explosive compounds especially 2, 4, 6 trinitrotoluene. It is not clear what the outcome of this matter was. Was the new SWMU named as required and a fee for review assessed?

The liquid discharges included RCRA metals, hexavalent chromium, cyanide, High Explosive (HE) compounds, VOCs, SVOCs, and radionuclides. The volumes of liquid discharges are not provided. A groundwater monitoring well CTF-MW2, installed in 2001, is more than 250 ft from the center of SWMU, over 400 ft from the septic system and does not meet RCRA point of compliance requirements. The borehole for the well was drilled to 190 ft bgs (below ground surface) but the borehole caved in up to 135 ft bgs. Groundwater rose to 44 ft bgs after the well was installed. One does not know if there was a perched water zone present to explain the rise in groundwater or if the depth to groundwater is very shallow at this location. The well was not repaired or replaced, no details are given about the original construction or the reliability of sampling from the well. The direction of the flow of groundwater is not provided. The data from this monitoring well is too questionable to form any basis for risk assessment.

It is concluded by Sandia that "For both the industrial and residential land-use scenario, the total HIs and estimated cancer risks are not acceptable (Table 16)." But then comes Sandia's statistical juggling act and lo and behold SWMU 154 becomes safe for industrial usage, but still not for residential usage. There is no basis for providing NFA status to SWMU 154. The appropriate groundwater investigation must be provided with 1 upgradient and minimum of 3 downgradient monitoring well network.

16. SWMU 161, Building 6636 Septic System

Received RCRA metals, hexavalent chromium, cyanide, VOCs, SVOCs and radionuclides from 1971 to ~1993. The septic system is a regulated unit. The volumes of liquid discharges are not provided. Depth of the septic tanks and the drainfields is not provided. Eight RCRA metals were detected in septic sludge, VOCs, and cyanide were detected in soil samples from 1994. Data for SWMU 161 is more than a decade old. No monitoring well network exists for SWMU 161 to determine if releases to groundwater occurred. Depth to groundwater is not provided.

There is no basis for providing NFA status to SWMU 161. An appropriate groundwater investigation must be provided with at least 1 upgradient and 3 downgradient monitoring well network.

17. SWMU 196, Building 6597 Cistern

This 25 ft diameter concrete-walled tank has only an unlined earthen bottom 22 ft bgs. The Cistern operated from 1978 to 1989 and received waste from the PROTO 1 facility that tested radiation effects on weapons and instruments. It also received waste as an emergency catch basin from a series of other underground storage tanks. No records of discharges were maintained. Contaminants include total petroleum hydrocarbons (TPH), VOCs, SVOCs, RCRA metals and radionuclides. Data from soil sampling shows that TPH was found at high levels of 60,500 mg/kg. U-235, U-238 and tritium were detected

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above background values from the bottom of the Cistern. Five VOCs were detected. A larger drill rig was used to collect samples from 300 ft bgs and 20 ft west of the Cistern. Nine VOCs such as Tetrachloroethene (TCE), Toluene, Xylene, Methylene Chloride and six SVOCs were detected at that depth. The distance to groundwater is not provided. There is a release of contamination from the Cistern that requires groundwater monitoring wells to be placed at the site. No groundwater monitoring currently exists for the Cistern despite the TPH, VOCs and SVOCs found at a great depth below the Cistern. Backfill of the Cistern does nothing to stop the plume of contaminants that are headed for the groundwater. There is no basis for providing NFA status to SWMU 196. This is a chemically and radioactively contaminated site with the potential to contaminate the groundwater and with no monitoring in place. An appropriate groundwater investigation must be provided with at least 1 upgradient and 3 downgradient monitoring well network. Sandia provides no information as to what radionuclides were found at the 300 ft depth.

No NFA Status should be provided for SWMU 196. The SWMU needs to be remediated under post-closure mechanisms as a regulated unit.

18. **ADC 1090 Characterization** is not sufficient for this SWMU. Contaminants detected include VOCs, SVOCs, RCRA metals, barium, cyanide, U-235. The SWMU has no groundwater monitoring well. The amounts of discharges are not set forth. The SWMU operated from 1959 to the early 1990s and was thus a regulated unit that must be closed with long-term monitoring in place. This SWMU is not sufficiently characterized for NFA status and the description of operations requires groundwater monitoring.
19. **ADC 1094 Live Fire Range East Septic System Lurance Canyon** This system began discharges in 1983 and is still active. It is illegally operating without a RCRA permit. The COCs include RCRA metals, hexavalent chromium, cyanide, HE compounds VOCs, SVOCs, PCBs, and radionuclides. By what rationale is SNI and NMED proposing to close this operating landfill without groundwater monitoring being conducted? This SWMU is not sufficiently characterized for NFA status and the description of operations requires groundwater monitoring.
20. **ADC 1095 Building 9938 Seepage Pit (Covate Test Field)** The seepage pit operated from 1971 to possibly August 2005. Operational history is not provided as are the amounts of discharges. No monitoring well is present. COCs are RCRA metals, hexavalent chromium, cyanide, HE compounds VOCs, SVOCs, PCBs, and radionuclides. This SWMU is not sufficiently characterized for NFA status and the description of operations requires groundwater monitoring.
21. **ADC 1114 Building 9978 Drywell** is still an active facility receiving discharges from a sink in Bldg. 9978. This is currently used as a shop and storage facility to support the ER field project operations. No RCRA groundwater monitoring is apparent for operation from 1971 and the amount and type of discharges have not been provided by the Fact Sheet. The operational history for COCs includes RCRA metals, hexavalent chromium, cyanide, HE compounds VOCs, SVOCs, PCBs, and radionuclides. This SWMU is not sufficiently characterized for NFA status and the description of operations requires groundwater monitoring.

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22. **ADC 1115 Former Offices Septic System** served the headquarters for the Solar Tower Complex. The site operated from approximately 1976 to 1979. Citizen Action does not challenge this NFA.
23. **ADC 1116 Building 9981A Seepage Pit** was constructed in 1981 and is currently active to receive cooling water from occasional tests conducted in Bldg. 9981A. COCs are RCRA metals, hexavalent chromium, cyanide, HE compounds VOCs, SVOCs, PCBs, and radionuclides. This facility is operating illegally without a RCRA Part B permit. It cannot be closed as a SWMU. It requires an operating permit, a closure plan, post-closure permit and a long-term groundwater monitoring network.
24. **ADC 1117 Building 9982 Drywell, Solar Tower Complex** is an abandoned drywell 4 ft in diameter and 11 ft deep. The condition of the drywell is not described to know if the well is even covered. COCs are RCRA metals, hexavalent chromium, cyanide, HE compounds VOCs, SVOCs, PCBs, and radionuclides. The drywell was constructed in 1980 and ceased receiving liquid wastes by August 1999. The drywell is thus a regulated unit that must close with groundwater monitoring. The SWMU is one of five shallow groundwater DSS sites that had 2-butanone soil sample concentrations above the 10 microgram/kg VOC trigger level specified in the DSS SAP. This SWMU is a regulated unit and does not qualify for NFA status. The description and history of operations and contamination requires groundwater monitoring for the COCs.

Respectfully submitted,

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ATTACHMENT 2

Citizen Action, New Mexico

NON-COMPLIANCE WITH DEPARTMENT OF ENERGY (DOE) ORDERS, THE RESOURCE CONSERVATION RECOVERY ACT (RCRA) AND THE NATIONAL ENVIRONMENTAL POLICY ACT (NEPA) AT SANDIA NATIONAL LABORATORIES' (SNL) MIXED WASTE LANDFILL (MWL)

The Corrective Measures Study (CMS) (p. 19-20) for the Sandia National Laboratories' (SNL) Mixed Waste Landfill (MWL) asserts that the Department of Energy (DOE) is in compliance with Closure Requirements under DOE Orders 5820.2A and 435.1. In fact, there is not compliance with either DOE Order. The DOE Manual (M 435.1-1) sets forth the requirements for contractor compliance with DOE O 435.1. Waivers or modifications of the requirements must be obtained by specific processing through requirements of DOE P (Process) 450.3, 450.3-1, DOE P 450.4 and/or DOE M 25.1.1-1A. (DOE M 435.1-1 at p.i).

DOE M 435.1-1 (p.I-3 (10) for Mixed Waste and IV-1 B. (1) Mixed Low Level Waste) requires compliance with the Resource Conservation and Recovery Act (RCRA), as amended, DOE O 435.1 and DOE M 435.1-1. The CMS (p. 20) asserts that RCRA hazardous waste regulations 40 CFR 261-270 are "used as guidance" for groundwater monitoring. However, the DOE orders require strict adherence to the requirements of RCRA at the Sandia MWL dump.

History of Disposal Operations and the Poor Performance of Groundwater Monitoring at the Sandia Mixed Waste Landfill (MWL).

At the 2.6 acre Sandia MWL dump, greater than 700,000 cubic feet of radioactive, hazardous and mixed wastes were buried at a shallow depth in unlined pits and trenches from 1959 through December 1988. EPA Comprehensive Environmental and Assessment Response Program (CEARP 1987). Current law does not allow this disposal practice. The absence of liners or leak detection systems requires a comprehensive network of monitoring wells installed below the discrete pits and trenches to measure changes over time in moisture content and the levels of vapor-phase contaminants. Many of these new wells should measure both soil gas contamination and groundwater contamination.

The deficiencies in the network of monitoring wells are described in a 1991 DOE Tiger Team Report. The four monitoring wells installed at the time of the Tiger Team Report include wells BW1, MW1, MW2, and MW3 (see Figure 1).

- "The number and placement of wells at the mixed waste landfill is not sufficient to characterize the effect of the mixed waste landfill on groundwater."

The Tiger Team Report also describes the failure of the monitoring well network to meet the requirements of DOE Orders 5820.2a and 5400.1. Both DOE Orders require a groundwater monitoring program that is in compliance with RCRA.

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Figure 1 displays six of the seven monitoring wells at the Sandia MWL dump. Well MW6 is located off the figure 500 feet west of the northern corner of the dump. Figure 2 presents the hydrostratigraphy at each of the seven wells. There are two groundwater flow systems below the MWL dump. The upper flow system is at the water table in the alluvial fan sediments. The deeper flow system is in the Ancestral Rio Grande (ARG) strata that are below the alluvial fan sediments. The drinking water wells for Albuquerque, Sandia and Kirkland Air Force Base are installed in the ARG strata.

- Monitoring wells MW4, MW5, and MW6 were installed after the Tiger Team Report. However, mistakes in the installation of all three wells did not eliminate any of the deficiencies noted in the 1991 DOE report.
- Nevertheless, since installation of the seven wells to the present time, the DOE/SNL annual monitoring reports describe the monitoring well program at the MWL to be adequate and that "Contamination is Not Detected."

A brief discussion of the several reasons that none of the seven wells have ever produced accurate data and the knowledge required for the decision to leave the dangerous wastes permanently buried within the City of Albuquerque above the sole source aquifer follows:

- Monitoring wells BW1, MW1, MW2 and MW3 were installed in the belief that groundwater flow was to the northwest. However, after the wells were installed, the 1991 water level map showed that the direction of groundwater flow was to the southwest. Nevertheless, the DOE/SNL reports to the present time describe wells MW1 and MW2 to be hydraulically downgradient of the MWL dump.
- Monitoring well BW1 was installed to monitor background water quality but never produced reliable and representative data because of the cross-gradient location 500 feet south of the dump and because of other reasons described below. RCRA requires background wells to be located hydraulically upgradient of the buried wastes.
- Monitoring wells MW1 and MW2 are also located cross-gradient to the direction of groundwater flow beneath the MWL dump. RCRA requires a minimum of three monitoring wells located immediately at the hydraulically downgradient boundary of the dumpsite. The only well that meets the location requirement is well MW3.
- Monitoring wells BW1, MW2, and MW3 were drilled with the mud-rotary method that invaded the wells with bentonite clay drilling muds that have well known properties to mask the detection of contaminants of concern from the buried wastes in the MWL dump.
- Monitoring wells BW1, MW1, MW2, and MW3 are constructed with stainless steel screens that are now recognized as being badly corroded. The corrosion was present for more than the past ten years. The corrosion coatings have strong properties to mask the detection of contamination. In addition, DOE/SNL make the unsubstantiated claim that the elevated levels of chromium and nickel measured in water samples produced from wells MW1 and MW3 are because of the corrosion. The chromium levels measured in the most recent water samples from the two wells are higher than the EPA MCL. RCRA requires installation of new wells with nonmetallic screens to investigate if the chromium and nickel contamination is from the wastes buried in the MWL dump. However,

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DOE/SNL plan to plug and abandon the two wells without installation of new wells to investigate the chromium and nickel contamination.

- Monitoring wells BW1, MW1, MW2, MW3, and MW4 are sampled by pumping the wells at high flow rates to dryness with collection of samples days later of the aerated water that has trickled into the wells. RCRA requires the use of low-flow sampling methods to avoid pumping wells dry and stripping contaminants from the water samples.
- Monitoring wells MW5 and MW6 are located too distant from the MWL dump. In addition, the screen in well MW5 is contaminated with bentonite clay/cement grout that was poured into the well during construction. The well development activities were unsuccessful in removing the grout contamination from the well screen. There is an immediate need to plug and abandon well MW5 with installation of a replacement well at a location close to the dump. The replacement well should be installed in the ARG strata.
- Monitoring Well MW4 was installed in 1993 to investigate chromium contamination at the water table below trench D where 271,000 gallons of reactor coolant water was dumped. Well MW4 has never produced reliable and representative water samples for detection of contamination. Figure 3 is the as-built construction of well MW4.

The water table is at a depth of 445 feet below ground surface. The upper screen in well MW4 is installed too deep to measure contamination at the water table.

An additional mistake is that the lower screen in well MW4 is installed across the hydraulic boundary between the productive Ancestral Rio Grande strata and the overlying alluvial fan sediments. A mistake in well construction is allowing cross-flow of water between the upper and lower screen. There is an immediate need to plug and abandon well MW4 and install a new angle well for investigation of contamination at the water table below Trench D.

DOE failed to comply with the requirements of DOE Orders O 5920.2a, O 435.1 and M 435.1 for the Sandia MWL. DOE M 435.1-1 (p. IV-2, D.(4)) for **Disposal Facilities** requires a "performance assessment, composite analysis, disposal authorization statement, closure plan, waste acceptance criteria requirements, and monitoring plan."

- **Performance Assessment, Composite Analysis (PA/CA).** DOE O 435.1 requires DOE/SNL to conduct a performance assessment (PA) at the Sandia MWL dump that includes projections of potential future impacts on groundwater that may occur over many centuries in the future. The historical annual groundwater monitoring reports and the proposed LTMMP for the MWL dump do not include any evidence that DOE/SNL are meeting the PA/CA requirement of DOE O 435.1. In addition, the groundwater monitoring program at the MWL dump has not provided the information to support the PA/CA process.

- **Closure Plan.** A comprehensive closure plan for the MWL was required by DOE O 5820.2A (p. III-9) to be provided within 5 years after the MWL was either filled or no longer needed. The requirements of the National Environmental Policy Act were also required to be met. (5820.2A, p. III-9 j.(1)). An inactive site, such as the MWL, was further required to be managed in accordance with RCRA. (5820.2A, p. III-9 j.(4)).

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- **Monitoring Plan.** DOE M 435.1-1 (p.IV 15-16), R.(3)(a)-(c) requires a preliminary monitoring plan shall be prepared and submitted to DOE headquarters for review with the Performance Assessment and Composite Analysis. There is no indication that the LTMMP was submitted to DOE headquarters for review and approval prior to filing the LTMMP with the NMED. The LTMMP shall be designed to include measuring and evaluating releases and migration of radionuclides. These topics are not addressed by the LTMMP.

The LTMMP omits the requirements of the DOE Orders as applicable to the LTMMP and claims that "The voluntary inclusion of such radionuclide information shall not be enforceable and shall not constitute the basis for any enforcement because such information falls wholly outside the requirements of the Consent Order. Thus, RCRA is "mere guidance" for DOE and DOE Orders are not cited as applicable to enforcement of radiological monitoring or other requirements for MWL long term monitoring and maintenance operations."

Failure to provide a Groundwater Surveillance Monitoring Plan under DOE Order 450.1, Environmental Protection Program which is in compliance with RCRA and with DOE Order 450.1. (DOE G 450.1-6, 6-24-04).

Under the requirements of DOE G 450.1-6 (p.7), no provisions are set forth in the LTMMP for monitoring to be provided "even after RCRA requirements have ceased."

Under the requirements of DOE G 450.1-6 (p.10), the Flow System beneath the MWL for the two different flow systems of the Ancestral Rio Grande Deposits and the Alluvial Fan strata have not been separately characterized:

"Understanding the local flow system is critical to predicting potential contaminant migration pathways from a facility or activity that may eventually release contaminants to the subsurface. A surveillance monitoring network that is designed and operated for early detection of releases to the subsurface at a specific facility would be completely ineffective if the wells that constituted the monitoring network were located where they would not intercept a contaminant plume, should one occur, due to a lack of understanding of the local flow system."

Under the requirements of DOE G 450.1-6: "Each site should prepare a site-wide ground water surveillance monitoring plan that serves as an internal management tool and also can be shared with regulators and the public." (p.14).

Under the requirements of DOE 450.1, DOE sites and the contractors at those sites are required to be in compliance for "...establishing and maintaining surveillance monitoring programs to detect future impacts on ground water resources from site operations, to track existing ground water contamination, and to assess the potential for exposing the general public to site releases."

"Monitoring performed to comply with external regulatory requirements provides the framework for the long-term monitoring program that will provide surveillance and site

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maintenance information for closed waste management units [such as the MWL dump] and passive remediation sites" [emphasis supplied]. (p. 10). The external regulatory requirement for the MWL would be RCRA regulatory requirements.

Under the requirements of DOE G 450.1-6 (p. 7), no provisions are set forth in the LTMMP for monitoring to be provided "even after RCRA requirements have ceased." The groundwater monitoring plan's basic elements must include the list of 9 elements stated on pp.14-15 of DOE G 450.1-6. As stated below, at a minimum, the following elements are not provided:

- For (1), the network design at the area-specific location of the MWL fails to comply with RCRA monitoring requirements and DOE O 450.1 (see p. 6, section 4 a. (1)(c)) - "compliance with applicable environmental protection requirements."
- For (2), the monitoring wells are not in compliance with 40 CFR 264.91-100 Subpart F. There is no vadose zone monitoring being performed for the MWL as required by p. 4, section 4 b.(4) to ensure early identification of adverse environmental impacts which would be releases from the MWL. The observation points in existence for the MWL do not comply with RCRA or DOE 450.1.
- For (3), the well purging methods used at the MWL are not RCRA compliant and destroy up to 70% of the contaminant of concern, e.g., volatile organic compounds such as PCE. Many DOE/SNL reports cite PCE as an "indicator parameter" for early identification of contaminants to groundwater from the MWL dump.
- For (5), neither the wells, their location, nor the sampling methodology are capable of providing representative water samples. The well monitoring system was installed when the flow was thought to be northwest. In 1991 the flow direction was known to be to the southwest. However, through 2007, wells MW1, MW2 and BW1 were installed cross-gradient to the flow of groundwater. Nevertheless, DOE/SNL reports through 2007 represent all of the wells as being at appropriate locations.

Under Attachment 2, p. 3 of the 450.1 Order, DOE has failed to:

- "11. Ensure the analytical work supporting environmental monitoring is implemented using—
- (a) a consistent system for collecting, assessing, and documenting environmental data of known and documented quality;
 - (b) a validated and consistent approach for sampling and analysis of radionuclide samples to ensure laboratory data meets program-specific needs and requirements within the framework of a performance-based approach for analytical laboratory work..."

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The monitoring well system at MWL is in violation of paragraph 11 because the sampling methodology does not produce reliable data for program specific needs of groundwater monitoring. The well construction use of drilling additives and bentonite clay for the monitoring wells at the MWL prevent the reliable collection of data for radionuclides, heavy metals and for other contaminants of concern. Wells BW1 and MW3 have gone dry. Wells MW1, MW2 and MW3 have corroded stainless steel well screens that mask contaminant detection. MW4 well screen is too deep to detect contamination at the water table beneath the dump. MW5 well screen was contaminated with bentonite clay and the well screen is across different strata. MW6 is 500-ft away from the boundary of the MWL to the northwest.

Failure of DOE/SNL to validate the contaminant transport model for the Sandia MWL dump. DOE is not validating contaminant transport modeling for the Sandia MWL dump by acquiring appropriate monitoring well data to measure early detection of contamination. Monitoring wells are not at locations at the dump that are at the hot spots beneath the dump or at the point of compliance under RCRA immediately along the downgradient boundary of the waste disposal site. DOE is refusing the request of NMED to install additional monitoring wells at locations within the MWL dump where high levels of mobile contamination including the solvent PCE and tritium are known to be present. Figures 4 and 5 display the locations where high levels of PCE and tritium

The request for additional wells was in the November 2006 NMED Notice of Disapproval (NOD) for the DOE/SNL Corrective Measures Implementation Plan:

19. Propose some additional monitoring to be conducted at locations within the landfill where contaminants were detected at their highest levels during the RFI. These locations should be subject to the same triggers as those proposed as points of compliance in Table E-6.

The refusal of DOE/SNL to propose installation of monitoring wells inside the MWL dump is in the January 15, 2007 Response of DOE/SNL to the NMED NOD:

Response: Additional monitoring at locations within the landfill using intrusive techniques is not recommended, and could compromise the integrity of the cover.

There is already one monitoring well (well MW4) installed within the landfill at a location through the proposed cover. However, as described above, well MW4 has never produced reliable and representative water samples because of the several mistakes in construction and sampling. In addition, installation of monitoring wells through covers is routine at many DOE and RCRA disposal sites. There is an immediate need to install monitoring wells within the MWL dump at the locations where high concentrations of PCE and tritium were discovered by the RCRA Facility Investigation (RFI). The wells will investigate and monitor for contamination at the water table below the dump because tritium and PCE are very mobile and are used as indicator parameters to establish the validity of the Sandia fate and transport model (HO et al. January 2007). The high levels of PCE and tritium are displayed on Figures 4 and 5, respectively.

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Failure of DOE/SNL to monitor the vadose zone for early detection of the release of contaminants from the unlined pits and trenches in the MWL dump.

The LTMMP states that "Because VOCs released from the MWL have the potential to migrate via the soil-vapor phase to groundwater (HO et al. January 2007), a monitoring system is planned for the vadose zone at the MWL to serve as an early warning system for protecting groundwater."⁴ "VOCs are the most mobile of the hazardous constituents detected in the soil beneath the MWL." (LTMMP, p. 3-12). However, Figure 6 shows that the FLUTE wells for sampling for VOCs are outside the soil cap distant from the buried waste and are thus incapable of serving as an early warning detection system.

This is demonstrated by the existing soil gas monitoring data on Figure 4 from the Phase 2 of the RCRA Facility Investigation that shows the high concentrations of soil gas such as PCE at concentrations greater than 50 times beneath the dump compared to the levels found where the FLUTE wells will be installed. This does not constitute "Early detection" as set forth in DOE G-450.1-6 (p. 5 at 3.) for surveillance monitoring "to be accomplished at observation points located and sampled based on prioritized areas of the site where the ground water may be particularly vulnerable to contamination." The described early detection promised by the LTMMP also cannot be delivered. Further, the Sandia computer model for contaminant transport (HO et al. January 2007) identifies concern for contamination of the groundwater with PCE but DOE/SNL fail to install monitoring wells at the required locations for early detection of groundwater contamination by PCE, other solvents, by tritium or the other many contaminants of concern.

Installation of the subgrade layer across the MWL dump creates an immediate need for comprehensive soil gas monitoring below the unlined pits and trenches. In the 2006 DOE/SNL installed the subgrade layer of the dirt cover across the MWL dump.

The installation of the subgrade involved hundreds of passes over the buried wastes with a roller compactor that had a minimum weight of 50,000 pounds. The heavy compactor may have released a large inventory of contaminants from fragile containers. There is an immediate need to do a comprehensive soil gas survey across the entire MWL dump to characterize vapor phase contamination below the unlined pits and trenches. The information from the comprehensive soil gas survey is important to the design of the permanent network of monitoring wells for long-term monitoring of vapor phase contaminants, soil moisture, and groundwater contamination.

Surface Soil Sampling required by DOE Orders and by the RCRA Facility Investigation Workplan was not performed for nuclear weapons radionuclides, heavy metals, PCBs, etc. The storm water run-off pathways for these contaminants were not characterized. Surface Soil sampling across the Mixed Waste Landfill was only evaluated for tritium for which significant levels of contamination were present. That suggests that other contaminants may also be present across the surface of the MWL, but have not been characterized.

Transuranic Waste (TRU)—the SWIMS database indicates that about 50 cu ft of TRU waste containing 1.2 mCi of total activity was disposed of at the MWL.

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Memoranda And Waste Management Site Plans from the early 1970s indicate that the amount of TRU waste could be as high as 600 cu ft. The major contaminants included in this waste category are Pu-238 and Pu-239. (A Preliminary Human Health Risk Assessment for the Mixed Waste Landfill, Sandia National Laboratories, 1995, p. 12) [http://www.nmenv.state.nm.us/hwb/SNL/MWL/Preliminary_Human_Health_Risk_Asses s_MWL_by_Johnson\(1-1995\).pdf](http://www.nmenv.state.nm.us/hwb/SNL/MWL/Preliminary_Human_Health_Risk_Asses s_MWL_by_Johnson(1-1995).pdf)

Pu-238 and Pu-239 in the surface pathways are unknown. With a half-life of 87.7 years for Pu-238 and 24,100 years for Pu-239, both of these contaminants should be of concern along the surface soil pathway.

No characterization was done with the surface soil samples for plutonium as required in the Work Plan at the Mixed Waste Landfill during the RCRA Facility Investigations (RFI) Phase 1 and Phase 2. The Phase 1 *Work Plan for an Expanded Site Assessment at the Mixed Waste Landfill* (July 1989) by Ecology and Environment, Inc., (Table 3-2, p. 3-11) stated 197 surface soil samples were to be collected for Tritium, Gross Beta, Gamma Spectrometry, Isotopic-Uranium, and Strontium 90 if gross beta and the gamma isotopic scan indicate its presence.⁴

The number of samples collected did not meet the 1989 Work Plan requirements. The Phase 1 Report (p.3-24) states:

"A total of 164 surface soil samples including duplicates and blanks were collected at the MWL. The workplan specified the collection of 182 samples. Samples could not be collected where surface obstacles prevented access (i.e., above ground storage casks, disposal pits and associated concrete, steel, or wood caps, unyielding ground), or near areas of excessively high radiation marked areas (previously roped off by SNL). Originally, all of the samples were to be analyzed for tritium, gross beta activity, gamma emitters (gamma spectroscopy), isotopic uranium, and isotopic plutonium. Ten Percent of the samples (randomly selected) were analyzed to determine if the radiological parameters could be determined. The remainder of the samples were list [lost?] by the laboratory.⁵ The actual analyses were for tritium, gross beta activity, gross alpha activity, gamma emitters, and isotopic uranium."⁶ (Emphasis added).

On the contrary, however, The RFI Phase 1 Report at Table 5-6 (p. 5-11) shows that gamma emitters were not analyzed. In addition, the analytic results for gamma emitters are not presented anywhere in the Phase 1 or Phase 2 Reports.

This statement is an indication that high levels of surface soil contamination were present and were not characterized for plutonium and many other contaminants, especially given the fact that only ten samples were analyzed. The ten samples, moreover, did not analyze for nuclear weapons related contaminants other than tritium, Ra-226, U-234, and U-238 (Table 5-6, p. 5-11).

⁴ See the attached .jpg file.

⁵ This sentence makes no sense unless the word "list" is changed to "lost." The writing is sloppy at critical junctures that could indicate deliberate miscommunication.

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None of the later sampling in the RFI Phase 2 looked for plutonium or other radionuclides, with the exception of tritium.⁶ Plutonium was detected in the surface soils from a limited study of the closure of an Interim Status Storage Unit. (Also, see below). The gamma isotopic scan was not performed as required by the RCRA Phase 1 Workplan. The Phase 1 Report (p.3-25 and Table 3-4) showed that the Workplan activity for Surface Soil Sampling was for -- "182 Samples to be collected for analyses for Tritium, Gross Beta, Gamma Spectrometry, Isotopic-Uranium, and Isotopic Plutonium. 100% Analysis of samples." The Completed work was -- "164 samples collected for Analyses for Tritium, Gross Alpha/Beta activity, Gamma Spectrometry, and Isotopic Uranium. Iso-Plutonium only if elevated gamma readings noted. Only 10% analyzed in 1989. Remainder to be analyzed in Phase II."

The remaining 90% of the samples were supposed to be analyzed in Phase 2. Apparently the laboratory lost the samples. (See fn 1). In the Phase 2 (p. 4-29) surface soil sampling, however, there is indication only that surface soil samples were collected for tritium. The remaining analysis of Phase 1 sampling was apparently not accomplished.

The failure to accomplish the RCRA Workplan for Phase 1 and 2 gives no confidence that soil surface contamination from plutonium or other radionuclides does not exist because only 10 samples were actually analyzed and for a limited analytical suite.

Failure to conduct adequate surface soil sampling precluded risk analysis for both the surface runoff pathway and for airborne emissions inhalation pathway.

Preliminary Human Health Risk Assessment for the Mixed Waste Landfill, Sandia National Laboratories, Albuquerque, New Mexico (January 1995) was based on the limited and insufficient data from the RFI phase 1 and 2 surface soil sampling. "No surface soil sampling was performed during the RCRA Facility Investigations Phase 1 and Phase 2 for RCRA heavy metals." (p.9). ([http://www.nmenv.state.nm.us/hwb/SNL/MWL/Preliminary_Human_Health_Risk_Assessment_MWL_by_Johnson\(1-1995\).pdf](http://www.nmenv.state.nm.us/hwb/SNL/MWL/Preliminary_Human_Health_Risk_Assessment_MWL_by_Johnson(1-1995).pdf))

The 1995 Risk Assessment states further: "In addition, the lack of surface soil data precludes modeling the potential airborne emissions from the site. The potential pathways of concern for the future resident include inhalation and absorption of tritium, external radiation, and ingestion of groundwater. Inhalation of radioactive air particulates was not assessed for the same reason as for the worker scenario. Incidental ingestion of soil, and ingestion of contaminated food also were not assessed *because surface soil data have not been collected.*" (Emphasis supplied).

The RFI Phase 2 Report (p.7-6) states "Surface soil sampling for radionuclides showed all values to be below the 95th percentile or UTL back-ground level, with the exception of tritium." However, the only data presented in the Phase 1 and 2 reports is from 10 samples that did not adequately characterize for radionuclides other than tritium.

4. Citizen Action believes that the areas outside the now constructed subgrade and boundaries of the MWL along the drainage pathways from the MWL should be examined

⁶ The number of samples stated in the Phase 1 Work Plan (1989) differs from the number stated in the Phase 1 Report.

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for radionuclides and other contaminants for compliance with terrestrial monitoring requirements under DOE O 450.1.

The surface soil flow path away from the MWL was not appropriately examined for contaminant dispersal as required also by the Sandia Environmental Monitoring and Surveillance Plan (PG470247) (p.13).

"Stormwater - Stormwater flowing over the ground surface has the potential to pick up and transport contaminants. Accordingly, this is considered in the design of terrestrial sampling, stormwater and groundwater sampling plans considering the watershed approach."

The terrestrial Sampling Locations shown in PG470247 indicate that only the four corners of the MWL were sampled and not the storm water run-off pathways away from the dump as identified by the topographic map. (See, RFI Phase 2 Report, p.1-4 Topographic Map of the MWL.) The terrestrial sampling on flow paths away from the dump is not adequately covered. At the four locations where soil was sampled, the analytical results are that soils are elevated in tritium. The actual activity levels are not listed. No samples were taken away from the dump along the storm water flow paths.

There was additionally surface soil contamination by low levels of plutonium detected in surface soil at the MWL at the location of the now closed Interim Status Storage Unit. (April 16, 2007, Letter to Citizen Action from New Mexico Environment Department.) Plutonium along the storm run-off pathway was not monitored. Additionally as stated above, the RFI Workplan requirements for 100% of the 164 out of 182 required samples analyzed only 10 samples for tritium and not plutonium.

Given the failure to collect data at the MWL for the surface soil contamination along the run-off pathway from the MWL, the Preliminary Risk Assessment could not analyze the risk to human health from plutonium and other radionuclides, RCRA metals, PCB's and other chemical contaminants.

Failure of DOE/SNL to monitor the surface runoff pathway in the LTMMP. In the LTMMP, only four locations outside the boundary of the dirt cover for the MWL are to monitor for tritium and gamma emitting radionuclides in surface soils. The four locations are at the corners of the MWL dump and are not along the storm runoff pathways. The storm runoff pathways have never been sufficiently characterized at the MWL dump and the LTMMP continues this failure.

Storm Waters Breach Protective Berms at Sandia Lab's Mixed Waste Landfill.

Documents obtained under a Freedom of Information Act request filed by the public interest group Citizen Action New Mexico state that rainfall events that took place at Sandia National Laboratories' Mixed Waste Landfill (MWL) during the period from late June 2006 through July 2007 breached protective berms installed around the MWL.

The berms were installed in 2006 to protect against storm water run-off going across the MWL during the construction of a soil cover at the dump.

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Ten to fifteen feet of both the eastern and western berms at the dump were breached by rain water from a single storm event in August, 2006, flowing across the site. Three breaches were present on the west berm. This allowed sediments and water to flow to the west off of the dump site. The reports also showed that on numerous occasions, ponds formed above the buried wastes in the shallow, unlined pits and trenches. Sandia's design criteria for the berms was not effective to prevent the severe ponding, breach of the berms and the movement of the storm water into the buried wastes. The documents indicate the berms had been previously breached and repaired.

DOE has failed to control storm water across the MWL. DOE M 435.1-1 M. (3)(d) (p. IV-9) requires **Control of Water**. "Low level waste disposal facilities shall be designed to minimize to the extent practical, the contact of waste with water during and after disposal." Documents obtained under a Freedom of Information Act request filed by the public interest group Citizen Action New Mexico state that rainfall events that took place at Sandia National Laboratories' Mixed Waste Landfill (MWL) during the period from late June 2006 through July 2007 breached protective berms installed around the MWL.

The berms were supposed to prevent storm water from flowing across the dump site that contains over 700,000 cu ft of hazardous and radioactive wastes that lie in shallow unlined pits and trenches above Albuquerque's sole source drinking water aquifer. The breaching of the berms is evidence that the rain events were carrying storm water across the dump for many decades, and possibly to the groundwater below. The berms should have prevented that, but instead the storm water flow was so aggressive that it was not prevented.

Sandia allowed storm water to flow across radioactive and hazardous wastes in the dump for nearly half a century. The berms were installed in 2006 to protect against storm water run-off going across the MWL during the construction of a soil cover at the dump. Sandia's design criteria for the berms was not effective to prevent the repeated breach of the berms, ponding and the movement of the storm water into the buried wastes. The documents indicate the berms had been previously breached and repaired.

DOE fails to comply with monitoring requirements of DOE M 435.1-1 P. (1)(a)-(c) (p. IV-10) that requires performance objectives to be met for dose calculations for all exposure pathways for waste disposed of after September 1988. The MWL did not close until December 1988 making this requirement applicable to the MWL. The SNL September (Long Term Maintenance and Monitoring Plan (LTMMP) for the MWL (p. 3-1, 3-2) currently states that "air monitoring for tritium and other radionuclides will not be performed." Although the estimated tritium emitted from the landfill is 0.09 Ci/yr, the calculated dose for the public from various radionuclides including tritium are not set forth in the LTMMP. (LTMMP, p. 3-11, 3.2.2). No dose calculation for the "intruder scenario" is performed for the MWL as required under DOE M 435.1-1 (p. IV-11). No Point of Compliance for monitoring either under DOE M (p. IV-11) or RCRA exists in the LTMMP.

DOE M 435.1-1 (p. I-11) (19) addresses **Waste With No Identified Path to Disposal**:

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(19) **Waste With No Identified Path to Disposal.** Ensuring a process is developed and implemented for identifying the generation of radioactive waste with no identified path to disposal, and reviewing and approving conditions under which radioactive waste with no identified path to disposal may be generated. Headquarters shall be notified of the decisions to generate a waste with no identified path to disposal [emphasis supplied].

DOE has not addressed the pathway for disposal of the large inventory of Sandia "Yardhole wastes." Citizen Action obtained information from a FOIA request that the waste from numerous experiments with the reactor fuels had been disposed of in various areas known as "Yardholes" at SNL. <http://www.radfreem.org/pages/nr/041504.html> The Yardholes were over 30 primitive holes dug in the ground; some were lined and some were unlined. One of the yardholes was a water filled hole under the Hot Cell Facility monorail at SNL and contained a spent fuel element from the Savannah River Site. SNL has kept secret from the public the types and amounts of the contents of the various yardholes. The yardholes contain nuclear materials and/or hazardous wastes that should be disposed of or regulated under the Resource Conservation and Recovery Act (RCRA), the Atomic Energy Act, Nuclear Regulatory Commission (NRC) regulations, or Department of Energy (DOE) Orders.

A "SNL Site Team Report on Spent Fuel," October 1993 ("Yardholes report"), assessed vulnerabilities of the DOE storage of irradiated reactor fuel and other irradiated nuclear materials (RINM). The 1993 Yardholes report stated: "The vulnerability identified was the lack of approved Safety Analysis Reports." The report identified the existence of the Yardholes at the location of the Sandia Pulse Reactors (19 yardholes) and the Hot Cell Facility (13 yardholes under the HCF Monorail) associated with the Annular Core Research Reactor (ACCR).

The Yardholes report, Appendix 1 C. Sandia Pulsed Reactor Facility states:

p. 7 - "The other concern is the ultimate recovery and disposition of these nuclear materials. All of the materials are currently stored on site since there is no approved method of disposal..... There are various concerns associated with the long term storage of any radioactive material, specifically leachability of material, decay rates and potential corrosion of the containment packages due to environmental conditions."

The Yardholes report, Appendix 1 D. Hot Cell Facility, p. 2, identifies "hazardous materials such as cadmium, silver, lead, metallic sodium, etc." These materials may constitute hazardous or mixed hazardous waste under RCRA.

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Attachment 3

April 1, 2008
 Mr. James Bearzi, Chief
 New Mexico Environment Department
 Hazardous Waste Bureau
 2905 Rodeo Park Drive East, Building 1
 Santa Fe, New Mexico 87505-6503

Dear Mr. Bearzi,

A New Mexico Environment Department (NMED) Hazardous Waste Bureau letter to the Department of Energy (DOE) and the Los Alamos National Laboratory (LANL) dated February 26, 2008 "Status of Remedy Selection at MDA H" brings attention to the fact that the FLUTE sampling membrane does not provide for collection of reliable and representative samples of soil gas for measurement of volatile organic compounds (VOCs). The NMED letter makes the statement pasted below:

"NMED contacted the manufacturer who acknowledged that there were problems with VOC adsorption in FLUTE systems greater than 50 feet in length. NMED is concerned that the material used for the construction of the membrane may have absorbed some of [sic] VOCs or influenced contaminant detection in other ways."

The Resource Conservation and Recovery Act (RCRA) Facility Investigation at the Sandia National Laboratories (SNL) Mixed Waste Landfill (MWL) measured many VOCs to be present in the soil gas below the MWL. DOE/SNL identifies the VOC tetrachloroethene (PCE) as a primary contaminant of concern for the contamination of groundwater below the MWL. In the Long-Term Monitoring and Maintenance Plan (LTMMP) for the SNL MWL, DOE/SNL proposes to monitor the VOCs with FLUTE membranes installed to a depth of 400 feet below ground surface in three boreholes at locations surrounding the MWL. However, the admission by the manufacturer that "there were problems with VOC adsorption in FLUTE systems greater than 50 feet in length" is proof that the FLUTE membranes will prevent collection of reliable and representative soil gas samples for the proposed unsaturated zone monitoring wells at the SNL MWL.

Therefore, based on this new information, Citizen Action requests NMED to order revision for the LTMMP by SNL. The LTMMP must then be informally presented to the public by DOE/SNL with a public comment period and public hearing. The LTMMP public comment period was closed on January 31, 2008 and the new information regarding concerns for the FLUTE membrane was not available until February 26, 2008. The new information needs to be taken into account by the LTMMP because the FLUTE wells do not provide effective vadose zone monitoring. Revision of the LTMMP must also comply with the requirements set forth in the SNL MWL Corrective Measures Study that require compliance with RCRA Subpart G and Subpart F for closure of the MWL.

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On November 5, 2007, the NMED released the Fact Sheet/Statement of Basis for the Selection of the LANL MDA H Remedy (MDA H Remedy Fact Sheet). The remedy selected by the NMED includes

- 1). complete encapsulation of the nine disposal shafts at MDA H,
- 2). an engineered evapotranspiration (ET) cover on the land surface above MDA H,
- 3). active vapor extraction of the soil gas plume at MDA H, and
- 4). long-term monitoring of soil gas below MDA H to a depth of 254 ft below ground surface (bgs).

The NMED selected this remedy because of a concern that trichloroethene (TCE) contamination in the soil gas below MDA H could result in TCE contamination in the groundwater below MDA H at a level greater than the EPA Drinking Water Standard of 5 ug/L.

The TCE contamination was measured at a concentration of 2,600 ug/cubic meter in soil gas samples that were collected from three boreholes at MDA H with the LANL Packer sampling system on a quarterly schedule from February 2005 to March 2006. From March 2006 to the present time, the soil gas samples were collected with FLUTE membranes that were installed in the same three boreholes at MDA H where gas samples were previously collected with the Packer sampling system.

The VOC contamination measured with the FLUTE membranes during four quarterly sampling events in 2007 are presented in Table 5.0-2 in LANL report LA-UR-07-7803 (November 2007). Table 5.0-2 presents TCE concentrations measured in a total of 48 gas samples collected from sampling ports in the three FLUTE membranes installed in the three boreholes. The measured TCE concentrations range from ND (i.e., "not detected") to a maximum concentration of 9.7 ug/cubic meter. For the 48 soil gas samples, the measured TCE concentrations were greater than 9.0 ug/cubic meter in only four of the samples and greater than 8.0 ug/cubic meter in only ten of the samples.

All of the TCE concentrations measured in the soil gas samples collected with the three FLUTE membranes were three orders of magnitude lower than the TCE concentration of 2,600 ug/cubic meter that was cited in the NMED MDA H Remedy Fact Sheet as the level of TCE contamination uniformly present below MDA H. The TCE concentration cited in the Fact Sheet was for measurements in the three boreholes with the LANL Packer sampling system.

Because of the very low concentrations measured with the FLUTE membranes for TCE and the other VOCs, NMED has ordered the following actions by DOE/LANL in a letter dated February 26, 2008:

"NMED therefore directed the Permittees in a December 21, 2007 letter to evaluate the effects of the FLUTE system on VOC sample measurements. The Permittees must collect data from existing boreholes at MDA H with and without the membranes for at least two quarters for comparison purposes." (p. 2)

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There is no merit in the direction of NMED for the intercomparison of data from a small number of new soil gas samples collected from the existing boreholes at MDA H with the FLUTE membranes and with the LANL Packer sampling system. The large amount of historical data collected from the existing boreholes with both the LANL Packer System and with the FLUTE membranes is superior to the new data to be collected "for at least two quarters for comparison purposes." Collecting the new data will require repeated installation and removal of the two sampling systems in the three boreholes. The periods of time the boreholes are open will allow cross-flow and cross-contamination of the *in situ* soil gas and dilution of the contamination in the soil gas by atmospheric air that will flow into and out of the open boreholes in response to the daily change of barometric pressure.

Furthermore, the manufacturer has acknowledged that the FLUTE membranes are inappropriate for sampling soil gas for VOCs at depths greater than 50 feet. This admission by the manufacturer is a reason not to use the FLUTE membranes for monitoring soil gas at MDA H or at the SNL MWL. At MDA H, the release of VOCs is from disposal shafts constructed to a depth of 60 ft below ground surface (bgs) and the three boreholes for sampling VOCs are drilled to depths of 256 ft bgs, 249 ft bgs, and 97 ft bgs, respectively. An excerpt from the NMED MDA H Fact Sheet is pasted below that describes the results from soil gas monitoring below MDA H for the time period before taking measurements with the FLUTE membranes:

"The Permittees have been conducting quarterly monitoring and submitting Periodic Monitoring Reports to NMED since (LANL 2005c, 2006a, 2006b, 2006c). Analytical results confirm the presence of VOCs and tritium in all vapor samples. The results do not indicate an increasing or decreasing trend over time and do not show increasing or decreasing trends with depth. However, the monitoring locations do not include the Cerro Toledo Interval or the underlying Otowi Member of the Bandelier Tuff." (p. 5)

The fact that the results do not indicate an increasing or decreasing trend over time for the quarterly samples collected over a period of one year and the sudden decrease in TCE concentrations from 2,600 ug/cubic meter to less than 10 ug/cubic meter when sampling began with the FLUTE membranes is evidence that the FLUTE membranes do have properties for adsorption of TCE from the soil gas.

In addition, the fact that the results do not show increasing or decreasing trends with depth is proof that DOE/LANL have not used an appropriate sampling methodology for soil gas samples collected with either the LANL Packer sampling system or with the FLUTE membranes. NMED also has a concern that the three boreholes are not drilled deep enough to monitor soil gas contamination in the Cerro Toledo Interval or the underlying Otowi Member of the Bandelier Tuff.

There are many deficiencies with all of the soil gas data collected at MDA H. The data do not support any decision on the remedy for MDA H. There is an immediate need to drill the three existing boreholes and two new boreholes to an appropriate depth for

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monitoring soil gas in the Cerro Toledo Interval and the underlying Otowi Member of the Bandelier Tuff. The two new boreholes should be drilled at appropriate locations within 25 feet of the nine disposal shafts. The required depth for the five boreholes is approximately 400 ft bgs.

It is essential to permanently install a multiple-port sampling system in all of the boreholes and for this system to be constructed with materials that will produce reliable and representative gas samples for measurement of *in situ* concentrations of VOCs and tritium. Soil gas samples should be collected from the multiple-port sampling systems installed in the five boreholes for a minimum period of eight quarters.

It is very likely that the results collected from properly monitoring the five boreholes will show even higher concentration of TCE than 2,600 ug/cubic meter for ports at depths from 60 ft to 200 ft. Ports in the lower 200 ft of the boreholes are expected to show a decreasing trend for VOCs and tritium. Reliable soil gas data is important for long-term monitoring for early detection of the release of contamination from MDA H.

However, the soil gas data does not replace the need for the installation of a minimum of two groundwater monitoring wells into the regional aquifer at locations within 50 feet of MDA H and one background water quality well at an appropriate location west of MDA H. The network of groundwater monitoring wells are a requirement of the Resource Conservation and Recovery Act (RCRA). The RCRA requirements are described below. The results from the properly instrumented soil gas boreholes and from the monitoring wells located close to MDA H may show that the VOC and tritium contamination released from MDA H is not a source for contamination of groundwater. The results may show that complete encapsulation of the nine disposal shafts is not a required remedy. Active vapor extraction of the VOCs also may not be needed as a remedy.

We would like to address issues of appropriate standards for protection of the public health, safety and the environment by comparing the differences between NMED's enforcement of corrective measures at LANL and SNL. Our conclusion is that LANL MDA H, a legacy era nuclear weapons dump with much less contamination than the SNL MWL, is receiving substantially more enforcement and remediation requirements.

The SNL MWL is a 2.6 acre dump where greater than 700,000 cubic feet of hazardous and radioactive wastes are buried in seven trenches and more than 40 pits. The LANL MDA H is a 0.6 acre site where 14,000 cubic feet of hazardous and radioactive wastes are buried in nine shafts. The volume of wastes at MDA H is only 2% of the volume at the MWL. The top of the regional zone of saturation is approximately 1000 ft below ground surface (bgs) at MDA H compared to approximately 470 ft bgs at the MWL.

The SNL MWL trenches and pits are unlined and there are no leak detection systems to monitor releases. In addition, NMED has not enforced the requirement of RCRA 40 CFR §264.98 (a)(2) for active monitoring of the release of contamination to the unsaturated zone below the buried wastes. Furthermore, the DOE/SNL long-term monitoring and maintenance plan (LTMMP) for the SNL MWL does not include active monitoring for

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soil gas contamination below the buried wastes in the MWL. Instead, DOE/SNL propose to monitor the VOCs with FLUTE membranes installed to a depth of 400 feet below ground surface in three boreholes at locations outside the perimeter of the dirt cover that will be installed over the MWL.

The three FLUTE wells will not place the MWL in compliance with §264.98 (a)(2) because the proposed wells are located outside the dump (LTMMP, p. B-9, Fig B-3.1-1) and also the FLUTE membranes will not produce reliable and representative soil gas samples because of the adsorption properties. Compliance with §264.98 (a)(2) requires monitoring wells must be placed within the dump to detect "[t]he mobility, stability and persistence of waste constituents or their reaction products in the unsaturated zone beneath the waste management area."

The Vadose Zone Soil-Vapor monitoring proposed under the LTMMP (p.3-12 to 3-17) can not provide "the early warning system for protecting the groundwater" that is required by law as the LTMMP claims. Given the lack of liners at the MWL, early detection of contamination in the unsaturated zone beneath the MWL pits and trenches is a necessity at the MWL. The early detection of contamination requires a large network of multiple port vadose zone monitoring wells that are installed within and immediately at the boundary of the MWL. The number of wells is not known but is a minimum of ten. The number and location of the monitoring wells must be determined by careful sampling of the soil gas below the MWL with a large number of temporary probe holes. On February 14, 2008, NMED approved a DOE/SNL sampling plan to use probe holes for collecting and analyzing soil gas samples below the MWL. The sampling plan does not take measurements at enough locations or to the necessary depth. The deficiencies in the plan are described below.

The soil gas data collected for the RFI Phase 2 are proof that the three FLUTE wells proposed in the LTMMP are too distant from the MWL for the early detection of releases below the buried wastes. Two figures in the RFI Phase 2 report show that the PCE concentrations measured at the proposed distance away from the MWL for the FLUTE wells are 10 times lower than the PCE concentrations measured within the MWL unclassified area. (RFI Phase 2 p. 4-76 PCE in Soil Gas at 10 ft and p. 4-83 PCE in Soil Gas at 30 ft).

The LANL MDA H and the SNL MWL are both RCRA "regulated units" where groundwater monitoring must be in compliance with RCRA 40 CFR §§264.90 through 264.101 (RCRA Subpart F). In a recent LANL report - *Technical Area 54 Well Evaluation and Network Recommendations, Revision 1* (LA-UR-07-6436, October 2007), NMED and DOE/LANL acknowledge that the groundwater monitoring at MDAs G, H, and L must be in compliance with RCRA Subpart F, but NMED has not enforced this requirement for the SNL MWL. The requirements in the LANL report for groundwater monitoring at MDAs G, H, and L are pasted below:

"The following requirements from 40 CFR 264.90-99, Subpart F apply to permitted units or regulated units that received waste after July 26, 1982. The

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regulations apply throughout the active life of the units and the closure and post-closure period if the units are not "clean-closed" under RCRA. The groundwater-monitoring network and facility process must be able to detect, evaluate, and respond to releases of hazardous waste or hazardous waste constituents into the uppermost aquifer. Detection monitoring is required to establish that a release has occurred. It is assumed that because of the significant depth to groundwater beneath TA-54, vadose-zone monitoring will be a key component of the overall monitoring program in support of both CMEs and the RCRA Part B permit.

"An integrated groundwater-monitoring system must consist of a sufficient number of near-field wells and downgradient monitoring wells installed at appropriate locations and depths to obtain representative groundwater samples from the uppermost aquifer. These samples must represent both the quality of background water not affected by the regulated unit and the quality of groundwater passing beneath the regulated unit to allow for detection of contamination in the uppermost aquifer." (p. 6)

The above requirements for RCRA regulated waste disposal sites at LANL TA-54 are especially pertinent to the LTMMP for the SNL MWL, the SNL Draft RCRA Permit, and the SNL Solid Waste Management Units (SWMLs) slated for No Further Action.

The SNL MWL is also a RCRA regulated unit because of the period of time that it received wastes. It is notable that the New Mexico Court of Appeals did not take jurisdiction over this issue and the issue is raised both for the record for the LTMMP and the SNL Draft RCRA Permit. As will be discussed below, the MWL does not have adequate soil gas monitoring or groundwater monitoring as is required by NMED at LANL for MDAs G, H, and L within TA 54.

The SNL MWL Corrective Measures Study p.19) states that

"Hazardous waste landfill closure requirements are codified under 20.4.1.500 New Mexico Administrative Code (MAC), 40 CFR Part 264, "Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities," Subpart G (Facility Closure Standards) and Subpart N (Landfills). The NMED, the lead regulatory agency, has adopted the federal regulations as written and incorporated them into the New Mexico Hazardous Waste Management Regulations 20.4.1 NMAC. These standards are performance-based regulations that specify performance criteria without specifying design, construction materials, or operating parameters. The EPA has provided numerous guidance documents to aid in interpreting the level of performance required to design, construct, and operate a compliant closure system. The closure performance standard is defined in 20.4.1.500 NMAC, 40 CFR 264.111 as follows:

"The owner or operator must close the facility in a manner that:

- (a) Minimizes the need for further maintenance; and
- (b) Controls, minimizes or eliminates, to the extent necessary to protect human health and the environment, post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated runoff, or hazardous

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waste decomposition products to the ground or surface waters or to the atmosphere; and
 (c) Complies with the closure requirements of this subpart”

The SNL MWL is not in compliance with Subpart G (40 CFR 264.117 (a)(1)(i)) because monitoring and reporting that must comply with Subpart F are not provided for in the LTMPMP as is required for the closure of a landfill. Additionally, the necessity of providing clean closure or obtaining a post-closure permit for the MWL or documents in lieu thereof have not been addressed as required by 40 CFR 270 et seq.

The NMED Response to Public Comments SNL MWL SV SAP (2/15/2008, p. 13) states that “There does not appear to be a significant increase in soil gas concentrations between the depths of 10 and 30 feet.” The Phase 2 RCRA Facility Investigation (RFI) on the contrary shows a great increase in the Total Volatile Organic Compounds (VOCs) in Soil Gas at 30 ft compared to the values measured at 10 ft and in some instances by a factor of four times greater. (Figs. 4.5-28, 4.5-29). The RFI report shows PCE in Soil Gas at 10 ft to be nearly doubled at the 30 ft depth. (Figs. 4.5-21, 4.5-27).

The PCE concentrations in soil gas below the MWL are identified as a source for contamination of groundwater in the MWL Fate and Transport Model (F&TM) (Ho, et al, 2006). However, the modeling of the PCE was from the maximum value of PCE in the soil gas measurements at the MWL measured to a maximum depth of only 30 ft bgs. The value used in the model is increasing from the level measured at 10 ft (5,200 ppb) to 30 ft (5,900 ppb). The data used by the F&TM was ten years old, too sparse and shows a trend to higher values from where the data was collected and there may be higher values at greater depth than 30 ft and at other locations beneath the dump. There is no indication that the highest value at the MWL is presented for the F&TM.

Because of the deficiencies in the F&TM, we have used Henry’s Law to calculate the groundwater contamination below the SNL MWL from the PCE contamination of 5,900 ppb that was used in the F&TM model. For the MWL, Henry’s law calculates that the PCE concentration of 5,900 ppb in soil gas will contaminate the groundwater with PCE at a concentration of 52 ug/L, a level 10 times greater than the EPA Drinking Water Standard of 5 ug/L. Our calculation with Henry’s Law was the same process used by NMED to select complete encapsulation as the required remedy for MDA H to protect groundwater from the release of TCE as soil gas from the disposal shafts.

LANL was required by NMED to conduct quarterly sampling for the past two years to measure the soil gas concentrations for a complete suite of VOCs at multiple depths to a total depth of 250 ft bgs and with a borehole for monitoring to a depth of 250 ft bgs at a distance of approximately 25 ft from the disposal shafts. By contrast at the SNL MWL, however, on February 14, 2008, NMED approved of a sampling plan that will collect new soil gas samples for VOCs at only six probe hole locations within the MWL. Three locations will collect samples at depths of 10 ft and 30 ft, and three locations will collect

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samples at 10 ft, 30 ft, and 50 ft. The sampling required by NMED at the MWL is a token effort.

The depth of the aquifer below LANL MDA H is approximately 1000 ft bgs. The depth of the aquifer for the SNL MWL is one half that at approximately 470 ft bgs and the MWL contains more than fifty (50) times the volume of waste that is buried at MDA H. Given the concentrations of TCE at MDA H, NMED stated concern that “More specifically, the Permittees have not sampled soil gas at depths greater than 250 feet below the ground surface.” On the other hand, at the MWL, NMED is only requiring one-time sampling for soil gas at a depth of 50 feet at only three locations. Deeper sampling should be required at many more locations.

Soil gas samples should be collected at a minimum of twenty locations within the SNL MWL and to depths of 200 ft bgs on a sampling interval of 10 ft, 30 ft, 50 ft, 100 ft, 150 ft, and 200 ft. The soil gas samples should be analyzed for a complete suite of VOCs and also for tritium. NMED requires LANL to analyze the soil gas samples collected from the three boreholes at MDA H for tritium on a quarterly schedule. At the MWL, no monitoring for tritium is being required although large quantities of tritium were disposed of in the MWL. LANL, on the other hand, is required to collect soil gas samples from the boreholes at MDA H and sample for tritium along with VOCs. Tritium concentrations are required to be measured in the soil gas. NMED is not requiring tritium gas sampling at the MWL.

The remedy required by NMED for the SNL MWL is only a soil cover draped over the surface of the dump with a design identical to the ET cover proposed for LANL MDA H. NMED praises the soil cover for the MWL for protection of groundwater but is non accepting of the nearly identical cover proposed for MDA H because it doesn’t protect groundwater. The NMED criticism is pasted below:

“In order to ensure the continued performance of an ET cover, the Permittees proposed to conduct regular maintenance and monitoring throughout the 100-year institutional control period once the vegetative cover has been established. However, this alternative, similar to other containment alternatives listed by the Permittees, does not address the plume of VOCs and tritium that are currently present in the soil pore gas in the vicinity of MDA H. This ET cover also does not prevent future releases of these compounds to the subsurface from the shafts at MDA H.”

There is a contradiction in the practice of NMED to protect human health and the environment between the selection of only a soil cover for the MWL dump and the acknowledgement of NMED for MDA H that the soil cover is not protective for the plumes of VOCs and tritium for releases at this time or for future releases.

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Hakomson states⁷ that "Controlling aqueous transport of volatile contaminants [with a soil cover] does not necessarily control vapor phase transport. In fact, maintaining low soil moisture content of cover and backfill soils to reduce aqueous phase transport may be associated with increases in vapor phase transport of volatile contaminants (Jury, 1987)."

Similarly to LANL, MDA H, the soil cover at the SNL MWL does not address the VOCs and tritium that are currently present beneath the dump in far greater amounts than at MDA H. The soil cover will also not prevent the future releases of those contaminants to the subsurface beneath the MWL. The shafts at MDA H, are similar to the unlined pits and trenches at the MWL. However, NMED is requiring much more protection for MDA H with far less contaminants in volume and type than for the MWL. No encapsulation of MWL pits and trenches, and no soil-vapor extraction system are required at the MWL. NMED must provide equal protection for similarly situated dumps and communities. At MDA H (p.12).

"NMED therefore has determined that it is appropriate to implement Alternative 3b (complete encapsulation of the shafts), along with a soil-vapor extraction system, at MDA H to prevent biointrusion and eliminate the VOC contaminant source detected in soil pore gas so that the drinking water resource can be conservatively protected.

"Alternative 3b will isolate the shafts from the environmental media to offer the greatest protection against potential intrusion of plants and animals, and accidental human access. This complete encapsulation alternative will prevent water from entering the shafts, and thus minimize the potential for contaminant migration into the surrounding turf through aqueous phase transport."

Also at MDA H, NMED is requiring that (p.13)

"To conservatively protect the regional groundwater from contamination by VOCs in soil pore gas, the Permittees will be required to operate the SVE [Soil-Vapor Extraction] until VOCs in soil pore gas are reduced to levels at which any of the detected VOCs, in contact with groundwater, theoretically could result in concentrations above half of the lower of the respective MCLs or Water Quality Control Commission (WQCC) standards. For example, TCE in soil pore gas must be reduced to a concentration below 1100 µg/m³ in vapor phase to meet the established criteria. Installation of a SVE system will require the installation of vapor monitoring extraction wells in the vicinity of MDA H and extending the depth of existing boreholes to the Otowi member of the Bandelier Tuff." (Emphasis supplied).

At the SNL MWL, NMED is leaving poorly understood soil gas contamination with VOCs and tritium unmonitored beneath a soil cover that increases the potential for volatile contaminants to contaminate the groundwater. The level of PCE contamination measured in the soil gas below the MWL required that an active soil vapor extraction (SVE) should have been installed 15 years ago. The SVE system was never installed and is not in the LTMMP as it should be.

⁷ Review of Sandia National Laboratories/New Mexico Evapotranspiration Cap Closure Plans for the Mixed Waste Landfill, T.E. Hakomson 2/15/02, p. 28.

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At MDA H, "NMED questions the long-term reliability of the engineered ET [evapotranspiration] cover in preventing the intrusion of deep-rooting plants and burrowing animals. According to the conceptual design of the engineered ET cover for MDA H, the total depth of the cover is approximately 4.5 feet over the existing surface layer. Based on the Permittees' findings at MDA H (LANL 2005), the site specific deep-rooting plants can extend roots to depths as deep as 23 feet (7 meters), and local burrowing animals can excavate to depths deep to 10 feet (3 meters)." (Emphasis supplied).

The depth of the soil cover proposed for the SNL MWL is 4.25 ft (MWL Design Report, 1999, p.3). At the MWL, Hakomson reports that many species of ants burrow beyond depths of 5 ft and three species can burrow to depths beyond 5 meters (16.4 feet). (p.37). Hakomson states, "The mixture of grasses that SNL/NM intends to use in re-seeding the MWL is lumped within the herbaceous plant category. These data show that deep root habits are quite common in woody and herbaceous species across most of the terrestrial biomes, far deeper than the traditional view has held up to now. The implications for the MWL are that no matter what vegetation is planted on the landfill, if moisture penetrates beneath the ET cover, roots can be expected to follow." (P. 31-32).

The monitoring at the SNL MWL never produced reliable data for the detection of any contamination (including the VOCs PCE and TCE) at the water table or in the deeper permeable groundwater zones below the MWL. There are other RCRA regulated units at SNL where VOC groundwater contamination with VOCs and other RCRA hazardous wastes is a concern but the required groundwater monitoring was never installed. One example is SWMU 101, Building 9926 Explosive Contaminated Sumps and Drains where PCE contamination was measured in soil gas samples. The nearest groundwater monitoring well is approximately 0.5 mile away. RCRA Subpart F requires a network of monitoring wells as close as possible to SWMU 101 and certainly within a distance not greater than 50 feet away.

A second example is SWMU 154 where High Explosive (HE) and VOC liquid wastes were disposed of in two 23-ft deep seepage pits known as "the west HE drain system. The seepage pits received liquid wastes for 40 years from 1965 to possibly 2005, the year the seepage pits were backfilled with clean, native soil. The only monitoring well for SWMU 154 is located 300 feet away from the seepage pits. SWMU 154 is not in compliance with the groundwater monitoring requirements of RCRA Subpart F.

A third example is SWMU 196 where poorly characterized radioactive and hazardous liquid wastes were discharged to a large cistern, a vertical concrete cylinder 2.5-ft in diameter installed from 3-ft above ground to a depth of 22 ft bgs. RCRA liquid wastes including total petroleum hydrocarbons, VOCs, SVOCs and metals (and also radionuclides) were discharged into the cistern for 12 years from 1978 to 1989. There are no groundwater monitoring wells to investigate groundwater contamination below the cistern. RCRA Subpart F requires a network of monitoring wells at SWMU 196.

The three SWMUS are among a population of many SWMUS that are being proposed for No Further Action status by DOE and NMED without establishment of RCRA requirements for groundwater monitoring.

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There currently is no monitoring at the MWL of the "Groundwater" as defined by the Consent Order. (p.15). The Consent Order ("CO", April 29, 2004) defines groundwater as follows:

"Groundwater means interstitial water which occurs in saturated earth material and which is capable of entering a well in sufficient amounts to be utilized as a water supply."

The fact that groundwater is not monitored at the MWL is evidenced from the monitoring reports that cite poor production of the MWL wells and samples being collected days later from the water that trickles into the wells after they are pumped dry.

At the Sandia MWL, wells MWL-MW4, MW5 and MW6 need replacement under the CO because they have all failed for their intended purpose. The pertinent part of the CO is pasted below:

"In the event of a well or piezometer failure, or if a well or piezometer is any way no longer usable for its intended purpose, it must be replaced with an equivalent well or piezometer. In constructing a well or piezometer, Respondents shall ensure that the well or piezometer will not serve as a conduit for Contaminants to migrate between different zones of saturation." (P. 63, CO Sec. VIII.A).

- Monitoring Well MW4.** The purpose of well MW4 was to investigate contamination at the water table beneath Trench D. However, the top screen in well MW4 was installed too deep below the water table, and the well has never met its important purpose to investigate contamination at the water table. The bottom screen in well MW4 is installed across the contact of the AF sediments with the ARG strata. The position of NMED is that well screens shall not be installed across formations with contrasting hydraulic properties or markedly different hydraulic head but this is the setting for the bottom screen in well MW4. In addition, the available information indicates that well MW4 is allowing cross-contamination between the top and bottom screen. There is an immediate need to plug and abandon well MW4, and install a new monitoring well to characterize groundwater contamination at the water table beneath Trench D.
- Monitoring Well MW5** is located west of the MWL, but the well screen is installed across the contact of the AF sediments with the ARG strata which, as explained above, is in violation of NMED requirements for monitoring wells. In addition, a mistake in well construction contaminated the screened interval with the bentonite clay grout that was used for back-filling and sealing the annular space between the well casing and the borehole wall. The grout accidentally filled the lower part of the screen. There is an immediate need to plug and abandon well MW5. The failure to do so is a violation of the CO.
- Monitoring Well MW6, MW6** is in the productive groundwater zone but is more than 500 ft distant to the northwest corner from the dump. No monitoring well is located at the point of compliance to monitor the "groundwater" as defined by the Consent Order. RCRA Subpart F also requires monitoring the productive groundwater zone as close as possible to the western and southern boundaries of the buried wastes in the MWL.

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Mccoy, David

Page 56 of 58

The SNL 2007 Annual Groundwater Monitoring Report (released by DOE/SNL February 21, 2008) again incorrectly takes credit over the years for sampling with one background monitoring well and five downgradient monitoring wells that have never existed at the MWL. The Report still presents flow direction as being to the northwest, contrary to NMED recent declaration that flow at the water table is to the southwest.

Fate and Transport Model for the MWL

National Academy of Sciences (2000): "Long-Term Institutional Management of U.S. Department of Energy Legacy Waste Sites" points out that "Stewardship" (covering waste with dirt and instituting institutional controls) of waste sites will be difficult if not impossible to achieve.

The National Academy of Sciences 2007 report - *Plans and Practices for Groundwater Protection at the Los Alamos National Laboratory* states (p.68):

"Numerical models combine information on geology, geochemistry, infiltration, regional groundwater fluxes and waste discharges in a manner that quantifies understanding of the physical/chemical processes and interactions involved in the transport of contaminants. Information gained during the process of model development provides valuable insight on the validity of the conceptualization implemented in the numerical model. Though many "solutions" are possible, comparison of predicted results to actual measurements [emphasis supplied] provides an estimate of the level of understanding of the flow and transport processes moving contaminants away from their initial disposal locations."

SNL has never put in monitoring wells at the identified hot spots for PCE and TCE at the MWL to verify the accuracy of its fate and transport model.

Drilling MWL wells with "mist" is not appropriate.

In a June 19, 2007 letter from Mr. Bearzi to SNL it states (page 5, Section 5.2.1): "The permittees shall log the depth of the first encounter with regional groundwater and the depth of any perched groundwater will be logged during drilling."

In a July 2 2007 letter from James Bearzi to SNL for replacement of MWL-MW 1 and MW3, it states, "The mud rotary drilling method shall not be used to install the wells." Our position is that the ARCH drilling method using an undefined amount of water as a mist is the same as the mud rotary method because using water to drill through clay-rich sediments will create "drilling muds" that will invade the zones that are important to monitor with the clay-rich muds produced by the fluid-assisted ARCH drilling method.

In the August 10, 2007 Workplan for MWL-MW7 and MW8 sent to James Bearzi by SNL it states: "Minimal water (but no other foams/liquids) in the form of "mist" may be introduced into the borehole to aid in the removal of cuttings."

Section 3.5.3 of the LTMMP should include the drilling methodology to be used for installing monitoring wells. It should state specifically that no drilling methods with water or water-based fluids (i.e., bentonite clay or organic fluids or -foams) shall be

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Mccoy, David

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allowed for any of the boreholes for the groundwater monitoring wells. Those fluid-assisted drilling methods should not be used at any location because the boreholes are to be used to investigate the existence of perched zones. The only drilling methods that meet the NMED requirement to investigate perched zones and the first encounter with regional groundwater are the air-rotary reverse circulation under reamer casing advance or sonic. The sonic drilling method was used to install well MWL-MW4 at the MWL. The air rotary casing hammer (ARCH) drilling method should not be used in any of the boreholes because the history is that circulation of water is necessary to recover the cuttings and the circulation of water produces drilling muds that invade the zones that are important to monitor.

Prior data from ARCH drilling with "mistig" at monitoring well MWL-MW5 shows that the misting resulted in slugs of mud that invaded the screened interval. The perched zones of saturation and the water table cannot be accurately identified nor can reliable sampling be obtained if water, even as a mist, is used for drilling. An additional important reason to use no water during drilling is that the *in situ* groundwater in the perched zones and from the water table of the regional zone of saturation should be sampled from the borehole for the full analytical suite including VOCs, Semi-VOCs, tritium and RCRA trace metal suite. Tritium should also be analyzed at the low detection limits of the University of Miami as is done for LANL. In the past year, the dry air-rotary reverse circulation underreamer casing advance drilling method was used for monitoring wells R-35a, R-35b and R-36 at LANL.

Recommendations

1. FLUTE wells shall not be used for monitoring soil gas at the SNL MWL. FLUTE membranes are inappropriate for their known properties to absorb the contaminants of concern.
2. Permanent installation of multiple port wells is required for monitoring the unsaturated zone beneath the MWL. The location and installation of the unsaturated zone wells at the MWL must be at locations within and immediately along the boundary of the MWL.
3. The monitoring wells MW4, MW5, and MW6 need to be replaced.
4. The nickel and chromium contamination measured at well MW1 requires a new monitoring well with a PVC screen at a location south of MW1 as close as possible to the northern side of the MWL.
5. The southwest direction of groundwater flow at the water table below the MWL requires installation of a monitoring well along the southern side of the classified area and along the southern side of the unclassified area.
6. All new groundwater monitoring wells installed outside the MWL dump shall be installed as close as possible to the boundary of the buried wastes.
7. Well MW4 must be plugged and abandoned and replaced with a new angle well installed at an appropriate location inside the MWL to monitor contamination at the water table below Trench D.
8. Two monitoring wells shall be installed at locations within the MWL where high levels of PCE and tritium are known to be present. The wells shall monitor

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Mccoy, David

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contamination at the water table. The two wells are essential for confirmation of the MWL Fate and Transport Mode.

9. DOE/SNL should be informed by NMED that the claims of the 2007 Annual Groundwater Monitoring Report are not accurate and that an appropriate monitoring network must be installed at the MWL and the SWMUs.
10. Only the dry air-rotary reverse circulation under reamer casing advance or sonic drilling methods should be used for drilling boreholes through the unsaturated zone and into the regional aquifer at the MWL. The ARCH drilling method with water as a mist to recover cuttings is not appropriate at the MWL.

In addition to considering these concerns for present action, please submit this letter for the Long Term Monitoring and Maintenance Plan, the SNL Draft RCRA Permit, 26 SWMUs for NFA Status and 5 SWMUs for NFA Status.

Sincerely,

David B. McCoy, Executive Director
Citizen Action New Mexico
POB 4276
Albuquerque, NM 87196-4276
505 262-1862
dave@radfreem.org

Robert Gilkeson, Registered Geologist
PO Box 670
Los Alamos, NM 87544
rbgilkeson@aol.com

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Mccooy, Lydia

Page 1 of 1

Levens, Matthew

PC_1440

From: Lydia McCoy [lydiamcco@earthlink.net]
Sent: Wednesday, April 23, 2008 10:42 PM
To: Complex2030
Subject: Re: "Complex Transformation" plan to build nuclear weapons

Lydia McCoy
426 E. Poppyfields Drive
Altadena, CA 91001-1918

April 23, 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:

116A The DOE should reject the Complex Transformation proposal to revamp the nuclear weapons arsenal.

2] Please, no more! The world is not a better place because of nuclear weapons. We, Americans, do not need to have cheaper, safer nuclear weapons. Instead, we need to focus our energy on making the world free of nuclear weapons.

13A.1. The cost to the world of a dependence on the war technology is to increase the power of those that think that with bombs comes the power to control. We do not focus on helping our people. We burden our children with the cost of all of this. We threaten our children's future security by having a technology that we demand should not be had by others. Why do we continue this? Please, no "Complex Transformation"!

39B 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,

Lydia McCoy
626 797 4024

Mccooy, Paul

Page 1 of 1

Levens, Matthew

PC_1495

From: Paul McCoy [paul_mccooy@baylor.edu]
Sent: Wednesday, February 20, 2008 4:27 PM
To: Complex2030
Subject: Nuclear Weapons Development

Paul McCoy
2605 Westbury Circle
Waco, TX 76710-1145

February 20, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

I am completely opposed to the administration's proposal to build a plant to produce plutonium pits for nuclear and plans to modify nuclear facilities across the country.

116A I will actively lobby against and vote against any elected officials who support this plan. This is a most destructive path that is being proposed, a path which will, without question, adversely effect the future quality of life on this planet, whether or not these weapons are ever used.

If the United States is to maintain any degree of true power and integrity within the global community, it must actively expand its view of the possible solutions to the problems which face our world today. We have reached a moment in our history when it is no longer possible to apply old solutions to problems of this magnitude. We do so only at the great peril of our children.

Sincerely,

Paul A. McCoy
(254)751-0507

McCranie, T

Page 1 of 1

Levens, Matthew

From: T. K. McCranie [tblue@mybluelight.com]
Sent: Wednesday, January 16, 2008 1:37 PM
To: Complex2030
Subject: Citizen Comment regarding SPEIS, Complex Transformation

PC_757

114K
28H
Mr. Wyka:
There are so many unresolved issues concerning nuclear waste, storage, employee safety, and employee compensation as well as the desires of us citizens to reduce nuclear weapons? that it does not make sense for you to force us taxpayers into investing in a new generation of nuclear-weapons facilities. The Department of Energy should be putting their resources into nuclear cleanup, reducing petroleum addiction, and green energy research/ not into expanding our weapons program.

T. K. McCranie
19381 De Vry Drive
Irvine, CA 92603

McCullam, Jane

Page 1 of 1

Levens, Matthew

From: Jane McCullam [cattemole@alltel.net]
Sent: Tuesday, February 19, 2008 5:18 PM
To: Complex2030
Subject: Nuclear Weapons

PC_1376

Jane McCullam
9880 Fairmount Rd
newbury, OH 44065-9712
February 19, 2008
Complex Transformation Department of Energy

Complex Transformation Department of Energy:

116A
I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons.

Sincerely,

Jane McCullam

McDaniel, Lisa

Page 1 of 1

Levens, Matthew

From: Lisa McDaniel [lisa.mcdaniel@utsouthwestern.edu]
Sent: Wednesday, February 20, 2008 4:54 PM
To: Complex2030
Subject: nuclear weapons

Lisa McDaniel
410 Remington Dr
Murphy, TX 75094-4171

February 20, 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.

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,

Lisa McDaniel

PC_1435

McDonough, Donald

Page 1 of 1

Levens, Matthew

From: dmcdonov@peoplepc.com
Sent: Saturday, April 05, 2008 12:08 PM
To: Complex2030
Subject: Nuclear weapons

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,

We already have enough nuclear weapons to kill all the people in the world many times over. Don't build any more or any new ones. Stop this nonsense. Thank you.

Sincerely,
Donald McDonough
8290 Lancaster Dr # 51
Robnet Park, CA 94928

cc:
Senator Dianne Feinstein
Senator Barbara Boxer
Representative Lynn Woolsey

PC_1596

Mcelhaney, Mabel

Page 1 of 1

Levens, Matthew

PC_616

From: Mabel [maney@ncrr.com]
Sent: Thursday, March 13, 2008 6:14 PM
To: Complex2030
Subject: Public Comment on Complex Transformation

Ladies and Gentlemen:

While I am in favor of consolidating weapon-grade nuclear materials into fewer locations and reducing the Complex footprint, I adamantly oppose any increase in weapon production capacity. The United States already has a more-than-adequate arsenal for all defense purposes, and enlargement would be incendiary and counter-productive. Furthermore, danger, high cost, and unmanageable byproduct classify both nuclear weapons and nuclear power as failed technologies, which should be abandoned.

As long as the U.S. seeks nuclear monopoly, we play the dangerous role of global villain. We must exchange it for the safer and honorable role of leader toward world peace through exchanging nuclear swords for the plowshares of shared clean, sustainable, efficient energy sources.

Sincerely,
Mabel McElhaney
1818 Piney Grove Church Rd.
Hillsborough, NC 27278

Mcfadden, Donna

Page 1 of 1

Levens, Matthew

PC_856

From: Donna McFadden [msbluzady@yahoo.com]
Sent: Thursday, March 27, 2008 6:39 PM
To: Complex2030
Subject: MORE NUKES???

Donna McFadden
849 E Stanley Blvd
Livermore, CA 94550-4008

March 27, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy,

How many times is this administration going to attempt to use fear against the American people? In this case, proposing that, for our security, the USA really NEEDS to blow up the world more times and faster than we already can! I know that I can count on you to put-think them. I just need you to out-talk and out-maneuver them.

Sincerely,


Donna McFadden

Mcghee, Dennis

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MAR-17-2008 06:25 Front/HC CRTH 8650304151 V. 3484 P. 1 P. 2/2

PC-47



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'm a former employee of a sub contractor of the 1-12 complex I know the labor unions of this facility. I live not far from the 1-12 complex. I'm in favor of keeping operations at the 1-12 facility. I believe that the employees are capable of doing quality work. I'm in favor of keeping the operations at the 1-12 complex.

Dennis Douglas Mcghee

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) 911-9222
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.complextransformation.gov>

1101


215A

Mcghee, Lois

Page 1 of 1

MAR-17-2008 06:25 Front/HC CRTH 8650304151 V. 3104 P. 1/2

PC-81



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'm an employee of Methodist Medical Center Hospital at Oak Ridge and live not far from the Oak Ridge Y-12 Complex. I know many people employees at that facility. I believe that many lives would be devastated by the loss of this complex. I'm in favor of keeping the complex in my community.

Lois Anne Mcghee

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) 911-9222
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.complextransformation.gov>

1188;

2141;

3101

415A

McGill, Linda

Page 1 of 2

Page 1 of 2

PC_603

Levens, Matthew

From: Linda McGill [mailto:ljndy33@yahoo.com]

Sent: Tuesday, March 18, 2008 7:35 PM

To: Complex2030

Subject: Complex Transformation Supplemental Programmatic Environmental Impact Statement

Administrator Thomas P. D'Agostino
National Nuclear Security Administration
Department of Energy
Washington, DC 20585
Email: complextransformation@mnsa.doe.gov

Subject: Revise the Complex Transformation SPEIS

Dear Administrator D'Agostino,

I strongly object to the current draft Complex Transformation Supplemental Programmatic Environmental Impact Statement. The NNSA 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.

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.

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

5/14/2008

McGill, Linda

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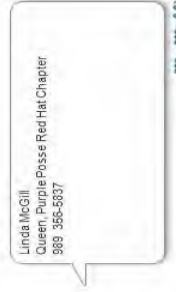
PC_603

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(cont)

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.

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.

Sincerely,



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signature

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5/14/2008

McGuinness, James

Page 1 of 1

Page 1 of 1

PC_1363

Levens, Matthew

From: Guin [guinvestigator@yahoo.com]
Sent: Thursday, May 01, 2008 4:13 PM
To: Complex2030
Subject: Stop Complex Transformation

It is beyond time to stop producing anymore nuclear weapons, and to dismantle ALL nuclear weapons worldwide now. We must begin to show the world that nuclear weapons are not the answer to ending disputes between countries. United States is going to have any credence in preventing other countries, such as Iran, Syria and North Korea, from creating nuclear weaponry, the US must take the lead in destroying and stopping the proliferation of such weapons. The US must begin to follow the letter of the law of the treaties signed by the United States and other countries to halt nuclear proliferation and to dismantle ALL nuclear weapons worldwide. The United States must also open it's nuclear weapons facilities and nuclear power plants to the IAEA as the president suggests other countries do. No country, including the United States of America, should be above the laws and treaties that are signed.

James McGuinness

Check out my MySpace page.

Find me on MySpace and be my friend!
Shundahai Network
6328 W Dayton Ave.
Las Vegas, NV 89107-2597

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

5/15/2008

McIntire, Sara

Page 1 of 1

PC_2099

Levens, Matthew

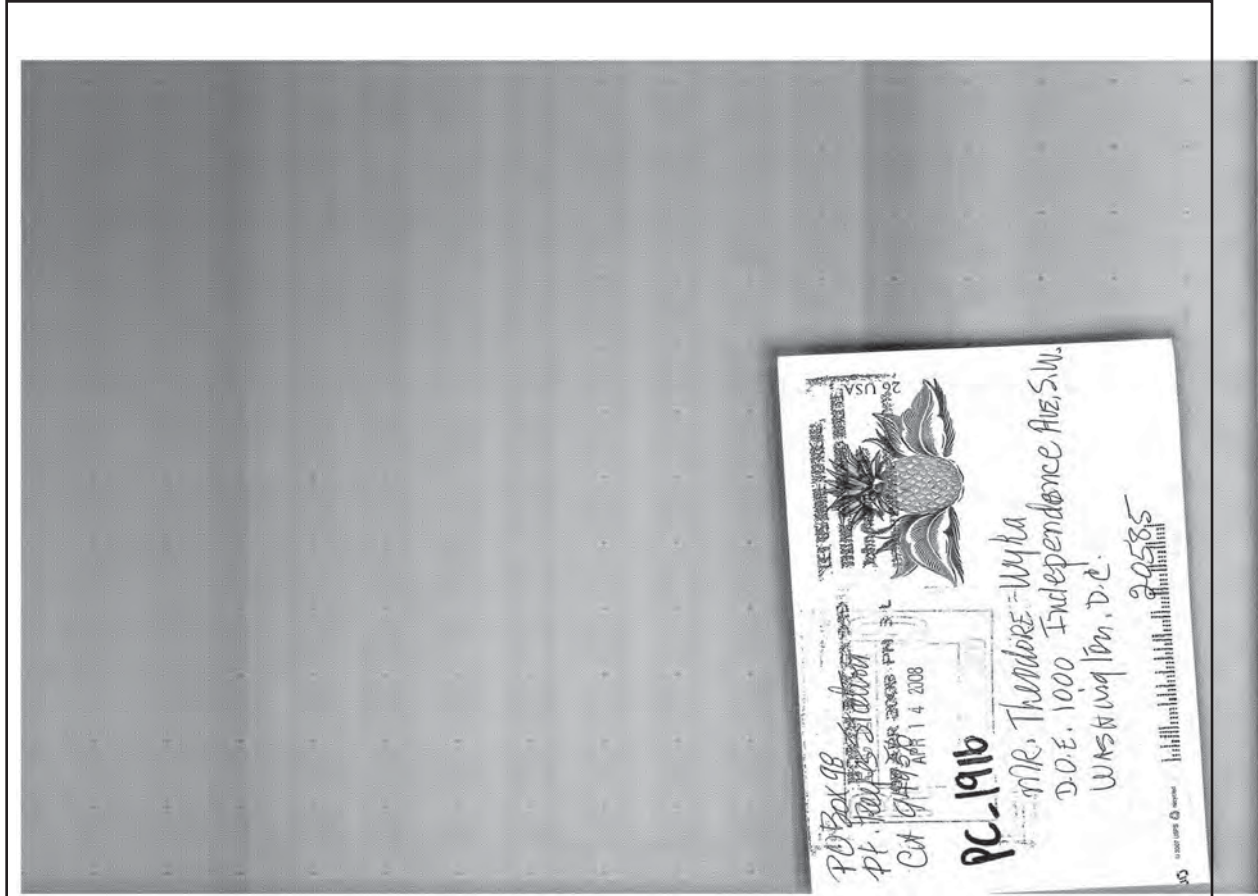
From: Sara McIntire [sisiaras@live.com]
Sent: Saturday, April 12, 2008 11:21 AM
To: Complex2030

116A I strongly oppose increased plutonium pit production at Los Alamos Labs. I think the future holds more complex challenges which will not be solved by bombs of any kind. A more sensible use of these facilities would be to research better ways of disposing of already existing radioactive waste and deterring warheads, cleaning our soil and water supplies and developing non-toxic renewable energy sources. To paraphrase a really smart guy, we can't solve our problems using the same thinking that created them. We need a science that works with nature rather than attempting to alter and abolish natural laws with disastrous consequences. We also need a society that does not depend on war and the threat of war for our economic security.

209B

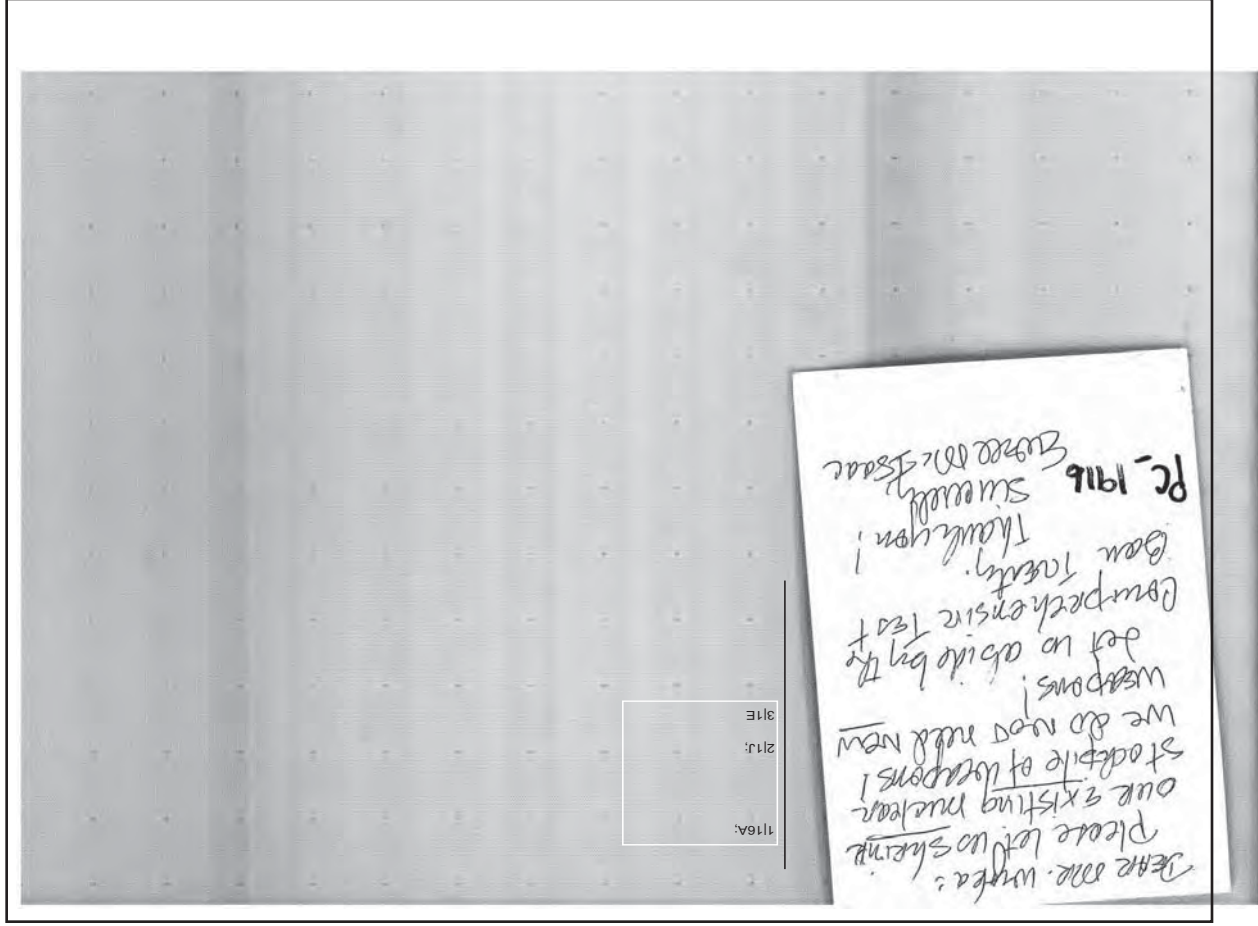
Mcisaac, Ewall

Page 1 of 2



Mcisaac, Ewall

Page 2 of 2



Mckee, Ann

Page 1 of 1

Buenafior, Justin

From: GNSH Sister Ann McKee [annmckee@greynun.org]
Sent: Friday, March 14, 2008 2:30 PM
To: Complex2030
Subject: CMRR

GNSH Sister Ann McKee
9168 New Falls Road
Fallsington, PA 19054-1805

March 14, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

I am a Roman Catholic Religious Sister in Pennsylvania and have taught elementary school in six states of our country.

I believe strongly that a substance with death-dealing waste products should not be used until we can safely dispose of the waste (safely excludes burying it to poison future generations and using it in weaponry that poisons the earth, air and water of the globe)

1114M

I oppose the CMRR project. I ask you to please stop the administration's plans to modify nuclear facilities across the country. I oppose action which would make it easier for the U.S. to rebuild its nuclear arsenal. Nuclear is not safe for anybody.

2116A

I strongly believe that use of nuclear weapons contaminate the ground that is blasted with it, the ground in which we bury the waste that we know not how to handle, the food chain of all living creatures, and the very air we breathe (it blows around the globe remember).

3114O

Note the horrible birth defects of babies born in Iraq and near Chernobyl. What we do to others is going to come right back into your body systems as well as mine.

411J

How do demand that other countries stop while we continue?

515J

I consider depleted uranium in the same category as nuclear weapons as far as its damage to earth, air, water and life.

2116A (cont.)

I ask that you vote in such a way as to halt the CMRR Project no matter what name is given to it, and any other proliferation of nuclear weaponry, especially in light of our governments propensity to preintive action.

Thank you.

Sincerely,

Sister Ann McKee, GNSH

215-269-9783

PC_487

Mckenzie, Jeannie

Page 1 of 1

Levens, Matthew

From: Jeannie McKenzie [jmckenzie@jliamorganschool.org]
Sent: Thursday, April 10, 2008 12:59 AM
To: Complex2030
Subject: reject more nuclear weapons!

Dear Mr Wyka,

We need to be dismantling our nuclear complex and cleaning up from the past 65 years of nuclear follies!

Please don't fund ANY further nuclear weapon research! Our children's grandchildren deserve a planet free from nuclear madness. They deserve a planet that is habitable. Further nuclear weapon research does NOT make the world a safer place for humanity!

Sincerely,
Jeannie McKenzie

1116A
2114O

PC_2002

Mckirgan, Sally

Page 1 of 1

PC_913

March 28, 2008

U.S. Dept. DOE

Jed Wyka NA-101

Complex Transformation Comment

Due: Apr 10, 2008

Mr. Wyka:

I oppose all nuclear weapons plants -- The Complex Transformation Plan. Build No NEW DUMBS. Instead, honor the 1970 Non-Proliferation Treaty.

Thank-you,

Sally Mckirgan

351 Bridge St.

Asheville, NC 28702

116A
21F

Mckittrick, John

Page 1 of 1

PC_91

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 Sirs:

Thank you for this opportunity to address the proposed reconfiguration of the National Nuclear Security Complex.

As a resident of Oak Ridge, I support the plans of the Agency to modernize and bring to bear current technological advances and processes to the Complex. I believe this will bring efficiencies and benefits to the Nation as it works to sustain its nuclear deterrent capabilities in the defense of our Country.

Here in Oak Ridge The Y-12 National Security Complex fulfills several important ongoing roles in the NNSA mission. They do this with an expertise developed over 60 years in uranium technologies and other special nuclear materials. Y-12 has an impressive operational record while at the same time being handicapped by the problems of aging facilities that date to the WWII era and an aging workforce.

In my 20 year tenure in Oak Ridge, I have come to learn and respect the expertise and record of successful operations of Y-12. I am confident and comfortable that as a local resident and those others in my community and the Nation can rely on the continuation of their impressive record. Their attention to safety and work to safeguard our community is evident. Including and enhancing their operations as a part of the proposed plans for reconfiguring the Complex would leverage an existing significant know how and management experiences to higher and more reliant outcomes critical to the Complex's missions in the future.

I encourage the Agency to support:

- To continue the current Y-12 operations and on-going efforts to modernize the Y-12 Complex, particularly the effort to build a new Uranium Production Facility and to support the Distributed Centers of Excellence Alternative.
- Building upon Y-12's excellence as a worldwide center of uranium technology.
- Implementing the Integrated Facilities Disposition Plan to complete the environmental restoration of the site for future mission work.
- Partnering with state and local organizations to develop programs that create a workforce for the future, particularly in the areas of crafts and engineering.

Sincerely,
John D. Mckittrick
John D. Mckittrick
345 Louisiana Avenue
Oak Ridge TN 37830
865-481-3781

2101 (cont.)
37J
4141

115A
2101

Mckittrick, John

Page 1 of 1

Buenafior, Justin

From: John Mckittrick [JMckittrick@ornl.gov]
Sent: Tuesday, February 26, 2008 9:56 AM
To: Complex2030
Subject: Complex Transformation SPEIS

PC_551

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

Dear Sirs:

As a 20 plus year resident of Oak Ridge, I am writing in support of the Departments consideration to make Y-12 a smaller more responsive, more secure, safer and more cost effective operation. Over the years I have gained great respect and appreciation for the expertise and professionalism of the operation of Y-12. I know my family, the residents of our community and our country can rely on the continued safe operation of Y-12. Much has been accomplished while modernization of operations have languished for many years. Reliable outcomes under these circumstances speak highly of the determination and resolve of the management team and the workers at Y-12.

The work at Y-12 is important to the nation and our local leadership supports the Distributed Centers of Excellence alternative. I believe you can depend on their recommendation for this designation as the best for NNSA's future to secure our National capabilities for defense purposes.

I also encourage you to support the need to continue remediate the legacy environmental challenges at Y-12. To do this will enable the modernization to be accomplished in place without expanding operations and broadening the foot print of operations. As I understand this would permit a smaller more efficient operation where existing WWIII facilities now exist. The advantage would be the elimination of legacy environmental issues created years ago in early operations.

Thank you for listening.

John Mckittrick,
345 Louisiana Avenue
Oak Ridge TN 37830
President, ORNL Federal Credit Union

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Mclendon, Bruce

Page 1 of 1

Levens, Matthew

From: Bruce McLendon [mracoll@hotmail.com]
Sent: Thursday, February 14, 2008 2:59 PM
To: Complex2030
Subject: This Citizen's Comment regarding SPEIS, Complex Transformation

PC_394

Mr. Wyka:
Jesus taught love, forgiveness and peace, not nuclear destruction. Promote peace - no new nuclear weapons. Dismantle the nukes. Thank you - peace!

The decision to transform the U.S. nuclear complex must reflect the will of the American people. The majority of us, 79%, 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.

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.

Bruce McLendon
220 E. Philura Ln.
Shelton, WA 98584

McLenon, Dolores

Page 1 of 1

Levens, Matthew

PC_391

From: bobdolmc@juno.com
Sent: Monday, March 17, 2008 11:01 AM
To: Complex2030
Subject: rebuilding Nuclear weapons

I dear Mr. Wyka, I want to express my opposition to building new nuclear weapons. We already have more weapons than we need. We are encouraging other countries to destroy their nuclear weapon stockpiles and yet we are building ours up. This does not make any sense. This is a very dangerous situation. Not only is it dangerous to U.S. citizens, but to the whole world. It is illegal because it violates the Nuclear Non-Proliferation Treaty. Please, please do not continue on this dangerous course. As our representative, I urge you to vote against this plan. Sincerely, Dolores McLenon bobdolmc@juno.com

McMahon, Maryann

Page 1 of 1

Levens, Matthew

PC_1157

From: Maryann McMahon [mmcmahon@racinedominicans.org]
Sent: Thursday, March 27, 2008 1:43 PM
To: Complex2030
Subject: I Oppose New Nuclear Weapons

Maryann McMahon
1247 Villa Street
Racine, WI 53403-1854

March 27, 2008
Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A |As a constituent and health care provider, I strongly oppose the development of new nuclear weapons or increasing our own capacity to build new nuclear warheads and weapons.

We already have enough ways in which to wreck havoc on other human beings . We need to develop our skills in conflict resolution, diplomacy and consensus building for the sake of the common good of all humanity.

Please use your voice and vote to halt the proliferation of weapons of mass destruction and help us move towards global peace.

Thank you for your kind consideration of this request.

Sincerely,

Maryann McMahon
2626330751

McMullen, Penny

Page 1 of 2

McMullen, Penny

Page 2 of 2

PC_2083

Levens, Matthew

From: penny.mcmullen [pmsl@cybermesa.com]
Sent: Monday, April 28, 2008 12:42 PM
To: Complex2080
Cc: Sen. Timothy Jennings; Speaker Ben Lujan; tom.uda@mail.house.gov; Senator Jeff Bingaman
Subject: dCTPEIS

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,

I am concerned about the Department of Energy (DOE) proposal Complex Transformation, which will expand nuclear pit manufacturing at Los Alamos National Laboratory (LANL).

I live in North Central New Mexico, which has been and will continue to be impacted by nuclear pits manufacturing at LANL through air emissions, discharges to water and burial of waste in the land.

A concern for me 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. While there may not be large commercial farms, many Northern New Mexico residents have organic vegetable gardens, and some sell their produce at the Farmers' Market.

I buy some of my produce at the Farmers' Market because it is organic and local (lessening the impact of global warming by not buying from farms that transport long distances).

I have seen the results of testing of vegetables, which show plutonium and other toxic materials in their vegetables (which were grown organically) as far as the Las Vegas area. This is a crime that must not be continued. Note that the area of impact is larger than the 50-mile radius that LANL uses as their definition of "vicinity" or "region of influence."

Some families also have grazing animals -- although most of these families raise their livestock for their families and not for market; they still have the right to protect their animals from harm. I have heard and read testimonies of families whose animals died very soon after the Cerro Grande fire.

Recent studies show that there are radionuclides in the Rio Grande - water that New Mexicans depend upon for their gardens and livestock.

Before the Atomic Energy Commission arrived on the Pajarito Plateau in 1943, all this land was prime farmland. It is unreasonable that LANL would take these farms and then argue that they can expand nuclear production because they think there are no farms in the area!

This dCTPEIS is a huge document that includes many serious issues, and the public therefore needs more time to study the dCTPEIS and provide informed comments to DOE. Citizens have just recently noticed that the proposal did not adequately consider the farming life style of Northern NM citizens. It is unconscionable to refuse to allow the 90-day extension of time that so many citizens have requested.

DOE must retract the draft Complex Transformation Supplemental Programmatic Environmental Impact Statement (dCTSPSIS) and reassess the LANL impacts to agriculture. Then DOE must

submit the revised draft to the public for review and public comment.
 Sincerely,

Penelope McMullen, SL
 NM Justice and Peace Coordinator
 Loretto Community
 113 Camino Santiago
 Santa Fe, NM 87501

505-983-1251
 pmsl@cybermesa.com

also cc: Senator Pete Domenici at (505) 988-6511, fax (505) 988-6514
 Governor Bill Richardson at (505) 476-2200

PC_2083

McNair, David

Page 1 of 1

Levens, Matthew

From: McNair, David G (DESJC) [David.McNair@da.mil]
Sent: Tuesday, March 18, 2008 2:33 PM
To: Complex2030
Subject: Opinion

PC_653

The Nuclear program I support , we need too implement plants and take care of our own. Our country is in a real mess and hopefully one day the light will go on to more americans and support issues that are crucial. instead of talking meeting after meeting and wasting time and money. I feel we need to re-coup some money that our country just seems to give away too other countries that don't deserve it , because they don't pay into it, and put it into energy that our generations will prosper from.

115A When I say they I mean anyone who drains our system, instead of paying into it. I have payed taxes, never collected un-employment and served my country in the U.S. Navy and am very proud to be an American. I just have concerns for the direction the country is going. I support this program , and just wish our leaders would see this, around and around we go and lately nothing seems to be working well, the war is a major drain, my son is in it and I am proud of him , very proud but what a drain on this country, once one of the riches countries, but we are falling fast, I went on a tour of Rancho-Secco years ago when I was in school, it was built opened and closed just like that, where do people really think they are going to get energy, or do they really care? I don't think a lot of people really have the full picture of the direction this country is going, all of a sudden our country is in a mess and a lot of people are back tracking, its all about short term goals first, and then working towards the long term goal, too much starting something and not finishing, and oh yes the politics. I love this country and am proud and want to stay this way, and really I do care about everyone's needs, not just mine. Thankyou for listening,
David

Mcnamara, Kevin

Page 1 of 1

Levens, Matthew

From: kevin.mcnamara [kmcnamara12000@yahoo.com]
Sent: Tuesday, April 15, 2008 8:46 PM
To: Complex2030
Subject: no new nukes

PC_1423

kevin.mcnamara
713 kelly way
rio vista, CA 94571-1263

April 15, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

11J. 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 fore go developing nuclear arsenals, we are simultaneously trying to increase our own capacity to build new 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,

kevin.mcnamara

Mcneil, Stephen

Page 1 of 2

Levens, Matthew

From: Stephen McNeil (SMcNeil@afsc.org)
Sent: Thursday, April 10, 2008 6:59 PM
To: Complex2030
Subject: AFSC San Francisco Written Testimony

PC_507

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, S.W.

Washington, D.C., 20585

Dear Friends:

The American Friends Service Committee is a Quaker organization which includes people of various faiths who are committed to social justice, peace and humanitarian service. Its work is based on the belief in the worth of every person and faith in the power of love to overcome violence and injustice. No one group speaks for the Religious Society of Friends that guides our AFSC work. Others from AFSC may speak and write about other concerns of going forward with this proposal for restructuring the nation's nuclear weapons infrastructure.

In this statement I wish to speak from the basis of AFSC's relationships with survivors of production and use of atomic weapons.

After five years of occupation of Iraq and Afghanistan, we are beginning to be aware of the human cost of the war -- over a trillion dollars to wage the wars, over 4,000 U.S. military deaths and upwards to six hundred thousand Iraqi deaths. Out of the over one million who have served in Iraq and Afghanistan, 27,000 wounded and through 2005 over six thousand military suicides -- with many more suffering military personnel and their families who will pay the costs for the rest of their lives. We have an infrastructure in Iraq and in the U.S. that are weakened more than before the occupation and invasions. Now the Administration, through this Complex Transformation, proposes to spend about \$6 billion a year on a set of facilities that might not be needed.

The proposal for the Complex Transformation, the environmental impact statement, and the Administration's FY 2009 budget requests for \$10 million for the Reliable Replacement Warhead and \$100 million to begin construction on a new plutonium pit facility -- all of these -- do not take into account the human costs of production, waste

2/9A

3/9C

Mcneil, Stephen

Page 2 of 2

3/9C storage, and waging war with these old and new nuclear weapons. AFSC has worked with hibakusha/survivors of the Hiroshima and Nagasaki bombings, "downwinders" from several States where extraction and testing occurred, and the Pacific Islanders such as the Marshallese who survived the testing and others who now experience the testing of missiles from Vandenberg Air Force Base here in California. We have seen the effects of testing and extraction on indigenous communities within our own borders. We believe that the true costs of the Complex Transformation have not been taken into account these environmental and human costs incurred in the past and proposed for the future.

5/1C AFSC agrees with the testimony of one former Lab worker submitted at the March 19th public hearing in Livermore: the first step before restructuring is to settle the national nuclear policy questions in nuclear weapons, nuclear energy, and nuclear nonproliferation. The last Nuclear Posture Review was in 2001. Congress has mandated a new review before proceeding to fund any proposal.

6/1F For over 25 years Quakers and others have come out to the gates of the Lawrence Livermore Lab to witness against continuation of nuclear weapons development and testing. This proposal simply continues the U.S. government intent to develop new nuclear weapons. At a time when we are pushing others to follow the spirit of the Nonproliferation Treaty, we must embody compliance with the Treaty's call for governments to dismantle their nuclear weapons and infrastructures. While we appreciate the limitations of the hearings "accepting" policy comments, we believe these questions need to be answered before a dime is spent.

7/16A We oppose going forward with this proposal.

In the Spirit,

Stephen McNeil

Assistant Regional Director for Peacebuilding and Relief

American Friends Service Committee

65 Ninth Street

San Francisco, CA 94103

(415) 565-0201 x12

(415) 565-0204 (fax)

(415) 350-9305 (cell)

Mephearson, Michael

Page 1 of 1

Medell, Erin

Page 1 of 2

02/16/2007 05:27 FAX 0001

UNOFFICIAL BALLOT PC_938
 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.

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

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

COMMENTS: Nuclear weapon proliferation and global warming are most probably the defining issues of our time. The best way to solve proliferation is to rid the world of acceptable arsenals and use of the terrible weapon. As long as any country has nuclear arsenals will attempt to acquire them. If the most powerful economic and military nation in the world believes it must have a nuclear arsenal, why wouldn't the rest?

NAME: Michael T. McPhearson
 ADDRESS: 1028 Oakview Place Apt 35
 Saint Louis, MO 63110
 SIGNATURE: [Signature] DATE: 26 April 2007

19A

21F

39B:

41J

PC_466

Buenaflor, Justin

From: Erin Nicole Medell [emedell@emich.edu]
 Sent: Thursday, February 21, 2008 1:37 AM
 To: Complex2030
 Subject: Re: "Draft Complex Transformation SPEIS Comments."

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@nrsa.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).

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 or 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?

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, tornadoes or lightning, 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 9-11?

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, North 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.

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 214N
 31J

Medell, Erin

Page 2 of 2

I look forward to hearing from you that the decision makers will take the wiser route of not issuing a clearance of environmental impact for building "Complex Transformation".

Sincerely,

Erin Medell
6082 Cottrawood
Clarkston, MI, 48346
emedell@emich.edu

PC_466

Medrano, Margarita

Page 1 of 1

Levens, Matthew

From: mmedrano@ausih.r.com
Sent: Saturday, April 05, 2008 3:24 PM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

PC_1652

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|1N As a liberal/progressive Democrat, I am not supporting Barack Obama because of his plan to
2|15A use nuclear energy to decrease our reliance on oil. 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|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.

4|16A Instead of recreating the capacity to produce new, unnecessary nuclear weapons, the DOE
should focus on shrinking the still-over-sized 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,
Margarita Medrano
5605 Palisade Ct
Austin, TX 78731
cc:
Senator Kay Hutchison
Senator John Cornyn
Representative Michael McCaul

Meeker, Carlene

Page 1 of 1

Levens, Matthew

From: Carlene Meeker [cmeeker@hotmail.com]
Sent: Thursday, February 14, 2008 3:48 PM
To: Complex2030
Subject: Citizen Comment regarding SPEIS, Complex Transformation

PC_399

Mr. Wyka:
TO: The Department of Energy
RE: SPEIS
The Department of Energy should not be expanding its nuclear weapons program. It should be working to eliminate nuclear weapons.
It should be putting its resources into nuclear cleanup and containment, and focusing on green energy research, not the expansion of a new nuclear weapons program.
The majority of Americans want the United States to lead the world in the elimination of nuclear weapons.

It is particularly disturbing in the face of Congress' rejection of the Reliable Replacement Warhead program, that the SPEIS still refers to a goal of creating 120-125 new warheads every year.

Why??
We have enough!!
These new warheads are unwanted and unnecessary. Last year the Jason's Report showed that the current U.S. nuclear stockpile will remain reliable for at least another 70 years.

70 years. If those stockpiles leak, or are contaminated, or blow up, or there's a nuclear accident, they pose a monumental threat to the earth's population. For crissakes they're dangerous.
Would you guys know how to shut down a nuclear accident? I doubt that you do.

There is no reason to rush into a costly new program to build more nuclear weapons. We have enough!!

Do the right thing. The world has to change. We cannot continue living like this.
PUT AN END TO NUCLEAR WEAPONS NOW.

Sincerely,
Carlene Meeker
February 14, 2008
Valentine's Day
Carlene Meeker
208 Orient Avenue
East Boston, MA 2128

Meeks, Mark

Page 1 of 1

Levens, Matthew

From: Mark Meeks [mkenosha@aol.com]
Sent: Tuesday, April 15, 2008 5:51 PM
To: Complex2030
Subject: Nuclear Weapons

PC_1456

Mark Meeks
399 Blackbird Dr.
Bailey, CO 80421-2077
April 15, 2008
Complex Transformation Department of Energy

Complex Transformation Department of Energy:
I want to be sure to be included in opposition to our country building more nuclear warheads. It is my most deeply held conviction that nuclear weapons make us all less secure and in greater danger, and that we are better served by concerted efforts to remove all nuclear weaponry from our world. Therefore, I oppose any efforts to update weaponry, build new facilities for their production, or do anything else that prolongs our dependence on such weapons and the threat they pose in being used.

I urge you to use your influence in Congress to uphold previous Congressional opposition to attempts to upgrade the nuclear arsenal and to help lead our world to freedom from entanglement from such weaponry. I do not think we as a nation can exercise moral leadership in removing threats from weapons of mass destruction as long as we are ourselves expending resources to maintain such an arsenal.

Sincerely,
Mark Meeks
303 816 1454

Meier, Charles

Page 1 of 2

PC_1053

Nuclear Weapons Complex Transformation – Public Hearing 3/19/08 6:00 PM

My name is Chuck Meier and I worked at Lawrence Livermore National Laboratory for more 35 years. I was involved in many programs at the Lab and, in 1992, I led the effort to produce the first Site Wide Environmental Impact Statement. I am well familiar with the process we are involved in here today. I know that there will be decisions that will not lessen the concerns of the many who believe that nuclear weapons work should not continue at Lawrence Lab. Their preferred option is a science oriented green lab. As I see it, the Complex Transformation Proposed Option moves Lawrence Livermore Lab singularly, more than at any other DOE site, in the direction of being wholly a research laboratory without the development phase of nuclear weapons, thereby paving the way for removal of special nuclear materials at Livermore. For those in the community whose concerns are truly environmental and not political, this is a significant step in the right direction. Those who would see it done sooner than proposed in the draft SPEIS can legitimately question the time frame for this transition. I support an accelerated schedule for the removal of special nuclear materials to other sites, but not because of safeguards, security, or environmental concerns. My concern is that funding for programs such as this starts out with a bang and often wanes with time, stretching out schedules far beyond those assumed.

As for my own comments on the draft SPEIS, I only have one, but I do consider it substantive. I note that the document does not consider the potential

115A

Livermore, CA

Meier, Charles

Page 2 of 2

211A

consolidation of the Sandia Livermore and Lawrence Livermore Laboratory sites. With the closure of East Avenue, there does seem to be an artificial and superfluous separation of the two sites. Clearly this results in a duplication of a number of facilities and administrative forces such as security and Plant Engineering. With the Department of Energy's stated goal of providing a smaller, safer, and less expensive complex for the continued support of our nuclear weapons efforts, I feel this is a significant oversight. I hope you will seriously evaluate this possibility and not dismiss it for reasons that may be more political than practical. Thank you.

Charles Meier
6597 Lausing Ct.
Pleasanton, CA 94566

Meier, Helen

Page 1 of 1



PC_300

Quality end-of-life care and grief support since 1980

6500 Dublin Blvd., Suite 100 • Dublin, CA 94568 • Phone: 925-829-8770 • Fax: 925-829-8888 • Email: info@hopehospice.com • www.hopehospice.com

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

Dear Mr. Wyka:

Lawrence Livermore National Laboratory is a very important presence in our local community. Each year many lab employees support local social service providers by donating through the HOME Campaign and giving of their time as volunteers. Hope Hospice has been the recipient of the generosity of LLNL employees. This year we are also very grateful for the matching gift program the lab has just initiated.

Hope Hospice, and many other local charities, would feel a dramatic impact should the lab be closed. The generous donations of time and money provided by LLNL employees would be lost. Downsizing or closing the lab would undoubtedly also have a profound negative impact on the local economy making it difficult or impossible for other community members to continue their support of the non-profit social service sector.

We hope that any changes the Department of Energy might consider making will include considering the impact on the local economy and social service sector.

Yours truly,

Helen Meier
Executive Director

118F

218C

314I

Mertens, Stephanie

Page 1 of 1

Levens, Matthew

PC_748

Stephanie Mertens [mertens@adorners.org]
Thursday, March 13, 2008 3:43 PM
Complex2030
NO New Nuclear Weapons!

Stephanie Mertens
2 Pioneer Lane
Red Bud, IL 62278-2640

March 13, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

I am the coordinator of the Justice and Peace Office of the Adorners of the Blood of Christ, an international congregation with women religious missionaries, located in nearly every country around the world. I have served in the ASC Justice and Peace Office in Southern Illinois, St. Louis and Jefferson City, Missouri for a total of at least 25 years. My attention to the question of the danger of nuclear facilities and weapons leads me to be unconditionally opposed to the administration's proposal to build a plant to produce plutonium pits for nuclear weapons. The expansion of nuclear capability is an undesirable prospect for the US and the world!
It is not only the negative dimension of the production of the weapons, but also the unanswered question after the fact of how to handle the waste generated by nuclear weapons that must be attended to. The production of a new nuclear facility would be a giant step backward for the US and our global society. The life of all people and the planet is threatened by the growth of and spread of nuclear weapons. This is an undeniable fact. We must not go in that direction.

Sincerely,

Stephanie Mertens

116A

Metcalf, Lila

Page 1 of 1

Levens, Matthew

PC_793

From: Wyka, Ted
Sent: Friday, February 22, 2008 9:59 AM
To: Complex2030
Subject: Fw: Support for Distributed Centers of Excellence

----- Original Message -----
From: Metcalf, Lila <lila.Metcalf@rau.org>
To: Wyka, Ted
Sent: Fri Feb 22 09:58:06 2008
Subject: Support for Distributed Centers of Excellence

Dear Sir,

I would like to voice my support of the Distributed Center of Excellence plan for the Y-12 National Security Complex in Oak Ridge, TN. This plan will enhance Y-12's long term role in supporting the weapons stockpile, improve safety and security and improve environmental conditions at the site. I want the "specialized uranium mission at Y-12" to continue and for the design of a new uranium processing facility there to proceed.

Lila Metcalf
117 Danbury Drive
Oak Ridge, TN 37830
856-483-5046

Meyer, Alfred

Page 1 of 2

Levens, Matthew

PC_357

From: Alfred Meyer [ameyer@anuclear.org]
Sent: Tuesday, January 15, 2008 5:27 PM
To: Complex2030
Subject: RE: Web posting of Complex Transformation Background Documents

Mr. Wyka,

Thank you very much for your reply and the good news that the documents are being posted. Can you please tell me if you expect to be posting any more documents than those currently posted at: http://www.complextransformationspeis.com/links_ref_pdfs.html ?

Also, are any of the background documents located at a URL different than that noted above?

Thank you,
Alfred Meyer
Alfred Meyer, Program Director
Alliance for Nuclear Accountability
322 4th Street NE
Washington, DC 20002
202-544-0217
202-544-6143 Fax
www.anuclear.org
ameyer<at>anuclear.org

-----Original Message-----
From: Complex2030 [mailto:Complex2030@mnsa.doe.gov]
Sent: Tuesday, January 15, 2008 1:37 PM
To: Alfred Meyer
Subject: RE: Web posting of Complex Transformation Background Documents

Mr. Meyer

The background documents are being posted on www.complextransformationspeis.com.

Regards,
Ted Wyka

-----Original Message-----
From: Alfred Meyer [mailto:ameyer@anuclear.org]
Sent: Monday, January 14, 2008 3:14 PM
To: Complex2030
Subject: Web posting of Complex Transformation Background Documents

Dear Mr. Wyka,

Can you please inform me if the background documents used for developing the Complex Transformation SPEIS have been posted on the web for public access?

When a group from the Alliance for Nuclear Accountability met with Mr. Thomas D'Agostino in April 2007, we asked that these documents be made available for easy public reference when reviewing the Draft SPEIS.

Meyer, Alfred

Page 2 of 2

PC_357

I have looked on the www.nrsa.doe.gov website, but do not find such documents.

Please let me know if such documents are or will be posted for public access, and when and where they will be posted.

Thank you,

Alfred Meyer, Program Director

Alliance for Nuclear Accountability

322 4th Street NE

Washington, DC 20002

202-544-0217

202-544-6143 fax

www.ananuclear.org

ameyer<at>ananuclear.org

Meyer, Alfred

Page 1 of 5

Alliance for Nuclear Accountability

A national network of organizations working to address issues of nuclear weapons production and waste cleanup

PC_1045

Mr. Ted Wyles, NNSA
Office of Transformation NA-10.1
1000 Independence Ave., S.W.
Washington, D.C. 20585

March 25, 2008

Oral Comments presented at the Washington, DC Complex Transformation Draft SPEIS Hearing

On page S-57, the Draft SPEIS lists suggested alternatives that have been eliminated from detailed study. The alternative called "Pursue Dismantlement and Refrain from Designing and Building New Nuclear Weapons" is second on the list of eliminated alternatives.

Representing the Alliance for Nuclear Accountability and its 35 member organizations, I am here to explain why the alternative that we call the "No Production Alternative" must be studied in detail if this NEPA process is to fulfill its purpose.

The No Production Alternative represents a true transformation of the Complex. It will save money and protect the environment.

17.0

The No Production Alternative defines how the Nuclear Weapons Complex should be maintained. The purpose of this Alternative is to support dismantlement, disposition of fissile and waste materials, and environmental cleanup. Until all weapons are dismantled, the complex will continue to certify the remaining stockpile and monitor its safety, security and reliability. The objective of this alternative is curtailment of the decreasing stockpile instead of production of new nuclear warheads.

The No Production Alternative offers environmental consequences which are significantly different than any of the production based alternatives. It puts major resources into dismantlement and cleanup, while at the same time, omitting new weapons production and the resulting environmental pollution. The combined effects will speed the improvement of environmental public health conditions and minimize any additional environmental degradation. These are significant long-term consequences which merit further study.

Washington, DC Office: 322 4th Street NE, Washington, DC 20002, 202-544-0217, fax 202-544-6143
www.ananuclear.org

washington, DC

Meyer, Alfred

Page 2 of 5

17.0 (cont)

25C.1

31.F

17.0 (cont)

The No Production Alternative is a reasonable alternative for maintaining a safe, secure, and reliable nuclear weapons stockpile. The Capability-Based Alternative has very different environmental impacts, and this does not substitute for the No Production Alternative.

Given the results of the Pit Lifetime Study, and the existing Stockpile Stewardship programs, there is no evidence that refurbished manufacturing facilities are needed.

Furthermore, if the US and DOE are genuinely working to satisfy Article VI of the Nuclear Nonproliferation Treaty, which is the legal obligation for nuclear weapons states to reduce and eliminate nuclear weapons, then the nuclear weapons complex must be guided by the only logical alternative, the No Production Alternative.

Alfred Meyer, Program Director

[A detailed description of the No Production Alternative accompanies this statement.]

Alliance for Nuclear Accountability

A national network of organizations working to address issues of nuclear weapons production and waste cleanup

No Production Alternative

Under the No Production Alternative, the 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.

Weapons Design and Certification

The need for weapons design activities will shift; some weapons design capacities will need to be maintained to address possible questions that arise during decommissioning, disassembly, dismantlement and disposition of the stockpile.

Maintaining three fully equipped national laboratories will not be necessary; consolidation of required laboratory-based activities will result in considerable savings—economic as well as environmental, savings that could be dedicated to addressing environmental concerns across the weapons complex.

Plutonium Operations and Pit Manufacture

Plutonium operations requirements will 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) that 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.

All plutonium should be placed under international monitoring and administrative control at the earliest possible moment.

The need for pit manufacture 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.

17.0 (cont)

Meyer, Alfred

Page 4 of 5

2

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, 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
 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.

The need for High Explosives Production for nuclear weapons would no longer exist. Bench-scale facilities might be maintained until all questions about stability of HEX during disassembly/dismantlement operations are resolved.

Category 1/II SNM Storage
 Co-location of storage facilities for some or all Category I/II SNM materials under international administrative control should be analyzed. Issues of safety and security that 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. 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.

High Explosives R&D
 High Explosives R&D will cease.

Flight Test Operations
 Flight Test Operations for nuclear weapons delivery systems will cease. Decommissioning, 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.

Major Environmental Test Facilities

117.0
(cont)

Meyer, Alfred

Page 5 of 5

3

117.0
(cont)

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. 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 will lead the way to addressing the horrendous environmental legacy of nuclear weapons production. By closing the complex our tax dollars can be redirected to clean up and remediate the health and environmental impacts to communities down wind and downstream from the weapons complex sites.
- The No Production Alternative can enhance the economic status of the communities in which facilities are located. Directing the efforts of the workforce toward dismantlement of warheads and cleaning up the weapon production sites will create jobs and improve the environmental quality of the communities. When sites are cleaned they become available for other economic development opportunities.
- The No Production Alternative is the only alternative that fulfills the United States' obligations for disarmament under Article 6 of the Nuclear Nonproliferation Treaty. Further, it is the only alternative in which the United States complies with the 1996 World Court opinion that the threat or use of nuclear weapons is contrary to the rules of international law.
- The No Production Alternative provides the United States leadership called for by arms control, diplomatic and military leaders.
- The No Production Alternative will enhance security for the United States by stopping the global momentum toward nuclear proliferation and increase security for every country.

Alfred Meyer, Program Director
 March 25, 2008

117.0
(cont)

Meyer, Axel

Page 1 of 1

Levens, Matthew

From: Axel Meyer [ameyer@niuedu]
Sent: Tuesday, February 19, 2008 6:10 PM
To: Complex2030
Subject: CMRR project

Axel Meyer
 739 W. Hillcrest Dr.
 DeKalb, IL 60115-1627

February 19, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

As a physicist with nuclear background at Oak Ridge National Laboratory from 1959-1967, I am deeply concerned about the administration's proposal to further erode the Nuclear Non-Proliferation Treaty by building a new plant to produce plutonium pits (triggers) for nuclear weapons. Reportedly, the Chemistry and Metallurgy Research Replacement (CMRR) project would be able to produce 80 plutonium pits annually, the first major nuclear warhead production since the end of the Cold War.

After the tragedy of Hiroshima and Nagasaki and the ridiculously large build up of nuclear weapons during the cold war to over 50,000 weapons in the U.S. and Russia (enough to blow up the world several times over), it is mind-boggling that we are now planning to mass produce more such weapons.

Building this plant would send a contradictory message to other countries, such as Iran, seeking to build nuclear weapons of their own. While the U.S. is asking others to forego developing nuclear arsenals, here we are seeking to increase our own capacity to build new weapons.

Congress stopped the Energy Department's last attempts to upgrade our arsenal by defunding the Reliable Replacement Warhead and a proposed large-scale bomb plant. The proposed CMRR project is another irresponsible new program that Congress should soundly reject.

Sincerely,

Axel Meyer, Physics Professor Emeritus, Northern Ill. Univ.
 815/758-0796

PC_377

Meyer, Coleen

Page 1 of 1

Buenafior, Delight

From: Coleen T Meyer [coleen@lanl.gov]
Sent: Thursday, April 10, 2008 10:26 AM
To: DIV,Complex,Transformation
Subject: Form posted from Windows Internet Explorer.

Last Name=Meyer
 First Name=Coleen
 Email Address=coleen@lanl.gov
 Street Address=2167A 35th Street
 City=Los Alamos
 State=NM
 ZIP Code=87544

Comments=I do not think this plan puts enough emphasis on science, especially pure science. Pure science is the building block of all other applications, weapons or otherwise. That it is not seen as cost effective or a profit center should not be a factor in making the right choices. That is a contractor's argument. DOE/NNSA should be making the right choices for the country, not contractors.

116A

This plan also raises a security risk of "having all our eggs in one basket". A program can be significantly targeted and maybe wiped out by being concentrated in one location.

213A

Spreading out programs across different sites lessens that risk and introduces diversity of ideas, too.

1

Meyer, Karl

Page 1 of 2

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

PC_178



2-26-2008

Written Comment Form

Must be received on or before April 10, 2008.



My name is Karl Meyer from Nashville, Tennessee, a community devoted to a sustainable natural environment for a world community based on peace. I am 70 years old. I was raised under the shadow of the atomic bombs that were created in part here at Oak Ridge. I was eight years old when two of these bombs were dropped at Hiroshima and Nagasaki, and I have devoted a large part of my adult life working for genuine world security, based on eliminating all nuclear weapons, the abolition of war, and a world community that would be safe for all people, rooted in peaceful international cooperation.

There are no such things as safe and secure nuclear weapons. They are inherently the most dangerous things on earth. I support your goals of reducing the number of nuclear weapons in the U.S. arsenal, and storing nuclear materials under less dangerous conditions, but I can not support any overall plan that does not aim at total abolition of all nuclear weapons and the least dangerous system for dismantling them and using or storing the radioactive materials left over.

(OVER)

Comment forms may be mailed to: Mr. Theodore Wyke, Complex Transformation SPEIS Document Manager, 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.complextransformation.gov

Meyer, Karl

Page 2 of 2

31F (cont.)

through universal international agreements and treaties.

After 50 years of activism for abolition of nuclear weapons, including a number of months spent in federal prisons, I was recently astounded to be joined in the goal of total abolition by such retired luminaries of the military-industrial-congressional complex as former Secretaries of State: Henry Kissinger, George Schultz, James Baker, Madeline Albright and Colin Powell.

Also, former Defense Secretaries: Robert McNamara, Melvin Laird and Warner Cohen.

And former Georgia Senator Murrin, let's get on to victors and brothers, let's get on with the challenge of eliminating all nuclear weapons, rather than refurbishing at Y-12.

Karl Meyer, Nashville, Tennessee
2407 HEIMAN ST.
NASHVILLE, TN 37208-2415

216A (cont.)

1140

216A

31F

Meyer, Kent
Page 1 of 1

Meyer, Maria
Page 1 of 2

Levens, Matthew

From: Sonny Meyer [sonnym1165@yahoo.com]
Sent: Thursday, April 10, 2008 3:59 PM
To: Complex2030
Subject: our stockpile of nuclear weapons

19H: Mr. Theodore Wyka: I would like say ,as a United States citizen and taxpayer that I am
216A: extremely opposed to any plan to increase or create new nuclear weapons. I sincerely
31F: believe that we should live up to the terms of the nuclear non-proliferation treaty which
we signed long ago. We cannot continue to justify our stockpiling and building new
weapons on one hand and strictly prohibiting other countries from doing the same on the
41J: other. I don't know who put us in charge of the world that we would think that whatever
we do is ok, and what the rest of the world does is ok as long as it is what we want them
to do. All the money spent on our bomb making could be better spent on taking our
59B: citizens out of poverty and helping out our beleaguered health-care system.

Sincerely
Kent R. Meyer
8317 Tamarack Dr.
Shelby Twp., MI. 48317

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PC_2111

PC_955

Maria C. Meyer
Ligatalain Produce @
Santa Fe Farmers Market
411 Apodaca Hill
Santa Fe, NM 87501

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,

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 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.

11441

DOE defines "prime farmlands" as "lands that has the best combination of physical and chemical characteristics for producing food, feed, fiber, forage, oil seed, and other agricultural crops within 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. There exists in Los Alamos a regularly scheduled Farmers Market that meets near the local library, providing fruits and vegetables for the local community. In fact, there are Farmers Markets all over the state of New Mexico (Please visit this website

Meyer, Maria

Page 2 of 2

for details: <http://www.farmersmarketsnm.org/locations.htm>). I am a member of the Santa Fe Farmers Market (<http://www.santafefarmersmarket.com/>) and our membership is over 150 strong, made of 80% farmer/growers and 20% food processors that derive their basic ingredients from local sources, i.e. local prime farmlands. I am in complete disagreement with DOE's claim because every week local farmers/growers, including myself, ranchers, producers, and crafters bring our goods for sale to the community during our very lively, vibrant, and thriving Santa Fe Farmers Market.

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,

SIGNED

Maria C. Meyer

Cc: Senator Pete Domenici
 Senator Jeff Bingaman
 Representative Tom Udall
 Representative Heather Wilson
 Representative Steve Pearce
 Governor Bill Richardson
 President Pro Tempore Tim Jennings
 House Speaker Ben Lujan
 Mr. George Gundry, Executive Director, Santa Fe Farmers Market
 Ms. Joni Arends, Executive Director, Concerned Citizens for Nuclear Safety
 Ms. Sarah Laeng-Gilliatt, Concerned Citizens for Nuclear Safety

11441
(cont)

Meyers, Mary

Page 1 of 1

Levens, Matthew

From: Mary Igoe Meyers [mailto:mimeyers@buckeye-express.com]
 Sent: Friday, March 28, 2008 10:16 PM
 To: Complex2030
 Subject: New Nukes

Mary Igoe Meyers
 1532 Bernath PKY
 Toledo, OH 43615-7323

March 28, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

11K I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons.

21J 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.

Let's not be hypocrites again!

Sincerely,

Mary Igoe Meyers

PC_1811

Michael, Sandra

Page 1 of 1

PC_725

Levens, Matthew

From: Sandra Michael [mailto:sdm1@cox.net]
Sent: Wednesday, January 16, 2008 11:22 PM
To: Complex2030
Subject: Citizen Comment regarding SPEIS, Complex Transformation

Mr. Wyka:
 116A 1. Stop making nuclear warheads. Now.
 27J 2. Clean up the nuclear mess we already have. Now.
 39B 3. Invest in green energy research. Now.

Until you do, you'll continue to prove that Common Sense is an oxymoron.

Sandra Michael
 PO Box 6228
 Scottsdale, AZ 85261

Miller, Ben

Page 1 of 2

Page 1 of 2

PC_381

Levens, Matthew

From: Ben Miller [mailto:bmiller30@gmail.com]
Sent: Tuesday, March 18, 2008 6:59 PM
To: Complex2030
Subject: stop now!!

Dear Administrator D'Agostino,

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.

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.

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 NSSA 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.

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 31F
 41C
 51J
 61F
 71E
 8J5G

4/18/2008

Miller, Ben
Page 2 of 2

Miller, George
Page 1 of 2

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.

Sincerely,

Ben Miller

Page 2 of 2

PC_381

Remarks for Complex Transformation SPEIS Public Hearing
George H. Miller, Director
Lawrence Livermore National Laboratory PC-1005
March 19, 2008

Good afternoon. I'm George Miller, Director of Lawrence Livermore National Laboratory and President of Lawrence Livermore National Security, LLC.

I am here today to comment on NNSA's preferred alternative for transforming the nation's nuclear weapons complex.

It has been clear for some time that the nation has needed a blueprint for the future of the nation's nuclear weapons complex that takes into account the circumstances that have changed since the end of the Cold War. You have provided a preferred alternative that takes important steps toward a smaller, more efficient complex that can effectively support and sustain a smaller stockpile while being good stewards of our environment.

I am pleased that Lawrence Livermore has been named as a center of excellence for nuclear design and engineering, supercomputing and for high explosive research and development. I am especially pleased that NNSA will continue its investment in high-energy-density physics, with the National Ignition Facility as science magnet. These selections recognize and build upon unique Laboratory expertise in nuclear design and engineering, high explosives science, high-energy-density physics, and high-performance computing and simulation. It is a responsible path forward for Livermore and for the nation.

The transformational changes cited in the Preferred Alternative are important. The preferred alternative addresses the need to consolidate special nuclear materials at fewer sites, to shrink the complex, and to replace outdated facilities and processes with modern equivalents that are more cost effective and environmentally responsible.

We strongly support you in your desire to remove Category 1 and 2 special nuclear material from our Laboratory by the year 2012. In fact, two such shipments have already been completed. We will of course continue to maintain the highest level of safety and security onsite during this transition and we will work closely with NNSA to ship this material properly as quickly as is practical.

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310C

115A
(cont)

Miller, George

Page 2 of 2

Miller, Guthrie

Page 1 of 1

310C
(cont)

As you have cited, LLNL plays an important continuing role for our nation in ensuring the safety, security, and reliability of the nation's nuclear deterrent. We look forward to continuing this mission and appreciate NNSA's support in the broader context of helping to ensure global stability through the application of the Laboratory's multidisciplinary science and technology to improve security, meet energy and environment needs, and strengthen U.S. economic competitiveness.

We will do this by building on our core scientific and technical competencies - such as the centers of excellence named in the preferred alternative and by developing new capabilities - particularly in the areas of national security, photon science, simulations, systems engineering, micro- and nano-science, engineering and advanced technology development, energy and environmental sciences, and intelligence.

25C
(cont)

Thank you for this opportunity to comment today and thank you for acknowledging the special and significant role Lawrence Livermore National Lab has in support of the nation.

Levens, Matthew

PC_1755

From: Guthrie Miller (guthriemiller@earthlink.net)
Sent: Wednesday, April 02, 2008 9:44 PM
To: Complex2030
Subject: comment on the Draft Complex Transformation PEIS

Comments on SPEIS Impact Assessments

Guthrie Miller
509 Camino Lejo
Santa Fe, NM 87505

116A My primary concern is about the existence and possible use of nuclear weapons. In 1996 the International Court of Justice, the principal judicial organ of the United Nations, gave an Advisory Opinion about the Legality of the Threat or Use of Nuclear Weapons. The 14 Judges of the Court examined current treaty law, customary rules and State practice with regard to nuclear weapons and, based on their analysis, concluded unanimously that the principles and rules of international humanitarian law apply to the use of nuclear weapons and that the use of nuclear weapons would generally be contrary to the principles and rules of international humanitarian law.

28A I question the development of the alternatives. It seems that transformation is not a consolidation plan. All major nuclear weapons sites are to be retained in NNSA's plan. NNSA's plans to build thousands of new warheads in the RRM program over the next quarter century, which have not been endorsed by the DoD or approved by Congress, while at the same time maintaining and extending the working life of existing warheads until the new RRM's could take their place, appears to undermine the choice of alternatives in the Complex Transformation plan. This set of "reasonable alternatives" are what the political appointees of this administration prefer. They do not stand up well to scrutiny by objective informed observers or to the standards of international humanitarian law.

3170 It has been reported that U.S. first use of nuclear weapons in a "preemptive strike" against Iran has been seriously considered by this administration. This overwhelming and indiscriminate use of military force would be in violation of international humanitarian law. I therefore find it entirely reasonable to insist that the range of reasonable alternatives for the 2030 nuclear weapons complex must embrace options that not only include very deep nuclear stockpile reductions, but also exclude NNSA complex support for weapons and capabilities required to implement illegal preemptive and preventive nuclear attacks.

Miller, Lamura

Page 1 of 1

Levens, Matthew

From: Lamura Miller [lamura@inesplanet.com]
Sent: Friday, March 28, 2008 11:20 AM
To: Complex2030
Subject: Reject "Complex Transformation" plan to build nuclear weapons

Lamura Miller
Rodeo Gulch Rd.
Soquel, CA 95073

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:

1|16A The DOE should reject the Complex Transformation proposal to revamp the nuclear weapons arsenal.

2|1J We have been a country other nations looked up to. What do we wish to be known for? Is death, destruction, fear, peace, harmony, sharing caring what we want to stand for. We must protect what we wish to receive back.

3|1L We are strong enough to protect ourselves now. We only now need to choose what we want to receive back from other nations.

2|1J By building up its nuclear arsenal right now, the US is essentially telling the world, "Do (cont) as I say, not as I do."

Sincerely,

Lamura Miller

PC_1786

Miller, Lee

Page 1 of 1

Levens, Matthew

From: Lee Miller [lee@leeyanmiller.com]
Sent: Tuesday, April 08, 2008 1:38 PM
To: Complex2030
Subject: Reject "Complex Transformation" plan to build nuclear weapons

Lee Miller
409 Magnolia Avenue
Modesto, CA 95354-0321

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|1J I oppose the development of new nuclear weapons. The US should be working to eliminate nuclear weapons, not develop new ones. Furthermore, this would be a waste of taxpayers' money, would create more radioactive contamination, and would undermine efforts to get other countries like Iran and North Korea to eliminate their nuclear programs.

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,

Lee Miller

PC_1428

Miller, Lisa
Page 1 of 1

Miller, Sam
Page 1 of 1

PC_743

Levens, Matthew

From: skidogs3@yahoo.com
Sent: Thursday, March 06, 2008 7:39 PM
To: Complex2030
Subject: Complex Transformation

I am proud of the work I do at Y-12 and I am proud of the role Y-12 plays in keeping my country safe. I am proud of the exceptionally talented and dedicated people I have the privilege to work with on a daily basis. I am excited to see the positive changes taking place at Y-12, which will prepare us to continue our important mission for NNSA for years to come. I had the privilege to moved to the beautiful New Hope Center this summer, and am proud to be part of the transformation of Y-12 into a modern workplace.

My grandfather traveled to Oak Ridge from Sevier County to help build the Y-12 plant over 50 years ago. I was born and raised in East Tennessee, and now I am raising my own family here. I have worked in Oak Ridge for nearly 20 years, and see first hand how important both safety and security are at Y-12. I have family, friends and neighbors who work at both Y-12 and nearby ORNL. I have confidence in Y-12, NNSA, and DOE and their abilities to keep myself and my loved ones safe.

I support the NNSA's nuclear weapons complex transformation option of the Distributed Centers of Excellence Alternative, which would allow Y-12 to continue as the Uranium Center of Excellence. We have a well-trained work force which is dedicated to this site and to this community. Our national security is more important than ever, and our technology and innovations are the envy of many foreign nations and terrorist groups who would love nothing better than to see our country wiped from the globe.

I have no disillusion that closing Y-12 would cause the entire world to hold hands in peace under a blue sky filled with rainbows - it's not going to happen in my lifetime. The best chance my son has to grow up in a free and prosperous United States is for us all to remain ever vigilant against foreign entities which daily preach our harm. Y-12 has helped to make this country strong, and with your support, Y-12 can continue to keep this country strong.

Thank you,
Lisa Miller
10215 Ivy Hollow Drive
Knoxville, TN 37931

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PC_380

Levens, Matthew

From: beatwalker@verizon.net
Sent: Saturday, April 05, 2008 1:05 PM
To: Complex2030
Subject: Comments on 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,

The Department of Energy needs to move forward with plans to consolidate and reduce the nuclear facilities, workforce, and redundant capabilities of our overgrown nuclear weapons system.

But this plan, Complex Transformation, puts far too much emphasis on re-creating new types of nuclear weapons. We do not need the capability to make more or newer nuclear weapons.

The DOE with the DOD should focus on safety and security of our existing weapons arsenal and work to quickly eliminate them entirely.

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.

I'm a veteran of the Korean War and retired hospital technology manager, and very concerned about the safety of the world's nuclear arsenal. Just one accident would be one accident too many.

Thank you,

Sincerely,
SAM MILLER
824 E. FILLMORE AVE.
East Aurora, NY 14052

cc:
Senator Charles Schumer
Representative Brian Higgins
Senator Hillary Clinton

Miller, Virginia

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Miller, Virginia

Page 2 of 3

Levens, Matthew

From: Virginia J Miller [vjimopus@cybermesa.com]
Sent: Wednesday, April 30, 2008 10:43 PM
To: Complex2030
Subject: DOE/NNSA C-T SPEIS public comments
Attachments: March 13 Complex2030 hearing 08.doc



March 13
lex2030 hearin

Attached you will find my public comments for the DOE/NNSA Nuclear Complex Transformation SPEIS. My name and contact information are at the top of the second page. Thank you.
Virginia J. Miller
Santa Fe, NM

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PC_2139

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3|2E

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5|1F;

6|9B

7|7J;

8|1C

DOE/NNSA DRAFT NUCLEAR COMPLEX TRANSFORMATION SUPPLEMENTAL PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT HEARING

This is the revised version of my oral comments at the hearing in Santa Fe on March 13, 2008. Thank you for extending the public comment period to April 30. I was concerned to learn that the SPEIS states that "there are no agricultural activities present at LANL, nor are there any prime farmlands in the vicinity." p. 4-2. LANL is located within the food basket of Northern New Mexico. Many pueblo people farm the land. I rely on local organic produce for my own food supply. Health and creating conditions for health are priorities. The impacts of proposed LANL activities on agriculture in a 50 mile radius must be assessed and the revised draft SPEIS resubmitted for public review and comment. I also request a full 90 day extension to the public comment period until July 8,2008. Thank you very much.

The proposed expansion of nuclear weapons and plutonium pit production in the draft C-T SPEIS for Los Alamos National Lab (LANL) will generate huge amounts of additional radioactive, toxic and hazardous waste, contaminants that will further compromise the health and safety of New Mexicans and both the quantity and quality of our water, and the quality of our land and air. You and I both know this is true without a SPEIS which usually states there is no significant impact. There is a significant impact. The future of New Mexico, our quality of life, our precious water supply, life itself, and a sustainable peace economy are all at stake.

I am sharing my comments with our congressional and state leaders calling on them to use all the nonviolent power at their disposal to stop Complex Transformation and ALL nuclear weapons and pit production at LANL and insist on active U.S. leadership in working for worldwide nuclear disarmament now, as mandated in the Nuclear Non-Proliferation Treaty and the United States Constitution that states treaties are the supreme law of the land. The citizens of New Mexico get to decide. We will let our congressional delegation know what we want, and our state and local leaders, and figure out together how to accomplish our goals. We support our Santa Fe Mayor, David Coss, in saying that nuclear weapons are not a part of our future. We want our leaders to fund cleanup, non-proliferation technology and practices, nuclear disarmament verification technology and practices, and safe and secure storage and monitoring for existing nuclear materials and waste worldwide. This is the critical work that scientists at LANL and SANDIA should be doing. It is time to stop generating new and dangerous nuclear materials and waste, time to end the nuclear cycle in New Mexico where it began. We are responsible.

None of the proposed DOE/NNSA alternatives are acceptable. Funding cleanup is the number one option, the one requested by the New Mexico Environment Department. It is premature to propose expanded nuclear activities based on the outdated Bush Administration's 2001 Nuclear Posture Review when we will soon have new leaders in Washington who will draft new nuclear policy and a 2009 Nuclear Posture Review. It is prudent to wait and not waste our resources and further endanger New Mexico and our planet.

I love this planet. I love this beautiful state. There is no room for weapons of mass destruction in our vision of our future. Let's create good new jobs developing sustainable renewable energy on a small scale throughout our state. That does not include nuclear energy. Let's choose life and prepare for peace and nonviolence. It's entirely possible!

Miller, Virginia

Page 3 of 3

Virginia J. Miller
Legislative Coordinator
NM Department of Peace Initiative
125 Calle Don Jose
Santa Fe NM 87501
505-986-8676

PC_2139

PC_313

March 13, 2008
Santa Fe NM

**DOE/NSA NEW MEXICO NUCLEAR WEAPONS COMPLEX 2030
TRANSFORMATION HEARING**

The proposed nuclear weapons and plutonium pit production Complex 2030 at Los Alamos National Lab (LANL) will generate huge amounts of additional radioactive and chemical waste and will further compromise the health and safety of New Mexicans and the quality of our water, land and air. You and I both know this is true without an EIS which usually states there is no significant impact. **There is a significant impact. The future of New Mexico, our quality of life, our precious water supply and a sustainable peace economy are all at stake.**

1140
216A

I am sharing my comments with our congressional and state leaders calling on them to use all the nonviolent power at their disposal to stop Complex 2030 and ALL nuclear weapons and pit production at LANL and insist on active U.S. leadership in working for worldwide nuclear disarmament now, as mandated in the Nuclear Non-Proliferation Treaty and the United States Constitution. The citizens of New Mexico get to decide. We will let our congressional delegation know what we want, and our state and local leaders, and figure out together how to accomplish our goals. We support our Santa Fe Mayor, David Cross, in saying that nuclear weapons are not a part of our future. We want our leaders to fund cleanup, non-proliferation technology and practices, nuclear disarmament verification technology and practices, and safe and secure storage and monitoring for nuclear materials and waste worldwide for scientists at LANL and SANDIA.

370

41F

58B

I love this planet. I love this beautiful state. There is no room for weapons of mass destruction in our vision of our future. Let's create good new jobs developing sustainable renewable energy on a small scale throughout our state. That does not include nuclear energy. Let's choose life and prepare for peace and nonviolence. It's entirely possible!

216A
(cont.)
58B
(cont.)

Virginia J. Miller
125 Calle Don Jose
Santa Fe NM 87501
505-986-8676

Millhorn, David

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PC_170

THE UNIVERSITY OF TENNESSEE
Office of the Executive Vice President
813 Andy Holt Tower
Knoxville, TN 37996-0160
Phone: 865-974-4048
Fax: 865-974-3990
E-mail: millhorn@utk.edu

February 26, 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 Mr. Wyka:

I am writing to convey to you and NNSA that the University of Tennessee enthusiastically supports the development of a uranium center of excellence at the Y-12 site. We also support the concept of Distributed Centers of Excellence which involves the secure storage of nuclear materials and the manufacturing responsibilities that Y-12 performs for NNSA.

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. A key component of this plan is preparing the next workforce with the special skills required to serve the nation's weapon complex.

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. As part of this activity, it is important to the East Tennessee community that NNSA and DOE's environmental management program finished the clean-up needed on the site.

Thank you for the opportunity to convey our support for this important program.

Sincerely,

David E. Millhorn, Ph.D.
Executive Vice President
The University of Tennessee

JP

Page 1 of 1

PC_1170

Levens, Matthew

From: Nancy Mills [nsm213@yahoo.com]
Sent: Thursday, April 03, 2008 12:23 PM
To: Complex2030
Subject: SAVE our FUTURE

Dear Sir,

The U.S. should quit wasting it's awesome power and lead the world in disarming ALL nuclear weapons. Nuclear disarmament is the true path to global and national security. It's time to kick the Bomb habit and switch to protecting our environment from DOE's deadly nuclear waste inventory and stickpiles of weapons-grade materials. Addressing nuclear waste and dismantling nuclear weapons-securing plutonium, uranium and tritium that make bombs- these missions demand talented high-tech workers for many decades and produce a valuable technology export from the Savannah, GA region. Bombplex is a wasteful corporate welfare program which would dangerously increase global tensions and decrease our own security, as other countries (like Iran) would feel it is their right, and indeed only defense against our vast nuclear arsenal to have atom bombs of their own.

Nancy A. Mills

You rock. That's why Blockbuster's offering you one month of Blockbuster Total Access, No Cost.

113A1:
21J:
37J

5/15/2008

Mills, Nancy

Page 1 of 1

Levens, Matthew

From: Nancy Mills [nanc213@yahoo.com]
Sent: Monday, February 11, 2008 3:42 PM
To: Complex2030
Subject: Draft Complex Transformation SPEIS Comments

In 1970, the US promised to disarm. Now, in 2008 our country's Department of Energy (DOE) tells us that it is necessary to streamline and modernize our entire nuclear complex. This 116A revitalization plan will take place at 8 locations, including a huge bomb plant-Savannah River Site, right across the river from Augusta, Georgia.

PLEASE DO NOT ALLOW THIS DANGEROUS, EXPENSIVE, AND TOTALLY UNNECESSARY UNDERTAKING!!!!

Sincerely,
Nancy Mills
concerned citizen/grandmother

Looking for last minute shopping deals?
Find them fast with Yahoo! Search. <http://tools.search.yahoo.com/newsearch/category.php?category=shopping>

PC_671

Milner, Glenn

Page 1 of 2

Levens, Matthew

From: Glen Milner [gkaajm@juno.com]
Sent: Thursday, April 10, 2008 1:41 AM
To: Complex2030
Subject: Public Comment-Draft Complex Transformation PEIS
Attachments: DOE ComplexTransformation 9 APRR 08.doc



DOE
transformatio
Glen Milner
3227 NE 198th Place
Seattle, WA 98155
(206) 365-7865
gkaajm@juno.com

April 9, 2008

Mr. Theodore Byka
Complex Transformation SPEIS Document Manager, Office of Transformation, MA-10, U.S.
Department of Energy/NER 1000 Independence Avenue, SW Washington, D.C. 20385

VIA E-MAIL: ComplexTransformation@nisa.doe.gov
RE: Draft Complex Transformation PEIS

I am commenting on the proposed Department of Energy Complex Transformation Plan.

I am opposed to the Complex Transformation Plan.

The United States should work toward the abolition of nuclear weapons instead of consolidating or updating programs for the continued production and maintenance of nuclear weapons.

I live approximately 15 miles from Naval Base Kitsap-Bangor, the Trident nuclear weapons base on the West Coast.

The DOE's environmental review should address the effect of the Complex Transformation plan on Naval Base Kitsap-Bangor and Washington State.

The Complex Transformation Plan will have a significant impact on the area where I live.

I am requesting that the environmental review of the Complex Transformation Plan address the impact on Washington State. I am also requesting that the Department of Energy extend the public comment period for this program.

I am requesting that at least one public hearing concerning this plan be held in the Seattle/Puget Sound region. There is great public interest in Department of Energy activities in the Puget Sound and Seattle regions. Department of Energy activities have a significant impact upon the Puget Sound and Seattle regions.

The National Environmental Policy Act (NEPA) of 1969 requires federal agencies to examine the individual and cumulative, or additive environmental effects of their activities. An Environmental Impact Statement (EIS) is a detailed public document that provides an assessment of the potential effects a federal action might have on the human, natural, or cultural environment.

It is the responsibility of the Department of Energy to keep communities informed and involved during the EIS process. The Department of Energy has not done this. The Seattle region is affected by the Department of Energy activities. The Puget Sound and Seattle

1/20

2/11/08
3/2E

3/2E
(cont)

4/2H

Milner, Glenn

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Miralla, Quilla

Page 1 of 1

3/2E (cont.)
 4/2H (cont.)

Regions did not have a public hearing.
 The Department of Energy must provide much more information. The Department of Energy must clearly explain the activities involved in the proposed Complex Transformation Plan and explain the effects of these activities on the environment.
 The Department of Energy has failed to present adequate information.
 Thank you for your consideration.

Glen Milner

PC_1985

Levens, Matthew PC_1191

From: qeath@gmail.com
Sent: Monday, April 07, 2008 10:04 AM
To: Complex2030
Subject: Complex Transformation SPEIS Comment

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,

We have more than enough nuclear weapons. We should not be making more. The country is in enough debt as it is with its war mongering. I want my tax dollars to go to protecting children and the environment, not to creating destruction.

Sincerely,
 Quilla Miralia
 4250 Huntington Forest Blvd.
 Jacksonville, FL 32257

cc:
 Senator Bill Nelson
 Representative Ander Crenshaw
 Senator Mel Martinez

Mirman, Ronald

Page 1 of 7

Page 1 of 7

PC_710

Levens, Matthew

From: Ronald Mirman [ssbbg@gmail.com]
Sent: Wednesday, March 19, 2008 8:27 AM
To: Complex2030
Subject: The transformation is really simple

The only complexity of the transformation to a nuclear policy which will increase our safety instead of threatening it is psychological. You should be able to deal with that. Why can't you?

Do you realize how much transformations, including complex ones, determine the laws of physics, perhaps completely? See the books, especially OAIU. With your e-mail address you should be happy about that. I hope you are, aren't you?

RM

The proof that physics, a universe, would be impossible in any dimension but 3+1 (strangely agreeing with reality) is clear and unavoidable. Stunning is that a change of any number in any of the formulas by even 1 would make any dimension, thus any universe, impossible.

That the universe allows, and has, galaxies, stars, planets, even life, thinking life, that all the conflicting conditions do not conflict and are met, is beyond stunning.

Click on

Science blog
impuuv.wordpress.com
 or
impuuv.blogspot.com

Political blog
randomabsurdities.wordpress.com

Books (details below)

OAIU:
 Our Almost Impossible Universe:
 Why the laws of nature make the existence of humans extraordinarily unlikely

GTFQM;
 Group Theoretical Foundations of Quantum Mechanics

MRPG;
 Massless Representations of the Poincaré Group

QM:QFT;
 Quantum Mechanics, Quantum Field Theory
 geometry, language, logic

1/20

Mirman, Ronald

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QFT,CGT,CFT;
 Quantum Field Theory, Conformal Group Theory, Conformal Field Theory:

GTF:IA:
 Group Theory: An Intuitive Approach
 PG,SG;
 Point Groups, Space Groups, Crystals, Molecules

Our Almost Impossible Universe:
 Why the laws of nature make the existence of humans extraordinarily unlikely
 R. Mirman
 iUniverse, inc. 2006

May be ordered from booksellers or www.iUniverse.com
 1-800-Authors (1-800-288-4677)

For special prices for class adoption, other discounts and information contact
bookorders@iuniverse.com; 800-288-4677, ext. 501.

An exploration of the precise conditions required for the existence of humans in the universe. ... the author does an admirable job delineating the laws of physics without becoming too bogged down in complicated jargon, and he maintains a sense of wonder about the unique and random nature of the universe. He repeatedly celebrates our highly improbable achievements as a species, marveling at our ability to use the language of abstract mathematics to unravel the mysteries of existence. ... the prevailing tone of the narrative is clear and confident, marked by a meticulous attention to detail. A(n) ... often fascinating journey through the history of the universe and mankind. --- Kirkus Discoveries

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 (cont.)

Existence, of the universe, structure, life, intelligence, is unthinkable, really impossible. Incredibly, intriguingly, we are here. From the universe itself to humans, that we are, what we are, what we have accomplished, we find implausibility upon implausibility making us as reasoning beings (at least almost) unique in the universe, quite fortunate, but quite dangerous. SETI is nonsense. Reasons range from mathematically rigorous -- unavoidable -- to extremely strong to highly likely. These force the question: does the word God exist?

This discussion is aimed at all interested in not only science, but in the world in which we (strangely can and do) live, the laws of nature, in what humanity is and why. It has in addition much material of value to specialists, and because of its breadth and coherence, its attempts to provoke thought, it, besides being a popularization, should be an excellent text for courses in science for non-scientists and as a (perhaps necessary) supplement for science courses.

I. IS OUR UNIVERSE REALLY POSSIBLE?

Existence is the greatest mystery, not only that it is but that it can be. Conditions are too many, too strict, too conflicting. Outlandishly we are, yet that we are impose upon us the responsibilities of loneliness. Horrendously our most basic need is to hate, hurt and kill, to horribly misuse that awesome, and likely unique, gift of intelligence --- destroying, dishonoring, the most magnificent constituent of nature.

II. MYSTERIES OF THE MERE NUMBERS THAT GIVE US LIFE

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The most elementary arithmetic, just counting, should make a universe impossible. Why then does one actually exist? Just counting, not even concepts of numbers and arithmetic are needed, just nothing, but in that nothing there is so much, so much that is so necessary. Nothing, but that nothing gives everything, existence itself. Why can, why should, our invention, mathematics, tell nature that it can be, what it must be? Is it counting or is it physics? Is it physics or just mere numbers? Yet mathematics extends almost infinitely beyond numbers, our mathematics that we create. That is the strangest part of being human: we can -- and do --- create rules for nature. And nature obeys. There is no reason that we should even have mathematical talent, no reason for it to have developed. Humans have immense, but quite unreasonable, talents not only in mathematics --- totally unreasonable but true. Why? And they work.

III. SPACE: THE COMPLEXITY AND WORTH OF EMPTINESS

We look, we see, but do not notice. The nothingness that is space much requires noticing --- the opulent structure of the emptiness is essential, even for just a universe. There is so much to see, especially because there is nothing to see. We should learn, and we should look.

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(cont.)

IV. HOW TURNING AROUND CREATES SPACE AND TIME

What do we mean when we say that space is 3+1-dimensional, that the space part of space is 3-dimensional, and that there is also another dimension, time? Couldn't we say that space is 3-dimensional and that time is an independent dimension? Why do we even say that space is 3-dimensional rather than space having 3 independent dimensions? And why is temperature not like time? So we have to consider how to turn around, even between space and time. If space is 3+1-dimensional some distances, and masses, are real, some imaginary. There must be a boundary: the boundary cone, unfortunately called the light cone. Light and gravity (these only) travel on it and only on it. Why?

V. WHY THE WORLD MUST BE UNCERTAIN

Atrocities nurtured by twisted views of the universe emphasize that they are not merely wrong but deeply malevolent, deeply malignant, and the overriding moral imperative of correct understanding and acceptance of the realities of nature. What are these realities, what are physical objects including people? Not particles, not waves, meaningless words here. However unpleasant it is, we must accept what all objects, all people, must be, whether we or nature wishes it so. Thus nature must be quantum mechanical, probability, uncertainty, are inherent, unavoidable. Yet it is causal, quite sensible, quite understandable even elementary. And physics must have axioms: physical objects. Quantum mechanics emphasizes how dangerous language is.

VI. OUR UNIVERSE IS --- JUST BARELY --- POSSIBLE

It is simple to show that physics, a universe, could not exist in any dimension but 3+1, little more than counting. Yet only because of a set of numeral accidents is 3+1 possible, thus that any dimension so any universe is possible at all. Change any number, even by 1, then nothing, no universe could exist.. But that universe allowed by arithmetic, barely much more than numbers, is the unique one allowing structure, galaxies, stars, atoms, certainly life. And these requirements have nothing to do with ones leading to the dimension. Satisfying any one does not mean any others can be, certainly not that all can be, that all are. So many conditions, it is just a freak that any are satisfied, thus extremely implausible that all can be, all are. Yet they are. Life is impossible, it really cannot exist.

VII. LAWS OF PHYSICS LOVE US

Why is the universe not concentrated in an immensely small region, or is not huge and practically empty, with nothing but a few useless particles? Why can it have galaxies, stars, light, people? This analysis of a broad range of laws of physics (and mathematics) amazes, that our universe can be possible, and more that it is true, and is what it is. These laws, what they are, their form, how many, the numbers, all the very, very little details --- if there were even the most minute difference then essentially

nothing. Laws must prevent a realistic universe, yet actually allow it.

VIII. WHY ON EARTH?

Because it is so special, and in so many ways. Yet it is not just that it is special but that it is possible at all seems so implausible. Physical laws, and the vagaries of chance, conspire to allow it --- quite, quite difficult --- and then to make it true, and thus very special.

IX. WHY LITTLE THINGS MEAN A LOT

To emphasize our implausibility and our peril, our dangerousness, we must consider the often immensity of the most minute, so the moral and ethical implications of mathematics. From the most fundamental laws of nature to the distribution of dirt on asteroids, the slightest change and we would not exist, perhaps intelligence would not exist in nature. Chance has been very kind. We are children of chance.

X. LIFE --- WAS IT REALLY NECESSARY?

Life is a precarious balance between altruism and selfishness. The necessity for both, from the beginning, emphasizes how difficult it is for life to arise. A review of the complexity, the intelligence, the linguistic ability, required of even the simplest cells, of what life is, shows that it, even the most primitive, is very likely extremely rare. We see also the absurdity of the concepts of genetic determinism, nature vs. nurture, even survival of the fittest. Looking at the huge number of potential forms of life, and of the small number of actual ones, emphasizes the immense improbability of a specific type, like one with intelligence, especially humans. We should be thankful to the universe for allowing life (seen clearly dreadfully hard), and to chance for actually creating it, and humans.

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(cont.)

XI. IS BEING SMART REALLY A VERY STUPID THING TO DO?

Intelligence is rare --- is it toxic? These arguments, including what nerves and brains are like, show strongly why it is, why it is so disadvantageous. The evolution of humans, even intelligence, emphasizes the huge number of accidents, the luck, needed. It is clear why only (placental) mammals have even hope of thought: MOTHERS.

XII. DOES THE WORD GOD EXIST?

The vast implausibility, yet actuality, of nature and of humans seem to have implications. Can there be any? To study this we must consider not science, not religion, but language. That is definitive. Inability and refusal to accept reality, to accept what humans are and our place in nature, and our egomania, megalomania, helping to cause these, has led to vast evil. Science is rejected, since it shows that evolution leads to morality, and because people cannot tolerate the truth about reality, about themselves, causing great suffering, much abominations.

XIII. A UNIVERSE OF WONDER

Our universe is a strange and wonderful place, almost impossible, as are we. But we do not care about these great gifts given us by the unbelievable beneficences of chance. We apply them, not gratefully, but to destroy and diminish, to show our contempt for that life likely so rare, perhaps unique. Our gifts are used not to enhance this life with such incredible talents that we are part of, but to satisfy what is so clearly the most basic human needs, to hate and to kill --- hatred, this cancer of the human soul, is fundamental. We are part of a universe of great rationality and grandeur, exceedingly kind and exceedingly cruel, that has made us, and made us what we are. We should be thankful, yet are contemptuous.

A. DOES SPACE MATTER FOR MATTER?

Laws of physics are (perhaps completely) consequences of geometry. Nature, God and we are all governed by geometry. Some of those that we are most aware of, like conservation of energy (with

Mirman, Ronald

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PC_710

obvious major effects on daily life), are required by geometry (and its monotony). Why? How does geometry enforce these; what do they mean? And how does it restrict turning around?

B. ASTONISH PEOPLE WITH YOUR BRILLIANCE BY BABBLING

See how to impress your friends with your mastery of the secrets of the universe without really knowing anything, especially by misusing language. There are many reasons for the strange stupidity of the errors about quantum mechanics, including often saying it requires that which it forbids (as with wave-particle duality and the vacuum). A major one is that words are not only wrong, meaningless, misleading, but say just the opposite of what we think they say. Quantum mechanics makes complete sense; often language makes none and makes it seem that quantum mechanics (even nature in general) is weird. Language is very dangerous. Weirdness is a confession of incompetence, or dishonesty. It is an interesting psychological question why so many physicists feel so compelled to flaunt their incompetence and complete misunderstanding of their own field.

C. HOW WE DEVELOP (HOPEFULLY CORRECT) BELIEFS ABOUT NATURE

Our world is vastly complicated. Biological objects, especially humans, have developed ways of coping, thus telling much about biology and us. In their most formalized forms they are called science. Which are the best scientists: bacteria, trees, worms, bees or birds? Among humans, babies. For biology, even at its most elementary, science is necessary. What is science, what is a scientific theory, why? What is required of these? Why can a theory be indispensable even if absurd? We see that evolution is scientific; (blasphemous) proposed alternatives are nonsense.

D. LIBERATING ARTS OF SCIENCE

Physics is the most valuable liberal art, but too often quite poorly taught. Here we consider some rules for one aspect, problems. The educational system in general is too often not only poor, even counterproductive, but dishonest, unethical. Emphasis on this can help, but it is only a start.

E. IS MODERN "PHYSICS" A SCIENCE?

It is shocking to see what leaders of the "physics" community, from the top universities, whose work appears in the leading journals, are working on, supported by taxpayer money. Do "physicists" really believe that an object (including a "physicist") can be in two places at the same time; that "physicists" are so extremely important that just by looking at something they cause the entire universe to split into many universes; that gravity can leak out of the universe; that our universe was started by "another universe" smashing into it (perhaps periodically); that part of the universe is rolled up into a tiny tube and that the dimension is actually 10 or 11 rather than the obvious (and necessary) 3+1; that I can have different values in different parts of the universe or at different times; that particles pop out of the vacuum to change solutions of equations; that the vacuum has energy; that a function (which depends on space so has different values at different points) equals a constant (which has the same value at all points); that they are melting the vacuum? Does the American Physical Society advocate that its member lie to Congress to get money, showing deep contempt for Congress, taxpayers, physics and honesty, or do they claim that they have crystal balls in their offices? Evidence is compelling. IS IT ALL A DELIBERATE MULTI-BILLION DOLLAR FRAUD? Taxpayers should be concerned.

by R. Mirman

Group Theory: An Intuitive Approach
(Singapore: World Scientific Publishing Co., 1995)

Group Theoretical Foundations of Quantum Mechanics

5/14/2008

2-794

Mirman, Ronald

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(Comrack, NY: Nova Science Publishers, Inc., 1995; republished by Backinprint.com)
Classical physics is inconsistent, impossible, quantum mechanics probability, dimension 3+1, and spin-statistics coming from geometry, are necessary.

Massless Representations of the Poincaré Group
electromagnetism, gravitation, quantum mechanics, geometry
(Comrack, NY: Nova Science Publishers, Inc., 1995; republished by Backinprint.com)
Geometry requires general relativity, which is thus the quantum theory of gravity. Trivially the cosmological constant is 0 as are the reasons for gauge transformations and CPT.

Point Groups, Space Groups, Crystals, Molecules
(Singapore: World Scientific Publishing Co., 1999)

Quantum Mechanics, Quantum Field Theory
geometry, language, logic

(Huntington, NY: Nova Science Publishers, Inc., 2001; republished by Backinprint.com)
Properties of (badly, misleadingly, named) quantum mechanics are required (by what?). Language, names, are dangerous. Waves, particles are meaningless. Weirdness comes only from incompetence and dishonesty. Properties of quantum mechanics and their reasons are necessary and clear.

Quantum Field Theory, Conformal Group Theory, Conformal Field Theory, Mathematical and conceptual foundations, physical and geometrical applications (Huntington, NY: Nova Science Publishers, Inc., 2001; republished by Backinprint.com)

The conformal group is the largest invariance group of geometry. Group theory is richer than realized. The proton can't decay, obviously. What is the significance of the mass level formula?

Our Almost Impossible Universe: Why the laws of nature make the existence of humans extraordinarily unlikely (Lincoln, NE: iUniverse, Inc., 2006)

Backinprint is an imprint of iUniverse, Inc.,

iUniverse
2021 Pine Lake Road, Ste. 100
Lincoln, NE 68512
www.iuniverse.com
1-800-Authors (1-800-288-4677)

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click on

Science blog
impuniv.wordpress.com
or
impuniv.blogspot.com

Political blog
randomabsurdities.wordpress.com

5/14/2008

October 2008

Mirman, Ronald

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Latest book:
Our Almost Impossible Universe:
Why the laws of nature make the existence of humans extraordinarily unlikely
for others see blog

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Mirus, Judith

Page 1 of 1

Levens, Matthew

PC_2019

From: Judith Mirus [mir@raonact.com]
Sent: Thursday, April 10, 2008 2:16 PM
To: Complex2030
Subject: Objection to nuclear activity in New Mexico

Dear Sirs or Madams:

I am hereby writing to state my objection to the development of any kind of nuclear activity in New Mexico.

I am particularly concerned that there is as yet no means of disposal of nuclear waste and by-products and I believe this should be the topic of first importance.

For sure, as a resident of New Mexico, I would not want any nuclear waste to be disposed of or "dumped" in New Mexico.

Let's don't dump it anywhere. Let's figure out how to take care of it responsibly so that it does not endanger anyone or our earth.

Thank you.
Judith Mirus
Arroyo Hondo, New Mexico 87513
505-776-2059

Misita, David**Page 1 of 2**

Page 1 of 2

PC_1311

Levens, Matthew**From:** Coby-Madrid, Rera [rcobyma@sendia.gov]**Sent:** Friday, April 25, 2008 11:44 AM**To:** Complex2030**Subject:** Written comment

This is a follow on to my public testimony at the Tonopah town meeting.

In 1999, eLIFE went to WSMR for the first set of firings at the system. The original schedule was for 5 weeks, 24 shots. It took ~12 weeks to finish 17 shots then the funding for that FY ran out and we weren't able to complete. Several problems were encountered. First, we were at WSMR when the winds were a very severe issue. Even though we could not raise the cable we were charged for the mission day. A majority of these shots were day shots. The system also encountered problems so not all issues were range related. We did however have days in the schedule when we were shut down for other higher priority missions.

In 2001, we returned to WSMR for eLIFE #2. We were scheduled for another 24 shots in 5 weeks including air-to-air assets. Again it took 3 months because of weather and range issues. We did however get the 24 assets fired and completed.

Each time it cost approximately 3 times the original estimate given by the range because of the amount of time it took to complete. I have been to their scheduling meetings and even though you ask for dates and they agree, their caveat is that if a higher priority Army mission calls in, your mission could possibly be canceled with a day's notice.

BUT, I caveat that when we ask for a block of time we get it. Example, if we ask for 12 hours, we would get it barring the higher priority mission thing. BUT, if you ask for 12 and you get shut down due to winds you pay for 12.

After experiencing these issues at WSMR, the eLIFE Program Manager decided (at the urging of John Gossett who accomplished firings at TTR in 2003 for LAIRCM) to try TTR.

In July 2004, the eLIFE program met with TTR to discuss the possibility of firing jammed assets at TTR. It was agreed that TTR could support a program such as eLIFE. The program arrived at TTR in mid-Aug 2004 to begin a 2 week set-up period. On Sept 7th, we commenced the program. We fired 30 rounds in 10 firing days not including firing 24 smokley sams (training device but used as a tracking device for the program). The success of the program convinced other live missile fire programs to come to TTR.

In the spring 2006, a major live missile fire program was developed. This program included 32 different participants, 112 different sensors or radiometers at an estimated value of \$117M dollars. The program also included participants from UK, Canada, Australia, New Zealand. During this program, 86 missiles were fired in 5 firing weeks (a firing week consisted of 4 nights per week). That program was considered a major demonstration averaging 140 personnel on range per night.

In the fall 2006, the Air Force AAR-44 and AAR-47 missile warning program office conducted another major program. That program fired 64 missiles in 12 firing nights.

110E

5/15/2008

2-796

Misita, David**Page 2 of 2**

Page 2 of 2

PC_1311

These successes prove that the infrastructure and support from TTR allows for cost-efficient and positively effective test programs.

DIRCM in the early years also suffered the same fate as eLIFE. DIRCM started in 1994 and spent 3 sessions at WSMR with the same results as eLIFE.

When raising a Kevlar cable anywhere from 600-1000 feet in the air, the winds play a big roll. Because of the sheer strength (which is very low) anything could possibly cut that cable. The cable has suffered 2 catastrophic events to my knowledge. One was the cutting of the cable with an asset fired at LP 1. The other was cable failure due to wear from rolling the cable. In both instances, millions of dollars of equipment has been lost.

110E
(cont)

David A. Misita
46th Test Squadron
Sensors and Defensive Systems Test Flight
46 TS/OGEE
101 E. Daytona Road Suite 241
Edlin AFB, FL 32542
DSN: 872-5487
Comm: 850-882-5487
Fax: 850-883-1216
Cell #1: 850-582-7077
Cell #2: 850-376-6554
SI PR: david.misita@edlin.af.mil

5/15/2008

October 2008

Mitchell, Brad

Page 1 of 1

Levens, Matthew PC_392

From: Brad Mitchell [tracey.brad@earthlink.net]
Sent: Sunday, March 16, 2008 6:59 PM
To: Complex2030
Subject: Form posted from Windows Internet Explorer.

Last Name=MitchellFirst Name=BradEmail
Address=tracey.brad@earthlink.netStreet Address=83 Camerada LoopCity=Santa FeState=NMZIP
Code=87508Comments=I am a native New Mexican. I am proud of my heritage. Los Alamos
National Laboratory (LANL) is part of that heritage. There are still people in my
hometown that talk about the false dawn on July 16, 1945. Nowadays there is much talk
about complex transformation and LANL's future mission. When the manufacturing mission is
discuss, inevitably, someone brings up the issue of contamination and waste. As a New
Mexican, I cherish the environment here. I hike in its mountains and fish in its waters.
As a worker for the Pit Manufacturing program, I can assure the NNSA and DOE that waste
minimization and contamination control are a priority. I believe LANL can continue with a
limited manufacturing capability in a safe and secure manner. It is true that
manufacturing can be more efficient. Efforts are underway in Lean Manufacturing
techniques and technology development that will result in a more efficient enterprise. In
conclusion, I support the preferred alternative option.Sincerely,Brad Mitchell

116A
27J

Mitchell, Michele

Page 1 of 1

Levens, Matthew PC_2067

From: Michele Mitchell [mimccsu@buncombe.main.nc.us]
Sent: Thursday, April 10, 2008 5:03 PM
To: Complex2030
Subject: Draft Complex Transformation SPEIS Comments

Attachments: Clear Day Bkgd.JPG



Clear Day
.grd.JPG (6 Ki

Clear DayMichele L Mitchell
165 South French Broad Avenue
Apartment 712
Asheville, North Carolina 28801

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

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

Subject: Draft Complex Transformation SPEIS Comments

April 10, 2007

Dear Mr. Wyca,

I am a citizen of Our Earthly Mother, and of the United States. I like citizens voices
to be heard in what they all want also. I do not join in any agreement to use nuclear
weapons or human made nuclear energy. Our Earth is a whole living part of Man, the
Cosmos, and it is important to respectfully live with its elements, and harmonies, and all
entities . Together we are One.

We do not need any nuclear weapons made or in storage. We need to have safe ways of
obtaining and using energies, that is fair to all energies involved. I do choose to love
all energies involved, to care about all of Cosmos . We are One With Earth , and All
Therein. Ancient Wisdom will also help guide us

I agree with opinions to Dismantle and Shut Down all of those, we do not need any
Nuclear Energy Plants or Nuclear Bombs.

Thank You

Michele Mitchell
Asheville, NC

116A

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31N

Mitrovic, Sue

Page 1 of 1

Levens, Matthew

From: Sue Mitrovic [su_mitro@hotmail.com]
 Sent: Tuesday, April 15, 2008 9:10 PM
 To: Complex2030
 Subject: No New Nuclear Weapons Facilities

Sue Mitrovic
 1293 W 3rd Ave
 Broomfield, CO 80020-2017

April 15, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

116A I strongly oppose the administration's proposal to build a plant to produce plutonium pits
 214M for nuclear weapons.

This past weekend I heard Daniel Ellsberg talk about resistance that began 30 years ago to
 the Rocky Flats Nuclear Weapons Facility that produced plutonium pits. After lies were
 exposed of accidents at the plant it was finally closed in 1989, leaving former employees
 riddled with cancer but denied treatment by their government and the soil and groundwater
 permanently contaminated.

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 OMR
 Project is another irresponsible new program that should be rejected.

41108

Sincerely,

Sue Mitrovic
 303 507-3979

PC_1544

Modica, Linda

Page 1 of 5

Levens, Matthew

From: Linda Modica [linda.c.modica@mac.com]
 Sent: Friday, April 11, 2008 12:39 PM
 To: Complex2030
 Cc: Ann Harris
 Subject: Sierra Club Comments on 'Complex Transformation'

Attachments: 04_10_08Comments-BombPlex2030.doc



04_10_08Co
 Is-BombPlex2

April 10, 2008

Mr. Wyka,
 Attached please find a pdf file containing Sierra Club Radiation Committee comments on the
 Draft SPEIS.

Earlier tonight, a copy of same was sent to you via fax.

If this email arrives after the April 10th deadline, please forgive my internet troubles.

Thank you,
 Linda Modica.

Linda C. Modica, Chair
 Sierra Club Radiation Committee
 266 Mayberry Road
 Jonesborough, TN 37659
 H: (423) 753-9697
 C: (423) 676-2925
 E: Linda.C.Modica@mac.com

"Radiation is like God -- you can't hide from it, and if you don't respect it, you'll be
 called to pay for your sins." -- former Nuclear Fuel Services employee quoted in "A big
 Job for a little town", The Progressive, April 1991.

1

Modica, Linda

Page 2 of 5



Linda C. Modica, Chair, 266 Mayberry Road, Jonesborough, Tennessee 37659
 TEL: (423) 676-2925 (mb); (423) 753-9697 (h); EMAIL: Linda.C.Modica@mac.com

April 10, 2008

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

VIA EMAIL: complextransformation@msa.doe.gov
 VIA FAX: (703) 931-9222

Dear Mr. Wyka:

Thank you for the opportunity to comment on the Draft Complex Transformation Supplemental Programmatic Environmental Impact Statement (Complex Transformation SPEIS, DOE/EIS-0236-S4). The following, made on behalf of the Sierra Club's national Radiation Committee, are in addition to comments made by Sierra Chapters & Groups around the country which may have also expressed concerns about the Complex Transformation SPEIS, hereinafter the "Draft SPEIS":

The national Sierra Club's stand regarding nuclear weapons has, for several decades now, favored American public policies that do not result in:

- nuclear weapons testing, production or deployment (Adopted by Sierra Club Board of Directors in 1983), or in the
- production of additional weapons-grade fissile materials such as plutonium or highly-enriched uranium (1988).

The Sierra Club has also made its opposition clear with respect to a first-strike or pre-emptive use of nuclear weapons, whether from land or space-based weapon systems (1986, 1987).

Comment 1. Because the Bush Administration's Nuclear Posture Review was reported in the media to recommend "tactical nuclear weapons" that would be deployed on battlefields where hardened underground bunkers were targeted on a first-strike basis whether or not the enemy used comparable radiological weapons of mass destruction of comparable force, and because the 2001 Nuclear Posture Review is one of the pillars

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Modica, Linda

Page 3 of 5

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PC_1140

on which the Complex Transformation plan is built, the Sierra Club position against first-strike use of nuclear weapons informs the Radiation Committee's opposition to the development of "tactical nuclear weapons" through Complex Transformation.

Further, because the succeeding Administration, to be elected later this year, can and should (in the opinion of the majority of Americans) reverse the Bush Administration's policy of first-use of tactical nuclear weapons, a "transformation" of the nuclear weapons complex now -- based upon a (potentially) soon-to-be-reversed policy -- is inimical to the public's interest.

Therefore, the Sierra Club's Radiation Committee supports the "No Action Alternative" -- i.e., that the current plan be shelved -- so that the nuclear posture of the new administration (which could call not only for a dramatic downsizing of the nuclear weapons complex but also of the DOE's overall nuclear promotion program) could take a fresh look at American policy of disarmament and, especially, the Bush Administration's proposal for first-strike nuclear capacity.

Comment 2. Since the Sierra Club's Board of Directors adopted its nuclear weapons policies in the mid-1980s, the Club's concern about the hazards that the nuclear weapons complex presents to environmental and human health (as well as public welfare and safety) has not diminished. Rather, in part because of the May 29, 2007 finding of the Agency for Toxic Substances and Disease Registry's Public Health Assessment of Nuclear Fuel Services, Erwin, Tennessee that the site was an "Indeterminant Public Health Hazard", the Sierra Club is all the more dedicated to the elimination of the public's exposure to radiation emitted by the industrial-military complex in our country. The ATSDR's Public Health Assessment can be found at <http://www.atsdr.cdc.gov/HAC/pha/NuclearFuelServices/NuclearFuelServicesPHA052907.pdf> and the determination that the Erwin nuclear facility is a Public Health Hazard is on page 25.

This finding is relevant to the Draft SPEIS because Nuclear Fuel Services (NFS) is licensed to possess and reprocess highly-enriched uranium (HEU) from nuclear weapons declared surplus, and, therefore, is an element of the complex for the "disposition" of weapons-grade uranium.

Comment 3. Insofar as NFS is a component of the weapons complex, the environmental impacts of its operations in Erwin must be included in the Draft SPEIS.

Comment 4. BWXT in Lynchburg, Virginia -- another DOE contractor which downblends weapons-grade uranium into reactor fuel -- and the environmental impacts of that operation were also omitted from the Draft SPEIS.

Comment 5. The 45 facilities of AREVA (the majority-French-government-owned corporation) and their environmental impacts need to be included in the Draft SPEIS if they are conducting weapons-complex operations. The downblending by AREVA of surplus weapons-grade HEU is described in a February 5, 2008 article that can be found at http://biz.yahoo.com/bw/080205/2008020506090.html?_v=1.

Comment 6. While the impacts of DOE contractors like NFS, BWXT and AREVA -- and

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 (cont)

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Modica, Linda

Page 4 of 5

3

PC_1140

others not listed for the sake of brevity – may have been analyzed by the Draft SPEIS when those corporations had their operations at DOE sites (such as ORNL, SRS, etc.), when they are emitting radionuclides and other contaminants into the air and water elsewhere, those impacts need to be included in the Draft SPEIS otherwise the total impact of “Complex Transformation” would be seriously understated.

Comment 7. Sierra’s Radiation Committee does not agree with DOE’s assertion that the Watts Bar tritium-production operations are not part of the nuclear weapons complex. Therefore, the tritium poisoning of the water supply downstream of the Watts Bar nuclear reactor should be an impact included in this assessment of the weapons complex.

Comment 8. The Agency for Toxic Substances and Disease Registry (ATSDR) Public Health Assessment (cited above) should have been referenced at least in Appendix C of the Draft SPEIS. Because that study was posted on the web in late May of 2007, it was certainly available to the preparers and should have been incorporated in the analysis of human health impacts of Complex Transformation.

Comment 9. The public health impact of “whole” mixtures – the chemical-radiological contaminant cocktail, if you will, that facilities in the weapons complex expose the public to – should have been addressed in depth in the Draft SPEIS. Instead, the report discusses radiation and chemical exposures as if they do not happen simultaneously and potentially present compounding &/or synergistic detriments to human health.

Specifically, the May 29, 2007 ATSDR Public Health Assessment not only declared the Erwin DOE contractor a **Public Health Hazard** – not a risk, not a threat, not a concern, but a Hazard – but it also stated on page 25:

“Because the contaminants present in the groundwater are a mixture of many volatile organic compounds, health effects of mixtures may be an issue. However, no available studies directly characterize health hazards and dose-response relationships for exposures to “whole” mixtures containing 1,1,1-trichloroethane, 1,1-dichloroethane, trichloroethylene, and tetrachloroethylene. Furthermore, physiologically based pharmacokinetic (PBPK) models have not been developed to predict dispositional and toxicological outcomes of joint action of mixtures of these four chemicals. Similarly, interactions of heavy metals with other heavy metals or organic compounds are unknown at this time.”

The DOE’s enormous budget can and must afford an in-depth scientific analysis of the human health impacts of “whole” mixtures of contaminants that nuclear facilities throughout the weapons complex discharge. In fact, when the ATSDR presented the findings of its Public Health Assessment of NFS in Tennessee, its lead scientist urged the Erwin community to seek such a study from the NRC, CDC &/or DOE.

With these comments, the Sierra Club requests that the NNSA work with the ATSDR, NRC and with East Tennessee State University (ETSU) environmental health

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professionals and fund a study of the impact of nuclear facilities on human health. Because the rates of breast cancer, colon cancer, leukemia and non-hodgkins lymphoma fatalities are rising in Unicoi County, Tennessee -- where Nuclear Fuel Services, AREVA, and Studsvik operate – and because the adjacent county (Washington) has a Defense Department contractor manufacturing depleted uranium weapons, the nuclear neighborhood of Northeast Tennessee deserves to be defended in depth, and would welcome researchers developing primary data on the cancer and other health consequences of weapons complex facilities in their midst.

In summary, the Sierra Club supports true economic transformation of the nuclear weapons complex toward sustainable, non-polluting uses. Unfortunately, the draft proposal presented as “Complex Transformation”, while having some supportable suggestions for downsizing the complex, is too little too late in this Administration. Therefore, the Radiation Committee proposes that the DOE solve this disingenuously-named plan and work with the new Administration toward true economic transformation of the nuclear weapons complex.

In the meantime, Sierra’s Radiation Committee urges the DOE to fund serious epidemiological research into the health impacts on communities confronted by mixtures of radiological and chemical contaminants from nuclear facilities.

Again, thank you for the opportunity to comment on such an important matter.

Respectfully,

Linda C. Modica, Chair
Sierra Club National Radiation Committee

cc: US Representative David Davis, TN-01
US Senator Bob Corker
Erwin Citizens Awareness Network
Ann Harris, Sierra Club Environmental Quality Strategy Team
Dr. Paul Charp, Agency for Toxic Substances & Disease Registry

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(cont.)

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(cont.)

Molan, Jackie

Page 1 of 1

PC_329

Your whole life should be a continual act of praise and prayer.
JMC McWhirley

March 24, '08

Dear Mr. Wyka:

I am deeply troubled by plans to refurbish US nuclear weapons capability. It is toxic to our environment and should not be allowed to rebuild our country's industrial infrastructure.

We need to set an example of peaceful ways to increase life & safety.

Do not grant clearance for the Complex Transformation to proceed.

J. Gerald Molan
State of Maine
Bethlehem Maine

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47U
116A (cont.)


Molberg, Gary

Page 1 of 1

PC_102

February 20, 2008

Established in 1926



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

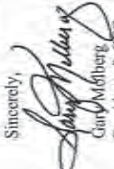
RE: Complex Transformation Supplemental Programmatic Environmental Impact Statement
(Complex Transformation SPEIS, DOE/EIS 0236-S4)

Dear Mr. Wyka:

For much of the past 65 years, the Pantex Plant has filled an important role in defending this country by first producing conventional weapons and then assembling and disassembling nuclear weapons. The Pantex Plant is very well suited to continue the mission of assembly/disassembly and high explosives production, and any new responsibilities including environmental testing functions. The site has a dedicated work force that has always put safety, security, quality and meeting the nation's needs as high priorities. Clearly, the Pantex Plant would be an excellent choice for anchoring the new Nuclear Weapons Complete of the future.

The City of Amarillo worked closely with the Pantex Plant in the past, and any new capabilities added to the site will assure continuation of this relationship in the future. Thank you for the opportunity to comment on the Pantex Plant's role in the Complex Transformation initiative. Please contact John Teague of my staff at (806)373-7800, if you have any questions or need any additional information.

As the U.S. Department of Energy continues its work to modernize the nation's Nuclear Weapons Complex, I urge you to give full consideration to the Pantex Plant facility and its capabilities for taking on an enhanced role under this initiative.

Sincerely,

Gary Molberg
President & CEO
Amarillo Chamber of Commerce

1000 South Polk • PO Box 9480 • Amarillo, TX 79105
806-373-7800 Fax: 806-373-3909
Visit our web site: www.amarillo-chamber.org

116A:
210F

Molino, Renzo

Page 1 of 1

PC_1511

Levens, Matthew

From: RENZO DEL MOLINO [codfish221@adelphia.net]
Sent: Tuesday, February 19, 2008 5:30 PM
To: Complex2030
Subject: Nuclear warheads plant

RENZO DEL MOLINO
 14 Glendale
 Glendale, WA 01229-0096

February 19, 2008
 Complex Transformation Department of Energy

Complex Transformation Department of Energy:

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.

I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons.
 STOP THE KILLING MACHINES!!

Sincerely,

RENZO DEL MOLINO
 4132985544

Moller, Susan

Page 1 of 1

PC_259

U.S. DEPARTMENT OF ENERGY
NATIONAL NUCLEAR SECURITY ADMINISTRATION

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.

April 2, 2008

To Whom it may concern:

Please cease and desist weapons production, specifically plutonium pit manufacturing at Los Alamos.

Why make more when you can reuse and recycle the ones you have? New info proves they are good for at least 100 years.

Weapons production severely harms the environment especially the ground water. For those of us who make our home here, this is a vital concern. There is already plutonium and other radioactive materials leaching into our water from dump sites in and around Los Alamos. Please do NOT create new ones.

Sincerely,
 Susan Moller

Please use other side if more space is needed.

Comment forms may be faxed to:
 Mr. Theodore Wyla
 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 mailed to:
 (703) 931-9222
 or sent by electronic mail to:
 complextransformation@emsa.doe.gov

You may also submit comments through the project website which can be found at:
<http://www.complextransformation.gov>

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2140:
 314E

Monjure, Heidi

Page 1 of 2

Monjure, Heidi

Page 2 of 2

Dear Mr. Wyka. PC_320

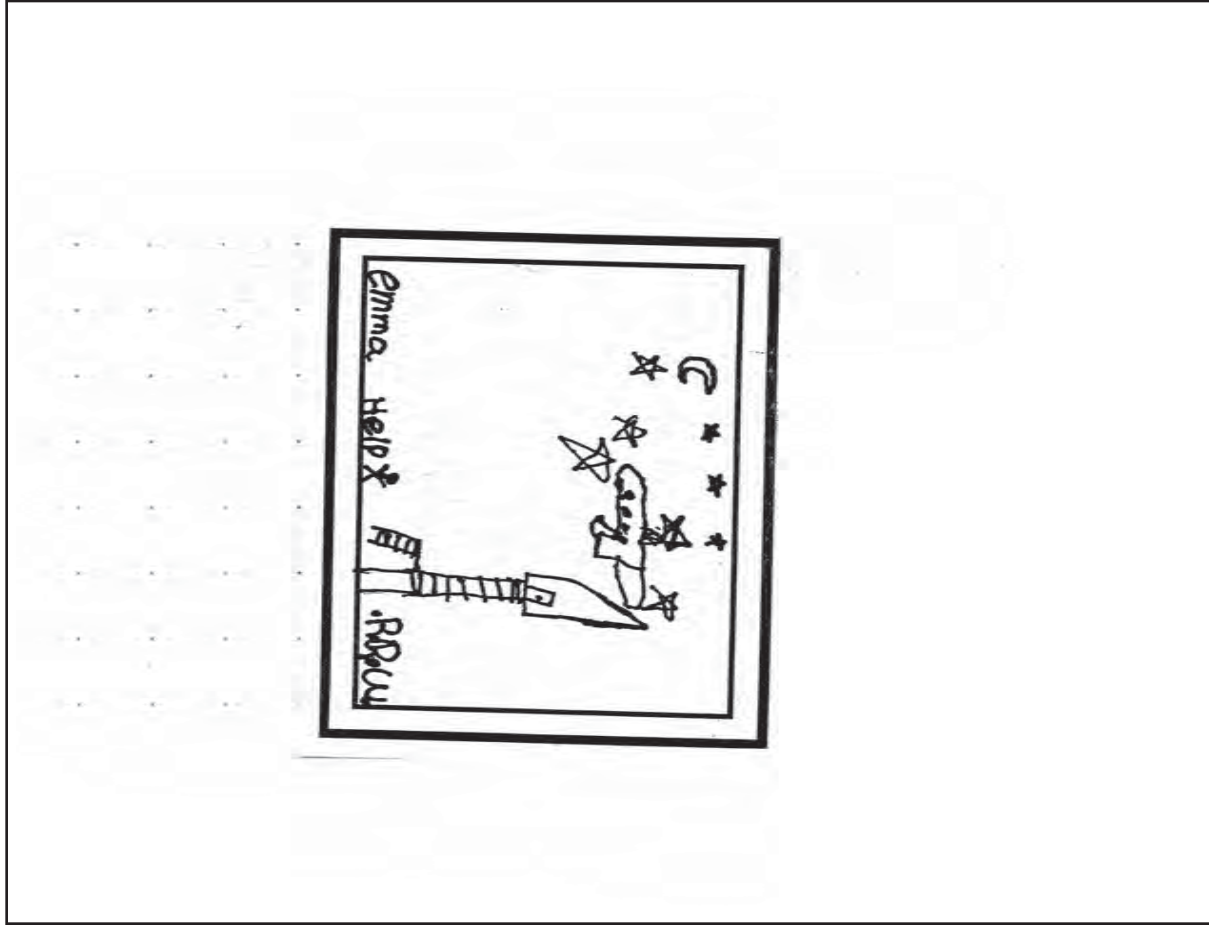
As an educator of small children I must write to you in the name of peace. It is time to spend our money on the health of our country. No new nuclear weapons production plants.

Respectfully yours,
Heidi Monjure

116A

288B

370



Mont-Eton, Jean

Page 1 of 1

Buenaflor, Justin

From: Jean MontEton [jeanmonteton@aetl.com]
Sent: Thursday, February 07, 2008 1:36 PM
To: Complex2030
Subject: defense

Jean Mont-Eton
4333 Ulloa st.
San Francisco, CA 94116-2068

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 20565

Dear Theodore Wyka:

116A The Department of Energy should reject proposed Complex 2030 project.

215C1 The DOE should 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.

31 13A1 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 .

I am also very concerned that revamping the current arsenal could lead to renewed nuclear tests.

4114C 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.

511J 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.

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,

Jean MontEton
415 664-4103

PC_524

Buenaflor, Justin

From: Eugenie MontBlanc [emb@cabr.unr.edu]
Sent: Wednesday, February 27, 2008 3:14 PM
To: Complex2030
Subject: Nuclear Weapons

Eugenie MontBlanc
1835 Stoneridge Dr.
Verdi, NV 89439-0887

February 27, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

198B This country and world needs to safely get rid of nuclear weapons, it does not need new and better ones. To spend money on building new weapons facilities would be defeatful domestic and international policy. We need to spend more money on education and green energy technology for ourselves and our neighbors. It does not behove our citizens to let us all get dumber and then put weapons in our hands. Get your priorities straight!

Sincerely,

Eugenie MontBlanc
775457657

Monteiro, Sergio

Page 1 of 2

Page 1 of 2
PC_732

Levens, Matthew
 From: Sergio Monteiro [mailto:monteiroserge@yahoo.com]
 Sent: Wednesday, February 20, 2008 11:00 PM
 To: Complex2030
 Cc: Kevin Martin, Peace Action
 Subject: Complex Transformation SPEIS

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 list of places for public comments on the Bomb³lex seems to include all the Bomb making facilities while excluding all places where civilians live! DO: went to the absurd of having one in Los Alamos and another one in Santa Fe, which are virtually the same geographical location, while the only California public comment meeting is at Livermore another Bomb making city, with none at San Francisco or Los Angeles!

I consider the choice of sites dishonest and I challenge the method. As is, the public has been selected to be the Bomb makers to the exclusion of peacemakers.

I hope that the Peace Action or else Mr. Henry Waxman, my representative, may be able to do something about the issue. Perhaps bringing my comment to the attention of the press or of the House or Senate.

Sincerely,

Sergio Monteiro
 1325 Wellesley Ave # 209
 Los Angeles, CA 90025

<http://www.peace-action.org/campaigns/bombplexhearings.htm>
 cc: "Kevin Martin, Peace Action" <Peaceact@mail.tenocracyinnovation.org>
 Rep. Henry Waxman (US House of Repres., 30th district, CA)

Information on
<http://www.complextransformationspeis.com/contact.html>
 If you would like to submit a comment on the Draft Complex Transformation PEIS, send it to:
ComplexTransformation@nrsa.doe.gov

Comments may be submitted by email through the web site [here](#).
 Comments may also be submitted by mail to:

5/14/2008

5/14/2008

Monteiro, Sergio

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PC_732

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

Or by facsimile to 1-703-931-9222
 If you experience any technical difficulties with this website, please contact the webmaster at:
complex.transformation@tenrtech.com

o
 -
 v
 C/O

Sergio Monteiro
 monteiroserge@yahoo.com

Be a better friend, newsfound, and know-it-all with Yahoo! Mobile. [Try it now.](#)

Montgomery, Lorita

Page 1 of 1

PC_105

There is today, a new Mandate—a Mandate of Change that is sweeping America. With this Mandate we need to reconsider the purpose of the transformations that are taking place in this branch of the U.S. Department of Energy. We need to redirect the department away from the direction of making nuclear weapons and toward a future in creating a safe source of energy, as the name of the department implies. We have in the nuclear facilities a wealth of minds that should not be working on plans for weapons, but on plans for building a peaceful future with clean, safe energy!

19B

This new Mandate would uphold the Nuclear Nonproliferation Treaty. It would also reflect the Congress' desire when it defeated the administration's attempt to fund new weapons. The Complex Transformation proposal should not contain the making of the Reliable Replacement Warhead!

21F: 31
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Thank you for allowing me to speak my opinion, and thank you, America, for the freedom to do so.

Lorita Montgomery
5801 W Cemetery Rd
Canyon, TX 79015
806-655-0446

LoritaTed@clearwire.net

I would like to add that the film shown stressed "weapons"! This actually was stronger than last hearings, held here, in this progress!

41F

Moore, Janet

Page 1 of 1

Buenafior, Justin

PC_517

From: Janet.Moore [jeywardm@sbcglobal.net]
Sent: Saturday, March 15, 2008 2:01 PM
To: Complex2030
Subject: Proposal to build a plant to produce nuclear weapons

Janet Moore
3971 N.3rd St
Fresno, CA 93726-4427

March 15, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

I am a retired elementary school teacher who has lived in California most of my life. I always tried to teach my students to be aware of the privilege of living in the U.S. What message are we sending to our children with this proposal.

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,

Janet Moore
(559)227-6832

11J

Moore, Tom

Page 1 of 1

PC_2134

Levens, Matthew

From: Tom Moore [tmoore@comcast.net]
Sent: Thursday, April 10, 2008 1:07 AM
To: Complex2030
Subject: NO to Bomplex and more Nukes

THIS IS GETTING REALLY OLD. I'M ANGRY AT HAVING TO DEFEND US AND THE REST OF THE WORLD FROM NUCLEAR MADNESS. WAR MONGERS KEEP INVESTING IN MORE AND MORE EFFORTS TO MAKE MORE NUKES. THIS IS ABSOLUTELY DISGUSTING.
NUCLEAR WEAPONS ARE THE MOST FEARSOME OF WEAPONS OF MASS DESTRUCTION. WE WHINE AND COMPLAIN ABOUT OTHER NATIONS BUILDING THEM BUT INVEST GREAT EFFORTS TO BUILD MORE FOR US. THE WORD "A C C I D E N T" IS IN THE LANGUAGE BECAUSE THEY OCCUR. THERE HAVE BEEN ACCIDENTS INVOLVING NUKES AND THERE WILL NO DOUBT BE MORE. BUILD MORE AND THE PROBABILITY OF DEVASTATING ACCIDENTS RISES. WE HAVE MORAL OBLIGATION TO STOP BUILDING THESE DEVILFISH DEVICES. THE NON PROLIFERATION TREATY GIVES AT LEAST THE SPIRIT IF NOT THE LAW THAT DEMANDS A "BUILD DOWN."
I WANT MY COUNTRY TO UNEQUIVOCALLY AT EVERY OPFURTUNITY THAT WE REJECT NUCLEAR WEAPONS UNDER ANY AND ALL CIRCUMSTANCES. FOR 20 YEARS WE HAVE NOT MANUFACTURED NUCLEAR WEAPONS DIRECTLY BUT WE HAVE LOOKED THE OTHER WAY FOR ISRAEL TO MAKE THESE DEADLY INSTRUMENTS AND ENCOURAGED INDIA TO STAY ACTIVE IN MAKING NUKES AND GIVEN PAKISTAN A WINK AND A NOD. THESE ARE BAD IDEAS THAT MOST OF THE PEOPLE IN AMERICA AND THE REST OF THE WORLD DON'T APPROVE.
THE U.S. IS FOR THE THIRD TIME SEEKING PERMISSION FROM ITS PEOPLE TO REBUILD THE NUCLEAR WEAPONS COMPLEX.
THANKS TO THE NATIONAL ENVIRONMENTAL POLICY ACT, THE GOVERNMENT IS NOW REQUIRED TO HOLD PUBLIC HEARINGS TO SOLICIT COMMENTS FOR AN ENVIRONMENTAL IMPACT STATEMENT BEFORE IT CAN BUILD NEW BOMB FACTORIES. THE PUBLIC HAS SPOKEN CLEARLY AND UNEQUIVOCALLY AT EACH OPPORTUNITY THAT WE REJECT NUCLEAR WEAPONS UNDER ANY AND ALL CIRCUMSTANCES. IN ROUND ONE OF THE PUBLIC COMMENT PERIOD, 37,000 COMMENTS DEMANDING NUCLEAR DISARMAMENT AND REJECTING NUCLEAR BUILD-UP WERE SUBMITTED! IN THE CURRENT PUBLIC COMMENT PERIOD WHICH BEGAN IN FEBRUARY, 55,000 COMMENTS HAVE ALREADY BEEN SUBMITTED.
OUR NATIONAL SECURITY LIES DOWN THE PATH OF NUCLEAR WASTE MANAGEMENT, ENVIRONMENTAL RESTORATION AND SECURING THE BOMB MATERIALS FROM DISMANTLED WEAPONS. WE FOR THE SAKE OF OUR SELVES, OUR BROTHERS AND SISTERS AROUND THE PLANET AND OUR CHILDREN AND THEIRS MUST BACK OUT OF NUCLEAR WEAPONS. END THE NUCLEAR NIGHTMARE!
IT HAS BEEN NEARLY 20 YEARS NOW SINCE OUR COUNTRY HAS MANUFACTURED NEW NUCLEAR WEAPONS. MOMENTUM IS ON THE SIDE OF NUCLEAR DISARMAMENT AND THE FINAL ABOLITION OF WEAPONS OF MASS DESTRUCTION. WE HAVE A RARE WINDOW OF OPPORTUNITY TO ESTABLISH A TURNING POINT IN HUMAN HISTORY - TO PUBLICLY EXPRESS THE VISION AND GOAL THAT MAY INSPIRE OUR COUNTRY TO LEAD THE WORLD IN ENDING THE GLOBAL NUCLEAR NIGHTMARE. NO NUCLEAR WEAPONS MANUFACTURING UNDER ANY NAME! WE NEED TO BUILD DOWN AND ENCOURAGE OTHERS TO DO THE SAME.!"

Tom Moore
2830 5th St
Boulder, CO 80304

Moran, Hamilton

Page 1 of 1

PC_1986

Levens, Matthew

From: Hamilton A Moran [halkhak@ustfamily.net]
Sent: Monday, April 14, 2008 10:21 PM
To: Complex2030
Subject: Nuclear weapons

Hamilton A Moran
15897 finch lane
apple valley, MN 55124-5839
April 14, 2008
Complex Transformation Department of Energy
Complex Transformation Department of Energy:
It seems that this administration continues to forget that we as a country need to pull back from foolish and unneeded Military spending. Spending money on the bomb is a step in the wrong direction. Especially for triggers that we just mistakenly sent over seas. It is the blind eye approach of this administration to the woes of our country from excessive military spending. I truly beleive in bombs bullets and our honorable troops. But foolish squandering of our resources for ego or stupidity or old cronies, is reprehensible. Please endeavor to stop this further wonton spending on widgets, put the money to a good use for a change; bring the troops home soon with honor and with a GI bill that works. How about truly funding VA so our Glorious Veterans can handle the PTSD that any warrior will experience. The company I run is being destroyed by gas, and petro chemical prices and we do not need more foolish spending by government. Our infrastructures are in deplorable condition. Bridge failures (2) in Minnesota. poor roads, river upkeep, and on and on. Time to change direction. Spend the money at HOME
Sincerely,

Hamilton A Moran
612-701-2367

Morearty, John

Page 1 of 2

Testimony by John Morearty, Ph.D.

“Bombplex” hearings

Tracy California, March 18, 2008

pc_1010

Good evening, and peace be with you!

I’m John Morearty, I’m sixty-nine and a half, I live in Stockton. Between us, my wife and I have ten grandchildren, ages three to fourteen. They are the first of three reasons I’m here this evening. I’d like them to have the same opportunities which God and our beautiful country have given me—to live in joy, and contribute to building the earth community. I’m afraid they won’t; as the Chinese proverb says, if you keep on going the way you’re going, you’re likely to wind up where you’re headed.

The second reason I’m here is, I’m a Ph.D. in Social Thought from the University of Chicago, trained as a cultural historian. As a young guy I helped found a small liberal arts college at University of the Pacific in Stockton, dedicated to global understanding. I left academia in 1975, became a carpenter, a licensed general contractor—and a peace activist.

I got arrested blocking the road to Livermore Lab in 1982, and went to jail, with thousands of others. Did it again in 1983, and then crossed the line onto the Nevada Test Site a few times. I’ve worked for peace candidates for Congress, created and hosted a public affairs cable TV show every week for fourteen years as a volunteer, and still help to publish a free monthly community newspaper, *Connections*, published by the Peace and Justice Network of San Joaquin County.

At the age of forty, it dawned on me that the very existence of thousands of nuclear weapons threatened the lives of my beautiful twin sons, who were then fourteen years old—and I could not tuck them under my arms and run away to hide. No place to hide. Have you read *On the Beach*, by Nevil Shute, or seen the movie? You really should.

Nuclear explosives are not even properly “weapons.” A weapon is something like a knife or a gun; you **may** use it, and survive. But the intrinsic dynamic of these clever and horrendous devices, **in a world full of them**, is that once some fool uses one, **global** catastrophe threatens. **And you all know that.** These nuclear—things—

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(cont)

Livermore, CA

Morearty, John

Page 2 of 2

are the absurd culmination and linchpin of the imperial war system which has dominated and bedeviled humankind for about five thousand years. But Martin Luther King was right. He called our country “the greatest purveyor of violence in the world today,” and he said: “Our choice is no longer between violence and nonviolence. It is between nonviolence and nonexistence.”

The third and final reason I’m here is that the whole nuclear enterprise is so sad: it’s a tragic squandering and diversion of capital resources and human ingenuity from the urgent problems that confront our species and our planet. Economists call it “opportunity cost.” There are thousands of brilliant scientists and meticulous engineers in the nuclear system, I honor them, and we need them—our country needs them, the world needs them—to become green scientists and engineers. Livermore and Los Alamos and the rest must become Green Laboratories, working on clean sustainable energy and transportation systems, medical technology, ways of cleaning up and cooling down the rivers and oceans, saving the forests and the topsoil, so our great-great-grandchildren can live in peace and plenty. The immense dangers of this planetary era summon us to immense opportunities. We human beings are so smart! We are so capable. And now we get to decide, you get to decide: Will we be midwives of a new time on earth, or hospice workers?

Peace!

John Morearty
1205 W. Acacia St.
Stockton CA 95203
john@morearty.com
Memoirs at www.johnmorearty.com

1120
(cont)

3116A

419A

5110B

6110C

Morgan, David

Page 1 of 1

Levens, Matthew

From: David Morgan [morgan6@lnl.gov]
Sent: Thursday, April 10, 2008 1:11 PM
To: Complex2030
Subject: Counter Nuclear Terrorism needs to be emphasized.

PC_1954

LLNL, along with LANL, and, perhaps, Sandia, should also be centers of excellence for Counter Nuclear Terrorism. We have and are putting a lot of effort into that and have progressed very far.

Such a designation and stressing its importance could help the labs obtain increased funding, and we do need to expand our efforts in this area. There is much research yet to be done, and applying that research can considerably reduce the terrorist (or small country) nuclear threat, which is quite real.

11:0
2:08

David Morgan
B-DIV, LLNL

Morris, Linda

Page 1 of 1

Levens, Matthew

From: Physicians for Social Responsibility [webmaster@psr.org] on behalf of Linda Morris [lindam@whibbey.com]
Sent: Tuesday, April 08, 2008 11:34 AM
To: Complex2030
Subject: The U.S. doesn't need new nuclear weapons

PC_1434

Apr 8, 2008

Mr. Theodore Wyka
1000 Independence Avenue, SW
Washington, DC 20585

Dear Mr. Wyka,

THE WORLD DOES NOT NEED MORE NUCLEAR WEAPONS!!!!!! Linda Morris

Sincerely,

Ms. Linda Morris
417 Island View Ln
Langley, WA 98260-8644

11:6A

Morris, Markley

Page 1 of 1

Levens, Matthew

From: Markley Morris [markleym@mac.com]
Sent: Friday, March 28, 2008 12:44 AM
To: Complex2030
Subject: No New Nuclear Weapons

Markley Morris
555 Moscow Street
San Francisco, CA 94112-2807

March 28, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

116A I have been working for nuclear disarmament for more than 50 years. I believe that the
people of the world support the abolition of nuclear weapons. Rather than upgrading its
nuclear weapons program I believe the United States should provide moral leadership. We
21J should forsake nuclear weapons and urge all countries to follow suit.

In peace,

Markley Morris
415 586-1782

PC_1807

Morris, Nansi

Page 1 of 1

Levens, Matthew

From: N.Morris [nmorris@taosnet.com]
Sent: Thursday, May 01, 2008 12:36 PM
To: Complex2030
Subject: Fence to Fence Clean Up--PLEASE!

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,

It was suggested that I modify the narrative below, but I could not find better words to
express my concern and my opinion on this matter. Thus, I am forwarding this letter as I
received it. Please take heed and do the prudent thing:

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 favor 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 embark
upon a project of such magnitude at such an unstable time in our politics, environment,
and economy.

1140

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.

21J

Sincerely,

Nansi Morris
337 Chamisa Road

Taos, NM 87571

505-758-5550

nmorris@taosnet.com

PC_1480

Morrison, Gloria

Page 1 of 1

Buenafior, Justin

PC_486

From: Gloria Morrison [gloriaje@classicnet.net]
Sent: Tuesday, February 19, 2008 4:47 PM
To: Complex2030
Subject: military

Gloria Morrison
1709 W. Jackson Blv.
Peccs, TX 79772-4702

February 19, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

116A Congress rebuked the Energy Department's last attempts to upgrade the arsenal by defunding the Reliable Replacement
218A Warhead and last year's proposed mega-scale bomb plant. The CMRR project is another irresponsible new program that
Congress should reject.

Sincerely,

Gloria Morrison
4324463326

Morrisette, Julien

Page 1 of 1

Buenafior, Justin

PC_509

From: J.R. Morrisette [JRMorrisette@columbus.rr.com]
Sent: Wednesday, March 19, 2008 1:46 AM
To: Complex2030
Subject: nuke sites

I have read the Natural Resources Defense Council's report on your activities concerning repositioning of nukes & development of new nuclear weapons.

13A Sorry, we have enuf ... all kinds and sized, MIRVed and non MIRVed.
Please no more.

But let's keep the ones we have!

Sincerely,

Julien Morrisette
164 Taylor Avenue
Marysville OH 43040

E-mail message checked by Spyware Doctor (6.5.0.212) Database version: 5.09430 http://www.pctools.com/en/spyware-doctor/

Morrow, Tara

Page 1 of 2

Morrow, Tara

Page 2 of 2

Public Comments to the U.S. Department of Energy on the Draft Complex Transformation Supplemental Programmatic Environmental Impact Statement

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, D.C. 20585

PC_1041

March 25, 2008

My name is Tara Morrow and I am on the staff of Faithful Security, a national interfaith coalition committed to the elimination of nuclear weapons.

As a member of the United Methodist Church, I am reminded of the pastoral letter and foundational document "In Defense of Creation: The Nuclear Crisis and a Just Peace" from the United Methodist Council of Bishops. It speaks to us today, as it first did in 1986:

"... We say a clear and unconditioned No to nuclear war and to any use of nuclear weapons. We conclude that nuclear deterrence is a position that cannot receive the church's blessing. We state our complete lack of confidence in proposed 'defenses' against nuclear attack and are convinced that the enormous cost of developing such defenses is one more witness to the obvious fact that the arms race is a social justice issue, not only a war and peace issue..."

The Council of Bishops reiterated its position in 2005 in a resolution on the 60th anniversary of the atomic bombing of Hiroshima and Nagasaki:

"... 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..."

While as an American taxpayer I appreciate the dedication of Department of Energy employees in preparing the Draft Complex Transformation Supplemental Programmatic Environmental Impact Statement, I stand here today and echo in agreement the comments from the Friends Committee on National Legislation (Quakers), Faithful Security: National Religious Partnership on the Nuclear Weapons Danger, and 14 other national religious groups. In their public comments today, they "propose a No Production Alternative to Complex Transformation. This would include the following steps:

- o Place a moratorium on new warhead designs.

1 In Defense of Creation: The Nuclear Crisis and a Just Peace" by The United Methodist Council of Bishops (Cokesbury, Nashville, 1986) p. 92.
2 "United Methodist Bishops Back Complete Ban on Nuclear Weapons, Church Joins in Prayer for Victims of Hiroshima, Nagasaki Bombings," 8/5/06, http://www.intepretermagazine.org/interior.asp?ipid=21&mid=9544 (Accessed 3/20/08)

washington,dc

170 (cont)

- o Limit plutonium pit production to replacement of pits destroyed by surveillance activities.
o Consolidate and downsize the Nuclear Weapons Complex.
o Continue the nuclear testing moratorium.¹

Finally, as someone who studied Physics as an undergraduate, with most of my classmates going on to doctoral work in Physics or Astro-Physics and now in their first years of professional work, I appreciate the need "to maintain core competencies" in any given scientific field from generation to generation. However, I cannot in this instance agree with spending untold billions of dollars to keep scientists and others at the ready, I especially cannot agree when the same great scientific intellect could be redirected to meet pressing demands, such as, alternative fuels and increased energy efficiency, which indeed have national security implications.

Submitted by:
Tara Morrow
Churches' Center for Theology & Public Policy, Associate Director
Faithful Security: National Religious Partnership on the Nuclear Weapons Danger,
Communications Manager
4500 Massachusetts Avenue, NW
Washington, DC 20016

1 U.S. Department of Energy, Draft Complex Transformation SPEIS - Summary, December 2007, http://www.complexttransformationspeis.com/Summary.pdf, section S.2 (Accessed 3/20/08)

Morrow, Wendy

Page 1 of 2

WPA-10
Wendy Morrow
45882 120th St
Rensselaer, NY 14652

507K

PC

April 02, 2008

Administrator Thomas P. D'Agostino
National Nuclear Security Administration
Department of Energy
Washington DC 20585

Dear Administrator D'Agostino,

I strongly object to the current draft Complex Transformation Supplemental Programmatic Environmental Impact Statement.

The NNSA 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.

116A

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31F

Morrow, Wendy

Page 2 of 2

wrong message to the world.

Under an alternative that presumes a good faith compliance with the Nuclear Nonproliferation and Comprehensive Test Ban Treaties, the USA 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.

31F (cont);
41E

This alternative alone would reduce the nuclear weapons complex from 8 sites in 7 states to 5 sites in 4 states and save on the order of a billion dollars annually.

51G

In sum, the draft SPEIS is unacceptable in its current form.

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. Share the vision of the people, the vision of a nuclear weapon-free world. War should be illegal!

62B

Sincerely Wendy Morrow

Mortillaro, Anthony

Page 1 of 4

PC_962



LOS ALAMOS COUNTY

P.O. Box 30, Los Alamos, NM 87544 (505) 662-1750 Fax (505) 662-6078

Website: www.losalamosnm.gov

April 8, 2008

COUNTY ADMINISTRATOR

Max H. Baker

COUNTY ATTORNEY

Mary McHenry

Mr. 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

Re: Los Alamos County Comments on the Draft Complex Transformation Supplemental Programmatic Environmental Impact Statement (SPEIS) DOBEIS-0236-S

Dear Mr. Wyka:

Los Alamos County submits the attached table of comments and information to assist the National Nuclear Security Administration (NNSA) during the review of the Draft Complex Transformation SPEIS. Also attached is a letter from the Los Alamos County Council in support of the Preferred Alternative.

Please do not hesitate to call Regina Wheeler at 505-662-8050 if we can assist in any way with this process.

Sincerely,

Anthony Mortillaro
Assistant County Administrator

AJM/Tab
enclosures: Los Alamos County Council of March 5, 2008
Table of comments and information

cc: County Council
Max H. Baker, County Administrator
Timothy Glasco, Utilities Deputy Manager
Regina Wheeler, Solid Waste Division Manager

Mortillaro, Anthony

Page 2 of 4

Los Alamos County Comments on the Draft Complex Transformation SPEIS, DOE/IS-0236-S4

Submitted by: Los Alamos County

Contact: Regina Wheeler, 505-690-1197, regina.wheeler@lacosm.us

Table with 2 columns: No, Comment. Contains detailed comments regarding water resources, DOE operations, and LANL contracts.

114823

Page 3 of 3

No Comment	8	The socioeconomic impact analysis does not address the impact on the ROI of additional security measures. Additional security access control implemented at LANL has restricted access to tourist and recreational activities and adversely affected Los Alamos County's economic development plans. Are any additional impacts likely or possible with any of the alternatives?
	9	The Los Alamos County Fire Chief and Police Chief have contractual responsibility to respond to emergencies at LANL. Regarding the Emergency Response Organization (ERO) that while it "establishes effective control at the event/incident scene" that this control cannot conflict with established HAZMAT response protocols as articulated in State Law nor violate local jurisdictional authority.
	10	Stations. The County comments on the role of the Emergency Response Organization (ERO) that while it "establishes effective control at the event/incident scene" that this control cannot conflict with established HAZMAT response protocols as articulated in State Law nor violate local jurisdictional authority.

Page 2 of 3

No Comment		The low water use projection was used for planning purposes in the Los Range Water Supply Plan. The total capacity of the Los Alamos water production system is 10,559 gallons per minute with a firm capacity of 9,109 gallons per minute. The firm water capacity is the maximum total output of all the wells less the largest producing well.
	2	Do the water use projections for the alternatives include water use by operation such as supercomputing? The SPEIS does not mention or assess the impact of the supercomputing operations proposed for LANL as part of the Complex Transformation. The LANL SPEIS indicates that supercomputing could use up to 51,000,000 gallons of water per year.
	3	Impacts on groundwater quality in Los Alamos do not seem to be evaluated in the SPEIS. Past operations at LANL have resulted in groundwater contamination in the region. In most of the alternatives, LANL would use more water and the SPEIS should address how that might or might not cause additional contamination and perhaps migration of existing contamination.
	4	According to the National Academy of Sciences study "Plans and Practices for Groundwater Protection at the Los Alamos National Laboratory" (2007) (available at www.nap.edu) "Despite progress in efforts to protect groundwater in the surrounding region, the Los Alamos National Laboratory (LANL) needs to address substantial technical challenges in groundwater beneath the 40-square-mile site". Additional information about groundwater contamination in Los Alamos is contained in the "Long Range Water Supply Plan, Los Alamos County" August 2006 (available at www.losalamosnm.us).
	4	Has the interaction between the cleanup activities outlined in the Compliance order on Consent and the activities proposed for the Complex Transformation been evaluated? Los Alamos County strongly supports the schedule of the Compliance order on Consent being maintained or improved.
	5	Has the impact of the alternatives on planned land transfers from DOE to Los Alamos County been evaluated? The land use analysis should identify land that will be transferred, evaluate the impact of the alternatives on land transfers, and identify opportunities for additional or accelerated transfers. Land stated for transfer could be identified in table 5.1.1-2. Section 5.1.1.2 states "Although there would be a change in land use, the proposed CPC is compatible with land use plans. No change to LANL land use plans or policies are expected". Does this statement include land transfer plans and policies? The total impact in dollars on the region of influence (ROI) of the LANL Plutonium Phaseout (section 5.1.9.5) is not provided. This section indicates a loss of 1,260 direct and indirect jobs. For comparison, section 5.1.9.2.3 states that the ROI of \$75.3 million dollars annually.
	6	The DOE complex and the possible impacts of uncertainty regarding the mission of LANL on the economy of the region. The socioeconomic impact analysis in Chapter 5 for LANL seems to be missing an analysis of the overall downsizing
	7	

Moseley, Eva

Page 1 of 1

Moszyk, John

Page 1 of 1

PC_1978

Levens, Matthew

From: Eva S. Moseley [esmoseley@mindspring.com]
Sent: Wednesday, April 30, 2008 9:34 AM
To: Complex2030
Subject: Complex Transformation

Mr. Theodore A. Wyka:

One more citizen against any expansion of the U.S. nuclear arsenal. We are supposed to be 116A, reducing nuclear weapons not expanding and "improving" them, especially as we tell other 21J nations they may not even try to have even one nuclear bomb.

Eva S. Moseley
 361 Mt. Auburn St.
 Cambridge, MA 02138-5526
 617/868-7569

PC_2016

Levens, Matthew

From: John Moszyk [johnmoszyk48@hotmail.com]
Sent: Monday, April 14, 2008 5:43 PM
To: Complex2030
Subject: No to nuclear war

John Moszyk
 4278 Bordeaux
 St Louis, MO 63129-3810

April 14, 2008

Complex Transformation Department of Energy

116A

Complex Transformation Department of Energy,
 No to nuclear war and no to war with Iran!!!!!!
 Sincerely,
 John Moszyk
 1-314-894-004

Mueller, Cheryl

Page 1 of 1

PC_411

Levens, Matthew

From: Cheryl Mueller [cmueller@slawrence.edu]
Sent: Monday, March 17, 2008 2:51 PM
To: Complex2030
Subject: Opposition to New Nuclear Weapons

Cheryl Mueller
81 Green St
Fond du Lac, WI 54935-4324

March 17, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

I drove by a nuclear energy plant in Oak Creek on Sunday. It is frightening even though it is said to produce energy for positive uses.

More than ever, as a nation, we need to work toward peace and designing new weapons of destruction sends the opposite message to 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.

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,

Cheryl Mueller
920-907-0244

11J

216A

11J

(cont)

Muhleman, Roberta

Page 1 of 1

PC_2097

Levens, Matthew

From: Roberta Muhleman [petemuhleman@stcglobal.net]
Sent: Thursday, April 10, 2008 1:23 PM
To: Complex2030
Subject: Citizen Comment regarding SPEIS, Complex Transformation

Mr. Wyka:

As long as we have and produce nuclear weapons so will the rest of the world. If mankind is to survive this insanity must stop. George Bush invaded a country because he said they had WMD's. Right or wrong, how in good conscience does someone, with the support of a majority of the populace at the time, attack another country for doing the same thing that they are. We are supposed to be the leaders of the world, then we must protect the human species from total destruction by working toward engaging all countries to give up these weapons. If we do not, you can be assured others will not. It must start somewhere.

Roberta Muhleman
8 Tullivers Aisle
Irvine, CA 92603

11K
21J

Muir, Scott
Page 1 of 1

Mullen, Valerie
Page 1 of 1

PC_1531

PC-95

Levens, Matthew

From: Scott Muir [13scotts@gmail.com]
Sent: Tuesday, April 08, 2008 11:19 PM
To: Complex2030
Subject: Reject "Complex Transformation" plan to build nuclear weapons

Scott Muir
684 Honeysuckle Road
Gainesville, GA 30501-1622

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:

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

116A

I am strongly opposed to the idea of the United States building new nuclear weapons. This past week, ten years after I earned my Eagle Scout, I went on a boy scout camping trip with younger boys. Around the campfire, we discussed the golden rule, "Do unto others as you would have them do unto you." I shared a favorite quote from Gandhi, "Be the change you wish to see in the world."

We are hypocrites if we tell other countries that they may not have nuclear weapons, yet we ourselves build more. This is bad foreign policy. If we wish to see the world move towards a future that is not threatened by destructive weapons and fear of their use, then we must lead the way.

We, the United States of America, must be the change that we wish to see in the world. We must take responsibility and lead by example. For our children, for our environment, for our integrity and the dream of peace, we must say NO!!! to new nuclear weapons.

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

Peaceful Thoughts,

Scott B. Muir
404-277-5832

21J
(cont)

695 North Road
Vershire, VT 05079-9702

February 19, 2008

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

Reference: "Draft Complex Transformation SPEIS Comments"

Dear Mr. Wyka,

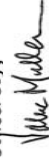
In regard to your proposal for the future of nuclear weapons entitled "Complex Transformation". As I understand this you are proposing building a Plutonium Center with a minimum production capacity of 125 pits per year. This will enable the complex to design new nuclear weapons and resume industrial scale bomb production.

The U.S. already has too many warheads and plutonium pits. The Plutonium Pit Lifetime study estimates that most of our nuclear arsenal will last at least a hundred years making the need for new nuclear weapons unnecessary. If we go ahead with this proposal we will only give the non-nuclear nations an excuse to go ahead in working towards the making of nuclear weapons and increase the risk of a nuclear war breaking out.

We are obligated under Article 6 of the Non-Proliferation treaty to work towards the abolishment of our nuclear weapons as are the other signers of the treaty. Your proposal not only violates this treaty it also gives an excuse to resume the nuclear arms race, which should have ended with the Cold War.

I hope that after you have heard all the comments both at the hearings and in writing you will reconsider this proposal and decide against it.

Sincerely,


Valerie Mullen

516A

41F;
31J
(cont)

21
SC.1
31J

13A

Muller, Abigail

Page 1 of 1

Levens, Matthew

PC_666

From: Muller, Abigail J (ANZ) [mulleraj@y12.doe.gov]
Sent: Wednesday, February 13, 2008 6:48 AM
To: Complex2030
Subject: Comments on Draft Complex Transformation SPEIS

As an individual citizen and employee at the Y-12 National Security Complex:

1/7N I strongly support the NNSA Preferred Alternative to continue the uranium mission at Y-12 with the new UPF. Y-12 and YSO have worked hard to plan for the Centers of Uranium Excellence for NNSA. The expertise to operate the UPF is located at Y-12. East Tennessee is a cost effective location for goods, services, and staffing.

2/4A I do not support the No Action alternative -- facilities are aging and sorely need improvement.

3/6D I do not support the Consolidated Centers of Excellence -- to move these tasks to another site will result in work and dollars lost. Also, expertise developed at Y-12 cannot easily be transferred to another site. Y-12 is working to pass core skills at all levels to new employees. Aging employees will not be interested in relocating to another site.

4/5F I do not support the Capability Based Alternative -- I do not believe this alternative is in the best interests of national security.

Thank you for the opportunity to comment.

A. J. Muller
Y-12 National Security Complex
Legal Division
FOIA/PA Program Office
865-576-0263

Murphy, Alice

Page 1 of 3

Levens, Matthew

PC_791

From: Wyka, Ted
Sent: Monday, February 25, 2008 5:51 AM
To: Complex2030
Subject: Fw:

Follow Up Flag: Follow up
Green

Flag Status:
Attachments: ETEBA Comments on SPEIS 2.08.doc



ETEBA
ns on SPEIS ;

----- Original Message -----
From: Alice Murphy <alice@eteba.org>

To: Wyka, Ted
Sent: Sun Feb 24 22:16:42 2008
Subject:

Mr. Wyka,

Attached are ETEBA's comments on the NNSA Transformation Supplemental Programmatic Environmental Impact Statement (SPEIS).

Thank you for this opportunity to comment.

Alice Murphy, Executive Director
Energy, Technology & Environmental
Business Association (ETEBA)

Phone: 865-945-1386

Cell: 865-386-3373

Email: alice@eteba.org


Murphy, Alice

Page 2 of 3

Murphy, Alice

Page 3 of 3

PC_791



February 26, 2008

Mr. Ted Wyka
 US Department of Energy (DOE)
 National Nuclear Security Administration (NNSA)
 Office of Transformation NA-10.1
 1000 Independence Avenue, NW
 Washington, DC 20585
Theodore.Wyka@nnsa.doe.gov

Subject: Comments on NNSA Supplemental Programmatic Environmental Impact Statement (SPEIS)

Dear Mr. Wyka:

The Energy, Technology, and Environmental Business Association (ETEBA) represents more than 180 large and small businesses doing work across the DOE and NNSA complex. ETEBA responds to the NNSA SPEIS in support of the Preferred Alternative for Distributed Centers of Excellence.

The draft complex transformation plan embraces the notion of modern "centers of excellence" by focusing on core competencies of the various NNSA sites, eliminating redundancies, and maximizing the consolidation of special nuclear materials. This preferred alternative will help the nation achieve a more effective, yet less expensive, nuclear security program that meets national security needs.

The preferred alternative would establish the Y-12 National Security Complex (Y-12) as the Center of Excellence for Uranium and the Los Alamos National Laboratory (LANL) as the Center of Excellence for Plutonium. Y-12 and LANL have historically played important roles in the NNSA employees at these sites have irreplaceable institutional knowledge that should be more fully leveraged by modernizing the facilities to enhance productivity, lower operating costs, and improve work conditions, overall safety and security. In addition, these NNSA facilities play a unique role in the economies of the communities in which they are located, employing large numbers of skilled laborers and professionals while offering better than average salaries and benefits.


ETEBA supports the NNSA proposal that Y-12 will be the *Center of Excellence for Uranium and Carried Subassemblies*, including:

- Storage of enriched uranium in the Highly Enriched Uranium Materials Facility (HEUMF);
- Processing of enriched uranium and performing research and development (R&D) activities within a newly constructed Uranium Processing Facility (UPF);
- Manufacturing of non-HEU components and subassemblies within the Consolidated Manufacturing Complex (CMC);
- Maximum utilization of Facilities Infrastructure Recapitalization Program (FIRP) and Transformation Disposition funding to eliminate excess facilities and enable footprint reduction; and
- Implementing the Integrated Facilities Disposition Plan to complete the environmental restoration of the site.

ETEBA supports the NNSA proposal that Los Alamos National Laboratory will be the *Center of Excellence for Nuclear Design and Engineering* and the *Center of Excellence for Plutonium*, including:

- Being the host site for the supercomputing platform;

PC_791



61108:
551 (cont.)

- Plutonium pit production R&D within TA-55, including construction of a Chemistry & Metallurgy Research Replacement (CMRR) Nuclear Facility;
- Detonator production and contained HE R&D;
- Materials research with the Matter-Radiation Interaction in Extremes facility as a potential science magnet;
- Maximum utilization of Facilities Infrastructure Recapitalization Program (FIRP) and Transformation Disposition funding to eliminate excess facilities and enable footprint reduction; and
- Continued stable Environmental Management program funding to complete the environmental restoration of the site.

ETEBA would be happy to answer any questions regarding this correspondence or provide further testimony. Thank you for the opportunity to comment on this important national security matter.

Sincerely,

Alice Q. Murphy
 Executive Director

Cc: The Honorable Pete Domenici, New Mexico
 The Honorable Lamar Alexander, Tennessee
 The Honorable Bob Corker, Tennessee
 The Honorable Zach Wamp, Third District, Tennessee
 The Honorable Tom Udall, New Mexico
 The Honorable Heather Wilson, New Mexico
 Mr. Thomas D'Agostino, NNSA
 Ms. Alice Williams, NNSA
 Mr. Theodore Sherry, Manager, NNSA Y-12 Site
 The Honorable Randy McNally, District 5
 The Honorable Jim Hackworth, District 33
 Mr. James O'Conner, Manager, City of Oak Ridge
 Mr. Tom Beehan, Mayor, City of Oak Ridge

Murphy, I

Page 1 of 1

Murphy, Polly

Page 1 of 1

Levens, Matthew

From: eanoneanon2@gmail.com
Sent: Sunday, April 06, 2008 8:43 PM
To: Complex2030
Subject: How can you possibly justify that?

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 Theodore Wyka, I don't know what your purpose in building new weapons is, but I am completely certain that it is a terrible and senseless one. Nuclear weapons have no positive or peaceful capabilities, only ones for destruction and chaos. When would the ability to end all the life in a particular city- for years to come also, mind- ever do us good? The only time it was deemed necessary to use nuclear arms was against Japan and that was absolutely horrendous. Picturing all that slough and melting flesh and death makes me sick and I could never understand how a person could plan another nuclear program in light of a tragedy such as that. Has history taught you nothing?

Nuclear weapons pose more of a threat to America and the world than anything they could be used against. If nuclear weapons must be your job, then I recommend you use your position to work with all your might to get rid of them. Please, please don't move forward with these plans because the world will only become a more wicked and menacing place.

You should sit for a few minutes and picture the people that make your life enjoyable and then try to explain to yourself why you need to endanger them so. Imagine missing out on your brothers or sisters or cousins or someone at your next family reunion because Chicago was destroyed in a retributive strike or they died of brain cancer or their faces were melted off in a plant meltdown. It might not seem like it, but you will have to pay for whatever decisions you make. I don't want any of our children or grandchildren to have to live through hell on earth, so please make the right decision and don't proliferate more, get rid of what we still have left. Love you man, have a nice day.

Sincerely,
I Murphy
189 Colonial Hill
Mount Kisco, NY 10549
cc: Senator Charles Schumer
Senator Hillary Clinton
Representative John Hall

PC_1740

PC_163

Can't make nuclear bombs
We're in a big war stopping
a country who we thought
had W.M.O. --dropping bombs
on them. BUT we can, we do
and we will create more nukes
bombs. A little boy created
me, is that permitted? Is that
fair? why do we do that?
I realize, this makes many
nearly join here in our ridge
I do believe there is
enormous amount of work
to clean it all up and
disarm it. One Edge
(CREBA) has some good
information on how to
have lots without making
more bombs. I urge us
all to come together and
stop this project and begin
disarmament all over the USA.

(cont) 311

Comments: Complex
Transformation
Feb. 26, 2008 Dave Ridge TN
by: Polly Murphy - Knoxville TN
I understand you, The National
Nuclear Security Administration
have heard from 9,000 people
and 8,000 of these are the comments
said, what we all know, the US
Commitments to the Non-Proliferation
Treaty requires our disarmament. 80
It seems clear enough we need to
be about working towards
reducing our arsenals not making
more.
We all know we already have
more than enough bombs for this
age.
I am a teacher, when I try
to explain the Non-Proliferation
Treaty to students, they
Pretty confused. We say the
rest of the world can't make

311

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11f

616a

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47u

Myers, Pamela

Page 1 of 2

Myers, Pamela

Page 2 of 2

PC_1661

From: pamwunder@hotmail.com
Sent: Saturday, April 05, 2008 2:09 PM
To: Complex2000
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 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 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.

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.

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.

In 1991, an estimated 375 tons of Depleted Uranium were dumped on Iraq, and approximately 2200 tons were dumped in the war in 2003. According to geiger counter readings in four different sites, the radiation levels were between one and two thousand times higher than normal background radiation. Millions of Iraqis have been affected. Of the 697,000 American troops that were there in 1991, about half of them have since reported serious medical problems and significant increases in birth defects in their newborn children.

For perspective, in Vietnam, about 10% of veterans reported problems, and in WWII about 3% reported, and now we are looking at 50%. About 1/3rd of the Iraq vets 230,000 people are on Veterans Administration (VA) Disability. That is a huge increase over previous wars.

What we are looking at is something beyond the imagination. DU has been blamed on the health level for the effects of the Gulf War Syndrome, including chronic muscle and joint pain, fatigue, and memory loss among at least 200,000 soldiers. Cancer in Iraq, according to a UN Subcommission, seems to have increased between 4 and 6 times expected levels of the norm. A United Kingdom Atomic Energy Authority report said up to 500,000 people would die before the end of the century due to radioactive debris left behind in the desert. The use of Depleted Uranium has led to birth defects in the children of our veterans, and it is believed to be a cause of anophthalmos, meaning babies born without eyes. The usual rate for this is one in fifty million births. In Baghdad, they had eight cases in just two years.

A study of 251 Gulf War Veterans from Mississippi conducted by the Veterans Administration showed that 67% of veterans had children with severe illnesses, missing eyes, blood infections, respiratory problems, and fused fingers. This is very significant data. Their babies were born after the war they were deemed to have severe defects. The newborns had missing: brains, arms, eyes, organs. . . they had blood diseases. The Gulf War Veterans came back with DU in their clothing, bodies, and semen. These were people who had normal babies before they went over there, now they are running 67% birth defects.

This is insane. Stop this now!

Sincerely,
Pamela Myers
PO Box 2848
Seal Beach, CA 90740

cc:
Senator Dianne Feinstein
Senator Barbara Boxer
Representative Dana Rohrabacher

Nagao, Yasuko

Page 1 of 1

Levens, Matthew

From: Yasuko [yasuman@yahoo.com]
Sent: Sunday, March 30, 2008 7:27 PM
To: Complex2030
Subject: NO to Complex Transformation Plan

PC_1885

To whom it may concern:

I have learned about recent submitted complex transformation draft plan. I cannot support the idea and activity. It is illegal and immoral to produce nuclear weapons. I was born in Nagasaki Japan and have visited the Nagasaki atomic bomb museum and learned how devastating and horrible it was. We do not want to repeat and experience this on this beautiful earth.
There will be no good result from this. Please reconsider and cancel this plan immediately for our world peace. Thank you for your reconsideration in advance.

Sincerely,

Yasuko Nagao

Looking for last minute shopping deals?
Find them fast with Yahoo! Search. <http://tools.search.yahoo.com/newsearch/category.php?category=shopping>

Nahman, Richard

Page 1 of 1

Levens, Matthew

From: Rev. Richard M. Nahman, OSA [rcaired4@aol.com]
Sent: Friday, March 28, 2008 9:36 AM
To: Complex2030
Subject: Please keep us safe

PC_1844

Rev. Richard M. Nahman, OSA
2345 University Avenue
Bronx, NY 10468-6102

March 28, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1) I strongly oppose the administration's proposals to effectively accelerate the nuclear arms race.

2) Maintaining more and more nuclear facilities makes us no safer than stockpiling more and more hand weapons around one's residence makes a family safer.

There comes a point of diminishing returns.

Please open your hearts to the plea of people such as the Quakers' Committee on National Legislation.

Thank you kindly,

Richard Nahman
718 295 6800

Nance, Kathy

Page 1 of 1

Nangle, Joseph

Page 1 of 3

Levens, Matthew

From: Kathy Nance [kathynance1@yahoo.com]
Sent: Thursday, March 13, 2008 5:17 PM
To: Complex2030
Subject: Do not fund nuclear weapons or energy

Kathy Nance
377 Arrowood Rd.
Rutherfordton, NC 28139-6502

March 13, 2008
Complex Transformation Department of Energy

Complex Transformation Department of Energy:

I am adamantly against the administration's proposal to build a plant to produce plutonium pits for nuclear weapons, and modify facilities to rebuild nuclear arsenals.

We must invest in peace, not war. That means no support of nuclear weapons in any form, and no support of nuclear energy plants.

We must focus on building a sustainable future and invest in a world of peace. That means helping the whole world to be prosperous so that terrorism is not a temptation to those who have not hope.

We should be investing in sustainable forms of energy production and not rewarding coal, oil, and other polluters and war machinery with our tax dollars.

Please get the priorities straight and do not support nuclear war or nuclear power or anything war related (except helping our soldiers who are coming home) or that pollutes the earth.

Thank you for your leadership in these efforts.

In peace and sustainability

Kathy Nance
828-287-0069

PC_581



Pax Christi USA Testimony to the Department of Energy
Hearing on Complex Transformation
March 25th, 2008; Washington, DC

Delivered by Rev. Joseph Nangle, OFM, Pax Christi USA Ambassador of Peace
Thank you for the opportunity to speak to the very important topic of the proposed Complex Transformation.

Since its founding in 1972, Pax Christi USA has opposed the possession of nuclear weapons, their continued development, testing, deployment and threatened use, as a sinful affront to any moral order and a threat from the billions of men, women and children in our world who daily struggle to find dignity and life amidst devastating and dehumanizing poverty. Over \$7 trillion has been spent by the US on its nuclear deterrent to date. The Complex Transformation program's estimated cost of an additional \$150 billion to enable the US to replace every warhead in its arsenal is an unacceptable continuation of a morally abhorrent policy: a policy of national security based on threats of massive annihilation.

Unlike US national security policy, the Catholic Church's teachings on nuclear weapons and deterrence have undergone dramatic changes since the end of the Cold War. In 1981, when Pope John Paul II offered a conditioned moral acceptance of nuclear deterrence it was offered only as an interim measure on the path to nuclear disarmament and complete elimination of nuclear arsenals as called for in Article VI of the Nonproliferation Treaty.

With the ending of the Cold War and the collapse of the Soviet Union, the Church has consistently called for the outlawing of nuclear weapons in the same way that chemical and biological weapons have been outlawed. Weapons of mass destruction have no place in a civilized world.

Indeed, on April 8, 2002, Mons. Francis Chullikatt, Deputy Head of the Holy See delegation to the UN, addressing the first session of the Preparatory Committee for the 2005 review conference of the NPT, reminded the Conference that the 2000 Review Conference yielded commitments by the US to, and I quote:

"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."

National Catholic
Peace Movement
532 West Eighth Street
Erie, PA 16502-1363
PH: 814-453-4095
FX: 814-452-5784
info@paxchristiusa.org
www.paxchristiusa.org

Washington, DC

Mons. Chullikot continued by declaring: "There can be no moral acceptance of military doctrines that embody the permanence of nuclear weapons....Those nuclear weapon states resisting negotiations should therefore be strongly urged to finally come to the negotiating table."

"In fact, in clinging to their outmoded rationales for nuclear deterrence, they are denying the most ardent aspirations of humanity as well as the opinion of the highest legal authority in the world. In this regard, my Delegation wishes to reaffirm its well-known position: nuclear weapons are incompatible with the peace we seek for the 21st century; they cannot be justified."

The Catholic Church again stated its position in 2005. In his address to the delegates at the NPT Review Conference, Archbishop Celestino Migliore, Vatican U.N. ambassador, condemned the very investments in upgrading nuclear arsenals that you are considering here with the Complex 2030 program. Archbishop Migliore said that "When the Holy See expressed its limited acceptance of nuclear deterrence during the Cold War, it was with the clearly stated condition that deterrence was only a step on the way toward progressive nuclear disarmament. The Holy See has never countenanced nuclear deterrence as a permanent measure, nor does it today when it is evident that nuclear deterrence drives the development of ever newer nuclear arms, thus preventing genuine nuclear disarmament."

In 1996, the US embarked on a \$60 billion reinvestment in its nuclear complex. At that time, the Science-Based Stewardship & Management program was presented as a means of assuring the safety and reliability of the US nuclear arsenal through the year 2065. Now we are presented with another proposal, "Complex Transformation", which intends to invest massive amounts of money—as much as \$150 billion over the next ten years—to ensure the viability of our nuclear deterrent for the rest of the century and beyond.

Preserving the nuclear deterrent indefinitely into the future, replacing the existing arsenal with newer, even so-called "usable" nuclear warheads, and relying on those weapons in national security doctrine represents an evil of mass proportions that will not be countenanced by any person of faith or conscience.

When does it end? When will the insanity and immorality of mass investments in weapons of mass destruction finally be rejected? In the name of the 142 US Catholic bishop members of Pax Christi USA, in the name of the 650 Catholic Religious Community members of Pax Christi USA, in the name of our 350 local Pax Christi Chapters across the US, and tens of thousands of Pax Christi USA members, our fervent hope is that that time is now. Nuclear weapons are incompatible with the peace we seek in this 21st century and we oppose Complex Transformation for that reason.

I would end my comments here, except for the fact that these hearings themselves represent a deeper element of the deception of nuclear deterrence. Last year, in addition to these hearings in our nation's capital, comments were accepted from across the United

States, particularly in communities where the nuclear danger is most urgent—those communities where the US nuclear complex is based. The overwhelming response from the citizens of this nation in opposition to the then, Complex 2030 program was dismissed by the NNSA. In the summary of Major Scoping Comments, NNSA concluded: "The majority of comments expressed opposition to the nuclear weapons program and US national security policies. Many of the comments stated that the US is violating the Nonproliferation Treaty. Many of the comments stated that the NNSA should assess an additional alternative—disarmament in compliance with the NPT—and not design or build new nuclear weapons." These concerns expressed by citizens across this nation were, unfortunately, summarily dismissed by NNSA.

It seems that NNSA is only interested in comments on the narrowest interpretation of the future disposition of the US nuclear weapons complex. The fact that the majority of comments have noted that the US nuclear weapons complex is currently in violation of international agreements and that the proposed activities and enhancements that Complex Transformation would further violate the terms of the Nonproliferation Treaty appears to be considered irrelevant to NNSA. NNSA claims it's "only following orders." NNSA's response to the scoping comments given last year is that the Administration sets National Security Policy and NNSA is only obliged to offer alternatives for consideration that further that policy. This "we're just following orders" approach did not work at Nuremberg and it is not acceptable here.

The NNSA should focus its resources on developing alternative approaches to maintaining the safety of the US nuclear arsenal while managing the effective dismantlement of these weapons in accordance with our international obligations.

Any other approach violates international law and our own Treaty commitments.

The Complex Transformation that we seek is a true transformation away from a large, provocative and destabilizing Complex that threatens to ignite a new nuclear arms race and toward a nuclear weapons free world where these horrendous weapons are eliminated under safe and irreversible conditions under strict international monitoring in compliance with our international commitments.

I thank you for your time.

Nash, Susan

Page 1 of 1

Navarro-Valenti, Ph.D, Susana

Page 1 of 3

PC_1237

Levens, Matthew

From: Susan Nash [fnagsndclaws@qcom]
Sent: Saturday, March 29, 2008 1:34 AM
To: Complex2030
Subject: No new nukes!

Susan Nash
14225 SE Upper Aldercrest Dr
Portland, OR 97267-1804

March 29, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy

116A Please join me in opposing this administration's proposal to build a plant to produce plutonium pits for nuclear weapons. The US already has horrific stockpiles of such weapons, which, unless we truly have a death wish for all life on Earth, must never be employed. Proliferation of such weapons is utterly incomprehensible, both in the vileness of the motivation and the arrogant wasting of tax payer dollars.

31K Such a proposal is typical of the indifference of this administration to the real problems our country faces.

Sincerely,

Susan Nash
5036590268

Levens, Matthew

From: Mary Rhea [mra@navarro-inc.com]
Sent: Wednesday, February 27, 2008 3:19 PM
To: Complex2030
Subject: Draft Complex Transformation SPEIS

Attachments: Draft Complex Transformation SPEIS Comments.pdf



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t NS O t

Attached are my written comments on the Draft Complex Transformation SPEIS.

Regards,

Susana Navarro-Valenti, Ph.D.
Navarro Research and Engineering, Inc.
669 Emory Valley Road

Oak Ridge, TN 37830

Phone: (865) 220-9650

Fax: (865) 220-9651

PC_644

Navarro-Valenti, Ph.D, Susana

Page 2 of 3



PC 644
NAVARRO
Research and Engineering, Inc.

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, DC 20585

Dear Mr. Wyka:

NNSA Weapons Complex Transformation

I am writing to express my support for the Y-12 National Security Complex (NSC) transformation from a legacy of large, cold war weapons production facility to a future of a modern, smaller, and much more cost efficient facility.

I am writing from the perspective of a small business owner which has been providing support for over 10 years to the Y-12 NSC. Currently, Y-12 represents a very important, although a relatively small (15%), part of the Navarro Research and Engineering, Inc. business. More importantly, however, the Y-12 represents a very important and unique piece of the U.S. Nuclear Weapons Complex which must be modernized if it is to continue its mission.

I have witnessed the neglect of Y-12 during the 1990's and the split-up of the large, single Management Operating Contractor for the Oak Ridge Reservation to multiple operating contractors with a single contractor for Y-12. I have witnessed the rebirth of Y-12 in recent years with the removal of many, but not enough, old buildings and facilities and the construction of the first new production facility in over 30 years. The construction of the New Hope and Jack Case facilities has not only changed the face of Y-12 but has changed the morale of all who work there. I believe that Y-12 was in front of the weapons complex in recognizing the need to downsize and restructure for a more efficient plant. We must keep the momentum going.

Having Navarro employees on site for over 10 years, I can tell you that the facility is on the right path. Many of the cost inefficiencies at the plant can be traced to the large number of oversized and cold war era facilities. These old facilities are in continual need of safety and security upgrades which divert attention from mission objectives. Given the amount of highly enriched uranium stored at the Y-12 NSC, and the need to put that material in safer and more secure forms, the upgrades and reduction of controlled security areas will be absolutely essential. I believe these upgrades are required independent of a continuing weapons mission. The ongoing non-proliferation mission and a continuing weapons mission only make the consolidation into a smaller and more efficient plant more urgent.

669 Emory Valley Road, Oak Ridge, TN 37830
865-220-9650 • www.navarro-inc.com • 865-220-9651 Fax

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3|15A;

4|3A;

5|4A

Navarro-Valenti, Ph.D, Susana

Page 3 of 3



PC 644
NAVARRO
Research and Engineering, Inc.

6|14A;
7|8B
The only thing I would suggest to improve the transformation plan would be a stronger and more visible commitment to remove the large Alpha and Beta buildings as they become no longer required. Until they are removed, they will be a continuing drain on the NNSA budget.

If you have any questions, please feel free to contact me at (865) 220-9650.

Sincerely,

Susana Navarro-Valenti, Ph.D.
President and CEO

669 Emory Valley Road, Oak Ridge, TN 37830
865-220-9650 • www.navarro-inc.com • 865-220-9651 Fax

Neal, A

Page 1 of 1

Neal, Louise

Page 1 of 6

Levens, Matthew

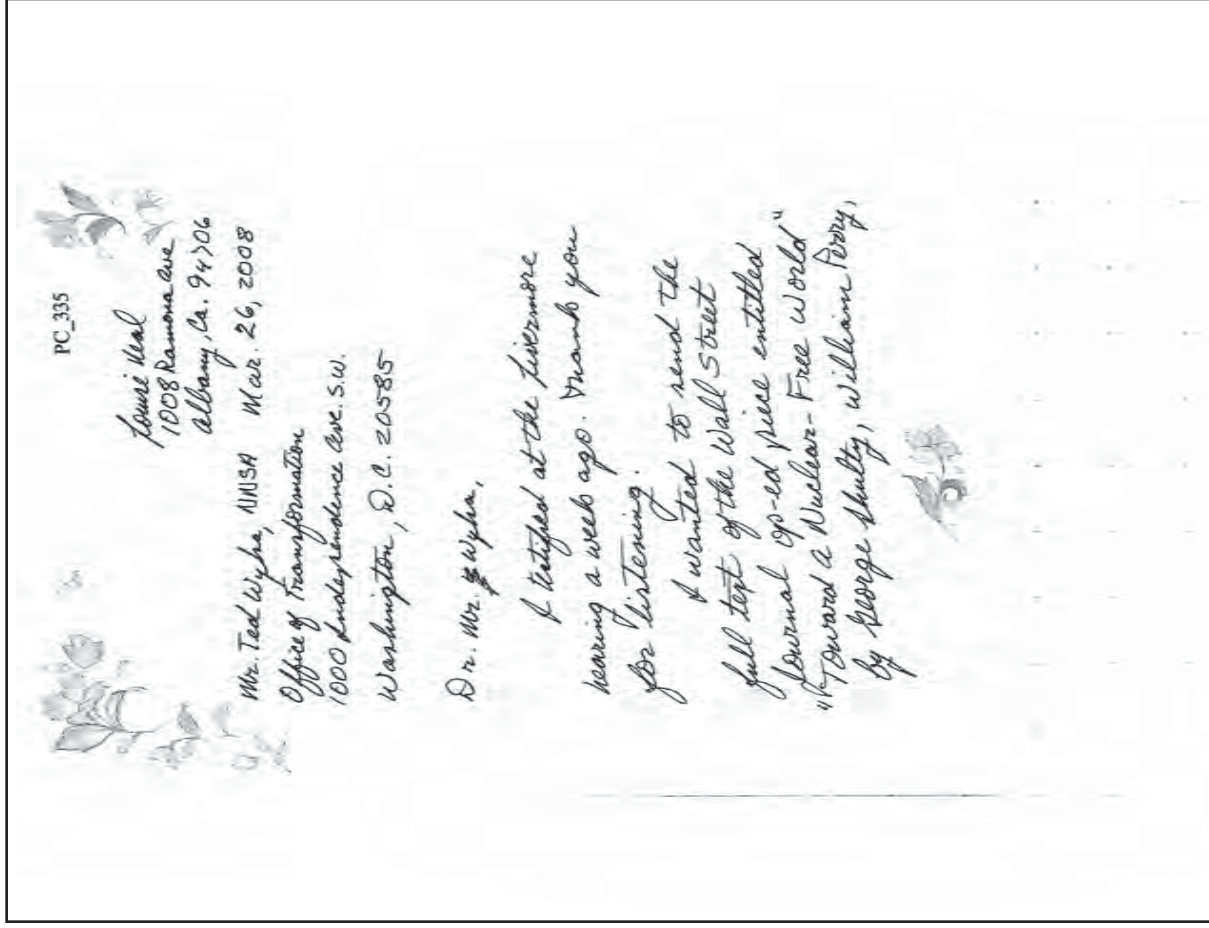
From: Brenda Neal [bneal@comcast.net]
Sent: Wednesday, March 26, 2008 10:17 AM
To: Complex2000
Cc: cergreen@charter.net

PC_1722

Dear Chairman Myka:
As a Methodist Christian, English Teacher and Tennessean, I am writing to ask you to oppose a new nuclear weapons complex. As Americans face the problems of the 21st Century, I pray that we may begin to rely less on fire power, which has proven so impotent in the Iraq War, and more on diplomacy and international cooperation. More than ever our survival as a species depends on securing our future through understanding not stockpiling and upgrading nuclear weapons--a foreign policy whose time is long past. Yours, Brenda A. Neal

116A

21J



Neal, Louise

Page 2 of 6

Henry Kissinger and Sam Nunn
 I hope you contact these
 gentlemen for their opinion
 on Complex Transformation. I
 think they would agree that
 it's a dangerous and costly
 step in the wrong direction.
 Thank you again for
 listening to all of us.
 Sincerely
 Louise Neal

1140

28A

Neal, Louise

Page 3 of 6

TOWARD A NUCLEAR-FREE WORLD
BY GEORGE P. SHULTZ, WILLIAM J. PERRY, HENRY A. KISSINGER and SAM NUNN
THE WALL STREET JOURNAL
January 15, 2008

The accelerating spread of nuclear weapons, nuclear know-how and nuclear material has brought us to a nuclear tipping point. We face a very real possibility that the deadliest weapons ever invented could fall into dangerous hands.

The steps we are taking now to address these threats are not adequate to the danger. With nuclear weapons more widely available, deterrence is decreasingly effective and increasingly hazardous.

One year ago, in an essay in this paper, we called for 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. The interest, momentum and growing political space that has been created to address these issues over the past year has been extraordinary, with strong positive responses from people all over the world.

Mikhail Gorbachev wrote in January 2007 that, as someone who signed the first treaties on real reductions in nuclear weapons, he thought it his duty to support our call for urgent action: "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."

In June, the United Kingdom's foreign secretary, Margaret Beckett, signaled her government's support, stating: "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."

We have also been encouraged by additional indications of general support for this project from other former U.S. officials with extensive experience as secretaries of state and defense and national security advisors. These include: 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.

Inspired by this reaction, in October 2007, we convened veterans of the past six administrations, along with a number of other experts on nuclear issues, for a conference at Stanford University's Hoover Institution. There was 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.

Neal, Louise

Page 4 of 6

The U.S. and Russia, which possess close to 95% of the world's nuclear warheads, have a special responsibility, obligation and experience to demonstrate leadership, but other nations must join.

Some steps are already in progress, such as the ongoing reductions in the number of nuclear warheads deployed on long-range, or strategic, bombers and missiles. Other near-term steps that the U.S. and Russia could take, beginning in 2008, can in and of themselves dramatically reduce nuclear dangers. They include:

- *Extend key provisions of the Strategic Arms Reduction Treaty of 1991.* Much has been learned about the vital task of verification from the application of these provisions. The treaty is scheduled to expire on Dec. 5, 2009. The key provisions of this treaty, including their essential monitoring and verification requirements, should be extended, and the further reductions agreed upon in the 2002 Moscow Treaty on Strategic Offensive Reductions should be completed as soon as possible.
- *Take steps to increase the warning and decision times for the launch of all nuclear-armed ballistic missiles, thereby reducing risks of accidental or unauthorized attacks.* Reliance on launch procedures that deny command authorities sufficient time to make careful and prudent decisions is unnecessary and dangerous in today's environment. Furthermore, developments in cyber-warfare pose new threats that could have disastrous consequences if the command-and-control systems of any nuclear-weapons state were compromised by mischievous or hostile hackers. Further steps could be implemented in times, as most grows in the U.S.-Russian relationship, by introducing mutually agreed and verified physical barriers in the command-and-control sequence.
- *Discard any existing operational plans for massive attacks that will remain from the Cold War days.* Interpreting deterrence as requiring mutual assured destruction (MAD) is an obsolete policy in today's world, with the U.S. and Russia formally having declared that they are allied against terrorism and no longer perceive each other as enemies.
- *Undertake negotiations toward developing cooperative multilateral ballistic-missile defense and early warning systems, as proposed by Presidents Bush and Putin at their 2002 Moscow summit meeting.* This should include agreement on plans for countering missile threats to Europe, Russia and the U.S. from the Middle East, along with completion of work to establish the Joint Data Exchange Center in Moscow. Reducing tensions over missile defense will enhance the possibility of progress on the broader range of nuclear issues so essential to our security. Failure to do so will make broader nuclear cooperation much more difficult.
- *Dramatically accelerate work to provide the highest possible standards of security for nuclear weapons, as well as for nuclear materials everywhere in the world, to prevent terrorists from acquiring a nuclear bomb.* There are nuclear weapons materials in more than 40 countries around the world, and there are recent reports of alleged attempts to smuggle nuclear material in Eastern Europe and the Caucasus. The U.S., Russia and other nations that have worked with the Nunn-Lugar programs, in cooperation with the International Atomic Energy Agency (IAEA), should play a key role in helping to implement United Nations Security Council Resolution 1540 relating to improving nuclear security – by offering teams to assist jointly any nation in meeting its obligations

under this resolution to provide for appropriate, effective security of these materials.

As Gov. Arnold Schwarzenegger put it in his address at our October conference, "Mistakes are made in every other human endeavor. Why should nuclear weapons be exempt?" To underline the governor's point, on Aug. 29-30, 2007, six cruise missiles armed with nuclear warheads were loaded on a U.S. Air Force plane, flown across the country and unloaded. For 36 hours, no one knew where the warheads were, or even that they were missing.

- *Start a dialogue, including within NATO and with Russia, on consolidating the nuclear weapons designed for forward deployment to enhance their security, and as a first step toward careful accounting for them and their eventual elimination.* These smaller and more portable nuclear weapons are, given their characteristics, inviting acquisition targets for terrorist groups.
- *Strengthen the means of monitoring compliance with the nuclear Non-Proliferation Treaty (NPT) as a counter to the global spread of advanced technologies.* More progress in this direction is urgent, and could be achieved through requiring the application of monitoring provisions (Additional Protocols) designed by the IAEA to all signatories of the NPT.
- *Adopt a process for bringing the Comprehensive Test Ban Treaty (CTBT) into effect, which would strengthen the NPT and aid international monitoring of nuclear activities.* This calls for a bipartisan review, first, to examine improvements over the past decade of the international monitoring system to identify and locate explosive underground nuclear tests in violation of the CTBT; and, second, to assess the technical progress made over the past decade in maintaining high confidence in the reliability, safety and effectiveness of the nation's nuclear arsenal under a test ban. The Comprehensive Test Ban Treaty Organization is putting in place new monitoring stations to detect nuclear tests – an effort the U.S. should urgently support even prior to ratification.

In parallel with these steps by the U.S. and Russia, the dialogue must broaden on an international scale, including non-nuclear as well as nuclear nations.

Key subjects include 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. The government of Norway will sponsor a conference in February that will contribute to this process.

Another subject: Developing an international system to manage the risks of the nuclear fuel cycle. With the growing global interest in developing nuclear energy and the potential proliferation of nuclear enrichment capabilities, an international program should be created by advanced nuclear countries and a strengthened IAEA. The purpose should be to provide for reliable supplies of nuclear fuel, reserves of enriched uranium, infrastructure assistance, financing, and spent fuel management – to ensure that the means to make nuclear weapons materials isn't spread around the globe.

Neal, Louise

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Neal, Louise

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Nederhiser, Terri

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There should also be an agreement to undertake further substantial reductions in U.S. and Russian nuclear forces beyond those recorded in the U.S.-Russia Strategic Offensive Reductions Treaty. As the reductions proceed, other nuclear nations would become involved.

President Reagan's maxim of "trust but verify" should be reaffirmed. Completing a verifiable treaty to prevent nations from producing nuclear materials for weapons would contribute to a more rigorous system of accounting and security for nuclear materials.

We should also build an international consensus on ways to deter or, when required, to respond to, secret attempts by countries to break out of agreements.

Progress must be facilitated by a clear statement of our ultimate goal. Indeed, this is the only way to build the kind of international trust and broad cooperation that will be required to effectively address today's threats. Without the vision of moving toward zero, we will not find the essential cooperation required to stop our downward spiral.

In some respects, the goal of a world free of nuclear weapons is like the top of a very tall mountain. From the vantage point of our troubled world today, we can't even see the top of the mountain, and it is tempting and easy to say we can't get there from here. But the risks from continuing to go down the mountain or standing pat are too real to ignore. We must chart a course to higher ground where the mountaintop becomes more visible.

Mr. Shultz was secretary of state from 1982 to 1989. Mr. Perry was secretary of defense from 1994 to 1997. Mr. Kissinger was secretary of state from 1973 to 1977. Mr. Nunn is former chairman of the Senate Armed Services Committee.

The following participants in the Hoover-NTI conference also endorse the view in this statement: General John Abizaid, Graham Allison, Brooke Anderson, Martin Anderson, Steve Andreasen, Mike Armacost, Bruce Blair, Matt Bunn, Ashton Carter, Sidney Drell, General Vladimir Douvakin, Bob Eshokorn, Mark Fitzpatrick, James Goolby, Rose Gottemoeller, Tom Graham, David Hamburg, Siegfried Hecker, Tom Henriksen, David Holloway, Raymond Jeanloz, Ray Juzzitis, Max Kampelman, Jack Matlock, Michael McFaul, John McLaughlin, Don Oberdorfer, Pavel Podvig, William Potter, Richard Rhodes, Joan Rohlfing, Harry Rowen, Scott Sigam, Ronald Soggeev, Abe Sofaer, Richard Solomon, and Philip Zalkow.

PC_1241

Levens, Matthew

From: Terri Nederhiser [es03@prodigy.net]
Sent: Thursday, March 27, 2008 9:15 PM
To: Complex2030
Subject: No more plants to build more nuclear weapons

Terri Nederhiser
 1615 Seminole Ave. N.W. #4
 Cedar Rapids, IA 52405-2370

March 27, 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. If this country is to have as its goal creating weapons and wars, we are signing our own death warrant. We can't afford anymore war and we signed agreements to limit nuclear weapons. Please stop this love of weapons and war.

1/16A

Sincerely,

Terri Nederhiser
 319-365-5677

Nekow, Lois

Page 1 of 1

116A

Department of Energy.

I would like to express my
 opposition to "Complex Transformation".

We should be a nation which
 has two price and not war.

Thank you

Lois Nekow 5.5.14

PC_308

3-19-08

Nelson, Dennis

Page 1 of 1

PC_443

Buenaflor, Justin

From: DENNIS NELSON [dennisonelson987@yahoo.com]
Sent: Saturday, March 22, 2008 4:57 PM
To: Complex2030
Subject: PLEASE STOP "COMPLEX TRANSFORMATION" (the 'Bomplex')!!

DENNIS NELSON
 19 East Ohio Street, #1204
 Chicago, IL 60611-2707

March 22, 2008

DOE Complex Transformation

Dear DOE Complex Transformation:

I WISH TO EXPRESS MY OPPOSITION TO THE PLAN BY THE U.S. DEPARTMENT OF ENERGY'S (USDOE'S) NATIONAL NUCLEAR SECURITY ADMINISTRATION (NNSA) TO REVAMP THE NUCLEAR WEAPONS INFRASTRUCTURE (FORMERLY "COMPLEX 2030", NOW UNDER "COMPLEX TRANSFORMATION," GOING FORWARD WITH THIS IDIOTIC 'BOMPLEX' PROGRAM IS DANGEROUS, EXPENSIVE (AT \$150 BILLION!), FOOLISH, AND UNNECESSARY!!!

"Complex Transformation" will jeopardize our national security by hindering international non-proliferation initiatives, and crippling international nuclear disarmament efforts. Revamping the massive industrial infrastructure, whose primary purpose is to construct new nuclear weapons (like the Reliable Replacement Warhead), will make it impossible to convince other countries not to rely on nuclear weapons.

THE 38TH ANNIVERSARY OF THE FIRST "EARTH DAY" IS COMING UP ON APRIL 22. (NUCLEAR WAR SHOULD RANK RIGHT UP THERE WITH HUMAN-CAUSED GLOBAL WARMING AS ONE OF MOST SERIOUS ECOLOGICAL THREATS) AS A RESULT, NUCLEAR DISARMAMENT SHOULD BE OUR PRIMARY GOAL: RATHER THAN GOING AHEAD WITH "COMPLEX TRANSFORMATION," THE U.S. DEPARTMENT OF ENERGY SHOULD ADOPT A CURATORSHIP PROGRAM TO SAFEGUARD, NOT AUGMENT, OUR NUCLEAR WEAPONS UNTIL COMPLETE DISMANTLEMENT OF THE NUCLEAR STOCKPILE HAPPENS.

"Let's Get Rid of the 'Nukes,'"

DENNIS R. NELSON

116A
 2/9H
 3/1J
 4/13A.1
 3/1J
 (cont.)
 5/70

Nelson, Lois
Page 1 of 1

Levens, Matthew

From: Lois Nelson [loisnelson01@earthlink.net]
Sent: Wednesday, February 20, 2008 12:31 PM
To: Complex2030
Subject: Nuclear weapons

Lois Nelson
5913 brown rd
oxford, OH 45056-8840

February 20, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

116A I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons.

214M3 I worked for many years on the cleanup of the Fernald uranium processing plant in SW Ohio. It was enormously expensive. Why would we want to go down that road again? We have no safe way to dispose of nuclear waste, the "temporary" storage facilities are full, and yet we set out to repeat the same deadly cycle. Why can't we learn from our past mistakes?

37J 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 CMER project is another irresponsible new program that Congress should reject.

Sincerely,

Lois Nelson

PC_1439

Nelson, Patricia
Page 1 of 4

Levens, Matthew

From: Patricia Nelson [peaceful_patti@msn.com]
Sent: Tuesday, April 08, 2008 3:06 PM
To: carlos.salazar@gsa.gov; Complex2030
Cc: Kris Cheatum; Dave Peck

PeaceWorks, Kansas City

4509 Walnut St., KCMO 64111

www.peaceworkskc.org

4/9/08

Toward a Sustainable Future

Talking Points

Opposing Nuclear Weapons

With Recommendations

(A Kansas City Perspective)

Complex Transformation (CT) is the administration's plan to seek funds to restructure and rebuild the Nuclear Weapons Complex. It is an attempt to build the next generation of nuclear weapons under the guise of making them more reliable and useable. The Honeywell Kansas City Plant (KCP) has been called "the lynchpin" of the nuclear weapons industry.

The whole concept of CT is based on lies generated to convince our elected officials and the public that useable nuclear weapons are needed and that production facilities should be updated. However, the nuclear weapons arsenal has been shown to be in tact and viable by the Scientific Advisory Group called JASON. CT has been explained as "consolidation" but takes the existing eight plants and moves them to eight new plants.

Employment has been sited by our elected officials for keeping these plants in operation. The KCP employed 8,000 in the 1980's which has dwindled to 2650 and will be diminished to 2000 at the new plant.

216A: Also, building Weapons of Mass Destruction (WMD) is not only immoral and dangerous to the environment, but not sustainable. According to their website KCP can build anything. Why can't this include good paying jobs in the production of technology for verification of nuclear security or alternative energy production? Their website also boasts of their commitment to the community and environmental protection proving a complete disconnect (cont.)with reality.

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Nelson, Patricia

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PC_1492

All over the country hearings are being held where tens of thousands of citizen taxpayers are turning out and are expressing their opposition to CT. In KC the citizens have been left out of the Programmatic Environmental Impact Statement required by NEPA. Where the citizens have had a chance to express their opinion, it has been overwhelmingly opposed.

It seems obvious to state that nuclear weapons are not usable. Use of them would end the world as we know it. The devastating effects would be nuclear winter, famine and disease, plus the land would not be usable for thousands of years. Even a small regional nuclear war would kill thousands of millions indiscriminately. Using them would amount to suicide.

In the U.S., more than 15,600 square miles are occupied by the nuclear weapons industry. Loss of use due to spills and leaks are widespread. Beryllium contamination and pbbs have caused cancers, congenital defects and respiratory disease. Plans for waste disposal are not in place, money for clean-up is not in budget proposals and people who are sick are not being compensated.

Money is being diverted away from human needs. 12 Trillion dollars has been spent so far on Nuclear Weapons worldwide. Issues of poverty, education and healthcare could have been solved with a fraction of that money. Complex Transformation amounts to a "bailout" of the nuclear weapons industry. The cost has been grossly underestimated because clean up has not been included. It is estimated at \$300 Billion to clean up the entire complex.

The new plant in KC is estimated to cost \$500 million, but the cost for clean-up at the old plant has been estimated at \$287 million which has not been included in the budget. The Honeywell president in 2005 said that the plant was experiencing "it's heaviest workload in 20 years." (this, after the cold war is over) The Complex would produce 125 new nuclear weapons a year until 2030. The U.S. spends \$110 million a day on its nuclear forces. We must halt the drain on our resources. Our unsustainable economy is based on violence and war. As an example, Costa Rica has an efficient humane economy based on peace.

Nuclear weapons are obsolete. Mutually assured destruction is not a reasonable deterrent in the age of terrorist bombs in suitcase. Fissile materials have been stolen, and bombs have been lost. 300 Kilograms of Plutonium X has been lost from the Los Alamos Lab, enough to make 60 bombs. Keeping these materials safe is not 100% feasible. Accidental detonation is a looming threat because of the high alert status of many warheads. We are not safer due to nuclear weapons, on the contrary, the longer nuclear weapons are in existence the bigger is the chance that one will be detonated on purpose or by accident.

As long as the U.S. produces WMD's others will want them. We can't keep telling North Korea, Iran and others they cannot have them when we continue to produce and update them. This leads to worldwide instability. The U.S. being the most powerful nation, should lead by example. We should help other nations, not threaten them. By so doing we will regain the respect of the world. We should diminish the role of nuclear weapons in military doctrine and in foreign policy. The Nuclear Non-Proliferation Treaty committed the United States to work toward a goal of

Nelson, Patricia

Page 3 of 4

71J Nuclear disarmament and is the law of the land. Complex Transformation under these agreements with the Global Community.

Recommendations:

Defund Complex Transformation; take all warheads off high alert to avoid false alarms and accidental detonation; investigate the "loss" of nuclear materials; sign and adhere to the Comprehensive Test Ban Treaty; stick to the Non-Proliferation Treaty and increase dismantlement; clean up sites and make reparations to those communities whose soil and water have been contaminated and whose people have been made ill; meet human needs for shelter, education and health care; retool for alternative energy that is non-nuclear to keep radioactive materials out of the environment and out of the hands of terrorists; create sustainable jobs; talk and use diplomacy to promote democratic openness. Support HR2641 "Comprehensive Nuclear Security Plan"

82O We should heed the warnings of distinguished leaders as well. From all around the world hundreds have warned of the dangers inherent in relying on nuclear weapons for security. Let us leave a legacy of the same values of democracy, accountability and sustainability that serve all of humanity.

Resources:

Peace Action, www.peace-action.org

www.middlepowers.org

Nuke Watch, New Mexico www.nukewatch.org

Alliance For Nuclear Accountability www.anuclear.org

New America Foundation www.newamerica.net

www.nonukes.org

Nuclear Information and Resource Service, www.nirs.org

Nelson, Patricia

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Arms Control Association, www.armscontrol.org

Friends Committee on National Legislation, www.fcnl.org

Federal Registry, Vol. 72, No 83 May 1, 2007

Nuclear Age Peace Foundation, www.wagingpeace.org

British American Security Information Council, www.basicint.org

The Sojourner, www.sojo.net

www.commondreams.org

Honeywell Corp., www.honeywell.com

The Kansas City Plant, www.kcp.com

KC Star article, Oct. 25, 2007

www.gsa.gov/kansascityplant

Comments can be sent via email to Complex2030@nrsa.doe.gov or to Theodore A. Wyka, Complex 2030 SETIS Document Manager, Office of Transformation, U.S. Department of Energy, NA-1-1, 1000 Independence Ave. S.W., Washington DC 20585

PC_1492

Nelson-Melby, Eric

Page 1 of 1

Levens, Matthew

From: ericnelsonmelby@yahoo.com
Sent: Sunday, April 06, 2008 10:57 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 a plasma physicist who has worked on nuclear fusion and lightning research. I know that part of the reason for wanting to develop new nuclear weapons is to give nuclear physicists something to do and to better utilize NIF. However, new nuclear weapons are worse than unnecessary. They would be destabilizing. They would show the U.S. to be hypocritical in our efforts to limit the development and spread of nuclear weapons throughout the world.

2|U

The DOE mission regarding nuclear weapons should be stockpile stewardship. That does NOT mean new weapons design. That means science, experiments, and simulation. Do not let any of our taxpayer money be spent on making the world less safe by developing totally unnecessary new nuclear weapons.

Sincerely,
Eric Nelson-Melby
416 E. Radburn St.
Tucson, AZ 85704

cc: Senator John McCain
Senator Jon Kyl
Representative Gabrielle Giffords

PC_1747

Netuschil, Thomas

Page 1 of 2

Form posted from Windows Internet Explorer.

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PC_625

Buenafior, Delight

From: Tom Netuschil [Tom@netuschil.com]
Sent: Sunday, March 09, 2008 4:52 PM
To: DIV Complex Transformation
Subject: Form posted from Windows Internet Explorer.

Last Name=Netuschil
First Name=Thomas
Email Address=tom@netuschil.com
Street Address=130 Central Park Square
City=Los Alamos NM
State=
ZIP Code=87544
Comments=March 8, 2008

Tom & Mary Ann Netuschil
130 Central Park Square
Los Alamos, New Mexico 87544

Re: Statement of Support,
Department of Energy, National Nuclear Security Administration
Draft Transformation Supplemental Programmatic Environmental Impact Statement

First, let me say the, the Draft Transformation Supplemental Programmatic Environmental Impact Statement (SPEIS), produced by DOE/NNSA is an enormous amount of specific information presented in a very understandable format. DOE/NNSA should be commended for generating such an impartial, detailed and comprehensive analysis of the "Complex". Moreover, the stated goal behind the endeavor of creating "the complex to meet national security requirements and to be smaller, more secure, more efficient and better able to adapt to unforeseen threats" is unquestionably a desirable goal.

My wife and I are second generation Los Alamosians. We grew up in Los Alamos beginning in the early 50's with both our parents employed at LANL and eventually retiring from the Laboratory. We have never worked at LANL ourselves, we have owned and operated small businesses in northern New Mexico for thirty-seven years. Our perspective is from a small business owner and a resident of Los Alamos for well over fifty years.

Los Alamos National Laboratory has been the economic and educational foundation of northern New Mexico since its beginning. Over the years LANL and more recently LANL/LANS, have been the catalyst for introducing and maintaining educational programs and systems all over northern New Mexico, which has enhanced their workforce and provided opportunity for thousands of others to get a better education. Our experience with their past procurement programs for small businesses can be described as tough, but a absolutely fair. It is clear to us, their efforts to seek out disadvantaged, women owned and minority businesses and employees have been much more than meeting a requirement, they have made it a priority. This endeavor alone has brought opportunity for more disadvantaged and low income people of northern New Mexico to live fuller and better lives. Without any hesitation, over the years the majority of Los Alamos citizens have overwhelmingly supported LANL's mission and presence.

The critical assignment of Los Alamos National Laboratory is still the highest of importance to our national security and LANL has always provided quality science as a basis for a better world. For over half a century, research at LANL has played an integral roll and driving force to the beginning and development of many wonderful changes that have made America a great nation and the world a better and safer place: medical doctors have more tools to better analyze and cure disease, air travel is safer, we can send people and instruments to space and back again, our water and air is safer, safer and cleaner fuels of the future, powerful computer modeling to predict the when, where and how natural disasters and you can even buy computers with "teraflops" of storage now.

5/28/2008

Netuschil, Thomas

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Form posted from Windows Internet Explorer.

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PC_625

There are those that want the entire Complex closed and Los Alamos is just part of that equation, but closing the Complex is not the task. The task is how we can make "the complex to meet national security requirements and to be smaller, more secure, more efficient and better able to adapt to unforeseen threats". Your stated goal is a compromise and the people of Los Alamos have and always will be here to help.

115A (cont.)

Existing Complex Facility
One only needs to look at Figure 3.3.1-1 to see that the current investment and infrastructure placed in Los Alamos and Sandia over the years has been considerable. In fact, according to this graph these two sites represent more Facility square footage than all other Complex Facility square footage put together. Moreover, the Los Alamos and Sandia are in close proximity to each other, which should be considered a great benefit of scale. Existing investment, support of the population, and limited future budgets should make New Mexico a good investment of the future for DOE/NNSA.

(Draft Complex Transformation SPEIS Chapter 3, December 2007 Alternatives 3 - 18
Figure 3.3.1-1 — Facility Construction History within the Current Complex)

Thank you for your consideration,
Respectfully your,

Tom Netuschil
130 Central Park Square
Los Alamos, NM

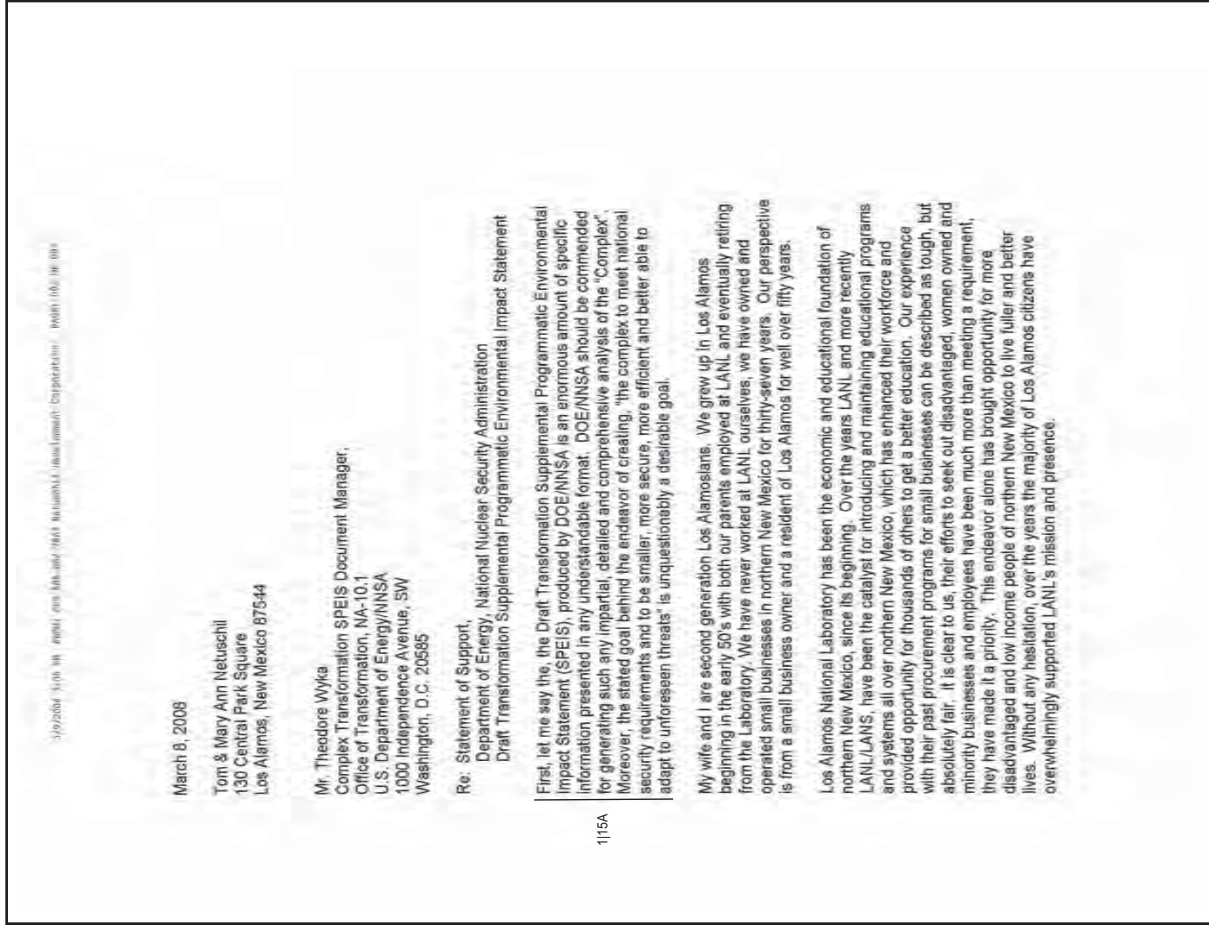
5/28/2008

Netuschill, Tom

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Netuschill, Tom

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Netuschil, Tom

Page 3 of 3

Newlin, Jennifer

Page 1 of 1

1/24/2008 11:51 AM FROM: CHS 503-962-7843 (EXTERNAL) (mailto:chc@lanl.gov)

The critical assignment of Los Alamos National Laboratory is still the highest of importance to our national security and LANL has always provided quality science as a basis for a better world. For over half a century, research at LANL has played an integral roll and driving force to the beginning and development of many wonderful changes that have made America a great nation and the world a better and safer place, medical doctors have more tools to better analyze and cure disease, air travel is safer, we can send people and instruments to space and back again, our water and air is safer, safer and cleaner fuels of the future, powerful computer modeling to predict the when, where and how natural disasters and you can even buy computers with "teraflops" of storage now.

There are those that want the entire Complex closed and Los Alamos is just part of that equation, but closing the Complex is not the task. The task is how we can make "the complex to meet national security requirements and to be smaller, more secure, more efficient and better able to adapt to unforeseen threats". Your stated goal is a compromise and the people of Los Alamos have and always will be here to help.

In closing,

Existing Complex Facility

One only needs to look at Figure 3.3.1-1 to see that the current investment and infrastructure placed in Los Alamos and Sandia over the years has been considerable. In fact, according to this graph these two sites represent more facility square footage than all other Complex Facility square footage put together. Moreover, the Los Alamos and Sandia are in close proximity to each other, which should be considered a great benefit of scale. Existing investment, support of the population, and limited future budgets should make New Mexico a good investment of the future for DOE/NSA.

(Draft Complex Transformation SPEIS Chapter 3, December 2007 Alternatives 3 - 18
Figure 3.3.1-1 — Facility Construction History within the Current Complex)

Thank you for your consideration,
Respectfully your,

Tom Netuschil
130 Central Park Square
Los Alamos, NM

115A
(cont)

Levens, Matthew

From: Jennifer Newlin [mailto:jnuff5519@aol.com]
Sent: Wednesday, February 20, 2008 10:17 PM
To: Complex2030
Subject: Oppose New Nuclear Weapons & Plants

Jennifer Newlin
530 Louisiana St.,
Lawrence, KS 66044-2231

February 20, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

Given that our nation is currently mired in a needless and inexplicable war of aggression, it would be folly to trust any elected official to make decisions regarding the use of nuclear weapons.

Therefore, 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.

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 CHRR project is another irresponsible new program that should be rejected.

Sincerely,

Jennifer Newlin

PC_1381

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Newman, Thomas

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Neymonk, Shel

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PC_1815

Levens, Matthew

From: MD Thomas B Newman [tbndoc@yahoo.com]
Sent: Friday, March 28, 2008 12:48 AM
To: Complex2030
Subject: We don't need more nuclear weapons!

MD Thomas B Newman
537 Vista Ave
San Carlos, CA 94070-1933

March 28, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

I urge you to oppose the Bush administration's plans to produce plutonium pits for nuclear weapons.

This effort violates at least the spirit of Article VI of the Nuclear Nonproliferation Treaty and emphatically violates commitments made at the 2000 NPT review conference, and it undermines any effort to pursue nuclear disarmament.

Furthermore, it is an enormous waste of money at a time when we can ill-afford such spending.

Thanks for doing all you can to stop this immoral insanity.

Sincerely,

Thomas B Newman, MD, MPH
6505943985



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



PC_1067

Written Comment Form

Must be received ~~by~~ before April 10, 2008

We were told we have 10000 pits stored at Pantex.
We don't need one more, we have 10,000 too many.

116A

This EIS is supposed to address and analyze the affected environment. The whole world is the affected environment.

Our leaders are promoting the development of bunker bombs - first strike weapons - scraping the "nuclear deterrent" - no first use policies with out any public discussion.

21K

We have a president out of touch that I would not be suprised if he mandated the use of Nukes.

Nuclear fall out knows no boundaries. We now get dust and pollution on our west coast from things using nuclear weapons anywhere will kill us all.

We need a new alternative: build no new weapons.

370

Shel Neymonk
PO Box 25
Embudo NM 87531
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
or send by electronic mail to:
complextransformation@nnsa.doe.gov

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

Albuquerque, NM

Nichols, Jean

Page 1 of 1

PC_33

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,

We join The Embudo Valley Environmental Monitoring Group and 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-02-36-S4, in Espanola, New Mexico. In order to more fairly provide all communities downwind from Los Alamos National Laboratory (LANL) public comment, we recommend changing the "second" Los Alamos hearing, scheduled for Wednesday, March 12, 2008 from 6 to 10, to an Espanola venue. We will bring people from Petasco,

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 "57 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 Espanola to Los Alamos, making this a 60 to 100 mile roundtrip in the night time to make public comments. The road to Los Alamos is dangerous, especially at night and if there is snow. The lack of a DOE hearing in the downwind community of Espanola, New Mexico raises considerable environmental justice issues and appears to silence a very important voice.

Additionally, we support the EVEMG request for 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,
Jean Nichols
La Comunidad*
PO Box 237
Petasco, NM 87553

*a community based non-profit project representing many Petasco area residents

Nichols, Jean

Page 1 of 2

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

114

PC_1011

Your Additional Comments:

1/70

Please include a NO PRODUCTION ALTERNATIVE dismantle to the 1700 weapons provide clean up at all sites, which will include more jobs something we all need.)

2/7J

Transform to R+D of renewable energy from sun, wind, water, surf, lightning etc support non-proliferation treaty, if weapons are a deterrent, we do not need to make more security is about feeling safe. Cumulative effects of Sandia + LANL are significant

3/8B

4/1F

5/3A

6/14O

Please print your name and address for DOE to respond to your comments

Jean Nichols
La Comunidad
PO Box 237
Petasco NM 87553

Nichols, Jean

Page 2 of 2

Nichols, Jean

Page 1 of 2

7/2E.1

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

CAMPAIGN 23

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 a Complex Transformation, with a focus on expanding nuclear weapons manufacturing at Los Alamos National Laboratory (LANL).

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. Many of my neighbors are just being informed of this SPEIS and so I respectfully request a 90-day extension of time so that they can provide public comments to DOE.

1140.21E

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:

4/16A

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 CFR 7, paragraph 658)," p. 13-27.

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 breadbasket of Northern New Mexico. Commercial farms in Espanola, Alcalde, Velarde and Dixon provide much local produce. Many people privately grow food for farmers markets and local groceries. With increases in gas prices and therefore in the price of food that comes from far away, many of us are working toward a revival in local food production. Currently I grow hay for livestock, as well as apples, cherries, blackberries, plums and pears, but I am looking to increase my production of vegetables and fruits, as well as herbs for culinary and medicinal use. New pit production at LANL threatens this. Accumulated dust from my farmhouse tested with elevated levels of Strontium 90. This is of serious concern and must result in follow up studies before any decisions are made.

5/14K:

6/11D

Nichols, Jean

Page 2 of 2

7/2A

The 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,

- 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) 348-6781, fax (505) 346-6723
- Representative Steve Pearce at (505) 522-2219, fax (505) 522-3069
- Governor Bill Richardson at (505) 476-2700
- President Pro Tempore Tim Wainwright at (575) 623-6331, fax (575) 623-6378
- House Speaker Ben Ray Lujan at ben.lujan@nmlegis.gov

Nichols, Jennifer

Page 1 of 1

PC_1775

Levens, Matthew

From: jnies@svn.net
 Sent: Sunday, April 06, 2008 5:18 PM
 To: Complex2008
 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,

I disagree entirely with the Department of Energy plan to consolidate and reduce the facilities, workforce, and redundant capabilities within the nation's sprawling nuclear weapons complex. It puts far too much emphasis on re-creating the unnecessary capability to research, develop, and manufacture new types of nuclear weapons.

23A The United States has more than enough nuclear weapons to maintain a nuclear deterrent. We simply do not need the capability to make more or newer nuclear weapons. We need a Department of Peace to get us out of the ridiculous cycle of frightening ourselves and our global neighbors into spending precious resources on the maintenance of Fear and Danger for All. We need those resources for far more productive and life enhancing tasks, like educating children, ministering to the sick, solving the dangers of global warming, getting our own economy back on track, and doing it on the shoulders of the democratic values and social justice issues on which this fine country was founded.

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,
 Jennifer Nichols
 PO Box 494
 Inverness, CA 94937

cc:
 Senator Dianne Feinstein
 Senator Barbara Boxer
 Representative Lynn Woolsey

Nicholson, Inca

Page 1 of 1

PC_188

Hi
 My name is Inca and I am
 nine years old. I think that you
 have got to be insane. We don't
 need another nuclear weapons
 facility. We need peace and
 justice. Not war. We need trees,
 sun and clean air. Not bombs. It
 threaten children in other
 countries, war is horrible.

113A

216A:
3140

Inca Nicholson,

Nickle, Carol

Page 1 of 1

PC_401

Levens, Matthew

From: Carol Nickle [CNickle@knxjustice.com]
 Sent: Sunday, March 23, 2008 1:49 PM
 To: Complex2030
 Subject: Draft PEIS on Complex Transformation

Theodore Wyka
 Complex Transformation SPEIS Document Nr.
 U.S. Dept. of Energy
 1000 Independence Ave. SW
 Washington, DC 20585

Dear Mr. Wyka,

Unfortunately, I was unable to attend the public hearing on February 26, 2008. Therefore, I am submitting my written comments to be considered.

To say that I am extremely concerned about our nation's nuclear build up is an understatement. Having practice law for over thirty years, I am aware of our obligations legally and the effect of our nation's hypocritical double standard on our security. We seem to mouth "nuclear disarmament" for all nations but our own. To continue down this road will bring disaster on our great nation, its peoples, and to the whole world.

114

I urge my government to stop the Stockpile Life Extension Program.

216A

None of the alternatives presently proposed are acceptable. The only safe and feasible alternative is to transform the Complex into non-nuclear weapon sites for non-nuclear production.

Open your eyes to our energy crises, our environmental crises, the effect of our nuclear build up on our relationship with other countries.

Choose the right course, the only course that will leave a healthy and safe world for our grandchildren. Dismantle, use the site for research and development of alternative energy sources.

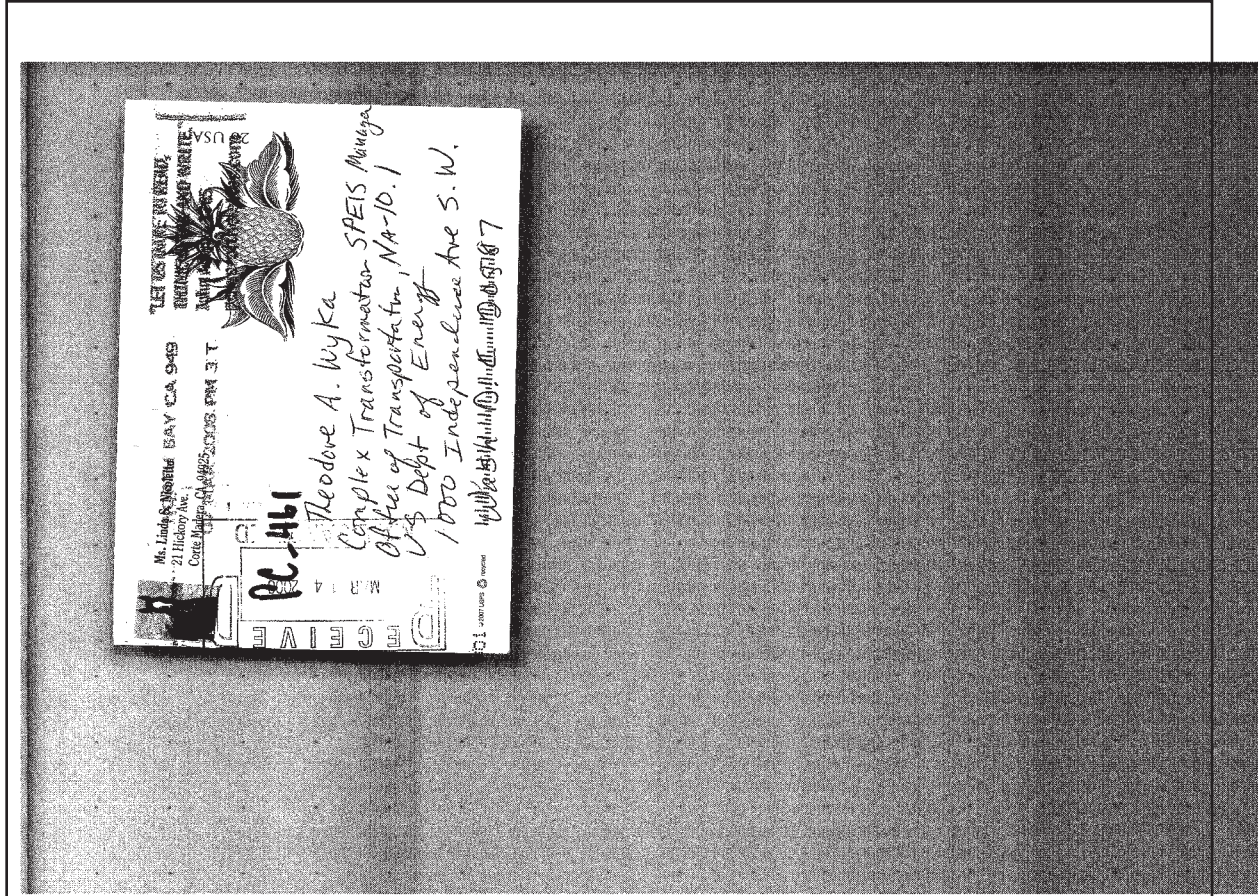
398

Sincerely,

Carol S. Nickle

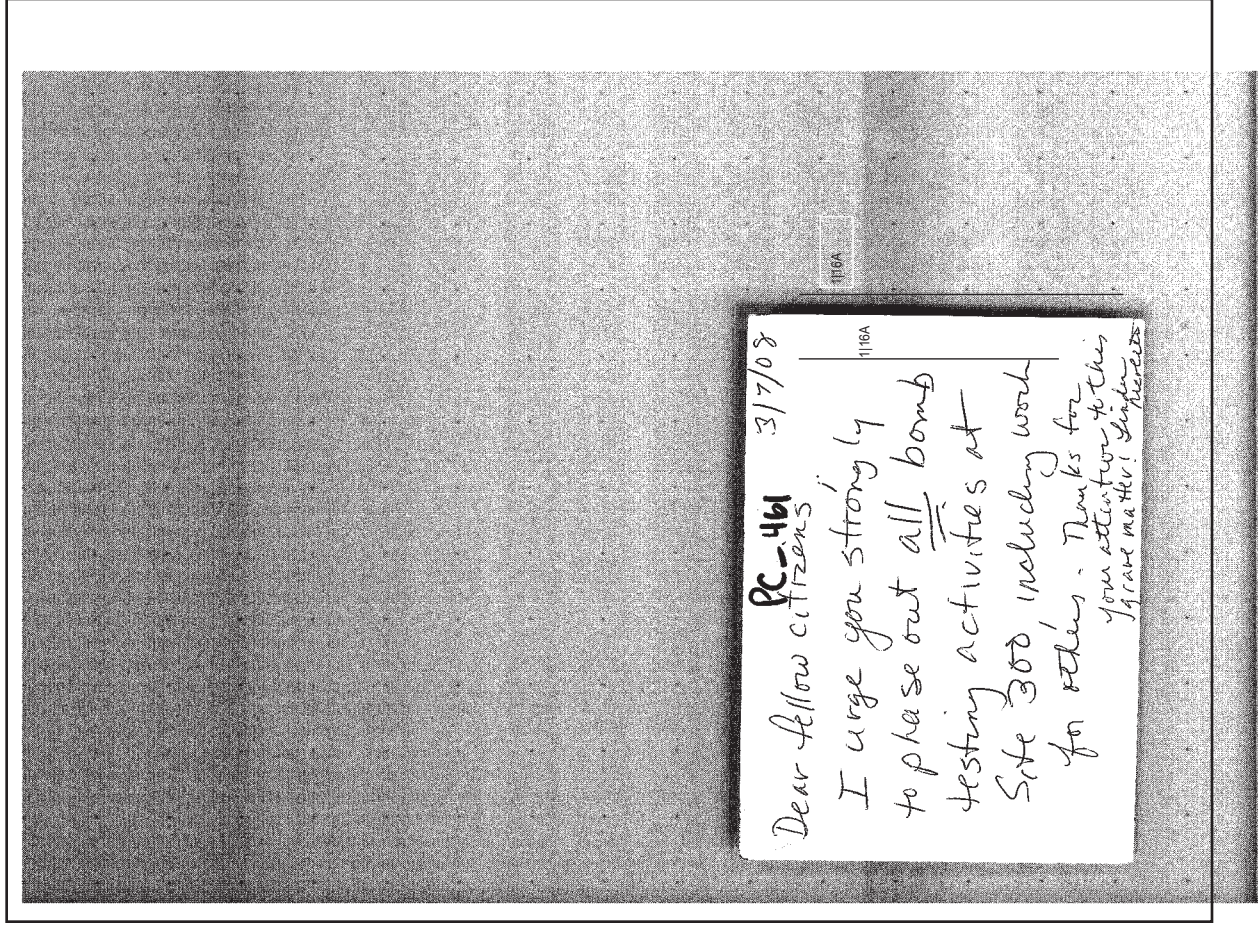
Nicoletto, Linda

Page 1 of 2



Nicoletto, Linda

Page 2 of 2



Noel, Susan

Page 1 of 1

PC_1821

From: Roy Nielsen [rsn@lanl.gov]
Sent: Thursday, April 10, 2008 12:25 PM
To: DIV.Complex.Transformation
Subject: Form Post from Firefox

Last Name=Nielsen
 First Name=Roy
 Email Address=rsn@lanl.gov
 Street Address=2942A Orange Street
 City=Los Alamos
 State=nm
 ZIP Code=87544
 Comments=I'm guessing that several if not many feel as I do.

[The Question is: Will I still have a job so I can support my family, whether or not they work in the lab?]

1188
 Regards,
 -Roy

Noel, Susan

Page 1 of 1

PC_1869

From: suenoel@cybermesa.com
Sent: Sunday, March 30, 2008 10:48 PM
To: Complex2030
Subject: comments on speis/weapons complex

111B I am a LANL retiree. When I started working for the Lab in 1975 I worked for the Solar Energy Group. When Ronald Reagan & his congress established the so-called Star Wars Initiative, the funding for alternative energy went to that and to weapons instead. This shows me that all it takes is the political will to switch priorities from the manufacture of pits (bombs) to something that will benefit the world rather than destroy it.

220 Of course now that LANS is a "for profit" organization, it needs to indulge in war profiteering. Has anyone said that as a profit-making company, it wouldn't behoove the Lab to make bombs and not use them, just letting them sit on the shelf? I don't know of many for profit companies that make a product at great expense and don't use it.

311E The environmental impact by the Lab on the Espanola Valley is already deleterious. I and 414K9 many of my neighbors have either had cancer, or have died from cancer. No one will look at the long-term health impact of what Bechtel is planning to do, and, indeed, what the Lab has already done.

111B To be honest, I know this is not really an environmental impact investigation. It's just business as usual with the war profiteers ginning up the destructive "toys" they want to use.

Susan Noel
 820 Zia Lane
 Escondido, NM 87532
 505-753-7925

Nordhausen, Ray

Page 1 of 15

PC_106

I am a member of the Amarillo Unitarian Universalist Fellowship. I am opposed to an expansion of nuclear weapons by the United States, and I wish to submit this statement from our Unitarian Universalist Association of Congregations and a host of other religious organizations, in opposition to this proposal.

Ray Nordhausen
Ray Nordhausen

7323 Parkway Drive
Amarillo, TX 79119

Attached Public Comments to the Energy Department

Nordhausen, Ray

Page 2 of 15

Public Comments to the Energy Department on the Supplement to the Stockpile Stewardship and Management Programmatic Environmental Impact Statement Complex 2030

Submitted by

- American Baptist Churches USA, Reconciliation Ministries, National Ministries
- American Friends Service Committee
- 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, USA
- Evangelical Lutheran Church in America
- Friends Committee on National Legislation (Quakers)
- Greek Orthodox Archdiocese of America
- Leadership Conference of Women Religious
- Mennonite Central Committee U.S. Washington Office
- 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 Social Justice Movement
- Presbyterian Church (USA), Washington Office
- Religious Action Center of Reform Judaism
- Sojourners/Call to Renewal
- Unitarian Universalist Association of Congregations
- United Church of Christ Justice and Witness Ministries
- United Methodist Church, General Board of Church and Society

and

18 State and Regional Religious Organizations

and

33 Congregations of Women Religious

Submitted to
Theodore Wylka
Complex 2030 SEIS Document Manager
U.S. Department of Energy/NNSA
NA-10.1, 1000 Independence Avenue, S.W.
Washington, D.C. 20585

December 14, 2006
with Additional Signatures, January 17, 2007

The above 74 religious organizations submit the following comments on the intent of the Energy Department's National Nuclear Security Administration (NNSA) to prepare a Programmatic Environmental Impact Statement (PEIS) for "Complex 2030."

Religious communities in America have long advocated for a world free of nuclear weapons. The teachings of the Bible, the Qur'an and other sacred texts are clear that as people of faith, we must be committed to the task of peacemaking. Jesus told his followers, "Blessed are the peacemakers for they shall be called children of God" (Matthew 5:9). Psalm 34 calls us to "seek peace and pursue it." The Qur'an equates killing a single person unjustly with killing all humanity and saving a single life with saving the life of all humanity (5:32). Guided by texts such as these, we cannot envision a situation in which we could support the indiscriminate destruction of human life from the use of a nuclear weapon.

While we come from separate religious traditions, we speak with one voice to say that we oppose the construction of a new nuclear weapons complex. The production of nuclear weapons brings with it a legacy of health problems and environmental degradation, borne in large part by the poorest of the poor. The renewal of the nuclear weapons complex as described in the Complex 2030 plan would add to the devastation that these communities are already experiencing.

The impact of the Complex 2030 plan would also be felt internationally. The underlying premise of international efforts to stop the spread of weapons of mass destruction is that the U.S. and other nuclear weapons states will also work to reduce their own stockpiles. The U.S. cannot call on other nations to stop the production of new nuclear weapons while American scientists are spending billions to develop a new generation of deadly nuclear bombs. Given that the U.S. arsenal of nuclear weapons has the destructive power to unleash an estimated 50,000 times the devastation of Hiroshima and Nagasaki combined,¹ the U.S. should be working to reduce its stockpile of nuclear bombs, not devising new ways to spend billions of taxpayer dollars to build new weapons.

We believe that there is little justification for Complex 2030. In particular, we believe the proposal for the construction of a new pit production facility, referred to as the Consolidated Plutonium Center (CPC), is unjustified. Our comments focus on the CPC and NNSA's main

¹ Hans M. Kristensen, Federation of American Scientists, Washington, D.C., personal communication, December 7, 2006.

116A
(cont.)

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41J

53A

arguments for its construction. Additionally, we address the international treaty obligations of the United States.

Assessing the Need for a New Pit Facility

We do not agree that there are sufficient reasons to justify the creation of a new nuclear weapons complex, the proposed Complex 2030. The idea that the United States lacks a credible long-term deterrent or that U.S. nuclear warheads are unreliable is a fallacy.

According to NNSA, the CPC "addresses a critical gap in the credibility of the long-term nuclear deterrent of the United States, namely the lack of capability and associated capacity to manufacture plutonium pits to support the stockpile."² Additionally, NNSA states that the CPC is intended to "have the flexibility to manufacture various pit types."³ These two main issues of *capacity* and *flexibility* are addressed below:

Capacity

NNSA argues that it lacks the capacity to meet projected stockpile requirements. First, unless the United States is planning to abandon its international disarmament obligations to reduce its nuclear arsenal and plans to expand the nation's stockpile, this is not true. Second, the assertion that the U.S. needs to replace pits because of plutonium aging issues has been proven inaccurate. Third, over 4,000 reserve warheads and a large surplus of more than 12,000 pits from dismantled warheads already exist.⁴

International Obligations and Stockpile Requirements. The United States currently has an estimated 5,000 deployed strategic nuclear warheads.⁵ In 2002, the U.S. government signed the Strategic Offensive Reductions Treaty (SORT) with Russia, which requires the United States to reduce its strategic nuclear arsenal to between 1,700 and 2,200 operationally deployed warheads by 2012. If the U.S. government does not intend to increase its nuclear weapons stockpile beyond SORT levels, there is no need for new pits for additional warheads.

Plutonium and Aging. The need to replace warhead pits in the near future because of aging effects of plutonium has also been used by the NNSA as an important reason for construction of a new pit plant. In testimony before Congress, Thomas D'Agostino, an administrator for NNSA, gave pit aging as the first reason for need of the new CPC. Mr. D'Agostino submitted that "our best estimate of minimum pit lifetime is 45-60 years."⁶

² National Nuclear Security Administration, "Consolidated Plutonium Center," fact sheet, November 2006. Available at <http://www.complex2030speis.com/ConsolidatedPlutoniumCenter.pdf>.

³ Ibid.

⁴ Robert S. Norris and Hans M. Kristensen, "Dismantling U.S. nuclear warheads," *Bulletin of the Atomic Scientists*, January/February 2004, pp. 72-74. Available at http://www.fedbulletin.org/article_fm.php?art_abbrev=dnoris.

⁵ Kristensen, personal communication, December 7, 2006.

⁶ Thomas P. D'Agostino, Deputy Administrator for Defense Programs, National Nuclear Security Administration, testimony before the House Armed Services Subcommittee on Strategic Forces, April 5, 2006, p. 10. Available at <http://www.house.gov/asec/4-5-06/DagostinoTestimony.pdf>.

However, a recent official study says otherwise. A congressionally mandated assessment of plutonium aging on pit lifetimes was conducted by scientists at the Los Alamos National Laboratory and Lawrence Livermore National Laboratory, independently reviewed, and released in November 2006. The study found that the plutonium in most nuclear weapons will remain "reliable" for a minimum of 100 years, "approximately double the previous NNSA estimate of 45 to 60 years. These findings obviate the need to produce new pits based on the argument of pit unreliability due to plutonium aging."

Surplus of Pits and Reserve Warheads. NNSA already has over 12,000 surplus plutonium pits available at its Pantex Plant near Amarillo, Texas.⁸ The number of pits in storage is increasing each year due to warhead dismantlement and will continue to increase as the United States implements the SORT treaty. SORT requires additional reductions from the current deployed strategic nuclear arsenal of some 5,000 warheads to 2,200 warheads or less by 2012.⁹

In addition to deployed weapons, the U.S. government has over 4,000 warheads in its reserve stockpile.¹⁰ In view of the large number of surplus pits and reserve warheads in existence, there is no necessity to produce additional pits.

Flexibility

The Los Alamos National Laboratory currently has the ability to produce plutonium pits and has requested additional capacity.¹¹ According to NNSA, the Los Alamos National Laboratory lacks the ability to change quickly from one pit type to another, or to produce more than one type of pit at a time.

We believe the administration's proposed new pit production facility and the stated need for flexibility is driven by its planning for the development of a new generation of nuclear weapons. We oppose the development of new nuclear weapons.

Treaty Obligations

The draft PEIS should address how the construction of the CPC complies with U.S. treaty obligations and advances nonproliferation efforts. Under Article VI of the U.S. Constitution, treaties are part of the "supreme Law of the Land."¹²

Nuclear Testing. A new nuclear weapon design with a redesigned pit may require nuclear testing. If the U.S. were to resume testing, other nuclear powers would follow suit, and the

⁸ National Nuclear Security Administration, "Studies Show Plutonium Degradation in U.S. Nuclear Weapons Will Not Affect Reliability Soon," news release, November 29, 2006. Available at http://www.nnsa.doe.gov/doc/newsevents/2006/PK_2006-11-29_NIA-06-16.pdf.

⁹ Norris and Kristensen, "Dismantling U.S. nuclear warheads," pp. 72-74.

¹⁰ Kristensen, personal communication, December 7, 2006.

¹¹ Robert S. Norris and Hans M. Kristensen, "U.S. nuclear forces, 2006," *Bulletin of the Atomic Scientists*, January/February 2006, p. 70. Available at http://www.dissbulletin.org/article_norris/ur_06-0106norris.

¹² National Nuclear Security Administration, "Notice of Intent To Prepare a Supplement to the Stockpile Stewardship and Management Programmatic Environmental Impact Statement—Complex 2030," *Federal Register*, October 19, 2006, p. 61733. Available at <http://www.federalregister.gov/NOI%2006Oct19%2006.pdf>.

Comprehensive Test Ban Treaty would dissolve. The world would, once again, find itself in a nuclear arms race.

Nuclear Disarmament. The nuclear Non-Proliferation Treaty (NPT) has been the backbone of the nuclear nonproliferation regime since its inception in 1970. Article VI of the NPT requires countries "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..."¹³

Yet, NNSA has stated the agency would like to restore the U.S. ability to produce nuclear weapons to Cold War levels. Mr. D'Agostino testified that Complex 2030 "would restore us to a level of capability comparable to what we had during the Cold War."¹⁴

We believe the planned construction of the CPC and production of plutonium pits undermines the NPT and the nonproliferation regime. As Kofi Annan, United Nations Secretary-General recently said, "All of the NPT nuclear-weapon States are modernizing their nuclear arsenals or their delivery systems. They should not imagine that this will be accepted as compatible with the NPT. Everyone will see it for what it is: a euphemism for nuclear rearmament."¹⁵

Nuclear Nonproliferation. In the world today, we have a nation that has recently acquired nuclear weapons capability, North Korea, and another that has been in violation of International Atomic Energy Agency agreements with uncertain intent, Iran. The U.S. is calling for restraint of these and other nations' military nuclear programs. In contrast, the U.S. government is proposing the expansion of its own nuclear weapons complex. If the U.S. government moves ahead with the CPC, this country will be joining North Korea and Iran in operating outside the nuclear nonproliferation framework, which Washington helped construct. This contradictory policy undermines the ability of the United States to call for restraint from North Korea and Iran and weakens the nonproliferation regime.

Why would an administration that is obligated to pursue nuclear disarmament seek the construction of a plant to produce additional nuclear weapons? We believe that the construction of the CPC would tell the world that the United States does not intend to keep its pledge of nuclear disarmament. Rather than reducing U.S. reliance on nuclear weapons, the construction of the CPC would reaffirm a central role for nuclear weapons in U.S. security policy. We believe NNSA should take seriously the commitments of the United States under the Non-Proliferation Treaty and reflect them in the draft PEIS for Complex 2030.

No Action Alternative

We ask for an amended "no action" alternative for Complex 2030 with the goal of not expanding the nuclear pit fabrication capacity of the United States. Spending billions of dollars to build a

¹³ D'Agostino, testimony, April 5, 2006, p.4.
¹⁴ Kofi Annan, address at Princeton University, Princeton, N.J., November 28, 2006. Available at http://www.un.org/News/Press/docs/2006/statements_full.asp?amID=6.

Nordhausen, Ray

Page 7 of 15

99A-1074;
71F (cont.)

new pit facility as part of an over \$150 billion new nuclear weapons complex¹⁴ is unjustified and wasteful. NNSA should eliminate the proposed CPC from Complex 2030. It should focus on more urgent concerns such as meeting NPT commitments, a more vigorous nonproliferation program, and cleanup of the nuclear weapons complex.

Names and Addresses of Commenting Organizations

National Religious Organizations

Rev. Dwight M. Lundgren, Reconciliation Ministries, National Ministries
American Baptist Churches USA
P.O. Box 851
Valley Forge, Pennsylvania 19482

Mary Lord, Assistant General Secretary for Peace and Conflict Resolution
American Friends Service Committee
1501 Cherry Street
Philadelphia, Pennsylvania 19102

Phil Jones, Director
Church of the Brethren Witness/Washington Office
337 North Carolina Avenue, S.E.
Washington, D.C. 20003

Rev. Barbara G. Green, Executive Director
Churches' Center for Theology and Public Policy
4300 Massachusetts Avenue, N.W.
Washington, D.C. 20016

Very Rev. Dominic Izzo, OP, President
Conference of Major Superiors of Men
8808 Cameron Street
Silver Spring, Maryland 20910

Rev. Dr. Ken Brooker Langston, Director
Disciples Justice Action Network (Disciples of Christ)
1040 Harbor Drive
Annapolis, Maryland 21403

Maureen Shea, Director, Office of Government Relations
Episcopal Church, USA
110 Maryland Avenue, N.E., Suite 309
Washington, D.C. 20002

¹⁴ Government Accounting Office, *Suggested Areas for Oversight for the 110th Congress*, GAO-07-235R, November 17, 2006, p. 15. Available at <http://www.gao.gov/new.items/d07235r.pdf>.

Nordhausen, Ray

Page 8 of 15

Mary Minette, Director of Environmental Education and Advocacy
Evangelical Lutheran Church in America
122 C Street, N.W., Suite 125
Washington, D.C. 20001

Joe Volk, Executive Secretary
Friends Committee on National Legislation (Quakers)
245 Second Street, N.E.
Washington, D.C. 20002

Rev. Dr. John Chryssavgis
For His Grace Bishop Dimitrios of Xanthos, Ecumenical Officer
Greek Orthodox Archdiocese of America
10 East 79th Street
New York, New York 20021

Sr. Marie Lucey, OSF, Associate Director for Social Mission
Leadership Conference of Women Religious
8808 Cameron Street
Silver Spring, Maryland 20910

J. Daryl Byler, Director
Mennonite Central Committee U.S. Washington Office
920 Pennsylvania Avenue, S.E.
Washington, D.C. 20003

Howard W. Hallman, Chair
Methodists United for Peace with Justice
1500 16th Street, N.W.
Washington, D.C. 20036

Rev. Robert Edgar, General Secretary
National Council of Churches USA
475 Riverside Drive, Suite 880
New York, New York 10115

Rev. Richard Killmer, Co-Coordinator
National Religious Partnership on the Nuclear Weapons Danger
Churches' Center for Theology and Public Policy
4500 Massachusetts Avenue, N.W.
Washington, D.C. 20016

Nordhausen, Ray

Page 9 of 15

<p>Sr. Simone Campbell, SSS, Executive Director NETWORK: A National Catholic Social Justice Lobby 25 E Street, N.W., Suite 200 Washington, D.C. 20001</p>	<p>Dave Robinson, Executive Director Pax Christi USA: National Catholic Peace Movement 532 West Eighth Street Erie, Pennsylvania 16502</p>
<p>Rev. Elenora Giddings Ivory, Director Presbyterian Church (USA), Washington Office 100 Maryland Avenue, Suite 410 Washington, D.C. 20002</p>	<p>Rabbi David Superstein, Director Religious Action Center of Reform Judaism 2027 Massachusetts Avenue, N.W. Washington, D.C. 20036</p>
<p>Adam R. Taylor, Senior Director of Campaigns and Organizing Duane Shank, Senior Policy Advisor Sojourners/Call to Renewal 3333 14th Street, N.W., Suite 200 Washington, D.C. 20010</p>	<p>Rob Keithan, Director, Washington Office for Advocacy Unitarian Universalist Association of Congregations 1320 18th Street, N.W., Suite 300B Washington, D.C. 20036</p>
<p>Rev. Ron Stief, Minister and Team Leader United Church of Christ Justice and Witness Ministries 100 Maryland Avenue, N.E., Suite 330 Washington, D.C. 20002</p>	<p>James E. Winkler, General Secretary United Methodist Church, General Board of Church and Society 100 Maryland Avenue, N.E. Washington, D.C. 20002</p>

Nordhausen, Ray

Page 10 of 15

<p>States and Regional Religious Organizations (listed by state)</p>	<p>Shakael Syed, Executive Director Islamic Shura Council of Southern California 2115 West Crescent Avenue, Suite 216 Anaheim, California 92801</p>
<p>The Rev. Dr. Diana Gibson, Co-Executive Director Council of Churches of Santa Clara County 1710 Moorpark Avenue San Jose, California 95128</p>	<p>The Rev. Dr. Stephen Sidonak, Executive Director Christian Conference of Connecticut 60 Lorraine Street Hartford, Connecticut 05401</p>
<p>Roy Craft, Executive Director Regional Council of Churches of Atlanta 2195 Deboer Hills Road, Suite L Atlanta, Georgia 30318</p>	<p>The Rev. Dr. Nancy Kemper, Executive Director * Kentucky Council of Churches 1500 Leesstown Road Lexington, Kentucky 40511</p>
<p>Rev. Charles Dana Kratz, Executive Director * Louisiana Interchurch Conference 527 North Boulevard, Fourth Floor Baton Rouge, Louisiana 70806</p>	<p>The Rev. Russell L. Meyer, Executive Director * Florida Council of Churches 3838 West Cypress Street Tampa, Florida 33607</p>
<p>The Rev. Jill Job Saxby, Executive Director Maine Council of Churches 19 Pleasant Avenue Portland, Maine 04103</p>	<p>Diane Kestler, Executive Director Massachusetts Council of Churches 14 Beacon Street, Suite 416 Boston, Massachusetts 02108</p>

The Rev. Dr. Brady Vardenanni, Executive Director
 Montana Association of Churches
 25 South Ewing Street, Suite 408
 Helena, Montana 59601

Marilyn Mechem, Executive
 Interchurch Ministries of Nebraska
 215 Centennial Mall, Suite 411
 Lincoln, Nebraska 68508

David Lamarre-Vincent, Executive Director
 New Hampshire Council of Churches
 P.O. Box 1087
 Concord, New Hampshire 03302

Mary Lu Bowen, Executive Director
 New York State Council of Churches
 18 Computer Drive West, Suite 107
 Albany, New York 12205

The Rev. Sandra L. Strauss, Director of Public Advocacy
 Pennsylvania Council of Churches
 900 South Arlington Avenue, Suite 100
 Harrisburg, Pennsylvania 17109

Gary Nesdahl, Executive Director *
 Association of Christian Churches of South Dakota
 100 South Spring Avenue, Suite 106
 Sioux Falls, South Dakota 57104

Rev. Dr. George Bithos, Executive Director *
 Texas Conference of Churches
 221 East Ninth Street, Suite 403
 Austin, Texas 78701

Jonathan Barton, General Minister *
 Virginia Council of Churches, Inc.
 1214 West Graham Road
 Richmond, Virginia 23220

The Rt. Rev. F. Neff Powell, Bishop *
 Episcopal Diocese of Southwestern Virginia
 P.O. Box 2279
 Roanoke, Virginia 24009

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* These signatories have signed in a personal capacity and are not representing their organization in supporting this statement.

Congregations of Women Religious (listed by state)

Sisters of St. Francis of Penance and Christian Charity
 P.O. Box 1028
 Redwood City, California 94062

Dominican Sisters of San Rafael
 1520 Grand Avenue
 San Rafael, California 94901

Sisters of St. Francis
 588 North Bluff Boulevard
 Clinton, Iowa 52732

Sisters of the Presentation of Dubuque Iowa
 2360 Carter Road
 Dubuque, Iowa 52001

Sisters of St. Joseph
 215 Court Street
 Concordia, Kansas 66901

Great Bend Kansas Dominicans
 3600 Broadway
 Great Bend, Kansas 67530

Sisters of Charity of Leavenworth
 4200 54th Street
 Leavenworth, Kansas 66048

Sisters of St. Joseph of Springfield
 34 Lower Westfield Road, #1
 Holyoke, Massachusetts 01040

Sisters of St. Anne Social Concerns Committee
 720 Boston Post Road East
 Marlborough, Massachusetts 01752

Missionary Sisters of Society of Mary
 349 Grove Street
 Waltham, Massachusetts 02453

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Nordhausen, Ray

Page 13 of 15

Society of the Mission Sisters of the Holy Spirit 1030 North River Road Saginaw, Michigan 48609	
Home Visitors of Mary 121 East Boston Street Detroit, Michigan 48202	
Sisters Servants of the Immaculate Heart of Mary Leadership Council 610 West Elm Avenue Monroe, Michigan 48162	
Sisters of St. Joseph of Kalamazoo P.O. Box 34 Nazareth, Mississippi 49074	
Franciscan Sisters of Mary 1100 Bellevue Avenue St. Louis, Missouri 63117	
Franciscan Sisters of Our Lady of Perpetual Help 335 South Kirkwood Road St. Louis, Missouri 63122	
Omaha Servants of Mary 7400 Military Avenue Omaha, Nebraska 68134	
Sisters of Charity of St. Elizabeth Leadership Council P.O. Box 476 Convent Station, New Jersey 07961	
Amityville Dominicans 555 Albany Avenue Amityville, New York 11701	
Sisters of St. John the Baptist 3308 Campbell Drive Bronx, New York 10465	
Sisters of Social Service 296 Summit Avenue Buffalo, New York 14214	

Nordhausen, Ray

Page 14 of 15

Sisters of St. Joseph of Buffalo 10324 Main Street Clarence, New York 14031	
Sisters of the Good Shepherd 82-31 Doncaster Place Dix Hill, New York 11432	
Religious of the Sacred Heart of Mary (US Provinces) 50 Wilson Park Drive Tarrytown, New York 10591	
Presentation Sisters 1101 32nd Avenue South Fargo, North Dakota 58103	
Sisters of the Most Precious Blood Leadership Team 4000 Denlinger Road Dayton, Ohio 45426	
Sisters of Charity of Cincinnati 5900 Delhi Road Mt. St. Joseph, Ohio 45051	
Sisters of St. Francis of Philadelphia 609 South Convent Road Aston, Pennsylvania 19014	
Sisters of Charity of Seton Hill 463 Mt. Thor Road Greensburg, Pennsylvania 15601	
Sisters of St. Joseph of Chestnut Hill 9701 Germantown Avenue Philadelphia, Pennsylvania 19118	
Grey Nuns of the Sacred Heart 1750 Quarry Road Yardley, Pennsylvania 19067	
Mother of God Benedictine Monastery 110 28th Avenue, S.E., Apt.212 Watertown, South Dakota 57201	

Nordhausen, Ray

Page 15 of 15

Dominican Sisters of Houston
6501 Almeida Road
Houston, Texas 77021

This statement was submitted to the Energy Department on December 14, 2006. It is being submitted again on January 16, 2007 with additional signatures.

14

Norman, Bart

Page 1 of 1

PC_817

Levens, Matthew

From: Bart Norman [bartnorman@hotmail.com]
Sent: Thursday, March 27, 2008 12:58 PM
To: Complex2030
Subject: Nuclear weapons vs Health Care and Education

Bart Norman
3892 ne 4th st.
gresham, OR 97030-6118

March 27, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy,

Senators and Representative,

116A |Another arms race we do not need.

208 |Quality national health care and a strong public education system we do need, desperately.

Sincerely,

Bart Norman, Gresham, Oregon
5036613229

Norman-Jones, Susan

Page 1 of 1

North, Barbara

Page 1 of 1

PC_1868

Levens, Matthew

From: suej11@yahoo.com
Sent: Sunday, April 06, 2008 5:47 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,

Dr. Helen Caldicott wrote a book addressing how one nuclear explosion could ruin our day, our week, our year...many many years. Why then, does America pursue nuclear weapons? Why do we bomb countries for weapons of mass destruction, when we have more weapons of mass destruction than all other countries combined? Are we crazy?

Sincerely,
 Susan Norman-Jones
 13805 NW Park Place
 Portland, OR 97229

cc:
 Senator Ron Wyden
 Senator Gordon Smith
 Representative David Wu

Page 1 of 1

PC_1715

Levens, Matthew

From: Barbara North [bschantnorth@yahoo.com]
Sent: Wednesday, March 26, 2008 4:43 PM
To: Complex2030

stop the madness, I say no.

Looking for last minute shopping deals? [Find them fast with Yahoo! Search.](#)

Norton, Rebecca

Page 1 of 2

Levens, Matthew

From: rainernorton@yahoo.com
Sent: Saturday, April 05, 2008 2:06 PM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

PC_ 1666

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 live in Montana, where our land is still very open and clear and pure. The more I travel outside of this state, the more I see the devastation that human beings, and their great focus on power and control in the financial markets of other countries, I realize that the continuation of nuclear technology is having a devastating effect on our own habitat, and escalating the mind-set of war all over the world, not contributing to peace.

It is not worth the risk to create yet even more nuclear weapons. In fact, I think that the only people who benefit from this idea are the companies who use US tax dollars for their own profits. I will be 50 years old this May..I've seen many Republican presidentialies, and for the last 30 years we are always in great debt, and using up alot of money for weapon production, with poor overseasing systems in place when they are in office.

It frankly disgusts me that someone could be given the great gift of leadership, stewardship, and not use it for the best purposes. I guess in my heart it has begun to feel evil...spin the tales a little more here and cover this there, and get away with raping the country of it's own coffers, so that the individual corporate interests can gain unprecedented wealth. If we are truly a country based on the idea that we will provide justice for all, the buck has to stop with us. Someone has to stop feeding this military build-up and work towards peace. And I don't buy the idea that without strong weapons we wouldn't have peace--I've traveled internationally and been approached by people from Europe who were mad at me, an american, because I came from a country that sold the weapons used by kids in their community, gangs now with their weapons to scare everyone....thus destabilizing their own daily life. Please stop this insanity. Be peace makers, not weapon hoarders. Those are my own words above. I concur with t he words written by others below. Do your best. Go to your hearts with this decision. Stop this insanity. It's all about greed, and what is one human being? Gone in a heartbeat..those of you making this decision? You'll be dead, in 20,30 years? Why create more suffering and misery? Leave behind a plan that stops contributing to the world's further misery, just for the sake of corporations that secretly capitalize on our government's support, and a waste of our tax dollars. People DO care. You CAN do what is right. Please try to limit even more damage and pain.

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 still maintains thousands of nuclear weapons and has thousands more in storage.

Instead of recreating the capacity to produce new, unnecessary nuclear weapons, the DOE should focus on shrinking the still-over-sized 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. BE CLEAR THAT IF YOU CONTINUE TO CONTRIBUTE TO THIS PROBLEM, YOU INDIVIDUALLY ARE THE

116A

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Cont.

415A

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59A

(cont)

Norton, Rebecca

Page 2 of 2

PROBLEM. WE CARE WHAT YOU DO. IT DOES MATTER. And thank you for being in see:PC_1666-us all, in the common good.

Sincerely,
Rebecca Norton
P.O. Box 762
Whitefish, MT 59937
cc:
Senator Max Baucus
Senator Jon Tester
Representative Denny Rehberg

Nougier, Mary

Page 1 of 1

PC_912 *March 26, 2008*

*U.S. Dept of Energy
Ted Wyka, NA-101
Complex Transformation
Comment*

Dear Sir:

*No new nuclear power
plants! Please comply
with the Non-Production
Treaty & honor our disarmament
promises.*

*I oppose the DOE's "Complex
Transformation" plan --
Brooklyn.*

*Sincerely,
Mary Nougier
Mary Nougier
45 Alida St #8
Ashland, Or 97520*


O'Connell, Tim

Page 1 of 6

Levens, Matthew PC_767

From: Tim O'Connell [tjoc40@gmail.com]
 Sent: Monday, April 07, 2008 12:50 PM
 To: Complex2030
 Subject: Comments

Attachments: Complex Transformation testimony.doc

 Complex formation test

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

Mr. Wyka,

Thank you for providing the opportunity to comment on Complex Transformation. My comments are pasted below and attached for your convenience.

Regards,

Tim O'Connell

Draft Complex Transformation SPEIS Comments

Submitted By: Tim O'Connell
 Maryknoll Office for Global Concerns
 P.O. Box 29132
 Washington, DC 20017
 (202) 832-1780

O'Connell, Tim

Page 2 of 6

I have come here today on behalf of the Maryknoll Office for Global Concerns. The office represents hundreds of Catholic Maryknoll missionaries, priests, sisters and lay people living and working among poor and marginalized people around the world. I am here to voice our opposition to Complex Transformation and to support the "no production" alternative.

We acknowledge there are positive aspects of the plan. We support consolidating the nuclear weapons complex into fewer sites for public safety, national security and economic treaties. We also support faster dismantling of weapons called for by arms control treaties. However, we strongly oppose building facilities such as the proposed Chemistry and Metallurgy Research Replacement (CMRR) plant which would produce nuclear warheads to supplement or replace the existing arsenal.

We are opposed to Complex Transformation for two simple reasons.

1. Nuclear weapons possess the power to destroy God's earth as we know it.

2. There is no reason to replace the current nuclear arsenal because it is reliable, unnecessary and dangerous.

As Catholics we look to the Pope and our Bishops for guidance. They accepted the deterrence doctrine and therefore US possession of nuclear weapons during the Cold War. However, at the Review Conference of the Nuclear Nonproliferation Treaty (NPT) in 2005, Archbishop Celestino Migliore, Vatican U.N. ambassador stated "The Holy See has never countenanced nuclear deterrence as a permanent measure, nor does it today when it is evident that nuclear deterrence drives the development of ever newer nuclear arms, thus preventing genuine nuclear disarmament." We at Maryknoll agree with this statement and believe that Complex Transformation would move the United States in exactly the wrong direction.

The Vatican and US Conference of Catholic Bishops have stated that the indiscriminate nature of nuclear weapons makes them abhorrent to those seeking to protect innocent people trapped between warring sides. With the destructive power to wipe out a city in a flash, they also argue that nuclear weapons represent a disproportionate method of achieving military objectives. We agree with our Church's leaders on both these points.

Additionally, we oppose nuclear weapons because they continue to harm people, plants and animals long after an initial detonation. The site of a nuclear explosion is poisoned for decades causing cancer, deformities and death. We take seriously our biblical responsibility as stewards of God's creation. No person, no group, no nation should have the power to destroy what God has given us all.

We are people of faith and reason. The moral arguments against nuclear weapons in general are clear, as are the practical problems associated with Complex Transformation in particular. These problems include the following.

2|16A cont.

O'Connell, Tim

Page 3 of 6

1. After thorough testing, the National Nuclear Security Administration PC 767 has certified that the current nuclear arsenal is reliable and will be for decades to come. Yet the Department of Energy envisions spending upward of \$150 billion on Complex Transformation. . Meanwhile tens of millions of Americans are uninsured, our aging infrastructure needs repair and Social Security faces shortfalls. We believe, that with so many urgent needs, replacing reliable warheads should not be a pressing priority in the federal budget.

2. Most security experts and American citizens believe the greatest threat to the US is a terrorist attack using weapons of mass destruction on American soil. Possessing thousands of nuclear warheads did not deter the attacks of 9/11 and "new nukes" will not deter another. There are only two ways a terrorist group could acquire a nuclear weapon or the technology and materials to build one. They can buy it or steal it. Therefore, the existence of nuclear weapons and materials anywhere increases the possibility of them falling into the "wrong hands." We believe the US should be using scarce resources to secure and/or eliminate nuclear materials rather than producing more weapons grade nuclear material.

3. Enhancing our own nuclear arsenal while threatening others we suspect of developing nuclear weapons undermines nonproliferation efforts including the NPT. Complex Transformation would declare to the world that the United States does not intend to live up to it's obligation under the NPT to work toward disarmament. In fact, it would demonstrate that nuclear weapons will remain an indispensable component of US national security strategy. With such a clear statement how will the US convince other countries not to build nuclear weapons? With more weapons? We believe reducing the US commitment to nuclear weapons will advance nonproliferation efforts and make us all safer.

Complex Transformation is symptomatic of the delusion that a nation's security is determined by the destructive power of their weapons. Despite our overwhelming military superiority, the threat environment today is more complicated than it has ever been for the United States. The reality is, in the long term, security cannot be achieved with more weapons. To the extent US policies make others feel vulnerable we will be vulnerable. To the extent our policies help others feel secure, we will be secure.

US national security is inextricably linked to global human security. We must make better use of diplomatic, economic, and development initiatives to mitigate threats. US citizens and people around the world will be more secure when we shift funding from waging war to alleviating poverty.

Maryknoll Missioners' experience on the ground, with the poorest of the poor, affirms our common humanity, our connection to each other and to God's creation. We enter city slums and rural villages as strangers. We develop relationships with local people and work with them to build wells, clinics, schools and hope. We have seen the results in communities transformed. That's the kind of transformation that is needed and will benefit us all.

O'Connell, Tim

Page 4 of 6

Duplicate of previous comments

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1. After thorough testing, the National Nuclear Security Administration has certified that the current nuclear arsenal is reliable and will be for decades to come. Yet the Department of Energy envisions spending upward of \$150

PC_767

PC_767

billion on Complex Transformation. Meanwhile tens of millions of Americans are uninsured, our aging infrastructure needs repair and Social Security faces shortfalls. We believe, that with so many urgent needs, replacing reliable warheads should not be a pressing priority in the federal budget.

2. Most security experts and American citizens believe the greatest threat to the US is a terrorist attack using weapons of mass destruction on American soil. Possessing thousands of nuclear warheads did not deter the attacks of 9/11 and "new nukes" will not deter another. There are only two ways a terrorist group could acquire a nuclear weapon or the technology and materials to build one. They can buy it or steal it. Therefore, the existence of nuclear weapons and materials anywhere increases the possibility of them falling into the "wrong hands." We believe the US should be using scarce resources to secure and/or eliminate nuclear materials rather than producing more weapons grade nuclear material.

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O'Connell, Tim

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O'Donnell, Jackie

Page 1 of 1

PC_767

Draft Complex Transformation SPEIS Comments

Submitted: March 25, 2008

By: Tim O'Connell
Maryknoll Office for Global Concerns
P.O. Box 29132
Washington, DC 20017
(202) 832-1780

PC_510

Buenaflor, Justin

From: Jackie O'Donnell [jackied@comcast.net]
Sent: Wednesday, March 19, 2008 7:33 PM
To: Complex2030
Subject: No More Nuclear Weapons

Jackie O'Donnell
6133 Maree Ct.
San Jose, CA 95123-4020

March 19, 2008
Complex Transformation Department of Energy

Complex Transformation Department of Energy:

Ours is a volatile world, one in which fighting seems to be the choice of decision-makers. Adding more nuclear weapons to the world at this point is suicide. It also reinforces our image in the world as a bully who would stop at nothing to get our way--what we accuse others of.

This scares me and makes me uncomfortable with my country's image and actions.

Please, please--reject programs to increase nuclear weapons.

Sincerely,

Jackie O'Donnell
(408)281-4713

O'Hare, Carol

Page 1 of 1

PC_402

Levens, Matthew

From: Carol O'Hare [carol@pliod.com]
Sent: Wednesday, February 20, 2008 12:56 PM
To: Complex2030
Subject: New Nuclear Warhead Plant

Carol O'Hare
209 Haws Lane
Flourtown, PA 19031-2137

February 20, 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.

Sincerely,

Carol O'Hare
215 680-7472

116A

O'Leary, Eline

Page 1 of 1

PC_128



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 am against Complex Transformation
& the building of any new nuclear bomb
factories.
Eline O'Leary
129 Bowing Cove Rd
Sevierville TN 37876

116A

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

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

O'Leary, Jeremiah

Page 1 of 1

Buenafior, Justin

From: Jeremiah O'Leary [joleary@xaverianbrothers.org]
Sent: Tuesday, March 18, 2008 10:33 AM
To: Complex2030
Subject: The CMRR project to produce new nuclear weapons

Jeremiah O'Leary
736 S. Beechfield Ave.
Baltimore, MD 21229-4423

March 18, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

I am a member of the Xaverian Brothers, a Catholic religious order, and I oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons. The Chemistry and Metallurgy Research Replacement project would be able to produce 50 to 80 plutonium pits annually. It would be the first major nuclear warhead production since the end of the Cold War. It would lead to many more billions of dollars being spent on weapons which would eventually destroy the earth, and take away resources which we need especially in places like Baltimore City

If the U.S. builds this plant how can we ask other countries to not develop nuclear arsenals.

3|16A You voted against last year's proposed nuclear bombs plant, and, even though this one is on a smaller scale, it still irresponsibly puts us on track to help destroy the earth.

Sincerely,

Bro. Jeremiah O'Leary, CFX
443 304-2303

PC_528

O'Neill, Ruth

Page 1 of 1

Levens, Matthew

From: Ruth O'Neill [roneill@ctdc.edu]
Sent: Thursday, March 27, 2008 1:26 PM
To: Complex2030
Subject: NO to U.S. setting up infrastructure to building nuclear weapons

Ruth O'Neill
9701 Germantown Ave.
Phila, PA 19118-2633

March 27, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A Let's not be taken in by verbage to that makes any possibillity to build nuclear weapons sound good - nuclear weapons are not good; they bring on destruction.

2|20 I want peace, not war, education for our children not destruction of them. I've taught children for nearly 50 years, please, let's think of them.

Sincerely,

Ruth O'Neill

PC_1212

O'Neill, Ruth

Page 1 of 1

PC_717

Levens, Matthew

From: Ruth O'Neill [oneill@cnc.edu]
Sent: Monday, February 25, 2008 3:37 PM
To: Complex2030
Subject: Nuclear Weapons

Ruth O'Neill
9701 Germantown Ave.,
Phila, PA 19118-2633

February 25, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

18A: Please, no weapons - let's put our money in education. I've spend a long time as a
22L: teacher, and believe me, we need to educate our children, they are so precious and want to
38B: learn.

Ruth O'Neill
Sincerely,

Ruth O'Neill

Oakley, Joshua

Page 1 of 1

PC_563

Buenafior, Justin

From: Joshua Oakley [joshua.oakley@gmail.com]
Sent: Friday, March 21, 2008 4:21 PM
To: Complex2030
Subject: No to new nuclear bombs and bomb factories!

Dear Ted,

Please think about the future of this country and the world and wake up to the reality of the extreme danger presented by nuclear weapon proliferation. They have impoverished this nation, as well as put us in far more danger than we can accept without submitting to a blind worship of such absolute destruction for political gain. This is not just a political or environmental or economic issue, though nuclear weapons do cause a great damage to politics, environment, and economics. This is not just about endangering the lives of millions of American citizens and people, animals, and ecosystems throughout the world, although nuclear weapon proliferation certainly does endanger the lives of millions of people, animals, and ecosystems. We do not need new nuclear weapons. We do not want nuclear weapons. Only a failed and outdated strategy of unwarranted potential for destruction exists for the continuation of nuclear proliferation in this country and the world. Highly respected and powerful leaders throughout the world are calling for the goal of complete nuclear disarmament. Continuing to develop and manufacture nuclear weapons is exactly the wrong choice the United States of America could make now. The world and the people of the United States of America, along with many distinguished leaders, calls for the immediate and continual disarmament of nuclear weapons and nuclear weapons capability. The future of the world and the spirit and soul of humanity and the United States of America depends on swift and decided action to disarm, disarm, disarm, so we can all overcome fear and thinking about the Bomb. I am very interested in hearing arguments to the contrary of what I and others have presented and will continue to present against the future development and manufacture of nuclear weapons. I cannot imagine that any of them can overcome the stark reality of the current situation in the world, the extreme danger to environment and all areas of human society, and the possibility of a massive Holocaust.

In the spirit of sincere concern,

Joshua Bradford Oakley
Knoxville, Tennessee

5/13/2008

Oehler, Susan

Page 1 of 1

PC_32

Theodore Wyka
Complex Transformation SPEIS Document Migr
US Department of Energy
1000 Independence Ave S W
Washington DC 20585

February 18, 2007

Dear Mr. Wyka:

I am writing this letter to you today to voice my opposition to the building of more nuclear bombs or nuclear weapons plants. I do not want to see a continuing arms race, because I feel this will one day lead to a horrible disaster.

116A:
21J

I am not able to come to the hearings at Oak Ridge on Tuesday, February 26, 2008. I am sending this letter to voice my opposition to these plans called "Complex Transformation". I feel we do not need to maintain or "improve" our current stockpile of nuclear weapons. In fact, I think it is insane to keep spending money on things like this. I want to see a world free of nuclear weapons, and the way to achieve that is to stop making new bombs and to work for world-wide nuclear disarmament. This dialogue needs to start today, and the USA needs to lead the way. The last thing we need to do is build more nuclear bombs. This would be the height of hypocrisy. The USA should demonstrate global leadership towards nuclear disarmament.

38C:
49H

21J
(cont.)

Also, I don't want my tax dollars spend on this type of warfare which could make the world an unfit place to live. I want my tax dollars spent on meeting human needs. I am convinced that, if we had chosen to help people instead of bomb them the last fifty years, the world would be a much better place today.

58B:
69H

Thank you for reading my comments.

*Sincerely,
Susan Oehler*

Oehler, Susan

Page 1 of 1

Levens, Matthew

From: Susan Oehler [dancewater2@gmail.com]
Sent: April 29, 2008 8:04 PM
To: Complex2030
Subject: Nuclear Weapons

PC_1549

Susan Oehler
2605 Vineyard Blvd
Asheville, NC 28805-2471

April 29, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

I do not want to see any more nuclear weapons. We have too many already. This is totally insane to think we can have a nuclear war and the planet will survive. Sincerely,

116A

Susan Oehler
828-337-1137

Oehler, Susan

Page 1 of 1

PC_32

Theodore Wyka
Complex Transformation SPEIS Document Migr
US Department of Energy
1000 Independence Ave S W
Washington DC 20585

February 18, 2007

Dear Mr. Wyka:

I am writing this letter to you today to voice my opposition to the building of more nuclear bombs or nuclear weapons plans. I do not want to see a continuing arms race, because I feel this will one day lead to a horrible disaster.

116A:
21J

I am not able to come to the hearings at Oak Ridge on Tuesday, February 26, 2008. I am sending this letter to voice my opposition to these plans called "Complex Transformation". I feel we do not need to maintain or "improve" our current stockpile of nuclear weapons. In fact, I think it is insane to keep spending money on things like this. I want to see a world free of nuclear weapons, and the way to achieve that is to stop making new bombs and to work for world-wide nuclear disarmament. This dialogue needs to start today, and the USA needs to lead the way. The last thing we need to do is build more nuclear bombs. This would be the height of hypocrisy. The USA should demonstrate global leadership towards nuclear disarmament.

38C:
49H

21J
(cont.)

Also, I don't want my tax dollars spend on this type of warfare which could make the world an unfit place to live. I want my tax dollars spent on meeting human needs. I am convinced that, if we had chosen to help people instead of bomb them the last fifty years, the world would be a much better place today.

58B:
69H

Thank you for reading my comments.

*Sincerely,
Susan Oehler*

Olmsted, Jean

Page 1 of 1

Levens, Matthew

jwo@svpal.org
Saturday, April 05, 2008 7:24 PM
Complex2030
Complex Transformation SPEISComments

PC_1633

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,

110A The DOE should focus on shrinking the still-over-sized nuclear weapons complex and on maintaining the safety and security of our existing weapons arsenal as the size of our nuclear stockpile is reduced.

21C The next president and the Department of Defense are responsible for deciding whether we need more nuclear weapons. That should be done before the DOE upgrade.

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 Olmsted
240 West Charleston Road
PALO ALTO, CA 94430

CC: Senator Dianna Feinstein
Senator Barbara Boxer
Representative Anna Eshoo

Olson, Connie

Page 1 of 1

PC_164 237 March 26, 2008

U.S. Dept. of Energy
 Ted Wyka, NADRI
 Complex Conformation Comment

Dear Sir,
 I am writing to urge you to support U.S. compliance with the Non-Proliferation Treaty and honor our disarmament obligations. I oppose the DOE's Complex Transformation "plan".

Sincerely,
 Connie Olson
 460 Siskiyou Blvd.
 Ashland, OR 97520

11F
 216A

Olson, Dennis

Page 1 of 1

PC_323 March 27, 2008

DS DOE
 Ted Wyka, NADRI
 Complex Conformation Comment

Dear Sir,
 I strongly urge you to support compliance with the Non-Proliferation Treaty, honoring our disarmament obligations. I strongly oppose the DOE's Complex Transformation plan.

Sincerely,
 Dennis Olson
 460 B Siskiyou Blvd.
 Ashland, OR 97520

11F

Olson, N
Page 1 of 1

Levens, Matthew

From: neolson77@yahoo.com
Sent: Monday, April 07, 2008 3:45 PM
To: Complex2008
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 love you, you love me, we're a happy nuclear-age family. So I say Puff the Magic Dragon lives by the sea, smoke a million joints and have a lot of fun on the planet, don't you see.
Forgiveness and love in the house. May we all get along and keep the sanity and health of the planet. Bury all munitions in the big ol hole from uranium mining at the four corners of the US to maintain the health of the planet before she goes all out of whack (there is a slight wobble that keeps the whole planet in balance and the hole over yonder in the SW needs to be filled or the Mother Earth, there's no tellin' what might happen???)!! No more nuclear: Moses code -- Do not kill -- so don't even pick up a weapon to promote killing -- let all weapons go and see love flow through the positivity of our kindness and nurturing for this planet, for humanity, for the sake of our babies yet unborn. Love for you, love for me, love for everybody.
Let us not fear, but walk in the ways of kindness and goodness with mercy in the heart. .

116A

Sincerely,
N. Olson
138 SW 21st Way
Ft. Lauderdale, FL 33312

cc:
Representative Alcee Hastings
Senator Bill Nelson
Senator Mel Martinez

PC_1171

Onalicky, William
Page 1 of 1

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@nmsa.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).

The process of building any nuclear weapon is a danger to our environment, especially when there are leaks of toxins like mercury, and to the workers, especially for those who mine uranium. 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?

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 lightning, 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?

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, North 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 1 Superpower" then it is up to us to set the example to the rest of the world of non-proliferation.

I look forward to hearing from you that the decision makers will take the wiser route of not issuing a clearance of environmental impact for building "Complex Transformation".

Sincerely,

William J. Onalicky

33631 Phillips

Southfield, MI

48075

Cell # 313.610.4095

EMAIL: WJONALICKY@AOL.COM

1176A

Ong, Kim
Page 1 of 1

PC_2030

Levens, Matthew

From: Kim Ong [kimong49@yahoo.com]
Sent: Wednesday, April 30, 2008 8:09 PM
To: Complex2030
Cc:
Subject: COMMENTS:DRAFT COMPLEX TRANSFORMATIONAL SUPPLEMENTAL PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Dear Program Director:
 Thank you for the extended opportunity to comment on the subject draft EIS. Also I appreciate receiving the complete volumes of this EIS via mail for early review. NNSA did a nice job of compiling comprehensive information for all the locations in the Complex for all public stakeholders to review in the EIS for potential environmental impacts in the alternatives for redesigning and operating the weapons complex. My focus was on the impacts to Sandia National Laboratory because I have volunteered since 1998 to serve as a local citizen stakeholder on a Citizen's Advisory Board and subsequently on Ad Hoc Task Groups to assess and to offer comments and advice to DOE and SNL on their environmental restoration program for cleaning up "legacy" waste sites at Kirtland AFB in Albuquerque, New Mexico. I believe most of this cleanup has been achieved successfully, but it was done at very high cost to the taxpayers. The taxpayers will pay more in the future for the mandated "long time stewardship" required at contaminated sites that are presently too dangerous or too expensive to cleanup to a safe level. I recommend that for the alternative selected for changing the Complex that high priority be given to the design and the operation of the transformed Complex to reducing dangerous waste generation and to processing and to storing the waste generated in ways ascertained to be safe for workers, the general public, to the local ecology, and to the physical environment.
 The assessment and cleanup of contaminants released to the air, water, and soil at the locations of facilities in the Complex would be very expensive and sometimes impossible as has been demonstrated in DOE's Legacy Waste Cleanup program.
 There is also the potential for high compensatory payments to parties injured by the contamination.

I recommend that the alternative selected be justified by stating in the final EIS why the alternative chosen was superior to the other alternatives in terms of NNSA's objectives which were improved SAFETY, SECURITY, ENVIRONMENTAL PROTECTION, REDUCED COSTS, AND FLEXIBILITY TO POLITICAL POLICY CHANGES.

For example cost estimates could be tabulated comparing the costs of the different alternatives from startup costs to annual operating and amortized costs. Taxpayers need to know how much is being invested in the nation's nuclear weapons stockpile stewardship program relative to other national expenses and needs.

It may be prudent for the United States to continue to maintain a reliable nuclear weapons stockpile considering potential nuclear threats that still exist from unfriendly nations or organizations.

However, I recommend that the NNSA with its wealth of scientific brainpower dedicate a larger portion of this resource into prevention of nuclear weapons proliferation and in encouraging all who may possess nuclear weapons in the dismantling of these nuclear weapons for the sake of the future of this planet.

Thanks again for the opportunity to comment. Your consideration to my recommendations would be appreciated.

Sincerely,
 Kim Ong, citizen stakeholder

Be a better friend, newshound, and know-it-all with Yahoo! Mobile. Try it now. <http://mobile.yahoo.com/>; _ylt=Ahu06162sr8HdtDypao8WcJ9tAcJ

Ong, Ming
Page 1 of 1

PC_1175

Levens, Matthew

From: ongming@hotmail.com
Sent: Thursday, March 27, 2008 10:08 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,

I strongly object to the current draft Complex Transformation Supplemental Programmatic Environmental Impact Statement. The NNSA 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.

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.

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.

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.

Sincerely,

Ming Hwee ong
 1907 Misty Woods Dr
 Duluth, GA 30097

Orozco-Neu, Suzi

Page 1 of 1

PC_1239

Levens, Matthew

From: Suzi Orozco-Neu [orozcneu@yahoo.com]
Sent: Thursday, March 27, 2008 5:39 PM
To: Complex2030
Subject: Reject "Complex Transformation" plan to build nuclear weapons

Suzi Orozco-Neu
3458 Lee Street
Los Angeles, CA 90023-2312

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:

116A The DOE should reject the Complex Transformation proposal to revamp the nuclear weapons arsenal.

116A The planet is already telling us that the way we do things is not working!
(cont) We have to find a way to live peacefully and sustainably, if we want to enjoy anything remotely similar to life on earth now. Please reject "Complex Transformation."

21U By building up its nuclear arsenal right now, the US is essentially telling the world, "Do as I say, not as I do."
Sincerely,

Suzi

Osborne, Guy

Page 1 of 2

PC_2033

Levens, Matthew

From: Larry Osborne [losborne@cn.edu]
Sent: Thursday, April 10, 2008 9:57 AM
To: Complex2030
Cc: Larry Osborne
Subject: In-put on nuclear weapons plans

Theodore Wyka

Complex Transformation SPEIS Document Mgr

U S Department of Energy

1000 Independence Ave SW

Washington, DC 20585

Dear Mr. Wyka:

116A I am writing to offer my comments on the recent public hearings in Oak Ridge on nuclear
21U weapons in Oak Ridge on February 26. My plea to you is simple. No more bombs and no more
31F bomb plants. No life extension programs for our old bombs, and no new bombs. The United States should lead the world toward nuclear disarmament and, finally, should comply with its obligations under the nonproliferation treaty.

420 My position on this issue reflects my experience as the parent of three sons, a veteran of the U.S. Army Reserves, a psychology professor who helps prepare college-age adults for life, a Quaker, and as a citizen of the U.S.A. who loves my country and its people and of the world who loves all God's Creation.

51B I am also persuaded by the words of former political leaders and elder statement notable for their history of being hawks when it comes to defense. In a recent op-ed piece in the Wall Street Journal, they issued a call to get serious about pursuing nuclear disarmament and laid the burden of leadership on the United States and other nuclear weapons states. In January of this year, those same men were joined by dozens of others who have put forward a comprehensive plan for moving forward with their agenda, citing Mikhail Gorbachev and Margaret Thatcher, among others, who have signed on to the general proposition.

After outlining a series of steps to be taken by the US and Russia, Henry Kissinger, George Shultz, Sam Nunn and William Perry add, "In parallel with these steps by the U. S. and Russia, the dialogue must broaden on an international scale, including non-nuclear as well as nuclear nations. Key subjects include 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."

116A There is no longer a viable argument for maintaining a nuclear arsenal, and powerful
(cont) people are making powerful arguments for disarmament. Gorbachev, in the Shultz and Co.
51B article, is quoted as saying, "It is becoming clearer that nuclear weapons are no longer a
(cont) means of achieving security; in fact, with every passing year they make our security more
613A1 precarious."

Thank you for your work in gathering public in-put on the critically important policy issue of our time. Please do the courageous and right thing.

Osborne, Guy

Page 2 of 2

Respectfully yours,

Guy Larry Osborne, Ph.D.
Professor of Psychology
Director of the Bonner Center for Service Learning & Community Leadership
Carson-Newman
College Jefferson City, TN 37760 USA

PC_2033

Ostwald, Tom

Page 1 of 1

Levens, Matthew

From: Tom Ostwald [tom@education.ucsb.edu]
Sent: Friday, April 25, 2008 4:50 PM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

PC_1558

Dear Sir,

116A The SPEIS and nuclear complex revision, with all its various parts, should not be begun at this time--major changes of this kind should await the required study in 2009 of the future needs for nuclear weapons, sites in the United States that should be maintained, plutonium pits, etc. It is irresponsible to begin on a new course of such magnitude without a long-term plan that takes into account current and future needs for weapons, weapon security, and the use of nuclear weapons generally.

Dr. Thomas Ostwald
PhD in Biophysics.

Ottenberg, Marjorie

Page 1 of 1

Otter, John

Page 1 of 1

PC_1804

Levens, Matthew

From: Marjorie Ottenberg [mjoatt@yahoo.com]
Sent: Friday, March 28, 2006 2:35 AM
To: Complex2030
Subject: Reject "Complex Transformation" plan to build nuclear weapons

Marjorie Ottenberg
12881 Foothill Lane
Saratoga, CA 95070-3712

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:

116A The DOE should reject the Complex Transformation proposal to revamp the nuclear weapons arsenal.

21L The Complex Transformation proposal is an insult to the entire world! Its cost would
39B deprive U.S. children of improvements in U.S. schools and prevent extension of medical
care to lower income U.S. citizens! Around the world, it would show other countries that
the U.S. intends to dominate EVERWHERE--and would thus encourage them to develop and
41J build their OWN nuclear arsenals--leading to a world holocaust when two nuclear giants
57J conflict! Use your time and funding to clean up your mess from PAST production of nuclear
weapons, and to guarantee the safety of our nuclear agreements with the rest of the world!

41U By building up its nuclear arsenal right now, the US is essentially telling the world, "Do
(cont.) as I say, not as I do."
Sincerely,

Marjorie Ottenberg
408/867-4576

PC_1395

Levens, Matthew

From: John Otter [jotter@cybermesa.com]
Sent: Tuesday, April 29, 2008 12:28 AM
To: Complex2030
Subject: Comment on Complex Transformation SPEIS

2300 W. Alameda St #A7
Santa Fe, NM 87507
April 29, 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 nation and world are facing multiple threats to the very existence of life on Earth.
Most threats, overpopulation, sea-level rise, unending growth, peaking of oil production,
global warming et al., are gradual processes. Nevertheless, competition for resources
could spawn
violent conflicts that would kill much of populations rather soon.

The worst scenario, the one with the most devastating effects in the short run, is the use
of nuclear weapons. Their very existence, proliferation, the threat of use by the US, and
likely resource conflicts almost assure their eventual use, and with a likely time horizon
uncomfortably short for this generation, not to mention precluding further ones.

Discussions of alternatives for the pursuit of new and/or additional components for
nuclear weapons are equivalent to rearranging the deck chairs on the Titanic. The only
same policy is the elimination of nuclear weapons. Any other posture is unconscionable.
Any alternative that involves spending funds for nuclear weapons related facilities is
unacceptable. The transformation needed is to eschew nuclear weapons and the assured
annihilation they promise.

I appeal to NNSA to step outside the narrow bounds of "complex transformation" to decide
in favor of life on Earth.

Sincerely,

John W. Otter

Otto, Lilly
Page 1 of 1

Ovenshine, Charles
Page 1 of 1

PC_600

Levens, Matthew

From: Lilly Otto [lilto75@yahoo.com]
Sent: Friday, March 14, 2008 12:46 PM
To: Complex2030; senatorbingaman@bingaman.senate.gov
Subject: Complex Transformation

Dear Mr. Wyka, you said you would carefully consider the people's comments after the hearings, although there was no evidence in your report that you did so after the last hearing. But since we were invited to come, and since we, the people, did come and speak up, you sitting there like a stoney statue, I will give you a summary of what I heard. And please do consider it.

We signed the Nuclear Nonproliferation Treaty, and that became the law for us. So, #1, you are lawbreakers and should be treated accordingly. We New Mexicans were never asked whether we wanted to have the labs, the testing grounds, WIPP etc. here in the first place. They have brought us nothing but pollution. The lab people say it has been cleaned up. Some of it has. But contrary to your assurances, several of our citizen experts know that your nuclear waste has polluted our air, our soil, and our water.

We have fought with Sandia about cleaning up their waste sites, and just like at Rocky Flats they bring in expert after expert to say: all is well - although they do not have the required monitoring devices.

Why should we have to fight the labs, the DOE, the NNSA as enemies, when they should exist for our benefit?

The lab scientists could just as well respond to the approaching climate change and devote themselves to develop alternative energies.

WE DO NOT NEED MORE NUCLEAR BOMBS. We still have 1900 + stored in the bunker on our airport, enough to destroy the whole world. How can you even consider dropping such hell on earth? Annihilating millions of people, vaporizing them? You say national security, and all reason and compassion stop.

You don't give a thought about spending OUR billions on it, no matter what WE need. One of the commentators suggested: pack up your bombs and your pits and your waste and get out of New Mexico.

Sincerely, Lilly Otto

Never miss a thing. Make Yahoo your home page.
<http://www.yahoo.com/r/hs>

Page 1 of 1
PC_1939

Levens, Matthew

From: Charles Ovenshine [charlesovenshine@gmail.com]
Sent: Thursday, April 10, 2008 6:01 PM
To: Complex2030
Subject: nuclear stockpiling

To: Mr. Ted Wyka

116A, Sir, I am writing to express the belief that the United States has far more nuclear weapons than are prudent, and I wish to strongly urge a permanent ban on producing any more of them.

23A

314K [This excess of stockpiling nuclear devices is a gross imbalance and a menace to our health and welfare.

49H [Our tax dollars could be spent far more productively] in other areas, too numerous to name.

I urge you to act accordingly.

Yours,
Charles S. Ovenshine
Knoxville, TN

5/19/2008

Owens, John

Page 1 of 1

PC_1780

Levens, Matthew

From: John owen [owenloean@aol.com]
Sent: Friday, April 04, 2008 11:42 AM
To: Complex2030
Subject: No new nuclear weapons

John owen
932 1/4 E. Edgeware Road
Los Angeles, CA 90026-5783

April 4, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

116A: I understand the government wants to develop new nuclear weapons. This is completely
213A: unacceptable. Humanity cannot survive in a nuclear armed world.
39B The big problems we face: pollution and poverty, declining resources, can only be solved
with humanity working together, without the threat of major war.
411: Please abolish nuclear weapons now. the united states invented them, we must take the lead
in abolishing them for all time
116A I strongly oppose the administration's proposal to build a plant to produce plutonium pits
cont. for nuclear weapons.

Sincerely,

John owen
213-481-1374

Owens, Charlotte

Page 1 of 1

PC_1728

Levens, Matthew

From: Charlotte Owens [cownensus@yahoo.com]
Sent: Friday, March 28, 2008 11:47 AM
To: Complex2030
Subject: No new nuclear weapons!

Charlotte Owens
P. O. Box 73
Lithopolis, OH 43136-0073

March 28, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

111F Please oppose President Bush's proposal to modify our nuclear lab facilities to allow
building more nuclear weapons, in particular the Chemistry and Metallurgy Research
Replacement project. Countries agreed to the nuclear nonproliferation treaty on the
216A agreement that the current nuclear powers would REDUCE their stockpiles. Our lack of
enough action in significantly reducing our nuclear weapons, and instead our considering
313A.1 new weapons, including the bunker busters, makes us less safe because it undercuts our
moral authority and trustworthiness. Getting other countries' cooperation against Iran's
nuclear development is made more difficult by this administration's efforts to expand our
41J own nukes and our willingness to aid India's expanding nuclear arms program, in spite of
the nuclear nonproliferation treaty.

Sincerely,

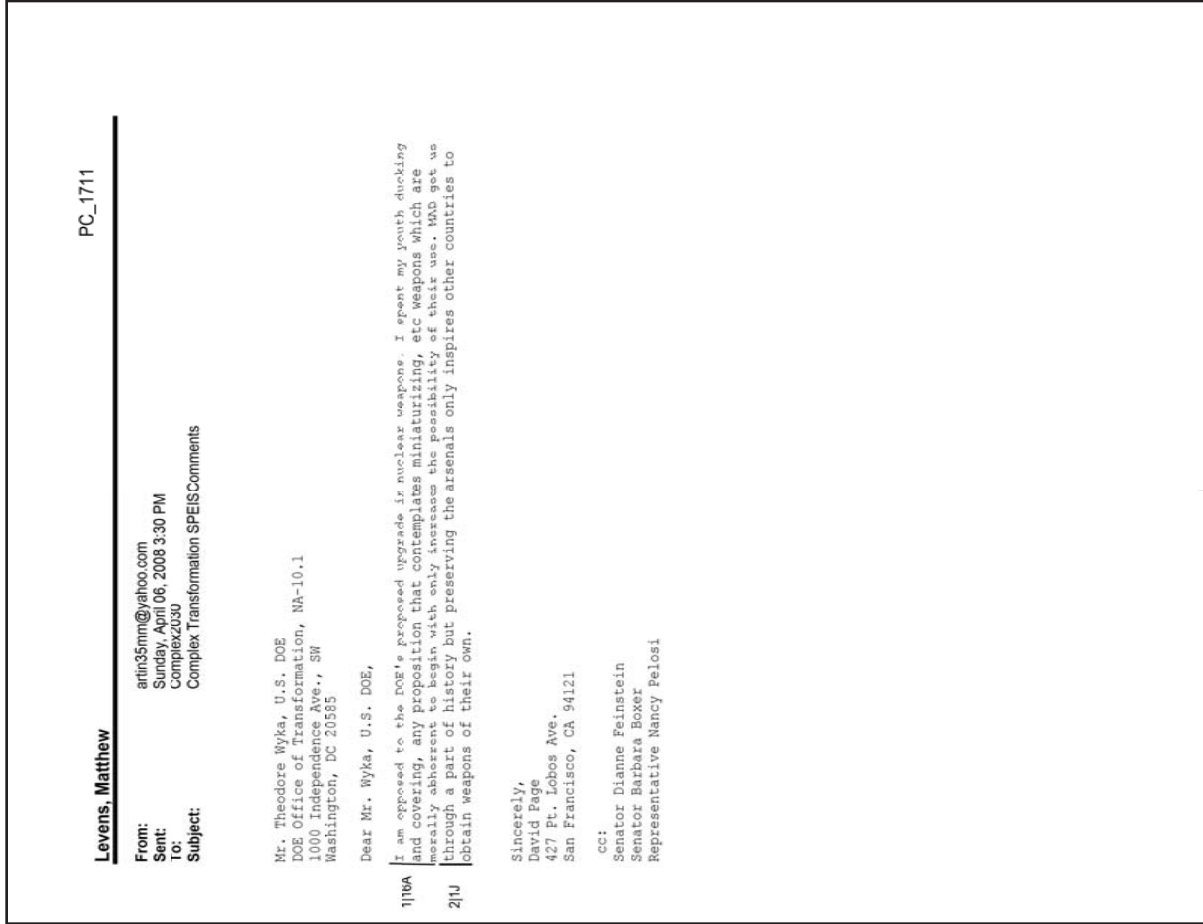
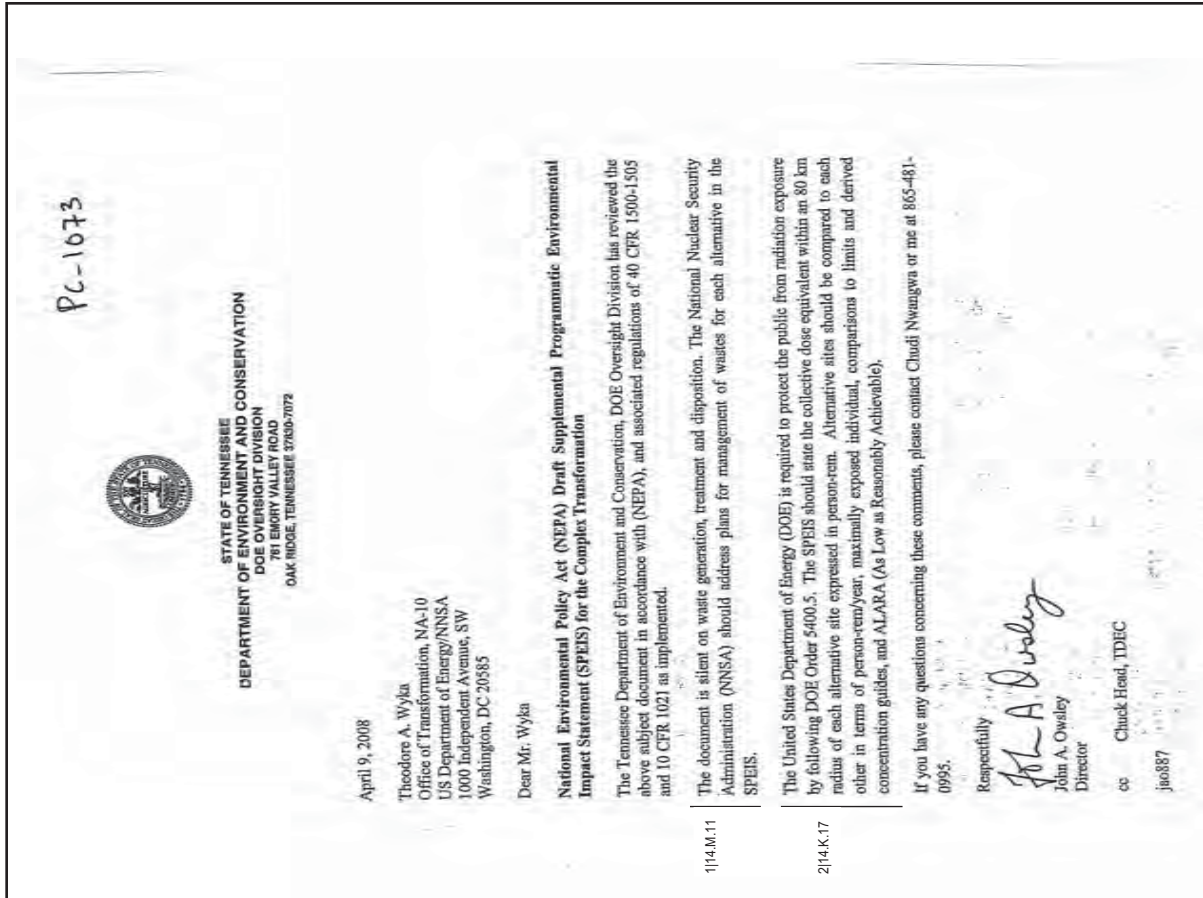
Charlotte Owens
(614)834-7196

Owsley, John

Page 1 of 1

Page, David

Page 1 of 1



Paine, Christopher

Page 1 of 3

PC_1016

Summary Comments of Christopher E. Paine
 Nuclear Program Director, Natural Resources Defense Council (NRDC)
 at the NEPA Public Comment Hearing on a Proposed Plan
 for "Transformation" of the NNSA Nuclear Complex
 U.S. Department of Energy, Forrestal Building
 1000 Independence Ave., SW
 Washington, D.C.
 March 25, 2008
 11 a.m. - 3 p.m.

The Natural Resources Defense Council welcomes this opportunity to comment upon the current draft *Complex Transformation Supplemental Programmatic Environmental Impact Statement* (SPEIS). Regrettably, NNSA appears to have ignored thousands of public comments submitted during the scoping process in preparing this draft. These requests that NNSA 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 our nation's obligation under the Nuclear Nonproliferation Treaty to negotiate progressive reduction and eventual elimination of its nuclear arsenal, in concert with other nuclear powers.

Instead, the current draft SPEIS analysis is explicitly guided by a widely discredited "Nuclear Posture Review Report" that former Secretary of Defense Donald Rumsfeld submitted to Congress in December 2001. Even at the time this now obsolete report was limited, in Mr. Rumsfeld's words, to "lay[ing] out the direction for American nuclear forces over the next 5-10 years." Therefore it cannot, as a legal matter, possibly serve as the basis for bounding the present analysis, which was publicly "scoped" to run from now until the year 2030. This shortcoming is even more glaring in light of the pending nuclear weapons and nonproliferation policy reviews that Congress recently mandated when it authorized national defense funding for fiscal year 2008.

One statistic from the current document says it all: in 1995, four years after the Soviet Union dissolved, NNSA's operational nuclear weapons complex consisted of eight sites in seven states. Under its proposed plan, by 2020 – twenty-five years later – NNSA's operational nuclear weapons complex will still consist of the same eight sites in the same seven states, but this complex will be maintaining a weapons stockpile that could well be 1/10 - 1/20 the size. This blatantly "political-industrial complex" would still have two nuclear weapons design laboratories, a nuclear weapons test site, new uranium and plutonium processing facilities costing billions of dollars, and a new "privatized" nuclear weapons parts plant in Kansas City.

The draft SPEIS arbitrarily excludes examination of consolidation options that would eliminate one or more geographically distinct sites that are no longer necessary, thus 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 twenty years after the end of the Cold War sends exactly the wrong message to the world.

Under a NEPA alternative that presumes good faith U.S. compliance with the Nuclear Nonproliferation and Comprehensive Test Ban treaties, NNSA must examine closure of its underground nuclear weapons testing grounds in Nevada, while consolidating nuclear warhead stockpile support functions at Los Alamos National Laboratory, and non-nuclear component production at Sandia National Laboratory.

12A

25A

31C

41G

51F

61E

washington, DC

Paine, Christopher

Page 2 of 3

There is no need to maintain two nuclear weapon design laboratories, because the nation has no currently approved or foreseeable requirement for a new nuclear weapon, or even a reasonably foreseeable requirement for a competitive nuclear weapons design environment requiring two nuclear design laboratories. One nuclear design laboratory will clearly more than suffice as a "hedge" against an uncertain future.

Likewise, there is no need to maintain a nuclear weapons test site in Nevada when all but a few nations are committed to observing a permanent Comprehensive Test Ban Treaty, and the remaining holdouts are in fact waiting for the United States and China to ratify the treaty.

Now is there any need to produce new plutonium pits, as thousands of existing long-lived surplus pits are available to be refurbished and recycled.

The draft SPEIS and indeed NNSA's entire SPEIS process has unreasonably excluded consideration of the future of the Kansas City Plant. This has deprived the citizens of the Kansas City area of their due process rights to participate in NEPA public hearings on the "Complex Transformation" proposal, and has arbitrarily excluded from the analysis an *obviously reasonable consolidation alternative* for non-nuclear fabrication at the Sandia National Laboratory.

The non-nuclear parts manufacturing needed to maintain a few hundred to a few thousand nuclear weapons could easily be consolidated within the footprint of the Sandia National Laboratory in Albuquerque, NM, avoiding many of the costs and environmental impacts of building and operating a separate new facility at a greenfield site in Kansas City. Indeed, this consolidation option was considered in detail by NNSA's predecessor, DOE Defense Programs, a decade ago and found to be a reasonable and technically feasible option.

It was not selected at that time because it was considered to have higher up-front investment costs and environmental impacts than continuing to downsize operations at the existing Kansas City Plant. But in light of the current plan to phase-out operations at the old plant and build a brand new KCP a few miles away, this ten year old conclusion regarding the Sandia consolidation option is clearly no longer valid. The refusal of NNSA to include this consolidation option within the scope of the present analysis is arbitrary, capricious and quite frankly, obdurate, and is likely to get the agency into legal trouble.

In sum, from where we stand, we see no serious technical, economic, or environmental impediment to actually implementing, much less analyzing in a NEPA document, a "Southwest Triangle" option for the complex that would incorporate all of the individual consolidations just mentioned. This would result in a compact and efficient nuclear weapons complex largely contained within the southwestern triangle defined by Amarillo, Albuquerque, and Los Alamos, supported by occasional flight testing at White Sands Missile Range and a small annual pit production capacity at Los Alamos, which needs no further enlargement to meet sensible future national security requirements.

The potential synergy of this Southwest Triangle Option with a further consolidation of uranium operations to a site within this triangle, thereby eliminating weapons program operations and facilities at Y-12, must also be examined. There is clearly some reduced stockpile size at which this further consolidation is not only the technically plausible and environmentally preferred option, but the more economical choice as well.

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PC_368



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

Via email to complextransformation@nnsa.doe.gov

Dear Mr. Wyka:

On behalf of 1.2 million members and online activists nationwide, the Natural Resources Defense Council welcomes this opportunity to comment upon the current draft Complex Transformation Supplemental Programmatic Environmental Impact Statement (SPEIS). For nearly forty years, NRDC has worked to achieve our mission: to safeguard the Earth, its people, its plants and animals, and the natural systems on which all life depends.

For 37 years NRDC's Nuclear Program has helped to shape U.S. energy, nonproliferation, and arms control policies. We helped to create vital judicial precedents for the application of U.S. environmental laws to the government's nuclear and national security programs, thereby ending an era of massive environmental abuses by the Department of Energy and its predecessor agencies. The overarching issue addressed by the NRDC Nuclear Program remains reducing the risks to human populations and the environment from the exploitation of nuclear energy for both military and civil purposes.

1. The Draft SPEIS Is Explicitly Guided by an Obsolete and Widely Discredited "Nuclear Posture Review Report" submitted to Congress in December 2001.

Regrettably, NNSA appears to have ignored thousands of public comments submitted during the scoping process requesting that NNSA analyze the full range of reasonable alternatives for consolidating the nuclear weapons complex between now and 2030, including alternatives that would both support and reflect implementation of our nation's obligation under the Nuclear Nonproliferation Treaty to negotiate progressive reduction and eventual elimination of its nuclear arsenal, in concert with other nuclear powers.

Instead, the current draft SPEIS analysis is explicitly guided by hawkish and widely discredited "Nuclear Posture Review Report" that former Secretary of Defense Donald Rumsfeld submitted to Congress in December 2001. Even at the time, the purview of this now obsolete report was limited, in Mr. Rumsfeld's words, to "laying out the direction for American nuclear forces over the next 5-10 years." Therefore it cannot, as a legal matter, continue to serve as a basis for bounding, guiding or narrowing the present analysis, which was publicly "scoped" to run from now until the year 2030. The heavy reliance on this old report is even more glaring in light of the

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Rather than maintaining the practice of shipping hundreds of HEU components annually between Pantex and the distant Y-12 site in eastern Tennessee, the current draft document must analyze as a discrete case the reasonable alternative of consolidating weapons uranium processing and fabrication capability, including necessary integrated storage, at either Los Alamos TA-55 or Pantex.

This option would leave in place both the current low-volume plutonium pit fabrication capability at TA-55 and the new uranium storage facility under construction at Y-12. The latter facility would then serve naval and civilian needs for storage of surplus uranium permanently withdrawn from the weapons stockpile. This option would have the benefit of greatly reducing the need to ship HEU-bearing nuclear weapon components around the country.

In sum, the SPEIS is unacceptable in its current form and should not proceed toward a planned Record of Decision later this year. Nor can its weaknesses be repaired by patching-up the present text. The current draft's guiding policy template, derived from the obsolete December 2001 Nuclear Posture Review Report - which predates the Moscow Treaty of May 29, 2002 - must be scrapped. Following receipt of the above-mentioned nuclear policy reviews, and fresh nuclear policy and stockpile guidance from Congress and the new administration, a radically revised draft SPEIS, fully rectifying the problems that NRDC and others have identified, should then be issued for public comment.

Finally, in all candor, I have to say that not only the substance but also the form and presentation of this document are unacceptable. The document is just barely intelligible even to someone like myself, with decades of experience with the workings of the nuclear weapons complex. I pity the member of the general public who tries to tackle this thing. NNSA has created the ultimate Russian matryoshka for the EIS process - an endless succession of opaque acronyms, each nested within another, until one finally loses patience trying to remember their meanings and how they are supposed to relate to one another and the larger picture of complex restructuring. The presentation is so bad you can only presume that fostering this degree of confusion is the agency's intention.

In line with NRDC's normal practice, I would note that we will be submitting separate from these remarks, more extensive and detailed written comments on the Draft SPEIS on or before the April 10 comment deadline. Thank you for your attention and for the opportunity to offer this public comment.

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pending nuclear weapons and nonproliferation policy reviews that Congress recently mandated when it authorized national defense funding for fiscal year 2008.

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Any and all sections of the Draft SPEIS that cite this report as dispositive in establishing the Agency's purpose and need for action, or that employ it to narrow the range of reasonable alternatives detailed analysis, should be deleted or revised.

II. The Draft SPEIS Arbitrarily Excludes Analysis of Reasonable Alternatives for Significant Consolidation.

One statistic from the current document says it all: in 1995, four years after the Soviet Union dissolved, NNSA's operational nuclear weapons complex consisted of eight sites in seven states. Under its proposed plan, by 2020 – twenty-five years later -- NNSA's operational nuclear weapons complex will still consist of the same eight sites in the same seven states, but this complex will be maintaining a weapons stockpile that could well be 1/10 - 1/20 the size. This complex would still have two separate nuclear weapons design laboratories (Los Alamos and Livermore), a nuclear warhead engineering and weapons integration lab (Sandia), a nuclear weapons test site, new weapons uranium and plutonium processing facilities costing billions of dollars, and a new "privatized" nuclear weapons parts plant in Kansas City.

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The draft SPEIS arbitrarily excludes examination of consolidation options that would eliminate one or more geographically distinct sites that are no longer necessary, thus 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 nuclear weapons test site almost twenty years after the end of the Cold War sends exactly the wrong message to the world, and it is inherently reasonable to consider closing or consolidating these facilities.

Under a NEPA alternative that presumes good faith U.S. compliance with the Nuclear Nonproliferation and Comprehensive Test Ban treaties, NNSA must examine closure of its underground nuclear weapons testing grounds at NTS, while consolidating nuclear warhead stockpile support functions at Los Alamos National Laboratory, and non-nuclear component production at Sandia National Laboratory.

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There is no need to maintain two nuclear weapon design laboratories, because the nation has no reasonably foreseeable requirement for a competitive nuclear weapons design environment that would require two nuclear design laboratories. There is not enough work for even one nuclear design laboratory, so one will clearly more than suffice as a "hedge" against an uncertain future.

Likewise, there is no need to maintain a nuclear weapons test site in Nevada, when all but a few nations are committed to observing a permanent Comprehensive Test Ban Treaty, and the remaining holdouts are in fact waiting for the United States and China to ratify the treaty.

Nor is there any need to produce new plutonium pits, as thousands of existing long-lived surplus pits are available to be refurbished and recycled.

III. The Draft SPEIS Has Unreasonably Excluded Alternatives for the Consolidation of Non-Nuclear Component Fabrication Activities.

The draft SPEIS and indeed NNSA's entire SPEIS process has unreasonably excluded consideration of the future of the Kansas City Plant. This has deprived the citizens of the Kansas City area of their due process rights to participate in NEPA public hearings on the "Complex

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"Transformation" proposal, and has arbitrarily excluded from the analysis an obviously reasonable consolidation alternative for non-nuclear fabrication at the Sandia National Laboratory.

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The non-nuclear parts manufacturing needed to maintain a few hundred to a few thousand nuclear weapons could easily be consolidated within the footprint of the Sandia National Laboratory in Albuquerque, NM, avoiding many of the costs and environmental impacts of building and operating a separate new facility at a greenfield site in Kansas City. Indeed, this consolidation option was considered in detail by NNSA's predecessor, DOE Defense Programs, 12 years ago and found to be a reasonable and technically feasible option.

It was not selected at that time because it was considered to have higher up-front investment costs and environmental impacts than continuing to downsize operations at the existing Kansas City Plant. But in light of the current plan to phase-out operations at the old plant and build a brand new KCP a few miles away, this 12 year old conclusion regarding the Sandia consolidation option is clearly no longer valid. The refusal of NNSA to include this consolidation option within the scope of the present analysis is an arbitrary and capricious action that has no legal standing under NEPA and is clearly motivated by the desire to protect NNSA's scheme to shift its KCP operations to a new privately owned, third-party financed, GAO procured manufacturing facility in the Kansas City area without consideration of consolidation alternatives.

IV. The SPEIS Must Consider the Reasonable Alternative of Consolidating Most Weapons Complex Operations in the "Southwest Triangle" of NNSA Sites in New Mexico and Texas.

From where we stand, we see no serious technical, economic, or environmental impediment to actually implementing, much less analyzing in a NEPA document, a "Southwest Triangle" option for the complex that would incorporate all of the individual consolidations just mentioned. This would result in a smaller, more compact and efficient nuclear weapons complex largely contained within the southwestern triangle defined by Amarillo, Albuquerque, and Los Alamos, supported by occasional flight testing at White Sands Missile Range and maintenance of a small annual pit production capacity—not actual pit production—at Los Alamos, which capacity requires no further enlargement to meet sensible national security requirements.

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The potential synergy of this Southwest Triangle Option with a further consolidation of uranium operations to a site within this triangle, thereby eliminating weapons program operations and facilities at Y-12, must also be examined. There is clearly some reduced stockpile size at which this further consolidation is not only the technically plausible and environmentally preferred option, but the more economical choice as well.

Rather than maintaining the practice of shipping hundreds of HEU components annually between Pantex and the distant Y-12 site in eastern Tennessee, the current draft document must analyze as a discrete case the reasonable alternative of consolidating weapons uranium processing and fabrication capability, including necessary integrated storage, at either Los Alamos TA-55 or Pantex.

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This option would leave in place both the current low-volume plutonium pit fabrication capability at TA-55 and the new uranium storage facility under construction at Y-12. The latter facility would then serve naval and civilian needs for storage of surplus uranium permanently withdrawn from the weapons stockpile. This option would have the benefit of greatly reducing the need to ship HEU nuclear weapon components around the country.

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The SPEIS must also consider the reasonable alternative of using the excess capacity of the HEUMF facility now under construction at Y-12 to house a version of the UPT now under consideration for that site.

V. The SPEIS Presentation of Reasonable Alternatives and NNSA's Preferred Alternative is Severely Flawed and Inaccessible to even a Well-Informed Person.

The problems in Section S.3.17 of the Summary volume are evident from the very first sentence: "CEQ regulations require an agency to identify its preferred alternative to meet its purpose and need, if one exists, in a Draft EIS (40 CFR 1502.14(e)). At this time, NNSA has identified the preferred alternatives as described below. This is based on the consideration of environmental impacts described in this Draft SPEIS, as well as consideration of other factors such as mission and infrastructure compatibility, economic analyses, safety, safeguards and security, and workforce training and retention."

If an agency has a Preferred Alternative from among those analyzed in a DRAFT EIS, it is required to identify it.

In the instant case, NNSA has cherry picked a set of "Preferred Alternatives" from literally dozens of possible permutations that it has purported to analyze for consolidating and restructuring certain nuclear and non-nuclear activities of the complex. The net result is a programmatic "Preferred Alternative" whose environmental impacts cannot meaningfully be compared with any other reasonable alternative, since literally dozens of such possible alternatives exist within the document.

The Draft SPEIS thus fails one of the basic threshold tests of adequacy for an EIS – does the analysis of reasonable alternatives present a meaningful comparison of alternatives having greater and lesser environmental impacts, such that these impacts can be meaningfully compared and weighed in the balance of decision-making? The answer here is, "No."

The mix and match, smorgasbord approach of the entire analysis, in which pro-forma "building blocks" representing highly abstracted conceptual renderings of new nuclear production facilities, are plunked down in varying combinations on a lengthy roster of candidate sites, produces almost no information of value to a comparative NEPA analysis of programmatic alternatives, as virtually the same data tables and charts are used to describe the environmental impacts of each facility at different sites, and the plethora of possibilities are never combined into a coherent set of complex configuration choices with greater or lesser impacts. Much of the weighty mass of Volume II of the SPEIS is generated in this spurious fashion. Indeed, when the branch diagrams of nuclear alternatives are labeled with nearly identical acronyms, the whole analysis becomes indecipherable by the ordinary citizen, congressional staff member, or state official.

Indeed, there are so many possible programmatic and "project-specific" alternatives that the only possible response is to do what NNSA itself did – dip into the document and more or less arbitrarily cherry pick from among the oversupply of possible permutations and combinations, and thereby assemble your own "alternative." This is clearly not what Congress had in mind when it created NEPA, and it is not what CEQ's regulations require.

In sum, the SPEIS is unacceptable in its current form and should not proceed toward a planned Record of Decision later this year. Nor can its weaknesses be repaired by patching-up the present text. The current draft's guiding policy template, derived from the obsolete December 2001 *Nuclear Posture Review Report* – which predates the Moscow Treaty of May 29, 2002 – must be scrapped. Following receipt of the above-mentioned nuclear policy reviews, and fresh nuclear

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policy and stockpile guidance from Congress and the new administration, a radically revised draft SPEIS, fully rectifying the problems that NRDC and others have identified, should then be issued for public comment.

VI. Detailed Page-by-Page Comments

Volume I:

p. 1-1: The SPEIS states: "National security policies require the U.S. Department of Energy (DOE), through the National Nuclear Security Administration (NNSA), to maintain the U.S. nuclear weapons stockpile, as well as core competencies in nuclear weapons. Since completion in 1996 of the *Programmatic Impact Statement for Stockpile Stewardship and Management* (SSM PEIS) and associated Record of Decision (ROD), DOE has implemented these policies through the Stockpile Stewardship Program (SSP). The SSP emphasizes development and application of greatly improved scientific and technical capabilities to assess the safety, security, and reliability of existing nuclear warheads without the use of nuclear testing (emphasis added)."

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Paying close attention to the underlined portions above, it is by no means obvious, inevitable, or reasonable to conclude that a requirement to "maintain the U.S. nuclear weapons stockpile" and "core competencies in nuclear weapons" can only be met by a program that "emphasizes development and application of greatly improved scientific and technical capabilities" for assessing the "safety, security, and reliability of existing nuclear warheads"—much less the design of new weapons such as NNSA's proposed Replacement Warhead—"without the use of nuclear testing."

How specifically does NNSA manage to transmute a requirement to maintain weapons and core competencies into an exclusive focus for the purpose this NEPA analysis, on a stewardship strategy that emphasizes development and application greatly improved capabilities for nuclear warhead "assessment." How did a mandate to "maintain" get translated into a mandate to "greatly improve?" Please provide a footnote here, or a cross reference to another section of the SPEIS, which specifically discusses the legislative and Executive Branch authorities that support NNSA's implicit contention that no other paradigm would be reasonable for implementing "national security policies" directing that nuclear warheads and core competencies be "maintained."

p. 1-8

"Since the inception of nuclear weapons, the U.S. has maintained a safe and reliable nuclear deterrent force.... This statement is grossly oversimplified, historically inaccurate, and at variance with NNSA's own assertions about serious safety and reliability problems in the stockpile from the late 1950's through the early 1980's. Even as late as the early 1990's, DOE Defense Programs was consciously trading off the potential of achieving improved safety for improved military capability, for example by the use of conventional HE rather than insensitive HE in the W 88 warhead, in order to extract maximum counterforce capability from the highly constrained volume on the reentry vehicle.

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p. 1-9 "In October 1993, President Clinton issued Presidential Decision Directive 15 (PDD-15), which directed DOE to establish the Stockpile Stewardship Program. PDD-15 significantly redirected the nuclear weapons program. Throughout the Cold War, the DoD and the DOE nuclear weapons laboratories had based much of their confidence in the reliability of nuclear weapons on performance data from atmospheric and underground nuclear tests."

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This statement is technically and historically incorrect. DOE did not even begin conducting nuclear explosive tests for the explicit purpose of increasing confidence in the reliability of stockpiled weapons until the early 1980's. This hardly qualifies as "throughout the Cold War." Moreover, "confidence in reliability" is a statistical concept—the larger the testing sample and higher the number of successful outcomes, the greater the level of "confidence" in the reliability of the warhead type concerned. Unfortunately, since nuclear explosive tests were prohibitively expensive and intrinsically hazardous to conduct, they were never conducted in sufficient number to establish the reliability of the mass-produced weapon types that had been placed in stockpile.

Presumably technically competent persons in NNSA already know this, which raises the question why NNSA would engage in such misleading simplifications. Perhaps the answer is to be found in the succeeding paragraph, in which this misunderstanding of the role of nuclear tests is used to justify the expensive and costly Stockpile Stewardship Program that replaced them.

"However, since 1992, the U.S. has been observing a moratorium on nuclear testing." This statement is misleading. In reality, the U.S. did more than simply "observe a moratorium" on nuclear testing since 1992. When Congress cut off Executive Branch funding for nuclear tests after September 30 of that year, the U.S. government took the lead in negotiating a multilateral Comprehensive Test Ban Treaty (CTBT), a permanent prohibition on all nuclear explosive tests, which President Clinton signed in September 1996. The Senate subsequently failed to give its advice and consent to the CTBT when it was first brought up for a vote in the fall of 1999, but President Clinton's signature remains on the treaty, signifying the possibility that it may be ratified at some future date, possibly within a year or two. All of America's closest allies, including nuclear allies Great Britain and France, have already ratified the CTBT, along with Russia and 144 of the world's nations.

The draft SPEIS continues: "To ensure weapons reliability during the moratorium on testing, DOE proposed to invest in new scientific tools to assess the complicated phenomena involved in the detonation of nuclear weapons. DOE also began to develop sophisticated tools and computer-based simulation techniques to assess various aging phenomena as nuclear weapons were expected to serve well beyond their originally anticipated lifetimes. These actions enhanced the experimental, computational and simulation capabilities at the laboratories."

This statement again distorts the underlying technical and historical realities in the service of a simplistic narrative that serves to justify the agency's constricted range of reasonable consolidation alternatives selected for detailed study. As a technical matter, it did not and does not require investing tens of billions of dollars in "new scientific tools to assess the complicated phenomena involved in the detonation of nuclear weapons" in order to ensure continuing reliability. What is needed for this task is to ensure that the fissile material can be brought reliably into a configuration where such "complicated [explosive] phenomena" ensue with 100% certainty, and a thorough warhead surveillance program to detect any physical or chemical deterioration that could disrupt the course of this explosive driven assembly.

This basic technical capability in the complex long predates the arrival of the Stockpile Stewardship Program. Moreover, the two leading "new scientific tools" for assessing "complicated" nuclear detonation phenomena at NNSA's laboratories—the Dual Axis Radiographic Hydrotest (DARHT) facility at Los Alamos and the National Ignition Facility (NIF) at Livermore—are collectively billions of dollars over budget and 7 – 10 years behind their original completion dates, so its clear that NNSA could not have employed them to certify the continuing safety and reliability of the stockpile, as it has proceeded to do for the last 12 years. In reality, these and other costly "stewardship" projects were used to purchase the political passivity

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of NNSA and its weapons laboratories toward the negotiation of a CTBT, which they did for a time, but despite all this taxpayer largesse, in the end both NNSA laboratory directors sandbagged Senate ratification of the CTBT by professing a lack of confidence that stewardship techniques would remain sufficient to maintain the nuclear stockpile for an indefinite period.

p. 1-9) "DOE deferred spending on the production complex because there were no new weapons production requirements and because of uncertainty about the future stockpile requirements."

The above statement is another egregious example of distorting the historical record. Numerous independent and GAO reviews from the mid-1990's to the present expressed concern about the imbalance in investment shown by flush national weapons laboratory funding, in contrast to the deteriorated state of some production complex facilities. In fact presidentially approved and forecast nuclear stockpile requirements were much higher than they are today, so in fact the reverse is true: the reasonably foreseeable burden on the production facilities, to sustain this larger stockpile, was considerably greater 5-15 years ago than it is today, or is likely to be in the future. Moreover, there was an approved production program for a substantially new weapon – the B61 Mod 11 earth penetrating gravity bomb – in the mid 1990's, and there is no such approved requirement today. Is someone in NNSA just making this stuff up?

"The following decisions announced in the SSM PEIS ROD have been implemented:
....The Atlas Facility was constructed and is operational at LANL."

This statement is erroneous. As we noted in our SPEIS scoping comments of Jan.17, 2007, which we have appended to these comments since they are still very much germane, "DOE/DP billed the 'Atlas' Project, a huge capacitor bank for electrical pulse power driven weapon physics experiments, as one of three ostensibly "critical" stockpile "stewardship" facilities proposed for construction in the SSM-PEIS. But upon completion in August 2000 at Los Alamos this facility barely operated during 2001 before it was disassembled in 2002, and shipped to the Nevada Test Site, where in 2005 it was finally reassembled at a cost of \$21 million, and used for only 10 experiments before being "mothballed" by NNSA in March 2006."

p. 1-11) Regarding the 1993 Non-Nuclear Consolidation Environmental Assessment, DOE/EA-0792, the Draft SPEIS notes: "The Non-Nuclear Consolidation EA analyzed the proposed consolidation of the facilities within the Complex that manufactured non-nuclear components for nuclear weapons." We note that this statement is not entirely true. The FONSI based on this EA resulted in the transfer of neutron generator tritium target loading to Los Alamos, and tritium handling activities performed at the Mound Plant in Ohio were transferred to the Savannah River Site.

¹"Laboratory's Atlas Machine begins experimental work," LANL News Release, September 27, 2001. According to this news release, despite its inclusion for review and decision in the SSM-PEIS, "the Atlas construction project began in 1995 with engineering design and component tests," well before completion of the PEIS and its nominal inclusion in the PEIS ROD of December 26, 1996. See also "Atlas Pulsed Power Machine: New Life for test site?" *Las Vegas Review Journal*, July 1, 2006. According to this news article, the soon to be fired director of NNSA, Ambassador Linton Brooks, felt "sorry" that Atlas had been relocated, saying "the data from Atlas... wasn't as important as the data we'd get from other sources... I wish I was smart enough to know this was coming before we spent the time and energy to move it [Atlas]. But we made that decision five years ago." Of course, if DOE/NNSA had paid any attention to the reasoned arguments of its critics, Atlas would never have been built the first time, much less twice!

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Given that tritium is a radioactively decaying nuclear material that plays a crucial role in boosting the fission reaction rate in modern nuclear weapons, the continued mischaracterization of the 1993 EA and FONSI as only involving "non-nuclear" materials is significant, because NNSA repeatedly returns to this example to demonstrate that there is a clear and consistent logic in the way it has historically segmented "nuclear" from "non-nuclear" activities in the complex, subjecting the former to more demanding analysis while handling the latter with EA's and FONSI's.

In reality, nuclear material activities involving nuclear weapon components, such as tritium target and reservoir loading, have been analyzed in EA's, and non-nuclear activities, such as the preceding example of the Atlas capacitor bank, or the further downsizing and consolidation in 1996 of non-nuclear component fabrication activities, have been analyzed in EIS-level documents. NNSA can no show no consistent logical pattern or rationale for the way it has historically segmented its analyses of weapons complex facilities and operations, other than being driven by a continually shifting evaluation of its own agency interests in response to the degree of public knowledge and concern regarding its proposed actions.

p. 1-18 "Because the non-nuclear operations at KCP are essential and do not duplicate work at other sites, no proposal to combine or eliminate these operations was formulated." This conclusion is arbitrary and capricious and cannot withstand scrutiny, and is not the approach taken in the SPEIS review of alternatives for the relocation of non-nuclear research, engineering, and testing activities conducted in support of the nuclear weapons stockpile. It's not even accurate, as all freestanding NNSA sites have a host of facility overhead activities – e.g. guard forces, secretaries, administrative staff, utility services, maintenance personnel that are clearly duplicated at other sites. Indeed, reducing such overhead costs are a major impetus toward consolidation.

The domain of reasonable consolidation alternatives under NEPA is obviously not bounded by whether the substantive activities in question "duplicate the work at other sites," but rather whether consolidation of even disparate weapons activities into fewer geographic sites makes objective economic and technical sense, and could yield environmental benefits that are worthy of detailed analysis.

Taken at face NNSA's arbitrary criterion would exclude from NEPA analysis any consolidation alternative that seeks to minimize environmental impacts, security risks, or costs through consolidation for its own sake, rather than solely to eliminate redundant program activities or capabilities.

By the same token, NNSA's phony criterion actually supports consideration of merging duplicate nuclear weapon design and engineering capabilities, such as the consolidation of Lawrence Livermore's nuclear weapons stockpile support program into the similar program conducted at Los Alamos. But in an equally arbitrary and capricious fashion, NNSA excludes consideration of this alternative as well.

In fact, elsewhere the SPEIS considers the *transfer* – not consolidation – of NNSA's unique flight testing program – not duplicated elsewhere, from its longstanding Tonopah Test range in Nevada to the Army's White Sands Missile Range in southern New Mexico. We conclude that the agency is indulging in wordplay and specious reasoning to avoid NEPA analysis of reasonable alternatives that are not to its liking, but which may offer significant environmental, security, and cost benefits worthy of detailed analysis.

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Nor does the draft SPEIS explain how a consolidation alternative for non-nuclear components fabrication—consolidate KCP plant with closely related design and engineering operations at Sandia National Laboratory—can be considered within the ambit of NEPA, "reasonable alternatives," subjected to detailed analysis in 1996—but remain completely outside the scope of the very document that now purports to "supplement" this earlier analysis.

If this SPEIS purports to supplement the earlier SSM-PEIS analysis, then its framework for consideration of alternatives should be detailed with that earlier document.

Moreover, the Sandia option was subjected to detailed analysis but not selected in 1996 because it was judged to have greater associated costs and environmental impacts than the preferred (and chosen) alternative – downsizing in place at the existing KCP Bannister Federal Complex site. That is certainly no longer true today, as NNSA's preferred alternative is to *abandon* the Bannister Complex for a new *greenfield site* within the Kansas City area on which it proposes to occupy a brand new manufacturing "campus". It is arbitrary and capricious in the extreme for the agency simply to *stimulate* that this brand new greenfield site, which actually represents an expansion of the NNSA's weapons complex outside of its historic environmental footprint, represents an environmentally preferred alternative to consolidation at Sandia National Laboratory.

We revisit this question elsewhere in these comments, but will note for the record here that NNSA has been appraised since at least January 17, 2007 – that is for almost 18 months -- that NRDC and many other stakeholder object vigorously to the exclusion of non-nuclear component fabrication facilities and operations from the scope of this SPEIS, and yet NNSA has not seen fit to accommodate this concern.

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In reality it would require very little effort for the agency to dust off and update the analysis regarding projected non-nuclear fabrication capacity requirements and vacant industrial workspace within the confines of Sandia Albuquerque.

Some 10% of all KCP employees already work in New Mexico at Sandia and Los Alamos, and given that a larger, and still increasing fraction of KCP's workload is now being contracted out to private industry, the scale of the necessary consolidation is likely to be *smaller* today that it was 12 years ago. These salient facts makes NNSA's adamant refusal to consider the Sandia consolidation alternative all the more inexplicable, arbitrary and unreasonable. To us it appears that NNSA is unwilling to examine this option because it is secretly wedded to a Byzantine and possibly illegal off-budget plan to build a new, privately-owned weapons parts plant in Kansas City, using local bond financing, which it would then lease back, through GSA, as though it were just another commercial arms length transaction for an operating lease.

NNSA fears the resulting SPEIS analysis might support the environmental and cost case for consolidating the KCP at Sandia, and is therefore bending over backward to avoid going down that road. Aside from the violation of NEPA involved in this course of action, we are appalled that an agency of the U.S. government would attempt to build a new classified weapons manufacturing facility in such a devious and roundabout way, evading the normal Congressional procedures for publicly vetting the proposal in hearings before the appropriate congressional committees, and obtaining a line-item Congressional appropriation to defray the construction costs. We are alarmed by the degradation and devolution of Constitutional responsibilities that NNSA's Kansas City gambit implies.

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p. 1-25¹⁴A 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)."

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The referenced Section does not exist, or perhaps exists somewhere else in the document in a differently numbered section.

p. 2-5 "The U.S. Senate has not ratified the CTBT; however, the U.S. has been observing a moratorium on nuclear testing that was first directed by President Clinton in 1992."

This statement is factually incorrect. President Clinton was not the President in 1992. George H.W. Bush was President, but he was not the first to direct a moratorium on nuclear tests. Congress cut off funding for underground nuclear tests after September 30, 1992, over the opposition of then President Bush, and gave the incoming President the option after July 1, 1993 of requesting the conduct of a limited number of tests to resolve any outstanding nuclear safety or reliability issues in the stockpile, prior to a permanent cutoff of funding for US nuclear tests that Congress directed would take effect after September 30, 1996 and last until another country tested. President Clinton reviewed pending nuclear warhead safety and reliability issues and found no problems meriting a resumption of testing. While the "Hatfield-Exon-Mitchell" funding restriction evaporated with the nuclear test explosion conducted in the late 1990's by India and Pakistan, the informal test moratorium among the major nuclear powers persists to this day.

"It has been almost 15 years since the last U.S. nuclear test and more than 15 years since the last new nuclear weapon entered the stockpile. While no issues have yet developed in maintaining legacy weapons that would require a return to nuclear testing in the reasonably foreseeable future, there is concern that the current weapon "life extension" approach to maintaining a safe and reliable stockpile will not ultimately, over the longer term, allow a continued moratorium on testing as weapons continue to age."

17/2K9

This statement is tendentious in the extreme and unsupported by any credible independent technical authority known to NRDC, and we know many of the independent experts in this field. It should either be expanded and buttressed by credible sources citing peer reviewed data and analysis to support the conclusions, or else deleted as unsupported hearsay and self-interested agency speculation. The formulation, "there is concern..." is completely unacceptable. Who specifically harbors these concerns? What are their qualifications? What technical evidence do they adduce for these conclusions?

What does it imply to suggest that "issues in maintaining legacy weapons" could "require" a return to testing, as if the political leadership would have no say in the matter? What does it mean to suggest that the current "life extension approach" will not "allow" a continued moratorium on testing as weapons age, as if the warheads themselves, or perhaps their overwrought "stewards," were sitting in the Oval Office with the power and discretion to determine national policy? This kind of rhetoric and reasoning seems unhinged from reality, and betrays the absence of any sense of proportion regarding the modest role nuclear weapons now occupy in the broad sweep of US policy priorities.

Even if NNSA's stewardship of the stockpile became so derelict that one or more warhead types turned to Swiss cheese, this would not necessarily "require" the President or the Congress to direct a return to testing. More likely, it would trigger an investigation into NNSA's incompetence in allowing such a condition to develop in the stockpile. The technical questions surrounding the feasibility of relying on warhead remanufacture as a means of sustaining the legacy stockpile for

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an indefinite period were extensively vetted and resolved during the period from 1987 until 1995, when President Clinton made the decision to go for a "zero yield" treaty with the assurance from both national laboratories that an adequate nuclear deterrent could be sustained for an indefinite period without reverting to nuclear explosive tests. For NNSA to be hinting otherwise in the context of this NEPA review is damaging to US nonproliferation and security interests and could weaken international confidence in the durability of the current international test moratorium.

17/2K9
(cont.)

p. 2-5; 2.1.4 Treaty on the Nonproliferation of Nuclear Weapons (NPT)

"Article VI of the NPT obligates the parties 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." However, the NPT does not establish a time frame for achieving these goals and the President and the Congress have not set a schedule for these goals."

The draft SPEIS misstates the U.S. NPT obligation. It acknowledges that the NPT, signed 40 years ago, obligates the parties to good faith negotiations on ending the nuclear arms race "at an early date", and then turns right around and argues that there is no "time frame for achieving these goals." Clearly 40 years is already at the outer limits of what common sense would suggest is logically implied by the phrases "negotiations in good faith" and "at an early date."

"...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 Congress."

18/2K10

The problem with this formulation of the agency's obligations is that current "national security policy," at least that part of it that has a statutory foundation, does not require NNSA to "design... the nuclear weapons stockpile." In fact, there are no new weapon designs approved for engineering development or production, and little prospect of gaining such approval. NNSA instead was instructed [in P.L. 103-160] to "maintain core competencies" in "research, design, development, and testing," which is clearly not the same thing as a mandate to design, develop, or produce new weapons. And as the agency itself notes, Section 3111 of Public Law 109-163 establishing a Reliable Replacement Warhead (RRW) program merely "mandates the study of a different technical approach" to maintaining stockpile reliability, safety and security "to serve as a complement to, and potentially a more cost-effective and reliable long term replacement for, the current Stockpile Life Extension Programs."

Thus in reality, there is nothing in NNSA's statutory obligations that bars it from conducting NEPA analysis that fully considers and meaningfully compares the environmental benefits to be realized from moving to dramatically smaller nuclear weapon stockpiles, different technical paradigms for stockpile stewardship than the present one, and successively higher degrees of complex consolidation. NNSA is simply exercising -- indeed abusing -- its agency discretion and arbitrarily choosing not to consider such alternatives, and then hiding behind an egregious over-reading of certain of its statutory obligations while ignoring its legal obligation under NEPA to consider "all reasonable alternatives."

p. 2-7; "Weapon reliability is assessed annually based in part on laboratory and surveillance tests on a relatively small number of each weapon type. There can be no "end-to-end" functional test of a complete nuclear weapon in its "stockpile-to-target" environments. In lieu of this, laboratory and flight surveillance tests are conducted at the component and subsystem levels and the data are combined and analyzed to produce a reliability estimate for the weapon. While this methodology

19/2K11

is adequate for estimating the current reliability of a weapon, it does not provide high-confidence predictions of the future behavior of an aging weapon. Because of these uncertainties, NNSA needs to plan some excess capacity beyond known requirements to be able to respond to unknown policy and technical issues that may arise over the next decades.”

Once again, NNSA is inventing mandates for itself out of whole cloth and pretending that these are immutable realities that shape and limit its consideration of alternatives for the nuclear weapons complex. We are aware of no NNSA statutory obligation that requires NNSA to provide “high-confidence predictions of the future behavior of an aging weapon.” NNSA’s mission is to maintain a reliable weapons stockpile by conducting regular surveillance and sampling activities, detecting any signs of deterioration, and correcting these deficiencies in a cost-effective manner. NNSA has not been charged with functioning as a Greek oracle.

Nor does NNSA have a statutory mandate to set aside “excess capacity beyond known requirements” to respond to “unknown policy and technical issues that may arise over the next decades.” Even if this were true, it obviously does not constrain NNSA’s inherent discretion, or its responsibility under NEPA, to consider lesser alternatives that respond to known policy issues that almost certainly will “arise over the next decades.” Indeed these “policy issues” have arisen now, in the form of Congressionally directed nuclear posture and nonproliferation policy reviews, and many tens of thousands of public comments urging NNSA to consider the environmental benefits of smaller stockpile sizes, less expansive technical paradigms for stockpile stewardship, and higher degrees of weapons complex consolidation.

Such NEPA analysis would be extremely timely and warmly welcomed by NNSA stakeholders, other government agencies, and congressional policymakers who must make key decisions regarding the capabilities and funding of the future complex. Indeed, it is NNSA legal obligation to provide such information to policymakers in a timely manner, so that it can be used to inform their deliberations and decisions on the future of the nuclear weapons complex.

p. 2-7: “Beginning in 2001, additional national security policies for the SSP began to develop. The 2001 NPR mandated a smaller U.S. nuclear weapons stockpile, but also a more robust and responsive infrastructure as part of the deterrence strategy.”

A “more robust and responsive infrastructure as part of a deterrence strategy” is not part of NNSA’s statutory mandate, and therefore it cannot not be relied upon to define the agency’s purpose and need for action, or truncate the range of reasonable alternatives. As noted elsewhere in these comments, the 2001 NPR can do no more than inform an historical account of the evolution of NNSA’s internal policy perspectives. By its own terms, it was limited to “the next 5-10 years,” while the present NEPA analysis was publicly scoped to run until the year 2030, and as a now discredited policy report authored by a coterie of hard-line conservative officials who are no longer in government, it can have no legitimate dispositive effect on NNSA’s assessment of the range of reasonable alternatives worthy of detailed NEPA analysis.

p. 2-10: “A reliable and responsive infrastructure is a cornerstone of the new triad discussed in the 2001 Nuclear Posture Review (Figure 2-2) and in section 3111 of the National Defense Authorization Act for FY 2006 (Public Law 109-163). 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.”

This statement inaccurately and misleadingly conflates the hawkish theorizing of the 2001 Nuclear Posture Review Report to Congress with NNSA’s statutory responsibilities as outlined in

19/2K11 (cont.)

21/2K13

22/2K14

Section 3111 of P.L. 109-163. The latter does not discuss or reference a “responsive infrastructure” as being the “cornerstone” of a “new triad.” Indeed the entire intellectual construct is dismissed by the vast majority of independent defense experts as loopy. The offending paragraph should either be deleted, or in the alternative, amended to correct the misleading conflation of two disparate and unequal sources for NNSA policy guidance. If the paragraph says, NNSA should explain what meaningful nuclear advantage a future adversary might plausibly seek over the United States, and how the “responsive infrastructure” would be employed to quickly “negate” this advantage.

22/2K14 (cont.) 23/2K-29

p. 2-10: “A more responsive infrastructure is expected to permit further reductions in the weapons stockpile. In the context of the SSP, this responsiveness could permit deeper reductions in the total weapons stockpile that supports the deployed stockpile.”

In what way would “more responsive” infrastructure permit deeper reductions in the total weapons stockpile that supports the deployed stockpile? Since when do inanimate facility capabilities dictate what may or may not be in the national and global security interest? If NNSA is going to assert this linkage, it needs to back it up with some serious numbers and analysis, so the environmental tradeoffs between a smaller stockpile with a responsive infrastructure and a larger stockpile without one can be assessed. How deep would these new reductions be? Are they beyond those in the reserve stockpile that have already been directed by President Bush? How much further beyond?

24/2K15

The direct linkage suggested in this statement between the more “responsive infrastructure” required to build RRW warheads and further reductions in the stockpile has been explicitly rejected by two senior congressional committee leaders on defense issues. “We see promise in the proposed RRW program, but we take issue with your assertion that any delay in RRW would “force the United States to maintain a large stockpile of nuclear weapons and sustain it through increasingly costly and risky Life Extension Programs.”

p. 2-12: “For the nuclear production alternatives, this SPEIS assumes, as a base case, a manufacturing capacity operated in single shift, five days per week that produces 50-125 weapons per year.”

25/2K16

We note that “nuclear production alternatives” actually concern production of nuclear weapon components, not “weapons.” But the slip is revealing. The cited production rate for nuclear weapons also depends, somewhat ironically in this instance, on the capacity of non-nuclear component manufacturing alternatives that have been illegitimately excluded from this analysis, and on the sizing of final assembly facilities at Pantex.

“The SPEIS also analyzes infrastructure needs for a production rate as low as 50 weapons per year?”

How does this alternative present a meaningfully different alternative, in terms of environmental impacts, from the base case of 50 – 125 “weapons” per year?

³ Letter from Representative Ike Skelton, Chairman, House Armed Services Committee, and Representative Ellen Tauscher, Chairman, Subcommittee on Strategic Forces, House Armed Services Committee, to Secretary Samuel W. Bodman, Department of Energy, Secretary Robert M. Gates, Department of Defense, and Secretary Condoleezza Rice, Department of State, July 26, 2007.

p. 2-13: "Pit reuse can limit the ability to improve the performance margin of the primary, which contributes to longer-term reliability. Lower primary performance margins reduce confidence in performance because the weapon is more sensitive to changes that may cause it to fail, such as undesirable changes due to aging or other environmental factors."

Since NNSA is relying on such statements as the preceding to preclude NEPA consideration of a "pit reuse only" option, please explain why it is plausible to believe that a recycled pit could undergo undetected "undesirable changes" that would be sufficient to cause it to "fail." Please define "fail."

"Pit reuse can limit the ability to upgrade the intrinsic safety and security features of a weapon."

What is meant by "intrinsic" safety and security features, and how do these differ from other "safety and security features"?

Is ensuring the ability to upgrade intrinsic safety and security features a threshold assumption for all nuclear production alternatives in the SPEIS? If so, why? What safety and security concerns are so pervasive and specific that resolving them requires the application of new "intrinsic" safety and security features rather than other measures?

If this unsubstantiated constraint is relaxed, would reliance on pit reuse be considered a reasonable alternative worthy of detailed consideration?

"Reuse in the form of non-intrusive pit modification can range from no external modification of the old pit to the addition of significant new external features to it. Concepts with new external features were studied and prototyped and a few nuclear tests were conducted just prior to the U.S. moratorium on nuclear testing began in 1992. The current weapon assembly/disassembly (AD) facilities may be able to perform such operations."

What "new external features" of reused pits are being referenced here. Improved fire resistance? Please explain the significance of these "features" and whether adding them to existing reusable pits is a documented requirement for the actual reuse of such pits in future remanufactured weapons?

p. 2-16: "The general approach in this SPEIS analysis is to evaluate the three functional capabilities—plutonium operations, uranium operations, and weapons assembly/disassembly in "building block" fashion so that the blocks can be arranged in any combination among the five alternative sites. Both new facilities and upgrades of existing facilities are considered and the building block approach is intended to allow phasing of construction. For example, to constitute a CNPC, a Consolidated Plutonium Center (pit production facility), a Consolidated Uranium Center (production facility for secondaries and cases), and an A/D/HE Center would be built in separate buildings set in a campus-like arrangement, but all would generally be within the same high security perimeter."

Please explain why this cookie-cutter building block approach results in a meaningful comparison of complex-wide consolidation alternatives with greater or lesser degrees of environmental impacts? The plethora of acronyms and nested "alternatives-within-alternatives" make the analysis virtually incomprehensible, even to experienced analysts of the nuclear weapons complex.

26/2K17

Out of the dozens of permutations generated, how many represent plausible candidates for implementation, and which of these are to be preferred based on a comparison of their environmental impacts?

Since the "blocks can be arranged in any combination among the five alternative sites," and one alternative, the CNPC, is merely an amalgamation of the other generic alternatives plunked down at any one of five alternative sites, how does this result in a range of reasonable alternatives with greater or lesser environmental impacts that can be meaningfully compared by decision-makers and the general public who have faithfully participated in this process?

The plethora of acronyms and nested "alternatives-within-alternatives" make the analysis virtually incomprehensible, even to experienced nuclear weapons analysts.

"The 1996 SSM PEIS did not include any proposed actions to restructure the laboratory technical base other than adding new facilities for enhanced experimental capability. That PEIS concluded, "The continued vitality of all three NNSA national security laboratories will be essential in addressing the challenges of maintaining a safe and reliable nuclear weapons stockpile without nuclear testing."

This statement leaves the false impression that "restructuring the laboratory technical base" would have necessarily jeopardized the "continuing vitality" of NNSA's national security laboratories, and it is inconsistent with the R&D restructuring actions NNSA now proposes in this SPEIS. In fact, many of these actions were first proposed by DOE stakeholders contesting the conclusions of the 1996 SSM-PEIS. It appears NNSA has wasted billions of extra dollars getting to a place it could have been 12 years ago.

p. 2-21: 2.5.8 RRW Summary

"The ultimate fate of the RRW has no effect on the proposed actions in this SPEIS, alternatives bounding production capacities studied, or the assessment of their environmental impacts."

How is this possible, given that production of RRWs would presumably involve the fabrication of new nuclear components, generating nuclear waste streams that would not be characteristic of alternatives that rely on pit reuse, or on current Life Extension Programs?

In general, please explain your clearly counter-intuitive assertion that the production of hundreds and possibly even thousands of new RRW weapons would not give rise to environmental impacts that are qualitatively and quantitatively different than continuing to rely on legacy weapons, or shifting to a pit recycling and remanufacture strategy?

"The RRW would enable NNSA to change how operations are conducted within the facilities studied in this SPEIS. While RRW would enable more cost-efficient and less hazardous operations, it would not eliminate the need for SNM operations or substantially reduce near-term production needs. Because the environmental impacts are based on the maintenance of the legacy weapons that are currently in the stockpile, a conservative estimate of the environmental impacts is provided by this SPEIS. A pit and CSA production capacity will be required for the foreseeable future with or without implementation of RRW."

With reference to the undefined portions, it does not seem credible how the environmental impacts of maintaining a (potentially quite small and unused) "capacity" for pit and CSA

28/2K19

29/8B2

28/2K-19 (cont.)

2812K19 (cont.) production could bound the environmental impacts of *actually producing* hundreds of thousands of RRW weapons with newly fabricated nuclear components?

Please provide the specific chain-of-reasoning that culminates in this startling conclusion?

p. 3-5 "In pursuit of a more responsive and cost-effective Complex, NNSA is considering a restructuring of the R&D and testing facilities within the Complex. For the proposed action to restructure R&D and test facilities, the alternatives focus on near-term actions to consolidate, relocate, or eliminate facilities and programs and improve operating efficiencies... The project-specific alternatives, shown on Figure 3.1-2, were developed to achieve significant benefits in making the Complex more secure and efficient. In addition to these project-specific alternatives for restructuring R&D and testing, this SPEIS also addresses alternatives related to non-nuclear component design and engineering work at SNL/California."

512.0 (cont.) We note that in this SPEIS, NNSA is proposing, in pursuit of a more "cost-effective" complex, significant consolidation and relocation of a wide range of non-nuclear activities conducted to support the nuclear weapons stockpile, including the possible transfer of non-nuclear component design and engineering work at SNL/California to SNL Albuquerque, "to achieve significant benefits in making the Complex more secure and efficient." In this context, we can't help but note once again the arbitrary and capricious exclusion of non-nuclear component fabrication activities from the purview of this SPEIS. Why don't all the potentially obtainable significant benefits listed above apply equally to NEPA consideration of the "relocation" and "consolidation" of other non-nuclear activities, including manufacturing?

If both Los Alamos and Sandia National Laboratories can each host "design and engineering" and non-nuclear "production" activities, as they have done for quite some time, what possible basis is there for excluding consideration of the potential benefits of transferring non-nuclear production activities from the Kansas City Plant to SNL Albuquerque? Sandia already fabricates neutron generators and microelectronic parts for nuclear weapons, and a large contingent of KCP employees already works at the Kirtland AFB site. Moreover, NNSA is already considering a directly analogous transfer of non-nuclear parts engineering capabilities from SNL/CA to SNL/Albuquerque, which makes the exclusion of the KCP transfer alternative seem all the more arbitrary.

Table 3.2.8-1 – Current Major Mission at Savannah River Site.

3012K20 This table identifies NNSA's Office of Defense Nuclear Nonproliferation as the "sponsor" of SNM disposition facilities at SRS. What role, if any does DOE's Office of Nuclear Energy play in funding overseeing the MOX facility project? Is this no longer an NNSA/NP program?

p. 3-23: "Additionally, for a CPC that might be constructed at SRS, this SPEIS considers using facilities and infrastructure that are to be constructed in support of the Materials Disposition Program. The Pit Disassembly and Conversion Facility (PDCF) would provide the capability to disassemble nuclear weapons pits and could be modified in the future to convert plutonium to a form suitable for producing new pits."

312K21 Please describe why it would be politically acceptable and consistent with our Nuclear Nonproliferation Treaty obligations to use facilities intended for "irreversible" nuclear weapons material disposition to produce new plutonium pits for new U.S. nuclear weapons? How does NNSA think this might appear to the rest of the world?

312K21 (cont.) Is the PDCF being proposed for construction pursuant to the analysis in this SPEIS? If so, why are this facility and its environmental impacts not described in greater detail, and analyzed at alternative locations, such as Pantex?

Does this SPEIS analysis assume that this facility will only be located at SRS?

What is the current status of NEPA coverage for this facility?

Is the analysis in this SPEIS based on the assumption that it makes more sense to ship intact pits from Pantex to SRS rather than cans of plutonium oxide?

p. 3-37: "For the period evaluated in this SPEIS, it is assumed that the Plutonium-238 mission would remain within TA-55 and PF-4."

What is the time horizon ("period evaluated") in this SPEIS?

"The 50/80 Alternative is evaluated to identify impacts from reductions in pit production needs. PF-4 at TA-55 is the only existing plutonium facility capable of being upgraded to support this level of pit production without major construction. Implementation of the 50/80 Alternative (if selected) would be timed to minimize disruption of LANL's interim small-scale pit production activities, which are needed to meet current requirements."

What are these "current requirements" that LANL's interim small-scale pit production activities is currently meeting? How many W88 surveillance pits need to be accumulated before these activities could be "disrupted" without harming the national security?

Assuming the agency's Preferred 50/80 Alternative is selected, it is not clear what this pit production capacity would actually be used for, in the event that production of new RRW pits is not approved by the Congress? What pit production activities are proposed for this facility in the absence of an approved RRW production requirement?

If the goal is to maintain a pit production capability by maintaining a cadre of skilled personnel who can build pits when called upon to do so, what is the minimal number of pits per year – and minimal waste stream – that would satisfy this training requirement?

"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. Modifications to existing facilities at TA-55 could be required to accommodate additional workers employed in pit manufacturing."

This analysis is unacceptably vague given that this is the agency's Preferred Alternative? Will the 50/80 Alternative require the expansion of the CMRR facility, or not?

What modifications to existing facilities at TA-55 will be required to accommodate additional workers employed in pit manufacturing?

Absent a requirement to produce RRW pits, what will these workers do?

Table 3.4.1-9 on page 3-38 shows a figure for total employment under the "Los Alamos 50/80 Alternative Annual Operating Requirements" of 680 workers.

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32pK22 (cont.) What number of pits/yr does this represent – 50 or 80? Why does it require this huge number of workers for such a relatively small output? How many workers would it require to produce 5 or 10 pits per year in this same facility?

p. 3-39 "The UPF would replace multiple existing enriched uranium (EU) and other processing facilities. The current operating and support areas occupy approximately 653,000 square feet in multiple buildings, while a UPF would result in approximately a 33 percent reduction, to approximately 400,000 square feet in one building. Once a UPF were operational, some existing facilities would be available for decontamination and decommissioning (D&D), while other facilities could be used for non-EU processes."

This section should specify the "multiple existing EU and other processing facilities," that the UPF would replace. What are the proposed maximum and nominal annual CSA production capacities for the proposed UPF?

7f5C2 (cont.) In discussing the construction of a UPF-like facility at a site other than Y-12, the SPEIS notes that such a Consolidated Uranium Facility (CUC) would also include storage of approximately 100,000 sq. ft., which represents the military storage requirement at approximately 1/5 of the total facility area.

This alternative raises the interesting possibility that the similarly sized HEUMF at Y-12 may have excess square footage to allocate to the UPF mission. The HEUMF is a very large facility, on the order of 8 acres. It is difficult to believe that all this space will be required to store HEU and EU removed from weapons, given ongoing disposition activities involving conversion of inventories to navy fuel and dilution to LEU for civil reactors.

What annual level of CSA and HEU component fabrication operations could be accommodated within the new HEUMF at Y-12 under various assumptions about future storage and uranium disposition requirements, and various projected levels for CSA production?

Has NNSA considered the alternative of collocating the UPF in the HEUMF at Y-12, and not building a costly \$3-4 billion freestanding UPF? If not, why not? Is this alternative objectively reasonable in NEPA terms and therefore worthy of detailed review?

Where will enriched lithium-deuteride components be stored and/or processed? Could this be in a facility separate apart from either the HEUMF or the UPF?

p. 3-66: 3.6.2 Further Stockpile Reductions

The interesting but brief discussion in this section of the Draft SPEIS raises far more questions than it answers. NNSA acknowledges that it has based its analysis on "current national policy" regarding stockpile size (1700-2200 operationally deployed "strategic nuclear warheads"). NNSA does not reveal the size of the current or projected "nonstrategic" and "war reserve" stockpiles that its current SPEIS analysis is designed to protect. NNSA should disclose these numbers, so that decision makers across the government, members of Congress, and the general public can judge for themselves whether these stockpile levels represent an objectively reasonable boundary for reasonably foreseeable changes to the stockpile until the year 2030.

NNSA goes on to note:

33pK23

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"If stockpile size were reduced even further [than what, the current level?] at some point [what point is this?] even a capability-based Complex may not be the optimum configuration. Indeed, in such a situation, it is likely that NNSA would make major changes to the Complex beyond those described in Section 3.6.1. For example, at some point on a path of denuclearization [what point is this?], closure of production sites would become reasonable, rather than reducing facilities in-place [why isn't this reasonable today?] In such a case, NNSA current thinking is that the Complex could be reconfigured as follows:

- LLNL, LANL, and SNL would become smaller as research and development laboratories;
- LANL or NTS would likely become locations for all Category I/II SNM component production;
- NTS would become the site for A/D/HE operations and any high-hazard testing;
- SRS would remain the tritium production site; and
- Pantex and Y-12 would close."

33pK23 (cont.)

We see no legal or other valid reason that justifies NNSA's refusal to consider in detail in this SPEIS just such stockpile reduction and complex consolidation scenarios that go beyond "current national policy" – after all, a central purpose of NEPA analysis is to force agencies to consider all "reasonably foreseeable impacts" rather than merely the ones suggested or acknowledged by "current policy."

By including this brief discussion, NNSA has conceded in principle that there exist complex consolidation alternatives that would have lesser total, connected and cumulative environmental impacts than those of the "Capability Based Alternative," which constitutes the floor of the present analysis based on a presumption of facility throughputs sufficient to support production of about 50 weapons per year. It also has conceded that the agency has "current thinking" on how the Complex could be optimally reconfigured to support a smaller stockpile, and it even provides a sketch of one such possible configuration.

Under NEPA, NNSA is obligated to share its thinking about such reasonable alternatives with the public, since it can no longer argue that they are not "reasonably foreseeable" while the agency engages in "current thinking" about them.

8.1 Summary

p. S-1. "NNSA now proposes to continue the transformation of the Complex by further consolidating operations, which could result in the relocation of activities among sites (emphasis added)"

The SPEIS should explain here why NNSA has limited its consideration of "consolidating operations" to "relocation of activities among sites," rather than excluding from the analysis consolidation options that could result in the elimination, closure, conversion, or transfer (to other beneficial uses) of existing weapons complex sites. Such an approach would appear at the outset to exclude the options with potentially the greatest environmental benefits, which is a poor way to begin a NEPA analysis.

34pK24

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In conclusion, please find appended to this set of comments additional comments that NRDC has filed with the GSA regarding NNSA's plan to privately procure new manufacturing capacity for non-nuclear components outside the scope of this SPEIS process, and without preparing a separate EIS. We intend that these additional comments be made part of the Administrative Record of this SPEIS.

342K24
(cont.)

Sincerely,

Christopher E. Paine
Director, NRDC Nuclear Program

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Mr. Carlos Salazar,
GSA Regional NEPA Coordinator
U.S. General Services Administration,
1500 East Bannister Road, Room 2191 (6PTA),
Kansas City, MO 64131,

Via Email to: NNSA-KC@gsa.gov

January 13, 2008

Dear Mr. Salazar:

The Natural Resources Defense Council (NRDC) appreciates this opportunity to comment on the draft *Environmental Assessment for the Transformation of Facilities and Infrastructure for the Non-Nuclear Production Activities Conducted at the NNSA Kansas City Plant* ("KCP-EA").

With a staff of over 350 scientists, economists, environmental litigators, policy experts, advocates and support personnel representing the environmental interests and views of approximately 1.2 million members and on-line activists, NRDC has for three decades maintained a deep and abiding interest in reducing the environmental and other harmful impacts of the U.S. Nuclear Weapons Complex.

I. Our Prior Extensive Written Comments on the Scoping of This EA Have Been Ignored

We note with regret that our extensive written comments (submitted jointly with Nuclear Watch New Mexico on 21 May 2007) on the GSA's Notice of Intent [FR/72 at 23822] to prepare this EA have been ignored. At that time we advised you that the proposed scope of the alternatives analysis for acquiring a "transformed" Kansas City Plant, as outlined in the NOI, was "premised on preemptive agency judgments that prematurely narrow and effectively predetermine the NEPA analysis."

Specifically we objected to the NOI's arbitrary, unsupported, and controlling presumption that "relocation of the non-nuclear production mission to another location outside of the Kansas City Metropolitan Area is not a reasonable alternative." [NRDC-Nuclear Watch letter to NNSA Acting Administrator Mr. William C. Ostendorff, (copied

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with a cover letter of the same date to Mr. Carlos Salazar, GSA Regional NEPA Coordinator) May 21, 2007, p.1-20]

We further noted our view that the segmentation of NNSA's non-nuclear fabrication activities from its ongoing programmatic review of its "Complex Transformation" proposal violates NEPA, because it arbitrarily and capriciously excludes consideration of objectively reasonable consolidation alternatives for non-nuclear component manufacturing that are worthy of detailed study. We also observed that DOE's underlying 1996 *Final Programmatic EIS for Stockpile Stewardship and Management*, which the NNSA's parallel ongoing review relies upon and purports to "supplement," regards non-nuclear consolidation at sites outside of the Kansas City area as a "reasonable alternative," worthy of detailed NEPA analysis. We see nothing in today's environment that would alter that judgment, and much that would tend to reinforce it.

Our May 21 2007 letter also commented that converting a 185 acre "greenfield" site in agricultural use into a modern \$500 million "campus" for nuclear weapon parts production that generates hazardous wastes in the course of its operations inherently meets the definition of a Major Federal Action requiring consideration in an EIS, not merely an EA. We noted that the "still unresolved environmental hazards at the current KCP plant site," and the siting of a nuclear weapons production facility near a proposed inland port with heavy truck and rail traffic, likewise raise environmental and security concerns that need to be analyzed in an EIS. We concluded by noting that, judging from the approach taken in the NOI, GSA's "cooperating agency" partner in the new KCP project, NNSA, was simply ignoring NRDC's previous comments, filed five months earlier (17 Jan. 2007), objecting to the arbitrary exclusion of non-nuclear fabrication mission alternatives from the "Complex 2030" (now "Complex Transformation") Supplemental PEIS analysis.

We do note, however, that one misguided and completely inappropriate response to these concerns was undertaken by NNSA. Rather than do what is clearly required under NEPA—which is first to *consider alternatives representing the range of reasonable consolidation alternatives for non-nuclear component fabrication activities as part of the broad programmatic "Complex Transformation" NEPA analysis, and then to conduct site-specific NEPA analysis on any construction projects included in a Record of Decision (ROD) based on this analysis*—GSA/NNSA have instead sought to substantiate retroactively their exclusion of these reasonable alternatives, from both the *Supplemental PEIS* process and the KCP-EA, by commissioning, in parallel with preparation of the draft EA for public comment, a "business case" analysis on "Relocation of Non-Nuclear Production to an Alternate Location." [Science Applications International Corp., October 18, 2007, Revision 2, hereafter referred to as the "SAIC study" or "SAIC report"]. This curious document is actually larger (2,152 vs. 1,635 kilobytes in PDF format), far more elaborate, and appears to have been more costly to prepare than the KCP-EA itself, which comprises a mere 63 double-spaced pages (with triple spacing between paragraphs and only two tables.)

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II. The SAIC Report Violates Government Regulations Barring Parties with Conflicts of Interest from Preparing Documents Used in the NEPA Process

NRDC has grave concerns about this SAIC document, extending both to the manner and timing of its preparation as well as its substance. Its scope and analytical assumptions were not subject to public review and comment, and as a result these appear custom-tailored to prejudice the case for relocation of non-nuclear production outside of Kansas City. This lengthy document and its conclusions are briefly described in a mere eight sentences in the KCP-EA [Sec. 3.4.2, Alternative Considered Outside Kansas City Metropolitan Area, p.17], which are introduced as follows:

"In response to comments made during the public scoping comment period, the NNSA Office of Transformation prepared an *independent and objective* assessment of the business case for moving non-nuclear production from the KCP to an alternate city, for comparison with alternatives identified in the GSA/NNSA EA NOI (p. 17, emphasis added)."

In reality, the study was not prepared by the "NNSA Office of Transformation," but rather by one of its contractors, SAIC Corp., a huge, ubiquitous contractor to both GSA and NNSA which routinely conducts billions of dollars worth of business with these and other government agencies. SAIC is in fact a "GSA Environmental Services" Schedule contractor, and also holds eight other GSA Schedules allowing it to provide government agencies with a wide array of products and services using streamlined non-competitive contract procedures. Thus SAIC's report was neither "independent" nor "objective" by any reasonable definition of those terms, since it is GSA's proposal for a privately financed, but NNSA-run nuclear weapons industrial park that is at issue.

The review's lack of independence at the corporate level is reflected in the individual resumes of the SAIC staff and consultants listed in "Appendix 7 – Vitae" [p. 61] as having worked on the study. *All of them are or have recently been employed on other SAIC contracts with NNSA on closely related matters:*

For example, Ms. Leslie A. Bowen is currently employed by SAIC as a "Senior Regulatory Engineer" on a contract supporting NNSA's "Deputy Assistant Deputy Administrator of Military Application and Stockpile Operations and other Federal staff in the evaluation, selection, and management of Readiness Campaign Projects." Thus Ms. Bowen was working for an official with direct responsibility over the very program and project she was charged with evaluating.

According to his vitae, "during the last five years, Dr. [Geoffrey D.] Kaiser, [an SAIC Assistant Vice President for Technology,] has been working with the National Nuclear Security Administration's (NNSA) Office of Stockpile Technology (OST) providing guidance in the areas of program and project risk management and business practices...During 2006, he worked on the development of an Applied Science and Technology Roadmap (ASTR) for NNSA's Nuclear Weapons Complex...*He works as*

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the de facto risk management coordinator for OST." Again, this person's "independence" is fatally compromised by his contract and work relationships with officials having direct responsibility for the US nuclear weapons stockpile.

Another co-author of the report, Dr. Steven R. Ligon, is a Lead Systems Engineer in SAIC's "Energy Solutions Operation" who "currently provides system engineering, engineering management, and program management advice to NNSA's Readiness Campaign, Office of Transformation, and [DOE's] Office of Civilian Radioactive Waste Management. (OCRWM)." As a contractor to NNSA's Office of Transformation, which has been deeply involved in the development of the controversial third-party finance deal for a new KCP, Dr. Ligon has a direct conflict.

According to her resume, since 2000 SAIC Senior Scientist Diane Nemeth has "supported the Department of Energy Office of Legacy Management (LM) and monitors grants awarded to 15 local development organizations in communities impacted by DOE downsizing through the 1993 National Defense Authorization Act. She reviews and makes recommendations on grant applications, proposed budgets, and the progress of local economic development activities...At SAIC, Ms. Nemeth is responsible for preparing socioeconomic, cultural, and environmental justice portions of *environmental impact statements and environmental assessments (EA) for DOE, the National Nuclear Security Agency (NNSA) ...Ms. Nemeth prepared strategic plans for several program offices with NNSA and DOE ...*" Since preparing these documents for DOE/NNSA is what she does for a living, can Ms. Nemeth really be "independent" and "objective" in her analysis of alternatives to an NNSA-sponsored weapons production initiative?

Another listed co-author of the report, SAIC Senior Project Manager Peter F. Riehm, "has over 16 years of experience in support of the NNSA Office of Defense Programs (DP)...Dr. Riehm has been the SAIC Project Manager [for] large, multi-task order contracts supporting the NNSA since 2001. (This conflict is obvious and requires no further comment)

"Since 2004," SAIC Senior Project Engineer William I. Toman has "conceived and produced a procurement program for \$4.6 billion or uranium to support long term production of tritium for DOE-NNSA ...Client is reviewing implementation of the program." Can Mr. Toman reasonably be expected to render independent views that are at odds with the desires of senior NNSA managers who are reviewing implementation of his program?

And finally, the sixth and last member of this nominally "independent" and "objective" SAIC team, James R. Chapman, is a consultant "subcontractor to SAIC" who "has provided program management support, mentoring, and training to the National Nuclear Security Administration to develop project charters, program plans, cost estimates and budgets, resource-loaded schedules, earned-value tracking, and issue papers for the Planning, Programming, Budgeting, and Evaluation system." As an SAIC consulting subcontractor scrounging for work, Mr. Chapman is possibly in an even more compromised position, as he must please both NNSA and SAIC senior managers by

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delivering an assessment that (a) affirms NNSA's desired outcome, (b) ensures that SAIC's assistance will be sought again on future contracts.

NRDC would like to take the opportunity, at this juncture, to remind GAO/NNSA that Courts have disallowed the delegation of public duties [such as the review of alternatives in a NEPA document] to conflicted private parties. The Fifth Circuit Court of Appeals in *Sterna Club v. Sigler*, 695 F. 2d 957 (1983), stated,

"[A]n agency may not delegate its public duties to private entities, see *Lynn*, 502 F.2d at 59, particularly private entities whose objectivity may be questioned on grounds of conflict of interest."

The *Council on Environmental Quality* has issued implementing regulations for NEPA which disallow the use of interested parties to conduct NEPA analyses. In fact, the regulations require contractors involved in the preparation of a statement to execute a "disclosure statement...specifying that they have no financial interest in the outcome of the project." [40 C.F.R. § 1506.5(c).]

In addition to the obvious, ongoing, and very large financial interest SAIC has in not displeasing either GAO and NNSA—and therefore jeopardizing its privileged position as a "large multi-task order" contractor for NNSA, and/or its special status as a "GSA Environmental Services" schedule contractor—KCP project records show that sometime between November 7 and Nov. 27, the registered vendor "Vernon Reid," representing "Science Applications International Corp." (DUNS No. 054781240), became a controlled access "planholder" of "National Nuclear Security Administration SFO 7MO2054" (SFO stands for "Solicitation for Offer") released by GSA on November 7, 2007. This

constitutes a clear and *disqualifying* conflict of interest, as this solicitation concerns the same third-party finance project for a new KCP at the Botts Road site that SAIC had just *revaluated* for GSA/NNSA in a supposedly "independent" and "objective" analysis. SAIC's possession of these limited access bidder documents clearly indicates a *direct* SAIC business interest in the outcome of the environmental review, for which it was purporting to prepare "independent" and "objective" analysis.

In light of the above evidence, GSA and NNSA must remove any references to the conflicted SAIC report from any final EA, should one be issued, and place a prominent disclaimer on the cover page of the PDF copy accessible via the GSA website, as follows:

"WARNING: THIS REPORT WAS PREPARED IN VIOLATION OF GOVERNMENT REGULATIONS GOVERNING CONFLICTS OF INTEREST IN THE PREPARATION OF DOCUMENTS USED IN THE NEPA PROCESS."

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III. The Baseline Assumptions and Analysis of the SAIC Study Are Deeply Flawed and Arbitrarily Exclude an Obviously Reasonable Re-location Alternative Analyzed in Previous DOE NEPA Documents.

The corporate-level and individual conflicts of interest involved in SAIC's performing this "business case assessment" are alone sufficient to fatally compromise its independence and objectivity, and hence the validity of its conclusions. But as one might suspect from a hired-gun study tailored to reach predetermined conclusions sought by the sponsoring agency, its baseline assumptions are arbitrary, erroneous, and overtly and needlessly prejudicial to the case for consolidation of the KCP mission activities within the existing NNSA laboratory footprint in New Mexico, principally at Sandia National Laboratories in Albuquerque.

For example, the SAIC study mistakenly (but we believe purposefully) assumes that relocation to Albuquerque of remaining KCP functions, even after implementing increased "outsourcing," would still require "comparable GSA land acquisition, financing, development, and lease arrangements" to those outlined for the preferred alternative in the KCP-EA, including "a desirable [private] plot of 100-140 acres with the same level of utilities and environmental advantages as the proposed KCRIMS site." [p. 26].

The study failed to model the most advantageous and obvious option – consolidation within Sandia-NM's 2,842 acre, government-owned site. In fact, Sandia has recently completed a \$518 million, 400,000-square foot complex that is devoted to microelectronics R & D and production of components for nuclear weapons systems and other national security needs. The ostensible need for this facility was predicated in part on the assumption that continuing and possibly extensive modernization of the non-nuclear components of future nuclear weapons systems would be required in the future, but political and national policy trends are taking the nation in a different direction, toward continuing reductions in nuclear weapons and away from continuing modernization of the US nuclear weapons stockpile. This means that the new MESA facility is likely to have significant unused capacity for its primary mission – sustaining the US nuclear weapons stockpile – that could be directed to some of KCP's relocated manufacturing missions.³

Even if one assumes that this is not the case, the relocation analysis performed for the 1996 *Stockpile Stewardship and Management PEIS*—when planning guidance for the future size of the active nuclear weapons stockpile was higher than it is today—showed that relocation of the non-nuclear fabrication mission to SNL-NM could be accommodated with new construction of "approximately 625,000 square feet," located on "22 acres of available land" directly east of Sandia Technical Area I and within the

³ This is not to say that Sandia's management has no other goals in mind for the use of MESA's floorspace that lie outside its primary NNSA mission. It clearly does. But using the nuclear weapons program as a kind of Christmas tree on which to hang other kinds of research is getting to be a bad habit with NNSA's weapons laboratories and production sites that have excess capacity and personnel, particularly when the outlook for the nuclear weapons business is no longer as brisk as it once was.

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Kirtland AFB site boundary. "Minor modifications" to existing SNL buildings "would yield an additional 55,000 sq. ft. of work space." [SSM PEIS, 1996, Vol. 1, p. 3-54]

The resulting total of 680,000 sq. ft. is *dramatically less* than the 1.0 – 1.55 million square ft. proposed for the new KCP at the Botts Road site, and the 22 government-owned acres within an existing secure military reservation is *dramatically less* than the "100-140 acres" of insecure commercial property that is deemed the starting point for the trumped-up SAIC analysis. This is a striking disparity with the SAIC report, and it must be explored in a thorough, unbiased analysis of reasonable relocation alternatives, either as part of the PEIS, or as part of a freestanding EIS.

Similar disparities exist in the analysis of waste management requirements. According to the draft EA, the new privately-developed KCP at the "greenfield" Botts Road site in Kansas City will require construction of an entirely new waste management infrastructure, including new sewer lines, as none of this exists currently at the site. However, at SNL, "existing waste management infrastructure can be applied to manage and treat all anticipated waste streams from this [KCP relocation] alternative...The wastes anticipated from the estimated workload would not require significant modification of the existing SNL waste management infrastructure." [SSM PEIS, Vol. 1, p. 3-57].

The SAIC study completely misses this and other significant cost differences by assuming that implementation of the KCP relocation project in Albuquerque must mirror the commercial property development deal proposed for the Kansas City site. But that deal is not a given. It is not mandated by any act of Congress, government regulation, or court decision. The terms of that deal are voluntary, and entirely self-generated by GSA/NNSA officials in Kansas City and Washington. Thus they do not and cannot bound the range of objectively "reasonable" alternatives that must be fairly considered as part of the NEPA evaluation process.

Curiously, the SAIC report contains no discussion of or even references to DOE's *Stockpile Stewardship and Management PEIS* regarding its analysis of the KCP relocation issue. In fact, the SAIC report contains no references or footnotes of any kind for the data and assumptions contained in the study, and no list of sources consulted. Thus there is no basis for believing that the conclusions of the report have any grounding in actual facts, while, as noted, there is strong evidence pointing to the opposite conclusion, namely, that the report is merely an elaborate wax job designed to apply retroactively a sheen of analytical plausibility to agency decisions already made. Such conduct, we note, if proven in court would represent an impermissible abuse of the NEPA statute, and a gross misuse of public funds.

Rather than taking heed of the many comments received during scoping urging preparation of EIS and/or reintegration into NNSA's Supplemental PEIS, GSA's and NNSA's joint decision was to press ahead with a thin and poorly documented EA that arbitrarily excludes analysis of significant alternatives and connected environmental impacts. Suffice to say, there can be no legitimate dispute here that these decisions have

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been "highly controversial." 40 C.F.R. § 1508.27(b) (4). As the Ninth Circuit explained in *NPCA*, this significance factor is triggered where "substantial questions are raised as to whether a project . . . may cause significant degradation of some human environmental factor . . . or there is a substantial dispute (about) the size, nature, or effect of the major Federal action" – which means evidence that "casts serious doubt upon the reasonableness of [the Agency's] conclusions." 241 F.3d at 736 (emphasis added). There can be no doubt that this significance factor for preparation of an EIS is satisfied, as virtually every aspect of this GSA/NNSA proposed action is in dispute, down to its fundamental constitutionality as an improper aggrandizement of federal executive power at the expense of the enumerated congressional tax and appropriation powers to "raise and support armies" and "provide for the common defense." [Sec. 8]

IV. NNSA and GSA Have Violated NEPA's Injunction Against Undertaking Agency Actions that Would Tend to Predetermine the Outcome of NEPA Analysis

Arbitrary assumptions abound in the SAIC study. It rejects out of hand that KCP relocation to SNL-NM could be accomplished by a "line-item construction project" on Federal property – the normal path for acquiring a new and secure nuclear weapons facility. The reason given for this rejection is embarrassingly circular. The SAIC report opines, "Obtaining approval and Congressional funding for a line item construction project is a protracted process that would push the potential move-in date beyond that required to capture potential savings." [SAIC, *Relocation Business Case*, Rev. 2, Oct. 18, 2007, p.37]

While we may not fully comprehend the meaning of this curious statement, we strongly suspect it is an oblique reference to the fact that NNSA/GSA have already deferred, and are continuing to defer necessary maintenance projects at the Bannister Complex in anticipation of their privately-financed flight from the facility. Therefore in the view of the NNSA's own SAIC analysts, any major delay now to accommodate the messy modalities of the democratic process could trigger the need to make these critical KCP improvements, thereby pushing the move-in date "beyond that required to capture the potential savings" that have allegedly accrued from deferring this maintenance to date. This interpretation is confirmed by an acknowledgement elsewhere in the SAIC report, in a section entitled "Risk Identification":

"When *KCRMS* planning [i.e. the NNSA's prior name for what is now the EA's "Preferred Option"⁴] was well underway, KCP began deferring maintenance at the Bannister facility to capture near-term savings from avoiding investments that would be unneeded upon vacating the site. As a result, there is a considerable backlog of maintenance actions that have been delayed with the expectation that the Bannister facility would be shortly closed. KCP estimates a backlog of approximately \$200 million deferred maintenance through 2014 in those areas normally funded by Readiness in Technical Base and Facilities (RTBF) and Facilities and Infrastructure Recapitalization Program (FIRP)." [SAIC, 2007, p. 27]

⁴The acronym KCRMS stands for "Kansas City Responsive Infrastructure Manufacturing and Sourcing."

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We hasten to note that the preceding paragraph constitutes significant indisputable evidence, in a report ordered and issued by NNSA itself, of just the sort of premature and irreversible commitment of agency resources to a proposed action, prior to completion of the NEPA process, which is clearly barred by CEQ regulations and judicial precedent.

CEQ's NEPA regulations provide that "[a]gencies shall not commit resources prejudicing selection of alternatives before making a final decision." 40 C.F.R. § 1502.2(f). Moreover, 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. Numerous courts have held that the same standards apply to an EA.

In this case, if NNSA's carelessly laid plan to underfund and then abandon the Bannister Complex does not come to fruition on schedule in 2010-2012, a huge deferred maintenance bill will likely come due. This heavily stacks the deck in favor of the agency's preferred option before even a word of NEPA analysis has been prepared. The agencies have effectively "predetermined" their favored outcome for the NEPA analysis by racking up a \$200 million deferred maintenance bill that can only be avoided by prompt implementation of its preferred option. We have litigated many NEPA cases over the years, and this fact pattern literally screams "predetermination."

But the SAIC analysts have a creative use for this illegal conduct: *pin the big deferred maintenance bill on the Albuquerque move option*, and thereby undermine its "business case" by claiming it would prompt delays sufficient to "lose" the "deferred maintenance savings," arising from purposeful neglect of the Bannister Complex.:

"In the event that an Albuquerque move is brought into the timeline, with both [sic] the planning delay, extending moving time and production hiatus, some deferred maintenance areas might require unplanned or emergency repairs to be made to the Bannister facility and related equipments." [SAIC, 2007, p. 27]

Of course, none of this contorted reasoning changes the real prospective long-term budget savings – in greatly reduced administrative overhead, site security, and land acquisition costs, reduced construction requirements, reduced finance costs, reduced personnel travel and shipping costs, lower product development costs, and smaller environmental footprint – that could very likely be obtainable from consolidating the remaining KCP production missions at Sandia National Laboratory. Staying longer at the Bannister Complex, as the SAIC study suggests might be required to implement its Sandia option, merely shifts the realization of these prospective savings farther out in time. *It does not eliminate them*. And there may even be ways to mitigate the short-term price of doing the right thing for the longer-term.

One obvious solution to KCP's self-imposed deferred maintenance backlog, not examined in the SAIC study, would be to limit KCP's production output during the transition period to essential stockpile maintenance items only, while deferring both additional stockpile Life Extension Programs (LEPs) and capital improvement projects

linked to those programs, until full-scale consolidated component production could resume at SNL-NM. Since the necessary extent of current and planned LEPs are currently in doubt and will be reviewed in the course of the nuclear policy reviews recently directed by Congress, the next 2-3 years could well be a *good* time to dial back on production at the Bannister Complex, and therefore possibly an *optimum time* to make the move to Sandia-NM.

The SAIC study also summarily dismisses a second "facility option" – "commercial construction and lease-back on Federal property," on the grounds that "it is an untried concept, especially for a facility of this size." This odd piece of misinformation would certainly be news to managers and staff of NNSA's own Y-12 *National Security Complex* in Oak Ridge Tennessee, 1100 of whom moved in July 2007 into the privately-owned and developed "Jack Case Center," which was constructed *inside* the site's security perimeter on federal land transferred to the private developer, and then leased-back to the site contractor, BWXT. [“Grand Opening – Summer 2007,” Y-12 Report, Fall 2006, Vol. 3 and “Nuke Plant has a ‘big, big, day,’” Knoxville News Sentinel, July 10, 2007.]

Since “practically speaking,” according to the SAIC analysts, “the first two facility options are not considered viable,” the option for the Albuquerque move cost comparison becomes (conveniently) “*the same arrangement as at KCRAMS*, in which GSA is working with a developer who will build and maintain the facility, with annual lease payments made by the tenant to GSA” [SAIC, Rev. 2, p. 37]. According to the SAIC study, the annual lease payments for the proposed privately-financed KCP, which include buildings operation and maintenance and GSA’s “management fee” as the middleman in the transaction, will total \$912 million through 2030 in constant FY 06 dollars [Table, p. 15]. This is \$412 million more than the reported \$500 million “construction budget” for the new buildings, and thus hardly a bargain for the taxpayers.⁵

If the government paid for the new “campus” up front, and incurred no additional costs for construction financing and private land acquisition, the cost to the taxpayer for the buildings could well be considerably less than \$500 million. In fact, GAO and NNSA appear to have chosen the most expensive route to “transforming” KCP’s non-nuclear production capabilities. Its chief, and perhaps only “advantage” is the apparent ability to proceed with the new KCP project without obtaining an up-front appropriation covering its full acquisition cost.

⁵ These lease payments do not cover the “Readiness in Technical Base and Facilities/Maintenance costs” for the production lines, computers, and other equipment that NNSA/Honeywell would install in these new buildings, and these costs which are expected to add another \$1.8 billion (in constant FY 06 dollars) to the 20-year cost of the project, according to the SAIC study. So paying an additional \$20.6 million/yr – and more each year in escalated “then-year” budget dollars – for some private property management firm rather than the operating contractor, to change the light bulbs and wax the floors, seems a rather dubious privilege.

V. The Matter of Possibly Willful Violations of the Anti-Deficiency Act

We say “apparent” ability to proceed because this entire private finance scheme—which is geared to magically transforming an agency’s acquisition of new capital assets, normally requiring Congressional line item budget approval, into a 20 year stream of invisible lease payments hidden in the agency’s aggregated operations and maintenance budgets—appears to us to be a violation of the *Anti-Deficiency Act*. The act is violated whenever a government official obligates the government to spend money, now or in the future, for which there is no matching Congressional appropriation in their budget *at the time the financial obligation or commitment to spend funds is made*. According to the General Accountability Office:

The fiscal principles underlying the Antideficiency Act are really quite simple. Government officials may not make payments or commit the United States to make payments at some future time for goods or services unless there is enough money in the “bank” to cover the cost in full. The “bank,” of course, is the available appropriation.

Violations of the Antideficiency Act are subject to sanctions of two types, administrative and penal. The Antideficiency Act is the only one of the title 31, United States Code, fiscal statutes to prescribe penalties of both types.

An officer or employee who violates 31 U.S.C. § 1341(a) (obligate/expend in excess or advance of appropriation), section 1342 (voluntary services prohibition), or section 1517(a) (obligate/expend in excess of an appropriation or administrative subdivision as specified in an agency’s regulation) “shall be subject to appropriate administrative discipline including, when circumstances warrant, suspension from duty without pay or removal from office.” 31 U.S.C. §§ 1349(a), 1518.

In addition, an officer or employee who “knowingly and willfully” violates any of the three provisions cited above “shall be fined not more than \$5,000, imprisoned for not more than 2 years, or both.” 31 U.S.C. §§ 1350, 1519. [http://www.gao.gov/ada/antideficiency.htm]

While GSA officials now have the authority to negotiate various types of innovative private financing arrangements, they do not have the authority to commit the government to what are effectively *new capital asset acquisitions*, under the guise of *long term capital leases* (often misrepresented as annual operating leases), without having a matching Congressional appropriation for the full cost of the long-term capital lease in the year in which the obligation is incurred. Since the FY 2008 budget has already been agreed upon, and contains no appropriation covering the \$912,000,000 cost of the “20 Year Firm” lease obligation for the new KCP campus on the Botis Road property, neither GSA nor NNSA may not enter into any such agreement, explicit or implied, in FY 2008.

While not entirely a settled question, we doubt that NRDC or other citizen’s organizations are likely to gain standing to sue GSA and NNSA directly for violating the *Anti-Deficiency Act* in the course of their efforts to “lock-in” their preferred option in advance of both a congressional appropriation and the required NEPA analysis.

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But if GSA/NSSA do not cease and desist immediately from their ongoing and planned violations of NEPA, we can and will refer the evidence we have gathered of *Anti-Deficiency Act* violations to the DOE Inspector General and to the Comptroller General of the United States, who do have the inherent authority to pursue this matter, and to seek fines and jail time for those officials who appear to have been involved in "willful violations." It is our view that the current Administration's interpretation of OMB rules and guidelines have strayed very far from the historical norms for scoring various types of government expenditures, and that a new Administration may not take the same benign view toward the breakdown of budget-scoring discipline that has characterized the present Administration. Government officials who continue to discount this possibility do so at their own risk.

The Congressional Budget Office (CBO) has raised a number of serious concerns about agencies resorting to the kind of private financing proposed for GSA's "Preferred Option" as outlined in the KCP-EA. According to CBO, "Third-party financing arrangements have a number of negative consequences. In general, projects are more costly to the government when they use such financing." Particularly relevant in the instant case is CBO's concern that "third party arrangements may also skew decisions about how to allocate budgetary resources by giving preferential treatment to investment projects on the basis of their method of financing rather than their relative merits."

Indeed, this is precisely the dysfunctional behavior being exhibited by GAO/NNSA in the present case, as they go to great lengths to skew the NEPA decision process, and even NNSA's own capital improvement budget process at the Bannister Complex, to favor the private-finance option, and to penalize the consideration of more cost-effective reasonable alternatives.

And finally, of considerable concern to NRDC and anyone concerned about the current state of our democracy, CBO notes that "third-party financing allows agencies to raise capital in private markets without the full scrutiny of the Congressional appropriations process." ["Third-Party Financing of Federal Projects," CBO Economic and Budget Issue Brief, June 1, 2005, p. 1, emphasis added]

Indeed, the prospect of putting together a third-party finance deal in this case appears to have induced GAO and NNSA to duck not only the congressional appropriations process, but the legally required NEPA process as well. And while we are on matter of agencies ducking their legal obligations, there remains the very serious concern that GSA and NNSA, in their haste to leave the Bannister Complex, will simply abandon the task of cleaning-up the old KCP plant.

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VI. The Current KCP-EA Unlawfully Segments NEPA Analysis of Bannister Site Decontamination, Demolition and Environmental Remediation From the Analysis of the KCP Transformation Alternatives

The Draft KCP-EA states "...disposition and cleanup activities for the existing NNSA facility at the KCP are not part of the current proposed action and will be addressed in appropriate future environmental analyses." The EA offers no justification for this view, which flies in the face of the common sense perception that construction of a new KCP, and cleanup of the old Bannister site the agencies intend to leave behind, are inherently "connected actions." The threat of an increased dispersion of underground contaminants under the existing KCP facility, now protected from surface water intrusion by the vast roof structures of the KCP facility, increases once these buildings are decontaminated, and torn down, or allowed to decay in a manner that increases surface water intrusion.

We find it imperative, therefore, for the ongoing *Complex Transformation Supplemental PEIS* and/or a freestanding EIS to consider alternatives for the remediation of the existing site, including which federal and state agencies will have continuing jurisdiction over and financial responsibility for cleaning up the site. This analysis must provide informed estimates of the cleanup timescale, its technical requirements and costs, and assess the environmental hazards and likely disposal pathways for wastes generated by the cleanup.

The SAIC study supporting the draft KCP-EA put these cleanup costs at \$287 million [SAIC, 2007, p. 22], and given the history of such cleanup programs, that estimate is probably low. Hence the total 20 year cost to the public for "transforming" the KCP to the new privatized site is at least \$3 billion: \$912 million for the 20-yr capital lease on the new "campus," + \$287 million for the old KCP cleanup, + \$1.8 billion to maintain and equip the new factory, plus any additional public expenditures (roads, sewer connections, culverts, etc.) that are required to accommodate the plant in an environmentally safe manner at its new location. A Federal action on this scale, with these types of connected impacts, is a "major federal action" that clearly rises to the level requiring consideration in an EIS.

As you know, an agency may not segment its analysis, and thus avoid preparing an EIS, by breaking down a project in smaller components, as GSA and NNSA are proposing to do by deferring analysis of environmental cleanup alternatives for the Bannister Complex and how the existing contamination will be controlled once NNSA and GSA depart the site. [Kern v. Bureau of Land Mgmt. 284 F.3d 1062, 1077 (9th Cir. 2003).]

An EIS is also required when the "environmental effects" of a planned cleanup are "highly uncertain," or when there are "substantial questions" regarding "the significance of the effect" a proposed action will have "on the local area." National Parks & Conservation Ass'n v. Babbitt ("NPCA"), 241 F.3d 723, 731 (9th Cir. 2001); Anderson v. Evans, 371 F.3d 475, 489-92 (9th Cir. 2004); Anderson, 371 F.3d at 492 (emphasis in original).

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It is well-established that "(a)n EIS *must* be prepared if 'substantial questions' are raised as to whether a project . . . may cause significant degradation of some human environmental factor." Ocean Advocates, 402 F.3d at 864 (emphasis in original); Blue Mountains Biodiversity Project, 161 F.3d at 1212 (EIS required if project "may have a significant effect" on the environment") (emphasis added); Idaho Sporting Cong. v. Thomas, 137 F.3d 1146, 1149-50 (9th Cir. 1998); Found. for N. Am. Wild. Sheep v. USDA ("ENAWS"), 681 F.2d 1172, 1178 (9th Cir. 1982). Thus, in order to prevail on a claim that an agency has violated its statutory duty to prepare an EIS, a "plaintiff need not show that significant effects *will in fact occur* [but rather] raising substantial questions whether a project may have a significant effect is sufficient." Ocean Advocates, 402 F.3d at 864-65 (emphasis in original) (other citations omitted).

In addition, the Council on Environmental Quality ("CEQ") – an agency within the Executive Office of the President -- has promulgated NEPA implementing regulations that are binding on all federal agencies. See 40 C.F.R. § 1500.3. These regulations provide for an agency to prepare an EA where it is uncertain whether an EIS is required, id. § 1501.4(b), but they also set forth a series of factors that govern whether an action may have "significant" environmental effects, in which case an EIS *must* be prepared. Id. § 1508.27. These factors include:

- "The degree to which the effects on the quality of the human environment are likely to be highly controversial;"
- "The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks";
- "Whether the action is related to other actions with . . . cumulatively significant impacts;"
- "The degree to which the proposed action affects public health or safety"; and
- "Whether the action threatens a violation of Federal [law] imposed for the protection of the environment." Id. (emphasis added).

The Ninth Circuit has explained that the presence of any one of these factors "may be sufficient to require preparation of an EIS." Ocean Advocates, 402 F.3d at 865.

It hardly seems necessary to point out that the effects on the human environment, from "transforming" KCP's non-nuclear manufacturing facilities and infrastructure with a new privately-owned "campus" at a new greenfield site, are "highly controversial," generating hundreds of public comments and sparking public protests in Kansas City. The controversy stems not only from the intimate and intrinsic association of KCP's activities with the *continued rebuilding and possible use of nuclear weapons*, which many people regard as deeply immoral in light of their devastating impacts on the human environment, but also because the proposed action is associated with the abandonment of a large heavily contaminated site by the two agencies that currently occupy it, with future responsibilities for containment of the contamination and cleanup left "highly uncertain."

Moreover, the proposed action is clearly and functionally related to the national complex that continues to maintain, design, develop, test, evaluate, and rebuild thousands of nuclear weapons, and there is no debate that these activities have "cumulatively significant impacts." The proposed departure of the agencies from the contaminated

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Bannister Complex obviously "affects public health and safety," as do the increased traffic and waste management issues at the proposed new site. Finally, the actions of GSA and NNSA not only "threaten" to violate laws protecting the environment, as detailed earlier in these comments, but they have already done so. So in fact not just one, but all of the C.E.Q. factors likely to trigger preparation of an EIS are met in the present case.

Specific Comments on the Draft KCP-EA

Since NRDC strongly objects to GSA's and NNSA's use of this EA to illegally segment NEPA review of its non-nuclear production activities from NNSA's ongoing *Supplemental PEIS on Complex Transformation*, and from consideration of inherently connected environmental remediation activities for the facility it is vacating, we will not expend a great deal of effort delineating the particular weaknesses of this document that render it completely inadequate. Suffice it to say, there are many such weaknesses, and here we will identify only a few of the most glaring:

Page iii – 3) Air Emissions: This paragraph states, "the *elimination* of chrome plating operations would result in a cumulative annual reduction of approximately 28% from current facility air emissions," but elsewhere [p. viii] the EA refers to "chrome plating" (sic) being "outsourced" under the preferred option and Alternatives 2-4. Of course, "outsourcing" of chrome plating operations would not necessarily result in their "elimination," and the EA contains no data showing this to be the case. To where is this operation being outsourced, and what are the local environmental impacts? Also it is not clear why "the use of chrome plating lines and associated pollution control equipment" "will continue" under Alternative 1, but not under any of the other alternatives? Further, in Table 1 (p.1), the formulation is "chrome plating *may* continue" under Alternative 1, which is different. Which is it, and what is the origin of the uncertainty?

Finally, on this same matter of chrome-plating operations, the claim is made on page 39 that the amount of water usage (and subsequent wastewater discharge) for regulated industrial processes would be reduced by approximately 12,800 gallons per day (primarily due to the elimination of the on-site chrome plating operations. Again, this statement is true only if these operations have been *eliminated* rather than "outsourced" to another facility in the region, in which case the environmental impacts are merely being displaced.

In the latter case, *NEPA requires consideration of connected actions*, and therefore the required EIS must include an analysis of the environmental impacts attributable to KCP's "outsourcing" operations. The Draft EA contains no information on this subject, although it is the factor most often cited for enabling the reduced size, work force, and operating expense of the proposed new plant. Also, given that this new plant will not be pickling cucumbers, but rather manufacturing some of the most highly sensitive weapons technology in the entire world, the off-hand treatment of "outsourcing" to commercial suppliers many of the parts formerly produced at the secure KCP surely merits consideration in an EIS.

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- What are the environmental impacts of the production being dispersed to commercial suppliers, where will these impacts be felt?
- What are the risks that this sensitive technology will become more exposed to theft, sabotage, or espionage as a consequence of this outsourcing?
- What would be the enabling impacts on foreign nuclear weapons programs if they were able to gain access to the designs or actual units of these components?

Again, these weighty matters cannot be assessed in a mere EA, but require a full-blown EIS, with a classified appendix if necessary evaluating the most sensitive national security risks involved in "outsourcing" nuclear weapons components to private commercial producers.

Page 1 – 1.0 Purpose: "The National Environmental Policy Act (NEPA) requires Federal officials to consider the environmental consequences of proposed actions prior to making decisions." This is a woefully incomplete description of an agency's obligations under NEPA, which are at once broader and more specific than merely "considering environmental consequences before making decisions." For example, NEPA requires that such consideration must be *timely*, and that analysis must be provided early enough in the process of formulating an agency's proposal for action that it can meaningfully inform the consideration of alternatives that would minimize adverse impacts and improve government decision-making, as opposed to serving as an *ex post facto* rationalization for decisions already made. NEPA analysis must consider *the full range of reasonable alternatives* to a proposed action that could accomplish the agency's purpose and need for action. It must consider *connected and cumulative impacts*.

NRDC is in possession of detailed information demonstrating that this EA is not timely, and that it has been developed primarily to justify decisions already made.

P. 3 the EA states, "The proposed facility would be at least 50% smaller in size than the current facility, resulting in reduced maintenance and energy costs." What is the size of the current facility, what is the size of the proposed new facility, and what is the standard used for comparison? Without this information, this statement is meaningless.

The EA (p. 8) states that "the current facilities are approximately 3 million square feet, but pursuant to the 1996 SSM-PEIS and ROD, the KCP footprint was to be reduced from 3.2 million sq. ft. to 1.8 million sq. ft. by October 2003. Does the EA's use of the "3 million sq. ft." figure mean that this mandated reduction never achieved in practice. If so, why? What is the source of the discrepancy? The EA should explain its origins and resolve it, and provide definitive data on the floor space currently utilized by KCP at the Bannister Complex, and on the space required for each of the other options.

p. 6 - 2.0 Description of Preferred Option. . . . "GSA would issue a Solicitation for Offers to the real estate development community. . . . This statement is misleading, and should be revised to reflect that GSA has already issued this solicitation, and actually did so a month before announcing the availability of this draft EA in the *Federal Register*. This sequence of dates in fact raises the serious question whether this EA meets NEPA's

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timeliness standard, and indeed whether the contents of this EA have been effectively predetermined by the agency's contract solicitation activities, conducted well in advance of public comment on this EA.

p. 8 In connection with this Proposed Action, the General Services Administration (GSA) sought early expressions of interest for a build-to-suit lease manufacturing facility consisting of approximately 1,035,000 square feet of rentable space with 2,100 parking spaces. In addition, GSA has sought options for expansion space up to 517,500 square feet of rentable space together with another 400 parking spaces. The total requirement could therefore be up to 1,552,500 square feet of rentable space with 2,500 parking spaces. The EA (p. 8) states, "The proposed facility would cover approximately 1 to 1.55 million rentable square feet, and provide up to 2900 surface parking spaces."

These figures encompass a fairly wide range – a difference of 550,000 square feet and 800 parking spaces, and an EIS should indicate what proposed activities or planning contingencies account for these differences?

p. 8, "a workforce reduction of approximately 900 employees (FY 2005 baseline) would be enacted. . . ." What is the point of measuring a workforce reduction from a three year old baseline? Why the use of this fiscal year?

p.12 - 3.3.2 Alternative No. 3 – This discussion lacks information on the associated workforce reduction, and the reduction in floor space from the "No Action" baseline, which itself is not clear.

p.14 - 3.4.1 This paragraph should state when GSA acquired an option to purchase and develop the Botis Road/Highway 150 property.

p.17- 3.4.2 ". . .the NNSA Office of Transformation prepared an independent and objective assessment of the business case for moving non-nuclear production As discussed at considerable length above, this statement is false. The other statements on this page relating to the SAIC assessment likewise give a false or misleading impression of the Sandia-NM alternative. A forecast mean difference of \$289 million in the net present value of future project cash flows cumulated over 22 years is largely a function of two arbitrary and prejudicial initial assumptions, namely, that the Sandia option would have to exactly mimic the high cost features of GSA's preferred Kansas City private-finance option, and that the Sandia option would kick in 3.5 years later than the KC proposal, generating a big project "debt" from remaining longer in the high maintenance Bannister Complex that must be recouped later on. Since the KC project in this analysis gets a head start, and discounted cash flow analysis values a dollar received this year more than one received three years from now, the future savings from the NM project never "catch-up" with those of the KC project within the period of interest, which runs in this analysis until 2030. As noted earlier, using more realistic initial assumptions regarding the consolidation option in Albuquerque, along the lines indicated in the 1996 SSM-PEIS, would lead to radically different "business case" results.

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Finally, the draft KCP-EA does not explicitly address why a further downsizing in place, combined with modest upgrades to a portion of the existing KCP, and the same outsourcing measures as the other alternatives, would not comprise a reasonable alternative worthy of detailed analysis. Indeed, this is an alternative that appears to have been overlooked, but in light of the uncertainties that pervade the future outlook for the entire NNSA nuclear weapons enterprise, it may in fact be a "reasonable" and realistic one, at least for the short term, until the strategic reviews now in progress can lead to the establishment of a more durable consensus on the future of the NNSA Complex, and other consolidation options can be restored to their rightful place in the NEPA analysis of alternatives.

In light of the gaping analytical deficiencies, and multiple agency violations of government regulations identified in these comments, GSA/NNSA have but two options before them that could, if pursued immediately with diligence and good faith, restore them to the path NEPA compliance. Whether or not they proceed to completion of this EA, they must either:

- (a) Restore the analysis of all reasonable alternatives for transforming and re-locating KCP non-nuclear manufacturing activities, including analysis of all the connected and cumulative impacts flowing from this action, to its rightful place in the ongoing Supplemental PEIS, from which it has been illegally excluded, or
- (b) Prepare a freestanding EIS that accomplishes the same objectives as (a), and is available in final form for consideration, in tandem with the *Final Transformation SPEIS*, in any Record of Decision to be taken on the future consolidation and transformation of the Nuclear Weapons Complex.

In sum, NNSA and GSA have already engaged in serious violations by NEPA, by:

- (1) Arbitrarily and capriciously segmenting the NEPA analysis of reasonable alternatives for transforming, consolidating, and re-locating NNSA's non-nuclear manufacturing activities from an ongoing Supplemental PEIS process in which they could easily have been included;
- (2) Depriving the citizens of the Kansas City area their due process rights under the APA and NEPA to participate in public hearings on the Scope and Draft of a complex wide SPEIS on Transformation of NNSA's Nuclear Weapons Complex. Kansas City was the only site and host city thus excluded.
- (3) Engaging in a wide array of illegal actions, ranging from employing contractors with severe conflicts of interest to prepare NEPA documentation, to issuing Solicitations for Offers and holding bidders conferences on their Preferred Alternatives before completing a draft EA and issuing it for public comment, to deliberately deferring maintenance at the old KCP plant to artificially inflate the budgetary reward for promptly abandoning KCP for their preferred option, thereby engaging in a pattern of conduct which has as its object to rig the NEPA process in favor of its preferred option.

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- (4) Arbitrarily and capriciously segmenting analysis, to unspecified later NEPA documents, of requirements for containment and remediation of contamination at the existing KCP and Bomister complex after they depart the site; and
- (5) Misusing NEPA documents and government funding set aside for NEPA analysis to falsely discredit, and preclude equitable consideration of, "reasonable alternatives" for consolidation of KCP capabilities at the Sandia National Laboratories-NM.

Numerous federal judges have set aside deficient EAs and FONSI's based on the agency's failures to satisfy the basic requirements of NEPA. See, e.g., *NRDC v. Dep't of Energy*, 2007 WL 1302498 (N.D. Cal. May 4, 2007) (permanently enjoining Department of Energy project based on deficient EA). In light of the manifest deficiencies and violations of law detailed in these comments, should GSA and NNSA, and their erstwhile "partners" in the private sector, elect to proceed with a FONSI and subsequent implementation of the preferred alternative described in this EA, please be advised that they do so at their own peril.

We are of course amenable to discussing these matters with you or representatives of NNSA to clarify these comments, or to answer any questions you may have. My contact information is below. Should you desire to contact me, please note that I will be out of the country from January 14-22.

Thank you for affording us the opportunity to comment on this draft KCP-EA, and we hope you have found the information contained herein to be useful.

Sincerely,

Christopher E. Paine
Director, NRDC Nuclear Program

202-289-2370 (DC office phone, leave message)
cpaine@nrdc.org

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Summary Comments of Christopher E. Paine
 Nuclear Program Director, Natural Resources Defense Council (NRDC)
 at the NEPA Public Comment Hearing on a Proposed Plan
 for "Transformation" of the NNSA Nuclear Complex
 U.S. Department of Energy, Forrestal Building
 1000 Independence Ave., SW
 Washington, D.C.

March 25, 2008

11 a.m. - 3 p.m.

The Natural Resources Defense Council welcomes this opportunity to comment upon the current draft *Complex Transformation Supplemental Programmatic Environmental Impact Statement* (SPEIS). Regrettably, NNSA appears to have ignored thousands of public comments submitted during the scoping process in preparing this draft. These requested that NNSA 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 our nation's obligation under the Nuclear Nonproliferation Treaty to negotiate progressive reduction and eventual elimination of its nuclear arsenal, in concert with other nuclear powers.

Instead, the current draft SPEIS analysis is explicitly guided by a widely discredited "Nuclear Posture Review Report" that former Secretary of Defense Donald Rumsfeld submitted to Congress in December 2001. Even at the time this now obsolete report was limited, in Mr. Rumsfeld's words, to "laying out the direction for American nuclear forces over the next 5-10 years." Therefore it cannot, as a legal matter, possibly serve as the basis for bounding the present analysis, which was publicly "scoped" to run from now until the year 2030. This shortcoming is even more glaring in light of the pending nuclear weapons and nonproliferation policy reviews that Congress recently mandated when it authorized national defense funding for fiscal year 2008.

One statistic from the current document says it all: in 1995, four years after the Soviet Union dissolved, NNSA's operational nuclear weapons complex consisted of eight sites in seven states. Under its proposed plan, by 2020 – twenty-five years later – NNSA's operational nuclear weapons complex will still consist of the same eight sites in the same seven states, but this complex will be maintaining a weapons stockpile that could well be 1/10 – 1/20 the size. This blatantly "political-industrial complex" would still have two nuclear weapons design laboratories, a nuclear weapons test site, new uranium and plutonium processing facilities costing billions of dollars, and a new "privatized" nuclear weapons parts plant in Kansas City.

The draft SPEIS arbitrarily excludes examination of consolidation options that would eliminate one or more geographically distinct sites that are no longer necessary, thus 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 twenty years after the end of the Cold War sends exactly the wrong message to the world.

Under a NEPA alternative that presumes good faith U.S. compliance with the Nuclear Nonproliferation and Comprehensive Test Ban treaties, NNSA must examine closure of its underground nuclear weapons testing grounds in Nevada, while consolidating nuclear warhead stockpile support functions at Los Alamos National Laboratory, and non-nuclear component production at Sandia National Laboratory.

12A

25A

31C

41G

51F

61E

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758A
There is no need to maintain two nuclear weapon design laboratories, because the nation has no currently approved or foreseeable requirement for a new nuclear weapon, or even a reasonably foreseeable requirement for a competitive nuclear weapons design environment requiring two nuclear design laboratories. One nuclear design laboratory will clearly more than suffice as a "hedge" against an uncertain future.

85C:1
Likewise, there is no need to maintain a nuclear weapons test site in Nevada when all but a few nations are committed to observing a permanent Comprehensive Test Ban Treaty, and the remaining holdouts are in fact waiting for the United States and China to ratify the treaty.

912A
Nor is there any need to produce new plutonium pits, as thousands of existing long-lived surplus pits are available to be refurbished and recycled.

1010G
The draft SPEIS and indeed NNSA's entire SPEIS process has unreasonably excluded consideration of the future of the Kansas City Plant. This has deprived the citizens of the Kansas City area of their due process rights to participate in NEPA public hearings on the "Complex Transformation" proposal, and has arbitrarily excluded from the analysis an *obviously reasonable consolidation alternative* for non-nuclear fabrication at the Sandia National Laboratory.

112I
The non-nuclear parts manufacturing needed to maintain a few hundred to a few thousand nuclear weapons could easily be consolidated within the footprint of the Sandia National Laboratory in Albuquerque, NM, avoiding many of the costs and environmental impacts of building and operating a separate new facility at a greenfield site in Kansas City. Indeed, this consolidation option was considered in detail by NNSA's predecessor, DOE Defense Programs, a decade ago and found to be a reasonable and technically feasible option.

1211A
It was not selected at that time because it was considered to have higher up-front investment costs and environmental impacts than continuing to downsize operations at the existing Kansas City Plant. But in light of the current plan to phase-out operations at the old plant and build a brand new KCP a few miles away, this ten year old conclusion regarding the Sandia consolidation option is clearly no longer valid. The refusal of NNSA to include this consolidation option within the scope of the present analysis is arbitrary, capricious and quite frankly, obtuse, and is likely to get the agency into legal trouble.

1211A (cont)
In sum, from where we stand, we see no serious technical, economic, or environmental impediment to actually implementing, much less analyzing in a NEPA document, a "Southwest Triangle" option for the complex that would incorporate all of the individual consolidations just mentioned. This would result in a compact and efficient nuclear weapons complex largely contained within the southwestern triangle defined by Amarillo, Albuquerque, and Los Alamos, supported by occasional flight testing at White Sands Missile Range and a small annual pit production capacity at Los Alamos, which needs no further enlargement to meet sensible future national security requirements.

1211A
The potential synergy of this Southwest Triangle Option with a further consolidation of uranium operations to a site within this triangle, thereby eliminating weapons program operations and facilities at Y-12, must also be examined. There is clearly some reduced stockpile size at which this further consolidation is not only the technically plausible and environmentally preferred option, but the more economical choice as well.

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1211A (cont)
Rather than maintaining the practice of shipping hundreds of HEU components annually between Pantex and the distant Y-12 site in eastern Tennessee, the current draft document must analyze as a discrete case the reasonable alternative of consolidating weapons uranium processing and fabrication capability, including necessary integrated storage, at either Los Alamos TA-55 or Pantex.

132B
This option *would leave in place* both the current low-volume plutonium pit fabrication capability at TA-55 and the new uranium storage facility under construction at Y-12. The latter facility would then serve naval and civilian needs for storage of surplus uranium permanently withdrawn from the weapons stockpile. This option would have the benefit of greatly reducing the need to ship HEU-bearing nuclear weapon components around the country.

142J
In sum, the SPEIS is unacceptable in its current form and should not proceed toward a planned Record of Decision later this year. Nor can its weaknesses be repaired by patching-up the present text. The current draft's guiding policy template, derived from the obsolete December 2001 *Nuclear Posture Review Report* – which predates the Moscow Treaty of May 29, 2002 – must be scrapped. Following receipt of the above-mentioned nuclear policy reviews, and fresh nuclear policy and stockpile guidance from Congress and the new administration, a radically revised draft SPEIS, fully rectifying the problems that NRDC and others have identified, should then be issued for public comment.

142J
Finally, in all candor, I have to say that not only the substance but also the form and presentation of this document are unacceptable. The document is just barely intelligible even to someone like myself, with decades of experience with the workings of the nuclear weapons complex. I pity the member of the general public who tries to tackle this thing. NNSA has created the ultimate Russian *mystery* for the EIS process – an endless succession of opaque acronyms, each nested within another, until one finally loses patience trying to remember their meanings and how they are supposed to relate to one another and the larger picture of complex restructuring. The presentation is so bad one can only presume that fostering this degree of confusion is the agency's intention.

142J
In line with NRDC's normal practice, I would note that we will be submitting separate form these remarks, more extensive and detailed written comments on the Draft SPEIS on or before the April 10 comment deadline. Thank you for your attention and for the opportunity to offer this public comment.

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

Via email to complextransformation@nnsa.doe.gov

Dear Mr. Wyka:

On behalf of 1.2 million members and online activists nationwide, the Natural Resources Defense Council welcomes this opportunity to comment upon the current draft *Complex Transformation Supplemental Programmatic Environmental Impact Statement* (SPEIS). For nearly forty years, NRDC has worked to achieve our mission: to safeguard the Earth, its people, its plants and animals, and the natural systems on which all life depends.

For 37 years NRDC's Nuclear Program has helped to shape U.S. energy, nonproliferation, and arms control policies. We helped to create vital judicial precedents for the application of U.S. environmental laws to the government's nuclear and national security programs, thereby ending an era of massive environmental abuses by the Department of Energy and its predecessor agencies. The overarching issue addressed by the NRDC Nuclear Program remains reducing the risks to human populations and the environment from the exploitation of nuclear energy for both military and civil purposes.

I. The Draft SPEIS Is Explicitly Guided by an Obsolete and Widely Discredited "Nuclear Posture Review Report" submitted to Congress in December 2001.

Regrettably, NNSA appears to have ignored thousands of public comments submitted during the scoping process requesting that NNSA analyze the full range of reasonable alternatives for consolidating the nuclear weapons complex between now and 2030, including alternatives that would both support and reflect implementation of our nation's obligation under the Nuclear Nonproliferation Treaty to negotiate progressive reduction and eventual elimination of its nuclear arsenal, in concert with other nuclear powers.

Instead, the current draft SPEIS analysis is explicitly guided by hawkish and widely discredited "Nuclear Posture Review Report" that former Secretary of Defense Donald Rumsfeld submitted to Congress in December 2001. Even at the time, the purview of this now obsolete report was limited, in Mr. Rumsfeld's words, to "laying out the direction for American nuclear forces over the next 5-10 years." Therefore it cannot, as a legal matter, continue to serve as a basis for bounding, guiding or narrowing the present analysis, which was publicly "scoped" to run from now until the year 2030. The heavy reliance on this old report is even more glaring in light of the

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pending nuclear weapons and nonproliferation policy reviews that Congress recently mandated when it authorized national defense funding for fiscal year 2008.

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(cont.)

Any and all sections of the Draft SPEIS that cite this report as dispositive in establishing the Agency's purpose and need for action, or that employ it to narrow the range of reasonable alternatives detailed analysis, should be deleted or revised.

II. The Draft SPEIS Arbitrarily Excludes Analysis of Reasonable Alternatives for Significant Consolidation.

One statistic from the current document says it all: in 1995, four years after the Soviet Union dissolved, NNSA's operational nuclear weapons complex consisted of eight sites in seven states. Under its proposed plan, by 2020—twenty-five years later—NNSA's operational nuclear weapons complex will still consist of the same eight sites in the same seven states, but this complex will be maintaining a weapons stockpile that could well be 1/10 - 1/20 the size. This complex would still have two separate nuclear weapons design laboratories (Los Alamos and Livermore), a nuclear warhead engineering and weapons integration lab (Sandia), a nuclear weapons test site, new weapons uranium and plutonium processing facilities costing billions of dollars, and a new "privatized" nuclear weapons parts plant in Kansas City.

317A5

The draft SPEIS arbitrarily excludes examination of consolidation options that would eliminate one or more geographically distinct sites that are no longer necessary, thus 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 nuclear weapons test site almost twenty years after the end of the Cold War sends exactly the wrong message to the world, and it is inherently reasonable to consider closing or consolidating these facilities.

Under a NEPA alternative that presumes good faith U.S. compliance with the Nuclear Nonproliferation and Comprehensive Test Ban treaties, NNSA must examine closure of its underground nuclear weapons testing grounds at NTS, while consolidating nuclear warhead stockpile support functions at Los Alamos National Laboratory, and non-nuclear component production at Sandia National Laboratory.

There is no need to maintain two nuclear weapon design laboratories, because the nation has no reasonably foreseeable requirement for a competitive nuclear weapons design environment that would require two nuclear design laboratories. There is not enough work for even one nuclear design laboratory, so one will clearly more than suffice as a "hedge" against an uncertain future.

Likewise, there is no need to maintain a nuclear weapons test site in Nevada, when all but a few nations are committed to observing a permanent Comprehensive Test Ban Treaty, and the remaining holdouts are in fact waiting for the United States and China to ratify the treaty.

Nor is there any need to produce new plutonium pits, as thousands of existing long-lived surplus pits are available to be refurbished and recycled.

III. The Draft SPEIS Has Unreasonably Excluded Alternatives for the Consolidation of Non-Nuclear Component Fabrication Activities.

The draft SPEIS and indeed NNSA's entire SPEIS process has unreasonably excluded consideration of the future of the Kansas City Plant. This has deprived the citizens of the Kansas City area of their due process rights to participate in NEPA public hearings on the "Complex

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"Transformation" proposal, and has arbitrarily excluded from the analysis an *obviously reasonable consolidation alternative* for non-nuclear fabrication at the Sandia National Laboratory.

The non-nuclear parts manufacturing needed to maintain a few thousand nuclear weapons could easily be consolidated within the footprint of the Sandia National Laboratory in Albuquerque, NM, avoiding many of the costs and environmental impacts of building and operating a separate new facility at a greenfield site in Kansas City. Indeed, this consolidation option was considered in detail by NNSA's predecessor, DOE Defense Programs, 12 years ago and found to be a reasonable and technically feasible option.

It was not selected at that time because it was considered to have higher up-front investment costs and environmental impacts than continuing to downsize operations at the existing Kansas City Plant. But in light of the current plan to phase-out operations at the old plant and build a brand new KCP a few miles away, this 12 year old conclusion regarding the Sandia consolidation option is clearly no longer valid. The refusal of NNSA to include this consolidation option within the scope of the present analysis is an arbitrary and capricious action that has no legal standing under NEPA, and is clearly motivated by the desire to protect NNSA's scheme to shift its KCP operations to a new privately owned, third-party financed, GAO procured manufacturing facility in the Kansas City area without consideration of consolidation alternatives.

IV. The SPEIS Must Consider the Reasonable Alternative of Consolidating Most Weapons Complex Operations in the "Southwest Triangle" of NNSA Sites in New Mexico and Texas.

From where we stand, we see no serious technical, economic, or environmental impediment to actually implementing, much less analyzing in a NEPA document, a "Southwest Triangle" option for the complex that would incorporate all of the individual consolidations just mentioned. This would result in a smaller, more compact and efficient nuclear weapons complex largely contained within the southwestern triangle defined by Amarillo, Albuquerque, and Los Alamos, supported by occasional flight testing at White Sands Missile Range and maintenance of a small annual pit production capacity—not actual pit production—at Los Alamos, which capacity requires no further enlargement to meet sensible national security requirements.

The potential synergy of this Southwest Triangle Option with a further consolidation of uranium operations to a site within this triangle, thereby eliminating weapons program operations and facilities at Y-12, must also be examined. There is clearly some reduced stockpile size at which this further consolidation is not only the technically plausible and environmentally preferred option, but the more economical choice as well.

Rather than maintaining the practice of shipping hundreds of HEU components annually between Pantex and the distant Y-12 site in eastern Tennessee, the current draft document must analyze as a *discrete case* the reasonable alternative of consolidating weapons uranium processing and fabrication capability, including necessary integrated storage, at either Los Alamos TA-55 or Pantex.

This option *would leave in place* both the current low-volume plutonium pit fabrication capability at TA-55 and the new uranium storage facility under construction at Y-12. The latter facility would then serve naval and civilian needs for storage of surplus uranium permanently withdrawn from the weapons stockpile. This option would have the benefit of greatly reducing the need to ship HEU nuclear weapon components around the country.

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The SPEIS must also consider the reasonable alternative of using the excess capacity of the HEUMF facility now under construction at Y-12 to house a version of the UPP now under consideration for that site.

V. The SPEIS Presentation of Reasonable Alternatives and NNSA's Preferred Alternative is Severely Flawed and Inaccessible to even a Well-Informed Person.

The problems in Section S.3.17 of the Summary volume are evident from the very first sentence: "CEQ regulations require an agency to identify its preferred alternative to meet its purpose and need, if one exists, in a Draft EIS (40 CFR 1502.14(e)). At this time, NNSA has identified the preferred alternatives as described below. This is based on the consideration of environmental impacts described in this Draft SPEIS, as well as consideration of other factors such as mission and infrastructure compatibility, economic analyses, safety, safeguards and security, and workforce training and retention."

If an agency has a Preferred Alternative from among those analyzed in a DRAFT EIS, it is required to identify it.

In the instant case, NNSA has cherry picked a set of "Preferred Alternatives" from literally dozens of possible permutations that it has purported to analyze for consolidating and restructuring certain nuclear and non-nuclear activities of the complex. The net result is a programmatic "Preferred Alternative" whose environmental impacts cannot meaningfully be compared with any other reasonable alternative, since literally dozens of such possible alternatives exist within the document.

The Draft SPEIS thus fails one of the basic threshold tests of adequacy for an EIS — does the analysis of reasonable alternatives present a meaningful comparison of alternatives having greater and lesser environmental impacts, such that these impacts can be meaningfully compared and weighed in the balance of decision-making? The answer here is, "No."

The mix and match, smorgasbord approach of the entire analysis, in which pro-forma "building blocs" representing highly abstracted conceptual renderings of new nuclear production facilities, are plunked down in varying combinations on a lengthy roster of candidate sites, produces almost no information of value to a comparative NEPA analysis of programmatic alternatives, as virtually the same data tables and charts are used to describe the environmental impacts of each facility at different sites, and the plethora of possibilities are never combined into a coherent set of complex configuration choices with greater or lesser impacts. Much of the weighty mass of Volume II of the SPEIS is generated in this spurious fashion. Indeed, when the branch diagrams of nuclear alternatives are labeled with nearly identical acronyms, the whole analysis becomes indecipherable by the ordinary citizen, congressional staff member, or state official.

Indeed, there are so many possible programmatic and "project-specific" alternatives that the only possible response is to do what NNSA itself did — dip into the document and more or less arbitrarily cherry pick from among the oversupply of possible permutations and combinations, and thereby assemble your own "alternative." This is clearly not what Congress had in mind when it created NEPA, and it is not what CEQ's regulations require.

In sum, the SPEIS is unacceptable in its current form and should not proceed toward a planned Record of Decision later this year. Nor can its weaknesses be repaired by patching-up the present text. The current draft's guiding policy template, derived from the obsolete December 2001 *Nuclear Posture Review Report* — which predates the Moscow Treaty of May 29, 2002 — must be scrapped. Following receipt of the above-mentioned nuclear policy reviews, and fresh nuclear

715C2
(cont.)

817N1

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6

8/781 (cont.) policy and stockpile guidance from Congress and the new administration, a radically revised draft SPEIS, fully rectifying the problems that NRDC and others have identified, should then be issued for public comment.

11/2K3 (cont)

VI. Detailed Page-by-Page Comments

Volume I:

p. 1-1: The SPEIS states: "National security policies require the U.S. Department of Energy (DOE), through the National Nuclear Security Administration (NNSA), to maintain the U.S. nuclear weapons stockpile, as well as core competencies in nuclear weapons. Since completion in 1996 of the *Programmatic Environmental Impact Statement for Stockpile Stewardship and Management* (SSM PEIS) and associated Record of Decision (ROD), DOE has implemented these policies through the Stockpile Stewardship Program (SSP). The SSP emphasizes development and application of greatly improved scientific and technical capabilities to assess the safety, security, and reliability of existing nuclear warheads without the use of nuclear testing (emphasis added)."

Paying close attention to the underlined portions above, it is by no means obvious, inevitable, or reasonable to conclude that a requirement to "maintain the U.S. nuclear weapons stockpile" and "core competencies in nuclear weapons" can only be met by a program that "emphasizes development and application of greatly improved scientific and technical capabilities" for assessing the "safety, security, and reliability of existing nuclear warheads"—much less the design of new weapons such as NNSA's proposed Replacement Warhead—"without the use of nuclear testing."

8/2K1

How specifically does NNSA manage to transmute a requirement to maintain weapons and core competencies into an exclusive focus, for the purpose this NEPA analysis, on a stewardship strategy that emphasizes development and application greatly improved capabilities for nuclear warhead "assessment." How did a mandate to "maintain" get translated into a mandate to "greatly improve?" Please provide a footnote here, or a cross reference to another section of the SPEIS, which specifically discusses the legislative and Executive Branch authorities that support NNSA's implicit contention that no other paradigm would be reasonable for implementing "national security policies" directing that nuclear warheads and core competencies be "maintained."

p. 1-8 "Since the inception of nuclear weapons, the U.S. has maintained a safe and reliable nuclear deterrent force.... This statement is grossly oversimplified, historically inaccurate, and at variance with NNSA's own assertions about serious safety and reliability problems in the stockpile from the late 1950's through the early 1980's. Even as late as the early 1990's, DOE Defense Programs was consciously trading off the potential of achieving improved safety for improved military capability, for example by the use of conventional HE rather than insensitive HE in the W88 warhead, in order to extract maximum counterforce capability from the highly constrained volume on the reentry vehicle.

10/2K2

p. 1-9 "In October 1993, President Clinton issued Presidential Decision Directive 15 (PDD-15), which directed DOE to establish the Stockpile Stewardship Program. PDD-15 significantly redirected the nuclear weapons program. Throughout the Cold War, the DoD and the DOE nuclear weapons laboratories had based much of their confidence in the reliability of nuclear weapons on performance data from atmospheric and underground nuclear tests."

11/2K3

This statement is technically and historically incorrect. DOE did not even begin conducting nuclear explosive tests for the explicit purpose of increasing confidence in the reliability of stockpiled weapons until the early 1980's. This hardly qualifies as "throughout the Cold War." Moreover, "confidence in reliability" is a statistical concept—the larger the testing sample and higher the number of successful outcomes, the greater the level of "confidence" in the reliability of the warhead type concerned. Unfortunately, since nuclear explosive tests were prohibitively expensive and intrinsically hazardous to conduct, they were never conducted in sufficient number to establish the reliability of the mass-produced weapon types that had been placed in stockpile.

Presumably technically competent persons in NNSA already know this, which raises the question why NNSA would engage in such misleading simplifications. Perhaps the answer is to be found in the succeeding paragraph, in which this misunderstanding of the role of nuclear tests is used to justify the expensive and costly Stockpile Stewardship Program that replaced them.

"However, since 1992, the U.S. has been observing a moratorium on nuclear testing." This statement is misleading. In reality, the U.S. did more than simply "observe a moratorium" on nuclear testing since 1992. When Congress cut off Executive Branch funding for nuclear tests after September 30 of that year, the U.S. government took the lead in negotiating a multilateral Comprehensive Test Ban Treaty (CTBT), a permanent prohibition on all nuclear explosive tests, which President Clinton signed in September 1996. The Senate subsequently failed to give its advice and consent to the CTBT when it was first brought up for a vote in the fall of 1999, but President Clinton's signature remains on the treaty, signifying the possibility that it may ratified at some future date, possibly within a year or two. All of America's closest allies, including nuclear allies Great Britain and France, have already ratified the CTBT, along with Russia and 144 of the world's nations.

The draft SPEIS continues: "To ensure weapons reliability during the moratorium on testing, DOE proposed to invest in new scientific tools to assess the complicated phenomena involved in the detonation of nuclear weapons. DOE also began to develop sophisticated tools and computer-based simulation techniques to assess various aging phenomena as nuclear weapons were expected to serve well beyond their originally anticipated lifetimes. These actions enhanced the experimental, computational and simulation capabilities at the laboratories."

12/2K4

This statement again distorts the underlying technical and historical realities in the service of a simplistic narrative that serves to justify the agency's constricted range of reasonable consolidation alternatives selected for detailed study. As a technical matter, it did not and does not require investing tens of billions of dollars in "new scientific tools to assess the complicated phenomena involved in the detonation of nuclear weapons" in order to ensure continuing reliability. What is needed for this task is to ensure that the fissile material can be brought reliably into a configuration where such "complicated [explosive] phenomena" ensue with 100% certainty, and a thorough warhead surveillance program to detect any physical or chemical deterioration that could disrupt the course of this explosive driven assembly.

This basic technical capability in the complex long predates the arrival of the Stockpile Stewardship Program. Moreover, the two leading "new scientific tools" for assessing "complicated" nuclear detonation phenomena at NNSA's laboratories—the Dual Axis Radiographic Hydrotest (DARHT) facility at Los Alamos and the National Ignition Facility (NIF) at Livermore—are collectively billions of dollars over budget and 7 – 10 years behind their original completion dates, so its clear that NNSA could not have employed them to certify the continuing safety and reliability of the stockpile, as it has proceeded to do for the last 12 years. In reality, these and other costly "stewardship" projects were used to purchase the political passivity

12/2K4
(cont)

of NNSA and its weapons laboratories toward the negotiation of a CTBT, which they did for a time, but despite all this taxpayer largesse, in the end both NNSA laboratory directors sandbagged Senate ratification of the CTBT by professing a lack of confidence that stewardship techniques would remain sufficient to maintain the nuclear stockpile for an indefinite period.

p. 1-9] "DOE deferred spending on the production complex because there were no new weapons production requirements and because of uncertainty about the future stockpile requirements."

The above statement is another egregious example of distorting the historical record. Numerous independent and GAO reviews from the mid-1990's to the present expressed concern about the imbalance in investment shown by flush national weapons laboratory funding in contrast to the deteriorated state of some production complex facilities. In fact presidentially approved and forecast nuclear stockpile requirements were much higher than they are today, so in fact the reverse is true: the reasonably foreseeable burden on the production facilities, to sustain this larger stockpile, was considerably greater 5-15 years ago than it is today, or is likely to be in the future. Moreover, there was an approved production program for a substantially new weapon – the B61 Mod 11 earth penetrating gravity bomb – in the mid 1990's, and there is no such approved requirement today. Is someone in NNSA just making this stuff up?

"The following decisions announced in the SSM PEIS ROD have been implemented:
...The Atlas Facility was constructed and is operational at LANL."

This statement is erroneous. As we noted in our SPEIS scoping comments of Jan.17, 2007, which we have appended to these comments since they are still very much germane, " DOE/DP billed the "Atlas" Project, a huge capacitor bank for electrical pulse power driven weapon physics experiments, as one of three ostensibly "critical" stockpile "stewardship" facilities proposed for construction in the SSM-PEIS. But upon completion in August 2000 at Los Alamos this facility barely operated during 2001 before it was disassembled in 2002 and shipped to the Nevada Test Site, where in 2005 it was finally reassembled at a cost of \$21 million, and used for only 10 experiments before being "mothballed" by NNSA in March 2006!"

p.1-11] Regarding the 1993 Non-Nuclear Consolidation Environmental Assessment, DOE/EA-0792, the Draft SPEIS notes: "The Non-Nuclear Consolidation EA analyzed the proposed consolidation of the facilities within the Complex that manufactured non-nuclear components for nuclear weapons." We note that this statement is not entirely true. The FONSJ based on this EA resulting in the transfer of neutron generator tritium target loading to Los Alamos, and tritium handling activities performed at the Mound Plant in Ohio were transferred to the Savannah River Site.

¹⁴"Laboratory's Atlas Machine begins experimental work," LANL News Release, September 27, 2001. According to this news release, despite its inclusion for review and decision in the SSM-PEIS, "the Atlas construction project began in 1995 with engineering design and component tests," well before completion of the PEIS and its nominal inclusion in the PEIS ROD of December 26, 1996. See also "Atlas Pulsed Power Machine: New Life for test site?" *Las Vegas Review-Journal*, July 1, 2006. According to this news article, the soon to be fired director of NNSA, Ambassador Linton Brooks, felt "sorry" that Atlas had been relocated, saying "the data from Atlas...wasn't as important as the data we'd get from other sources...I wish I was smart enough to know this was coming before we spent the time and energy to move it [Atlas]. But we made that decision five years ago." Of course, if DOE/NNSA had paid any attention to the reasoned arguments of its critics, Atlas would never have been built the first time, much less twice!

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Given that tritium is a radioactively decaying nuclear material that plays a crucial role in boosting the fission reaction rate in modern nuclear weapons, the continued mischaracterization of the 1993 EA and FONSJ as only involving "non-nuclear" materials is significant, because NNSA repeatedly returns to this example to demonstrate that there is a clear and consistent logic in the way it has historically segmented "nuclear" from "non-nuclear" activities in the complex, subjecting the former to more demanding analysis while handling the latter with EA's and FONSJ's.

In reality, nuclear material activities involving nuclear weapon components, such as tritium target and reservoir loading, have been analyzed in EA's, and non-nuclear activities, such as the preceding example of the Atlas capacitor bank, or the further downsizing and consolidation in 1996 of non-nuclear component fabrication activities, have been analyzed in EIS-level documents. NNSA can no show no consistent logical pattern or rationale for the way it has historically segmented its analyses of weapons complex facilities and operations, other than being driven by a continually shifting evaluation of its own agency interests in response to the degree of public knowledge and concern regarding its proposed actions.

p. 1-18] "Because the non-nuclear operations at KCP are essential and do not duplicate work at other sites, no proposal to combine or eliminate these operations was formulated." This conclusion is arbitrary and capricious and cannot withstand scrutiny, and is not the approach taken in the SPEIS review of alternatives for the relocation of non-nuclear research, engineering, and testing activities conducted in support of the nuclear weapons stockpile. It's not even accurate, as all freestanding NNSA sites have a host of facility overhead activities – e.g. guard forces, secretaries, administrative staff, utility services, maintenance personnel that are clearly duplicated at other sites. Indeed, reducing such overhead costs are a major impetus toward consolidation.

The domain of reasonable consolidation alternatives under NEPA is obviously not bounded by whether the substantive activities in question "duplicate the work at other sites," but rather whether consolidation of even disparate weapons activities into fewer geographic sites makes objective economic and technical sense, and could yield environmental benefits that are worthy of detailed analysis.

Taken at face NNSA's arbitrary criterion would exclude from NEPA analysis any consolidation alternative that seeks to minimize environmental impacts, security risks, or costs through consolidation for its own sake, rather than solely to eliminate redundant program activities or capabilities.

By the same token, NNSA's phony criterion actually supports consideration of merging duplicative nuclear weapon design and engineering capabilities, such as the consolidation of Lawrence Livermore's nuclear weapons stockpile support program into the similar program conducted at Los Alamos. But in an equally arbitrary and capricious fashion, NNSA excludes consideration of this alternative as well.

In fact, elsewhere the SPEIS considers the *transfer* – not consolidation – of NNSA's unique flight testing program – not duplicated elsewhere, from its longstanding Tomopah Test range in Nevada to the Army's White Sands Missile Range in southern New Mexico. We conclude that the agency is indulging in wordplay and specious reasoning to avoid NEPA analysis of reasonable alternatives that are not to its liking, but which may offer significant environmental, security, and cost benefits worthy of detailed analysis.

15/2K7

51/2.0
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Nor does the draft SPEIS explain how a consolidation alternative for non-nuclear components fabrication—consolidate KCP plant with closely related design and engineering operations at Sandia National Laboratory—can be considered within the ambit of NEPA “reasonable alternatives” subjected to detailed analysis in 1996—but remain completely outside the scope of the very document that now purports to “supplement” this earlier analysis.

If this SPEIS purports to supplement the earlier SSM-PEIS analysis, then its framework for consideration of alternatives should be consistent with that earlier document.

Moreover, the Sandia option was subjected to detailed analysis but not selected in 1996 because it was judged to have greater associated costs and environmental impacts than the preferred (and chosen) alternative—downsizing in place at the existing KCP Bannister Federal Complex site. That is certainly no longer true today, as NNSA’s preferred alternative is to *abandon* the Bannister Complex for a new *greenfield site* within the Kansas City area on which it proposes to occupy a brand new manufacturing “campus”. It is arbitrary and capricious in the extreme for the agency simply to *stipulate* that this brand new greenfield site, which actually represents an expansion of the NNSA’s weapons complex outside of its historic environmental footprint, represents an environmentally preferred alternative to consolidation at Sandia National Laboratory.

We revisit this question elsewhere in these comments, but will note for the record here that NNSA has been apprised since at least January 17, 2007—that is for almost 18 months -- that NRDC and many other stakeholder object vigorously to the exclusion of non-nuclear component fabrication facilities and operations from the scope of this SPEIS, and yet NNSA has not seen fit to accommodate this concern.

In reality it would require very little effort for the agency to dust off and update the analysis prepared for the 1996 SSM-PEIS on this question, and update it with current information regarding projected non-nuclear fabrication capacity requirements and vacant industrial workspace within the confines of Sandia Albuquerque.

Some 10% of all KCP employees already work in New Mexico at Sandia and Los Alamos, and given that a larger, and still increasing fraction of KCP’s workload is now being contracted out to private industry, the scale of the necessary consolidation is likely to be *smaller* today than it was 12 years ago. These salient facts makes NNSA’s adamant refusal to consider the Sandia consolidation alternative all the more inexplicable, arbitrary and unreasonable. To us it appears that NNSA is unwilling to examine this option because it is secretly wedded to a Byzantine and possibly illegal off-budget plan to build a new, privately-owned weapons parts plant in Kansas City, using local bond financing, which it would then lease back, through GSA, as though it were just another commercial arms length transaction for an operating lease.

NNSA fears the resulting SPEIS analysis might support the environmental and cost case for consolidating the KCP at Sandia, and is therefore bending over backward to avoid going down that road. Aside from the violation of NEPA involved in this course of action, we are appalled that an agency of the U.S. government would attempt to build a new classified weapons manufacturing facility in such a devious and roundabout way, evading the normal Congressional procedures for publicly vetting the proposal in hearings before the appropriate congressional committees, and obtaining a line-item Congressional appropriation to defray the construction costs. We are alarmed by the degradation and devolution of Constitutional responsibilities that NNSA’s Kansas City gambit implies.

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p. 1-25¹⁴ 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).¹⁵

16/2/08

The referenced Section does not exist, or perhaps exists somewhere else in the document in a differently numbered section.

p. 2-5
“The U.S. Senate has not ratified the CTBT; however, the U.S. has been observing a moratorium on nuclear testing that was first directed by President Clinton in 1992.”

This statement is factually incorrect. President Clinton was not the President in 1992. George H.W. Bush was President, but he was not the first to direct a moratorium on nuclear tests. Congress cut off funding for underground nuclear tests after September 30, 1992, over the opposition of then President Bush, and gave the incoming President the option after July 1, 1993 of requesting the conduct of a limited number of tests to resolve any outstanding nuclear safety or reliability issues in the stockpile, prior to a permanent cutoff of funding for US nuclear tests that Congress directed would take effect after September 30, 1996 and last until another country tested. President Clinton reviewed pending nuclear warhead safety and reliability issues, and found no problems meriting a resumption of testing. While the “Hatfield-Exon-Mitchell” funding restriction evaporated with the nuclear test explosion conducted in the late 1990’s by India and Pakistan, the informal test moratorium among the major nuclear powers persists to this day.

“It has been almost 15 years since the last U.S. nuclear test and more than 15 years since the last new nuclear weapon entered the stockpile. While no issues have yet developed in maintaining legacy weapons that would require a return to nuclear testing in the reasonably foreseeable future, there is concern that the current weapon “life extension” approach to maintaining a safe and reliable stockpile will not ultimately, over the longer term, allow a continued moratorium on testing as weapons continue to age.”

17/2/09

This statement is tendentious in the extreme and unsupported by any credible independent technical authority known to NRDC, and we know many of the independent experts in this field. It should either be expanded and buttressed by credible sources citing peer reviewed data and analysis to support the conclusions, or else deleted as unsupported hearsay and self-interested agency speculation. The formulation, “there is concern...” is completely unacceptable. Who specifically harbors these concerns? What are their qualifications? What technical evidence do they adduce for these conclusions?

What does it imply to suggest that “issues in maintaining legacy weapons” could “require” a return to testing, as if the political leadership would have no say in the matter? What does it mean to suggest that the current “life extension approach” will not “allow” a continued moratorium on testing as weapons age, as if the warheads themselves, or perhaps their overwrought “stewards,” were sitting in the Oval Office with the power and discretion to determine national policy? This kind of rhetoric and reasoning seems unhinged from reality, and betrays the absence of any sense of proportion regarding the modest role nuclear weapons now occupy in the broad sweep of US policy priorities.

Even if NNSA’s stewardship of the stockpile became so derelict that one or more warhead types turned to Swiss cheese, this would not necessarily “require” the President or the Congress to direct a return to testing. More likely it would trigger an investigation into NNSA’s incompetence in allowing such a condition to develop in the stockpile. The technical questions surrounding the feasibility of relying on warhead remanufacture as a means of sustaining the legacy stockpile for

an indefinite period were extensively vetted and *resolved* during the period from 1987 until 1995, when President Clinton made the decision to go for a "zero yield" treaty with the assurance from both national laboratories that an adequate nuclear deterrent could be sustained for an indefinite period without reverting to nuclear explosive tests. For NNSA to be limiting otherwise in the context of this NEPA review is damaging to US nonproliferation and security interests and could weaken international confidence in the durability of the current international test moratorium.

172K/9
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p. 2-5: 2.1.4 Treaty on the Nonproliferation of Nuclear Weapons (NPT)

"Article VI of the NPT obligates the parties '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.' However, the NPT does not establish a time frame for achieving these goals and the President and the Congress have not set a schedule for these goals."

The draft SPEIS misstates the U.S. NPT obligation. It acknowledges that the NPT, signed 40 years ago, obligates the parties to good faith negotiations on ending the nuclear arms race "at an early date", and then turns right around and argues that there is no "time frame for achieving these goals." Clearly 40 years is already at the outer limits of what common sense would suggest is logically implied by the phrases, "negotiations in good faith" and "at an early date."

"... 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 Congress."

182K10

The problem with this formulation of the agency's obligations is that current "national security policy", at least that part of it that has a statutory foundation, does not *require* NNSA to "design... the nuclear weapons stockpile." In fact, there are no new weapon designs approved for engineering development or production, and little prospect of gaining such approval. NNSA instead was instructed [in P.L. 103-160] to "maintain core competencies" in "research, design, development, and testing," which is clearly *not* the same thing as a mandate to design, develop, or produce new weapons. And as the agency itself notes, Section 3111 of Public Law 109-163 establishing a Reliable Replacement Warhead (RRW) program merely "mandates the study of a *different technical approach*" to maintaining stockpile reliability, safety and security "to serve as a complement to, and *potentially* a more cost-effective and reliable *long term replacement* for, the current Stockpile Life Extension Programs."

Thus in reality, there is *nothing* in NNSA's statutory obligations that bars it from conducting NEPA analysis that fully considers and meaningfully compares the environmental benefits to be realized from moving to dramatically smaller nuclear weapon stockpiles, different technical paradigms for stockpile stewardship than the present one, and successively higher degrees of complex consolidation. NNSA is simply exercising -- indeed abusing -- its agency discretion and arbitrarily choosing not to consider such alternatives, and then hiding behind an egregious over-reading of certain of its statutory obligations while ignoring its legal obligation under NEPA to consider "all reasonable alternatives."

"Weapon reliability is assessed annually based in part on laboratory and surveillance tests on a relatively small number of each weapon type. There can be no "end-to-end" functional test of a complete nuclear weapon in its "stockpile-to-target" environments. In lieu of this, laboratory and flight surveillance tests are conducted at the component and subsystem levels, and the data are combined and analyzed to produce a reliability estimate for the weapon. While this methodology

p. 2-7:
192K11

is adequate for estimating the current reliability of a weapon, it does not provide high-confidence predictions of the future behavior of an aging weapon. Because of these uncertainties, NNSA needs to plan some excess capacity beyond known requirements to be able to respond to unknown policy and technical issues that may arise over the next decades."

Once again, NNSA is inventing mandates for itself out of whole cloth and pretending that these are immutable realities that shape and limit its consideration of alternatives for the nuclear weapons complex. We are aware of no NNSA statutory obligation that requires NNSA to provide "high-confidence predictions of the future behavior of an aging weapon." NNSA's mission is to maintain a reliable weapons stockpile by conducting regular surveillance and sampling activities, detecting any signs of deterioration, and correcting these deficiencies in a cost-effective manner. NNSA has not been charged with functioning as a Greek oracle.

Nor does NNSA have a statutory mandate to set aside "excess capacity beyond known requirements" to respond to "unknown policy and technical issues that may arise over the next decades." Even if this were true, it obviously does not constrain NNSA's inherent discretion, or its responsibility under NEPA, to consider lesser alternatives that respond to known policy issues that almost certainly will "arise over the next decades." Indeed these "policy issues" have arisen now, in the form of Congressionally directed nuclear posture and nonproliferation policy reviews, and many tens of thousands of public comments urging NNSA to consider the environmental benefits of smaller stockpile sizes, less expansive technical paradigms for stockpile stewardship, and higher degrees of weapons complex consolidation.

Such NEPA analysis would be extremely timely and warmly welcomed by NNSA stakeholders, other government agencies, and congressional policymakers who must make key decisions regarding the capabilities and funding of the future complex. Indeed, it is NNSA legal obligation to provide such information to policymakers in a timely manner, so that it can be used to inform their deliberations and decisions on the future of the nuclear weapons complex.

"Beginning in 2001, additional national security policies for the SSP began to develop. The 2001 NPR mandated a smaller U.S. nuclear weapons stockpile, but also a more robust and responsive infrastructure as part of the deterrence strategy."

p. 2-7:
202K12

"A more robust and responsive infrastructure as part of a deterrence strategy" is *not* part of NNSA's statutory mandate, and therefore it cannot not be relied upon to define the agency's purpose and need for action, or truncate the range of reasonable alternatives. As noted elsewhere in these comments, the 2001 NPR can do no more than inform an historical account of the evolution of NNSA's internal policy perspectives. By its own terms, it was limited to "the next 5-10 years," while the present NEPA analysis was publicly scoped to run until the year 2030, and as a now discredited policy report authored by a core of hard-line conservative officials who are no longer in government, it can have no legitimate dispositive effect on NNSA's assessment of the range of reasonable alternatives worthy of detailed NEPA analysis.

212K13

"A reliable and responsive infrastructure is a cornerstone of the new triad discussed in the 2001 Nuclear Posture Review (Figure 2-2) and in section 3111 of the National Defense Authorization Act for FY 2006 (Public Law 109-163). 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."

p. 2-10:
222K14

This statement inaccurately and misleadingly conflates the hawkish theorizing of the 2001 Nuclear Posture Review Report to Congress with NNSA's statutory responsibilities as outlined in

Section 3111 of P.L. 109-163. The latter does not discuss or reference a "responsive infrastructure" as being the "cornerstone" of a "new triad." Indeed the entire intellectual construct is dismissed by the vast majority of independent defense experts as loopy. The offending paragraph should either be deleted, or in the alternative, amended to correct the misleading conflation of two disparate and unequal sources for NSSA policy guidance. If the paragraph says, NSSA should explain what meaningful nuclear advantage a future adversary might plausibly seek over the United States, and how the "responsive infrastructure" would be employed to quickly "negate" this advantage.

22/2K14
(cont.);
23/2K-29

p. 2-10³ "A more responsive infrastructure is expected to permit further reductions in the weapons stockpile. In the context of the SSP, this responsiveness could permit deeper reductions in the total weapons stockpile that supports the deployed stockpile."

In what way would "more responsive" infrastructure permit deeper reductions in the total weapons stockpile that supports the deployed stockpile? Since when do inanimate facility capabilities dictate what may or may not be in the national and global security interest? If NSSA is going to assert this linkage, it needs to back it up with some serious numbers and analysis, so the environmental tradeoffs between a smaller stockpile with a responsive infrastructure and a larger stockpile without one can be assessed. How deep would these new reductions be? Are they beyond those in the reserve stockpile that have already been directed by President Bush? How much further beyond?

24/2K15

The direct linkage suggested in this statement between the more "responsive infrastructure" required to build RRW warheads and further reductions in the stockpile has been explicitly rejected by two senior congressional committee leaders on defense issues. "We see promise in the proposed RRW program, but we take issue with your assertion that any delay in RRW would 'force the United States to maintain a large stockpile of nuclear weapons and sustain it through increasingly costly and risky Life Extension Programs.'²

p. 2-12³ "For the nuclear production alternatives, this SPEIS assumes, as a base case, a manufacturing capacity operated in single shift, five days per week that produces 50-125 weapons per year."

25/2K16

We note that "nuclear production alternatives" actually concern production of nuclear weapon components, not "weapons." But the slip is revealing. The cited production rate for nuclear weapons also depends, somewhat ironically in this instance, on the capacity of non-nuclear component manufacturing alternatives that have been illegitimately excluded from this analysis, and on the sizing of final assembly facilities at Pantex.

"The SPEIS also analyzes infrastructure needs for a production rate as low as 50 weapons per year?"

How does this alternative present a meaningfully different alternative, in terms of environmental impacts, from the base case of 50 - 125 "weapons" per year?

² Letter from Representative Ike Skelton, Chairman, House Armed Services Committee, and Representative Ellen Tauscher, Chairman, Subcommittee on Strategic Forces, House Armed Services Committee, to Secretary Samuel W. Bodman, Department of Energy, Secretary Robert M. Gates, Department of Defense, and Secretary Condoleezza Rice, Department of State, July 26, 2007.

p. 2-13³ "Pit reuse can limit the ability to improve the performance margin of the primary, which contributes to longer-term reliability. Lower primary performance margins reduce confidence in performance because the weapon is more sensitive to changes that may cause it to fail, such as undesirable changes due to aging or other environmental factors."

Since NSSA is relying on such statements as the preceding to preclude NEPA consideration of a "pit reuse only" option, please explain why it is plausible to believe that a recycled pit could undergo undetected "undesirable changes" that would be sufficient to cause it to "fail." Please define "fail."

"Pit reuse can limit the ability to upgrade the intrinsic safety and security features of a weapon."

What is meant by "intrinsic" safety and security features, and how do these differ from other "safety and security features?"

Is ensuring the ability to upgrade intrinsic safety and security features a threshold assumption for all nuclear production alternatives in the SPEIS? If so, why? What safety and security concerns are so pervasive and specific that resolving them requires the application of new "intrinsic" safety and security features rather than other measures?

If this unsubstantiated constraint is relaxed, would reliance on pit reuse be considered a reasonable alternative worthy of detailed consideration?

"Reuse in the form of non-intrusive pit modification can range from no external modification of the old pit to the addition of significant new external features to it. Concepts with new external features were studied and prototyped and a few nuclear tests were conducted just prior to the U.S. moratorium on nuclear testing began in 1992. The current weapon assembly/disassembly (A/D) facilities may be able to perform such operations."

What "new external features" of reused pits are being referenced here. Improved fire resistance? Please explain the significance of these "features" and whether adding them to existing reusable pits is a documented requirement for the actual reuse of such pits in future remanufactured weapons?

p. 2-16³ "The general approach in this SPEIS analysis is to evaluate the three functional capabilities--plutonium operations, uranium operations, and weapons assembly/disassembly in "building block" fashion so that the blocks can be arranged in any combination among the five alternative sites. Both new facilities and upgrades of existing facilities are considered and the building block approach is intended to allow phasing of construction. For example, to constitute a CNPC, a Consolidated Plutonium Center (pit production facility), a Consolidated Uranium Center (production facility for secondaries and cases), and an A/D/HE Center would be built in separate buildings set in a campus-like arrangement, but all would generally be within the same high security perimeter."

27/2K18

Please explain why this cookie-cutter building block approach results in a meaningful comparison of complex-wide consolidation alternatives with greater or lesser degrees of environmental impacts? The plethora of acronyms and nested "alternatives-within-alternatives" make the analysis virtually incomprehensible, even to experienced analysts of the nuclear weapons complex.

Out of the dozens of permutations generated, how many represent plausible candidates for implementation, and which of these are to be preferred based on a comparison of their environmental impacts?

Since the "blocks can be arranged in any combination among the five alternative sites," and one alternative, the CNFC, is merely an amalgamation of the other generic alternatives plunked down at any one of five alternative sites, how does this result in a range of reasonable alternatives with greater or lesser environmental impacts that can be meaningfully compared by decision-makers and the general public who have faithfully participated in this process?

The plethora of acronyms and nested "alternatives-within-alternatives" make the analysis virtually incomprehensible, even to experienced nuclear weapons analysts.

"The 1996 SSM PEIS did not include any proposed actions to restructure the laboratory technical base other than adding new facilities for enhanced experimental capability. That PEIS concluded, "The continued vitality of all three NNSA national security laboratories will be essential in addressing the challenges of maintaining a safe and reliable nuclear weapons stockpile without nuclear testing."

This statement leaves the false impression that "restructuring the laboratory technical base" would have necessarily jeopardized the "continuing vitality" of NNSA's national security laboratories, and it is inconsistent with the R&D restructuring actions NNSA now proposes in this SPEIS. In fact, many of these actions were first proposed by DOE stakeholders contesting the conclusions of the 1996 SSM-PEIS. It appears NNSA has wasted billions of extra dollars getting to a place it could have been 12 years ago.

p. 2-21: **2.5.8 RRW Summary**

"The ultimate fate of the RRW has no effect on the proposed actions in this SPEIS, alternatives, bounding production capacities, studied, or the assessment of their environmental impacts."

How is this possible, given that production of RRWs would presumably involve the fabrication of new nuclear components, generating nuclear waste streams that would not be characteristic of alternatives that rely on pit reuse, or on current Life Extension Programs?

In general, please explain your clearly counter-intuitive assertion that the production of hundreds and possibly even thousands of new RRW weapons would not give rise to environmental impacts that are qualitatively and quantitatively different than continuing to rely on legacy weapons, or shifting to a pit recycling and remanufacture strategy?

"The RRW would enable NNSA to change how operations are conducted within the facilities studied in this SPEIS. While RRW would enable more cost-efficient and less hazardous operations, it would not eliminate the need for SSM operations or substantially reduce near-term production needs. Because the environmental impacts are based on the maintenance of the legacy weapons that are currently in the stockpile, a conservative estimate of the environmental impacts is provided by this SPEIS. A pit and CSA production capacity will be required for the foreseeable future with or without implementation of RRW."

With reference to the underlined portions, it does not seem credible how the environmental impacts of maintaining a (potentially quite small and unused) "capacity" for pit and CSA

27/2K18 (cont.)

28/2K19

29/2B.2

28/2K19 (cont.)

production could bound the environmental impacts of *actually producing* hundreds of thousands of RRW weapons with newly fabricated nuclear components?

Please provide the specific chain-of-reasoning that culminates in this startling conclusion?

p. 3-5 "In pursuit of a more responsive and cost-effective Complex, NNSA is considering a restructuring of the R&D and testing facilities within the Complex. For the proposed action to restructure R&D and test facilities, the alternatives focus on near-term actions to consolidate, rebalance, or eliminate facilities and programs and improve operating efficiencies... The project-specific alternatives, shown on Figure 3.1-2, were developed to achieve significant benefits in making the Complex more secure and efficient. In addition to these project-specific alternatives for restructuring R&D and testing, this SPEIS also addresses alternatives related to non-nuclear component design and engineering work at SNL/California."

We note that in this SPEIS, NNSA is proposing, in pursuit of a more "cost-effective" complex, significant consolidation and relocation of a wide range of non-nuclear activities conducted to support the nuclear weapons stockpile, including the possible transfer of non-nuclear component design and engineering work at SNL/California to SNL/Albuquerque, "to achieve significant benefits in making the Complex more secure and efficient." In this context, we can't help but note once again the arbitrary and capricious exclusion of non-nuclear component fabrication activities from the purview of this SPEIS. Why don't all the potentially obtainable significant benefits listed above apply equally to NEPA consideration of the "relocation" and "consolidation" of other non-nuclear activities, including manufacturing?

If both Los Alamos and Sandia National Laboratories can each host "design and engineering" and non-nuclear "production" activities, as they have done for quite some time, what possible basis is there for excluding consideration of the potential benefits of transferring non-nuclear production activities from the Kansas City Plant to SNL Albuquerque? Sandia already fabricates neutron generators and microelectronic parts for nuclear weapons, and a large contingent of KCP employees already works at the Kirtland AFB site. Moreover, NNSA is already considering a directly analogous transfer of non-nuclear parts engineering capabilities from SNL/CA to SNL/Albuquerque, which makes the exclusion of the KCP transfer alternative seem all the more arbitrary.

Table 3.2.8-1 – Current Major Mission at Savannah River Site.

This table identifies NNSA's Office of Defense Nuclear Nonproliferation as the "sponsor" of SNM disposition facilities at SRS. What role, if any does DOE's Office of Nuclear Energy play in funding overseeing the MOX facility project? Is this no longer an NNSA/NP program?

p. 3-23: "Additionally, for a CPC that might be constructed at SRS, this SPEIS considers using facilities and infrastructure that are to be constructed in support of the Materials Disposition Program. The Pit Disassembly and Conversion Facility (PDCF) would provide the capability to disassemble nuclear weapons pits and could be modified in the future to convert plutonium to a form suitable for producing new pits."

Please, describe why it would be politically acceptable and consistent with our Nuclear Nonproliferation Treaty obligations to use facilities intended for "irreversible" nuclear weapons material disposition to produce new plutonium pits for new U.S. nuclear weapons? How does NNSA think this might appear to the rest of the world?

28/2K19 (cont.)

5/12.0 (cont.)

30/2K20

p. 3-23:

31/2K21

Is the PDCF being proposed for construction pursuant to the analysis in this SPEIS? If so, why are this facility and its environmental impacts not described in greater detail, and analyzed at alternative locations, such as Pantex?

312K21
(cont.)

Does this SPEIS analysis assume that this facility will only be located at SRS?

What is the current status of NEPA coverage for this facility?

Is the analysis in this SPEIS based on the assumption that it makes more sense to ship intact pits from Pantex to SRS rather than cans of plutonium oxide?

p. 3-37: "For the period evaluated in this SPEIS, it is assumed that the Plutonium-238 mission would remain within TA-55 and PF-4."

What is the time horizon ("period evaluated") in this SPEIS?

"The 50/80 Alternative is evaluated to identify impacts from reductions in pit production needs. PF-4 at TA-55 is the only existing plutonium facility capable of being upgraded to support this level of pit production without major construction. Implementation of the 50/80 Alternative (if selected) would be timed to minimize disruption of LANL's interim small-scale pit production activities, which are needed to meet current requirements."

What are these "current requirements" that LANL's interim small-scale pit production activities is currently meeting? How many W88 surveillance pits need to be accumulated before these activities could be "disrupted" without harming the national security?

Assuming the agency's Preferred 50/80 Alternative is selected, it is not clear what this pit production capacity would actually be used for, in the event that production of new RRW pits is not approved by the Congress? What pit production activities are proposed for this facility in the absence of an approved RRW production requirement?

322K22

If the goal is to maintain a pit production capability by maintaining a cadre of skilled personnel who can build pits when called upon to do so, what is the minimal number of pits per year – and minimal waste stream – that would satisfy this training requirement?

"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. Modifications to existing facilities at TA-55 could be required to accommodate additional workers employed in pit manufacturing."

This analysis is unacceptably vague given that this is the agency's Preferred Alternative? Will the 50/80 Alternative require the expansion of the CMRR facility, or not?

What modifications to existing facilities at TA-55 will be required to accommodate additional workers employed in pit manufacturing?

Absent a requirement to produce RRW pits, what will these workers do?

Table 3.4.1-9 on page 3-38 shows a figure for total employment under the "Los Alamos 50/80 Alternative Annual Operating Requirements" of 680 workers.

What number of pits/yr does this represent – 50 or 80? Why does it require this huge number of workers for such a relatively small output? How many workers would it require to produce 5 or 10 pits per year in this same facility?

322K22
(cont.)

p. 3-39: "The UPF would replace multiple existing enriched uranium (EU) and other processing facilities. The current operating and support areas occupy approximately 633,000 square feet in multiple buildings, while a UPF would result in approximately a 33 percent reduction, to approximately 400,000 square feet in one building. Once a UPF were operational, some existing facilities would be available for decontamination and decommissioning (D&D), while other facilities could be used for non-EU processes."

This section should specify the "multiple existing EU and other processing facilities," that the UPF would replace. What are the proposed maximum and nominal annual CSA production capacities for the proposed UPF?

In discussing the construction of a UPF-like facility at a site other than Y-12, the SPEIS notes that such a Consolidated Uranium Facility (CUC) would also include storage of approximately 100,000 sq. ft., which represents the military storage requirement at approximately 1/5 of the total facility area.

76C2
(cont.)

This alternative raises the interesting possibility that the similarly sized HEUMF at Y-12 may have excess square footage to allocate to the UPF mission. The HEUMF is a very large facility, on the order of 8 acres. It is difficult to believe that all this space will be required to store HEU and EU removed from weapons, given ongoing disposition activities involving conversion of inventories to navy fuel and dilution to LEU for civil reactors.

What annual level of CSA and HEU component fabrication operations could be accommodated within the new HEUMF at Y-12 under various assumptions about future storage and uranium disposition requirements, and various projected levels for CSA production?

Has NNSA considered the alternative of collocating the UPF in the HEUMF at Y-12, and not building a costly \$3-4 billion freestanding UPF? If not, why not? Is this alternative objectively reasonable in NEPA terms and therefore worthy of detailed review?

Where will enriched lithium-deuteride components be stored and/or processed? Could this be in a facility separate apart from either the HEUMF or the UPF?

p. 3-66: **3.6.2 Further Stockpile Reductions**

The interesting but brief discussion in this section of the Draft SPEIS raises far more questions than it answers. NNSA acknowledges that it has based its analysis on "current national policy" regarding stockpile size (1700-2200 operationally deployed "strategic nuclear warheads"). NNSA does not reveal the size of the current or projected "nonstrategic" and "war reserve" stockpiles that its current SPEIS analysis is designed to protect. NNSA should disclose these numbers, so that decision makers across the government, members of Congress, and the general public can judge for themselves whether these stockpile levels represent an objectively reasonable boundary for reasonably foreseeable changes to the stockpile until the year 2030.

332K23

NNSA goes on to note:

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"If stockpile size were reduced even further [than what, the current level?] at some point [what point is this?] even a capability-based Complex may not be the optimum configuration. Indeed, in such a situation, it is likely that NNSA would make major changes to the Complex beyond those described in Section 3.6.1. For example, at some point on a path of denuclearization [what point is this?], closure of production sites would become reasonable, rather than reducing facilities in-place [why isn't this reasonable today?]. In such a case, NNSA current thinking is that the Complex could be reconfigured as follows:

- LLNL, LANL, and SNL would become smaller as research and development laboratories;
- LANL or NTS would likely become locations for all Category I/II/III/IV component production;
- NTS would become the site for A/D/HE operations and any high-hazard testing;
- SRS would remain the tritium production site; and
- Pantex and Y-12 would close."

33/2K23 (cont.)

We see no legal or other valid reason that justifies NNSA's refusal to consider in detail in this SPEIS just such stockpile reduction and complex consolidation scenarios that go beyond "current national policy" -- after all, a central purpose of NEPA analysis is to force agencies to consider all "reasonably foreseeable impacts" rather than merely the ones suggested or acknowledged by "current policy."

By including this brief discussion, NNSA has conceded in principle that there exist complex consolidation alternatives that would have lesser total, connected and cumulative environmental impacts than those of the "Capability Based Alternative," which constitutes the floor of the present analysis based on a presumption of facility throughputs sufficient to support production of about 50 weapons per year. It also has conceded that the agency has "current thinking" on how the Complex could be optimally reconfigured to support a smaller stockpile, and it even provides a sketch of one such possible configuration.

Under NEPA, NNSA is obligated to share its thinking about such reasonable alternatives with the public, since it can no longer argue that they are not "reasonably foreseeable" while the agency engages in "current thinking" about them.

8.1 Summary

p. S-1. "NNSA now proposes to continue the transformation of the Complex by further consolidating operations, which could result in the relocation of activities among sites (emphasis added)"

The SPEIS should explain here why NNSA has limited its consideration of "consolidating operations" to "relocation of activities among sites," rather than excluding from the analysis consolidation options that could result in the elimination, closure, conversion, or transfer (to other beneficial uses) of existing weapons complex sites. Such an approach would appear at the outset to exclude the options with potentially the greatest environmental benefits, which is a poor way to begin a NEPA analysis.

34/2K24

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In conclusion, please find appended to this set of comments additional comments that NRDC has filed with the GSA regarding NNSA's plan to privately procure new manufacturing capacity for non-nuclear components outside the scope of this SPEIS process, and without preparing a separate EIS. We intend that these additional comments be made part of the Administrative Record of this SPEIS.

Sincerely,

Christopher E. Paine
Director, NRDC Nuclear Program

34/2K24 (cont.)

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Mr. Carlos Salazar,
GSA Regional NEPA Coordinator
U.S. General Services Administration,
1500 East Bannister Road, Room 2191 (6PTA),
Kansas City, MO 64131,

Via Email to: NNSA-KC@esa.gov

Dear Mr. Salazar:

The Natural Resources Defense Council (NRDC) appreciates this opportunity to comment on the draft *Environmental Assessment for the Transformation of Facilities and Infrastructure for the Non-Nuclear Production Activities Conducted at the NNSA Kansas City Plant* ("KCP-EA").

With a staff of over 350 scientists, economists, environmental litigators, policy experts, advocates and support personnel representing the environmental interests and views of approximately 1.2 million members and on-line activists, NRDC has for three decades maintained a deep and abiding interest in reducing the environmental and other harmful impacts of the U.S. Nuclear Weapons Complex.

I. Our Prior Extensive Written Comments on the Scoping of This EA Have Been Ignored

We note with regret that our extensive written comments (submitted jointly with Nuclear Watch New Mexico on 21 May 2007) on the GSA's Notice of Intent [FR/72 at 23822] to prepare this EA have been ignored. At that time we advised you that the proposed scope of the alternatives analysis for acquiring a "transformed" Kansas City Plant, as outlined in the NOI, was "premised on preemptive agency judgments that prematurely narrow and effectively predetermine the NEPA analysis."

Specifically we objected to the NOI's arbitrary, unsupported, and controlling presumption that "relocation of the non-nuclear production mission to another location outside of the Kansas City Metropolitan Area is not a reasonable alternative." [NRDC-Nuclear Watch letter to NNSA Acting Administrator Mr. William C. Ostendorff, (copied

January 13, 2008

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with a cover letter of the same date to Mr. Carlos Salazar, GSA Regional NEPA Coordinator) May 21, 2007, p.1-20]

We further noted our view that the segmentation of NNSA's non-nuclear fabrication activities from its ongoing programmatic review of its "Complex Transformation" proposal violates NEPA, because it arbitrarily and capriciously excludes consideration of objectively reasonable consolidation alternatives for non-nuclear component manufacturing that are worthy of detailed study. We also observed that DOE's underlying 1996 *Final Programmatic EIS for Stockpile Stewardship and Management*, which the NNSA's parallel ongoing review relies upon and purports to "supplement," regards non-nuclear consolidation at sites outside of the Kansas City area as a "reasonable alternative" worthy of detailed NEPA analysis. We see nothing in today's environment that would alter that judgment, and much that would tend to reinforce it.

Our May 21 2007 letter also commented that converting a 185 acre "greenfield" site in agricultural use into a modern \$500 million "campus" for nuclear weapon parts production that generates hazardous wastes in the course of its operations inherently meets the definition of a Major Federal Action requiring consideration in an EIS, not merely an EA. We noted that the "still unresolved environmental hazards at the current KCP plant site," and the siting of a nuclear weapons production facility near a proposed inland port with heavy truck and rail traffic, likewise raise environmental and security concerns that need to be analyzed in an EIS. We concluded by noting that, judging from the approach taken in the NOI, GSA's "cooperating agency" partner in the new KCP project, NNSA, was simply ignoring NRDC's previous comments, filed five months earlier (17 Jan. 2007), objecting to the arbitrary exclusion of non-nuclear fabrication mission alternatives from the "Complex 2030" (now "Complex Transformation") Supplemental PEIS analysis.

We do note, however, that one misguided and completely inappropriate response to these concerns was undertaken by NNSA. Rather than do what is clearly required under NEPA—which is first to consider alternatives representing the range of reasonable consolidation alternatives for non-nuclear component fabrication activities as part of the broad programmatic "Complex Transformation" NEPA analysis, and then to conduct site-specific NEPA analysis on any construction projects included in a Record of Decision (ROD) based on this analysis—GSA/NNSA have instead sought to substantiate retroactively their exclusion of these reasonable alternatives, from both the Supplemental PEIS process and the KCP-EA, by commissioning, in parallel with preparation of the draft EA for public comment, a "business case" analysis on "Relocation of Non-Nuclear Production to an Alternate Location." [Science Applications International Corp. October 18, 2007, Revision 2, hereafter referred to as the "SAIC study" or "SAIC report"]. This curious document is actually larger (2,152 vs. 1,635 kilobytes in PDF format), far more elaborate, and appears to have been more costly to prepare than the KCP-EA itself, which comprises a mere 63 double-spaced pages (with triple spacing between paragraphs and only two tables.)

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II. The SAIC Report Violates Government Regulations Barring Parities with Conflicts of Interest from Preparing Documents Used in the NEPA Process

NRDC has grave concerns about this SAIC document, extending both to the manner and timing of its preparation as well as its substance. Its scope and analytical assumptions were not subject to public review and comment, and as a result these appear custom-tailored to prejudice the case for relocation of non-nuclear production outside of Kansas City. This lengthy document and its conclusions are briefly described in a mere eight sentences in the KCP-EA [Sec. 3.4.2 Alternative Considered Outside Kansas City Metropolitan Area, p.17], which are introduced as follows:

"In response to comments made during the public scoping comment period, the NNSA Office of Transformation prepared an *independent* and *objective* assessment of the business case for moving non-nuclear production from the KCP to an alternate city, for comparison with alternatives identified in the GSA/NNSA EA NOI (p. 17, emphasis added)."

In reality, the study was not prepared by the "NNSA Office of Transformation," but rather by one of its contractors, SAIC Corp., a huge, ubiquitous contractor to both GSA and NNSA which routinely conducts billions of dollars worth of business with these and other government agencies. SAIC is in fact a "GSA Environmental Services" Schedule contractor, and also holds eight other GSA Schedules allowing it to provide government agencies with a wide array of products and services using streamlined non-competitive contract procedures. Thus, SAIC's report was neither "independent" nor "objective" by any reasonable definition of those terms, since it is GSA's proposal for a privately financed, but NNSA-run nuclear weapons industrial park that is at issue.

The review's lack of independence at the corporate level is reflected in the individual resumes of the SAIC staff and consultants listed in "Appendix 7 - Vitae" [p. 61] as having worked on the study. *All of them are or have recently been employed on other SAIC contracts with NNSA on closely related matters:*

For example, Ms. Leslie A. Bowen is currently employed by SAIC as a "Senior Regulatory Engineer" on a contract supporting NNSA's "Deputy Assistant Deputy Administrator of Military Application and Stockpile Operations and other Federal staff in the evaluation, selection, and management of Readiness Campaign Projects." Thus Ms. Bowen was working for an official with direct responsibility over the very program and project she was charged with evaluating.

According to his vitae, "during the last five years, Dr. [Geoffrey D.] Kaiser, [an SAIC Assistant Vice President for Technology,] has been working with the National Nuclear Security Administration's (NNSA) Office of Stockpile Technology (OST) providing guidance in the areas of program and project risk management and business practices... During 2006, he worked on the development of an Applied Science and Technology Roadmap (ASTR) for NNSA's Nuclear Weapons Complex... *He works as*

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the de facto risk management coordinator for OST." Again, this person's "independence" is fatally compromised by his contract and work relationships with officials having direct responsibility for the US nuclear weapons stockpile.

Another co-author of the report, Dr. Steven R. Ligon, is a Lead Systems Engineer in SAIC's "Energy Solutions Operation" who "currently provides system engineering, engineering management, and program management advice to NNSA's Readiness Campaign, Office of Transformation, and [DOE's] Office of Civilian Radioactive Waste Management. (OCRWM)." As a contractor to NNSA's Office of Transformation, which has been deeply involved in the development of the controversial third-party finance deal for a new KCP, Dr. Ligon has a direct conflict.

According to her resume, since 2000 SAIC Senior Scientist Diane Nemeth has "supported the Department of Energy Office of Legacy Management (LM) and monitors grants awarded to 15 local development organizations in communities impacted by DOE downsizing through the 1993 National Defense Authorization Act. She reviews and makes recommendations on grant applications, proposed budgets, and the progress of local economic development activities... At SAIC, Ms. Nemeth is responsible for preparing socioeconomic, cultural, and environmental justice portions of *environmental impact statements and environmental assessments (EA) for DOE, the National Nuclear Security Agency (NNSA) ... Ms. Nemeth prepared strategic plans for several program offices with NNSA and DOE ...*" Since preparing these documents for DOE/NNSA is what she does for a living, can Ms. Nemeth really be "independent" and "objective" in her analysis of alternatives to an NNSA-sponsored weapons production initiative?

Another listed co-author of the report, SAIC Senior Project Manager Peter F. Riehm, "has over 16 years of experience in support of the NNSA Office of Defense Programs (DP)... *Dr. Riehm has been the SAIC Project Manager [for] large, multi-task order contracts supporting the NNSA since 2001.* (This conflict is obvious and requires no further comment)

"Since 2004," SAIC Senior Project Engineer William I. Toman has "conceived and produced a procurement program for \$4.6 billion of uranium to support long term production of tritium for DOE-NNSA... Client is reviewing implementation of the program." Can Mr. Toman reasonably be expected to render independent views that are at odds with the desires of senior NNSA managers who are reviewing implementation of his program?

And finally, the sixth and last member of this nominally "independent" and "objective" SAIC team, James R. Chapman, is a consultant "subcontractor to SAIC" who "has *provided program management support, mentoring, and training to the National Nuclear Security Administration* to develop project charters, program plans, cost estimates and budgets, resource-loaded schedules, earned-value tracking, and issue papers for the Planning, Programming, Budgeting, and Evaluation system." As an SAIC consulting subcontractor scrounging for work, Mr. Chapman is possibly in an even more compromised position, as he must please both NNSA and SAIC senior managers by

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delivering an assessment that (a) affirms NNSA's desired outcome, (b) ensures that SAIC's assistance will be sought again on future contracts.

NRDC would like to take the opportunity, at this juncture, to remind GAO/NNSA that Courts have disallowed the delegation of public duties [such as the review of alternatives in a NEPA document] to conflicted private parties. The Fifth Circuit Court of Appeals in *Sierra Club v. Stigler*, 695 F.2d 957 (1983), stated,

"[I]n agency may not delegate its public duties to private entities, see *Lynn*, 502 F.2d at 59, particularly private entities whose objectivity may be questioned on grounds of conflict of interest."

The *Council on Environmental Quality* has issued implementing regulations for NEPA which disallow the use of interested parties to conduct NEPA analyses. In fact, the regulations require contractors involved in the preparation of a statement to execute a "disclosure statement...specifying that they have no financial interest in the outcome of the project." [40 C.F.R. § 1506.5(c).]

In addition to the obvious, ongoing, and very large financial interest SAIC has in not displacing either GAO and NNSA—and therefore jeopardizing its privileged position as a "large multi-task order" contractor for NNSA, and/or its special status as a "GSA Environmental Services" schedule contractor—KCP project records show that sometime between November 7 and Nov. 27, the registered vendor "Vernon Reid," representing "Science Applications International Corp." (DUNS No. 054781240), became a controlled access "Planholder" of "National Nuclear Security Administration SFO 7MO2054" (SFO stands for "Solicitation for Offer") released by GSA on November 7, 2007. This

constitutes a clear and *disqualifying* conflict of interest, as this solicitation concerns the same third-party finance project for a new KCP at the Bofis Road site that SAIC had just *revaluated* for GSANNNSA in a supposedly "independent" and "objective" analysis. SAIC's possession of these limited access bidder documents clearly indicates a *direct* SAIC business interest in the outcome of the environmental review, for which it was purporting to prepare "independent" and "objective" analysis.

In light of the above evidence, GSA and NNSA must remove any references to the conflicted SAIC report from any final EA, should one be issued, and place a prominent disclaimer on the cover page of the PDF copy accessible via the GSA website, as follows:

"WARNING: THIS REPORT WAS PREPARED IN VIOLATION OF GOVERNMENT REGULATIONS GOVERNING CONFLICTS OF INTEREST IN THE PREPARATION OF DOCUMENTS USED IN THE NEPA PROCESS."

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III. The Baseline Assumptions and Analysis of the SAIC Study Are Deeply Flawed and Arbitrarily Exclude an Obviously Reasonable Re-location Alternative Analyzed in Previous DOE NEPA Documents.

The corporate-level and individual conflicts of interest involved in SAIC's performing this "business case assessment" are alone sufficient to fatally compromise its independence and objectivity, and hence the validity of its conclusions. But as one might suspect from a hired-gun study tailored to reach predetermined conclusions sought by the sponsoring agency, its baseline assumptions are arbitrary, erroneous, and overtly and needlessly prejudicial to the case for consolidation of the KCP mission activities within the existing NNSA Laboratory footprint in New Mexico, principally at Sandia National Laboratories in Albuquerque.

For example, the SAIC study mistakenly (but we believe *purposefully*) assumes that re-location to Albuquerque of remaining KCP functions, even after implementing increased "outsourcing," would still require "comparable GSA land acquisition, financing, development, and lease arrangements" to those outlined for the preferred alternative in the KCP-EA, including "a desirable [private] plot of 100-140 acres with the same level of utilities and environmental advantages as the proposed KCRIMS site." [p. 26].

The study failed to model the most advantageous and obvious option — consolidation within Sandia-NM's 2,842-acre, government-owned site. In fact, Sandia has recently completed a \$518 million, 400,000 square foot complex that is devoted to microelectronics R & D and production of components for nuclear weapons systems and other national security needs. The ostensible need for this facility was predicated in part on the assumption that continuing and possibly extensive modernization of the non-nuclear components of future nuclear weapons systems would be required in the future, but political and national policy trends are taking the nation in a different direction, toward continuing reductions in nuclear weapons and away from continuing modernization of the US nuclear weapons stockpile. This means that the new MESA facility is likely to have significant unused capacity for its primary mission — sustaining the US nuclear weapons stockpile — that could be directed to some of KCP's relocated manufacturing missions.³

Even if one assumes that this is not the case, the relocation analysis performed for the 1996 *Stockpile Stewardship and Management PEIS*—when planning guidance for the future size of the active nuclear weapons stockpile was *higher* than it is today—showed that relocation of the non-nuclear fabrication mission to SNL-NM could be accommodated with new construction of "approximately 625,000 square feet," located on "22 acres of available land" directly east of Sandia Technical Area I and *within* the

³ This is not to say that Sandia's management has no other goals in mind for the use of MESA's floorspace that lie outside its primary NNSA mission. It clearly does. But using the nuclear weapons program as a kind of Christmas tree on which to hang other kinds of research is getting to be a bad habit with NNSA's weapons laboratories and production sites that have excess capacity and personnel, particularly when the outlook for the nuclear weapons business is no longer as brisk as it once was.

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Kirtland AFB site boundary. "Minor modifications" to existing SNL buildings "would yield an additional 55,000 sq. ft. of work space." [SSM PEIS, 1996, Vol. 1, p. 3-54]

The resulting total of 680,000 sq. ft. is *dramatically less* than the 1.0–1.55 million square ft. proposed for the new KCP at the Bots Road site, and the 22 government-owned acres within an existing secure military reservation is *dramatically less* than the "100-140 acres" of insecure commercial property that is deemed the starting point for the trumped-up SAIC analysis. This is a striking disparity with the SAIC report, and it must be explored in a thorough, unbiased analysis of reasonable relocation alternatives, either as part of the PEIS, or as part of a freestanding EIS.

Similar disparities exist in the analysis of waste management requirements. According to the draft EA, the new privately-developed KCP at the "greenfield" Bots Road site in Kansas City will require construction of an entirely new waste management infrastructure, including new sewer lines, as none of this exists currently at the site. However, at SNL "existing waste management infrastructure can be applied to manage and treat all anticipated waste streams from this [KCP relocation] alternative... The wastes anticipated from the estimated workload would not require significant modification of the existing SNL waste management infrastructure." [SSM PEIS, Vol. 1, p. 3-57].

The SAIC study completely misses this and other significant cost differences by assuming that implementation of the KCP relocation project in Albuquerque must mirror the commercial property development deal proposed for the Kansas City site. But that deal is not a given. It is not mandated by any act of Congress, government regulation, or court decision. The terms of that deal are voluntary, and entirely self-generated by GSA/NNSA officials in Kansas City and Washington. Thus they do not and cannot bound the range of objectively "reasonable" alternatives that must be fairly considered as part of the NEPA evaluation process.

Curiously, the SAIC report contains no discussion of or even references to DOE's *Stockpile Stewardship and Management PEIS* regarding its analysis of the KCP relocation issue. In fact, the SAIC report contains no references or footnotes of any kind for the data and assumptions contained in the study, and no list of sources consulted. Thus there is no basis for believing that the conclusions of the report have any grounding in actual facts, while, as noted, there is strong evidence pointing to the opposite conclusion, namely, that the report is merely an elaborate wax job designed to apply retroactively a sheen of analytical plausibility to agency decisions already made. Such conduct, we note, if proven in court would represent an impermissible abuse of the NEPA statute, and a gross misuse of public funds.

Rather than taking heed of the many comments received during scoping urging preparation of EIS and/or reintegration into NNSA's Supplemental PEIS, GSA's and NNSA's joint decision was to press ahead with a thin and poorly documented EA that arbitrarily excludes analysis of significant alternatives and connected environmental impacts. Suffice to say, there can be no legitimate dispute here that these decisions have

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been "highly controversial." 40 C.F.R. § 1508.27(b) (4). As the Ninth Circuit explained in *NFCA*, this significance factor is triggered where "substantial questions are raised as to whether a project . . . may cause significant degradation of some human environmental factor . . . or there is a substantial dispute (about) the size, nature, or effect of the major Federal action" – which means evidence that "casts serious doubt upon the reasonableness of [the] agency's conclusions." 241 F.3d at 7:36 (emphasis added). There can be no doubt that this significance factor for preparation of an EIS is satisfied, as virtually every aspect of this GSA/NNSA proposed action is in dispute, down to its fundamental constitutionality as an improper aggrandizement of federal executive power at the expense of the enumerated congressional tax and appropriation powers to "raise and support armies;" and "provide for the common defense." [Sec. 8]

IV. NNSA and GSA Have Violated NEPA's Injunction Against Undertaking Agency Actions that Would Tend to Predetermine the Outcome of NEPA Analysis

Arbitrary assumptions abound in the SAIC study. It rejects out of hand that KCP relocation to SNL-NM could be accomplished by a "line-item construction project" on Federal property – the normal path for acquiring a new and secure nuclear weapons facility. The reason given for this rejection is embarrassingly circular: The SAIC report opines, "Obtaining approval and Congressional funding for a line item construction project is a protracted process that would push the potential move-in date beyond that required to capture potential savings." [SAIC, *Relocation Business Case*, Rev. 2, Oct. 18, 2007, p.37]

While we may not fully comprehend the meaning of this curious statement, we strongly suspect it is an oblique reference to the fact that NNSA/GSA have already deferred, and are continuing to defer necessary maintenance projects at the Bannister Complex in anticipation of their privately-financed flight from the facility. Therefore in the view of the NNSA's own SAIC analysts, any major delay now to accommodate the messy modalities of the democratic process could trigger the need to make these critical KCP improvements, thereby pushing the move-in date "beyond that required to capture the potential savings" that have allegedly accrued from deferring this maintenance to date. This interpretation is confirmed by an acknowledgement elsewhere in the SAIC report, in a section entitled "Risk Identification":

"When *KCRIMS planning* [i.e. the NNSA's prior name for what is now the EA's "Preferred Option"] was well underway, *KCP began deferring maintenance at the Bannister facility to capture near-term savings from avoiding investments that would be unneeded upon vacating the site*. As a result, there is a considerable backlog of maintenance actions that have been delayed with the expectation that the Bannister facility would be shortly closed. KCP estimates a backlog of approximately \$200 million deferred maintenance through 2014 in those areas normally funded by Readiness in Technical Base and Facilities (RTBF) and Facilities and Infrastructure Recapitalization Program (FIRP)." [SAIC, 2007, p. 27]

⁴ The acronym *KCRIMS* stands for "Kansas City Responsive Infrastructure Manufacturing and Sourcing."

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We hasten to note that the preceding paragraph constitutes significant indisputable evidence, in a report ordered and issued by NNSA itself, of just the sort of premature and irreversible commitment of agency resources to a proposed action, prior to completion of the NEPA process, which is clearly barred by CEQ regulations and judicial precedent.

CEQ's NEPA regulations provide that "[a]gencies shall not commit resources prejudicing selection of alternatives before making a final decision." 40 C.F.R. § 1502.2(f). Moreover, 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. Numerous courts have held that the same standards apply to an EA.

In this case, if NNSA's carefully laid plan to under fund and then abandon the Bannister Complex does not come to fruition on schedule in 2010-2012, a huge deferred maintenance bill will likely come due. This heavily stacks the deck in favor of the agency's preferred option before even a word of NEPA analysis has been prepared. The agencies have effectively "predetermined" their favored outcome for the NEPA analysis by racking up a \$200 million deferred maintenance bill that can only be avoided by prompt implementation of its preferred option. We have litigated many NEPA cases over the years, and this fact pattern literally screams "predetermination."

But the SAIC analysts have a creative use for this illegal conduct: *pin the big deferred maintenance bill on the Albuquerque move option*, and thereby undermine its "business case" by claiming it would prompt delays sufficient to "lose" the "deferred maintenance savings" arising from purposeful neglect of the Bannister Complex.:

"In the event that an Albuquerque move is brought into the timeline, with both [sic] the planning delay, extending moving time and production hiatus, some deferred maintenance areas might require unplanned or emergency repairs to be made to the Bannister facility and related equipments. [SAIC, 2007, p. 27]

Of course, none of this contorted reasoning changes the real prospective long-term budget savings – in greatly reduced administrative overhead, site security, and land acquisition costs, reduced construction requirements, reduced finance costs, reduced personnel travel and shipping costs, lower product development costs, and smaller environmental footprint – that could very likely be obtainable from consolidating the remaining KCP production missions at Sandia National Laboratory. Staying longer at the Bannister Complex, as the SAIC study suggests might be required to implement its Sandia option, merely shifts the realization of these prospective savings farther out in time. *It does not eliminate them.* And there may even be ways to mitigate the short-term price of doing the right thing for the longer-term.

One obvious solution to KCP's self-imposed deferred maintenance backlog, not examined in the SAIC study, would be to limit KCP's production output during the transition period to essential stockpile maintenance items only, while deferring both additional stockpile Life Extension Programs (LEPs) and capital improvement projects

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linked to those programs, until full-scale consolidated component production could resume at SML-NM. Since the necessary extent of current and planned LEPs are currently in doubt and will be reviewed in the course of the nuclear policy reviews recently directed by Congress, the next 2-3 years could well be a *good* time to dial back on production at the Bannister Complex, and therefore possibly an *optimum time* to make the move to Sandia-NM.

The SAIC study also summarily dismisses a second "facility option" – "commercial construction and lease-back on Federal property," on the grounds that "it is an untried concept, especially for a facility of this size."⁵ This odd piece of misinformation would certainly be news to managers and staff of NNSA's own *Y-12 National Security Complex* in Oak Ridge Tennessee, 1100 of whom moved in July 2007 into the privately-owned and developed "Jack Case Center," which was constructed *inside* the site's security perimeter on federal land transferred to the private developer, and then leased-back to the site contractor, BWXT. ["Grand Opening – Summer 2007," Y-12 Report, Fall 2006, Vol. 3 and "Nuke Plant has a 'big, big, day,'" Knoxville News Sentinel, July 10, 2007.]

Since "practically speaking," according to the SAIC analysts, "the first two facility options are not considered viable," the option for the Albuquerque move cost comparison becomes (conveniently) "*the same arrangement as at KCRIMS*, in which GSA is working with a developer who will build and maintain the facility, with annual lease payments made by the tenant to GSA" [SAIC, Rev. 2, p. 37] According to the SAIC study, the annual lease payments for the proposed privately-financed KCP, which include buildings operation and maintenance and GSA's "management fee" as the middleman in the transaction, will total \$912 million through 2030 in constant FY 06 dollars [Table, p. 15]. This is \$412 million more than the reported \$500 million "construction budget" for the new buildings, and thus hardly a bargain for the taxpayers.⁵

If the government paid for the new "campus" up front, and incurred no additional costs for construction financing and private land acquisition, the cost to the taxpayer for the buildings could well be considerably less than \$500 million. In fact, GAO and NNSA appear to have chosen the most expensive route to "transforming" KCP's non-nuclear production capabilities. Its chief, and perhaps only "advantage" is the apparent ability to proceed with the new KCP project without obtaining an up-front appropriation covering its full acquisition cost.

⁵ These lease payments do not cover the "Readiness in Technical Base and Facilities/Maintenance costs" for the production lines, computers, and other equipment that NNSA Honeywell would install in these new buildings, and these costs which are expected to add another \$1.8 billion (in constant FY 06 dollars) to the 20-year cost of the project, according to the SAIC study. So paying an additional \$20.6 million-yr – and more each year in escalated "then-year" budget dollars – for some private property management firm rather than the operating contractor, to change the light bulbs and wax the floors, seems a rather dubious privilege.

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V. The Matter of Possibly Willful Violations of the Anti-Deficiency Act

We say "apparent" ability to proceed because this entire private finance scheme—which is geared to magically transforming an agency's acquisition of new capital assets, normally requiring Congressional line item budget approval, into a 20 year stream of invisible lease payments hidden in the agency's aggregated operations and maintenance budgets—appears to us to be a violation of the *Anti-Deficiency Act*. The act is violated whenever a government official obligates the government to spend money, now or in the future, for which there is no matching Congressional appropriation in their budget *at the time the financial obligation or commitment to spend funds is made*. According to the General Accountability Office:

The fiscal principles underlying the Antideficiency Act are really quite simple. Government officials may not make payments or commit the United States to make payments at some future time for goods or services unless there is enough money in the "bank" to cover the cost in full. The "bank," of course, is the available appropriation.

Violations of the Antideficiency Act are subject to sanctions of two types, administrative and penal. The Antideficiency Act is the only one of the title 31, United States Code, fiscal statutes to prescribe penalties of both types.

An officer or employee who violates 31 U.S.C. § 1341(a) (obligate/expend in excess or advance of appropriation), section 1342 (voluntary services prohibition), or section 1517(a) (obligate/expend in excess of an appropriation or administrative subdivision as specified in an agency's regulation) "shall be subject to appropriate administrative discipline including, when circumstances warrant, suspension from duty without pay or removal from office." 31 U.S.C. §§ 1349(a), 1518.

In addition, an officer or employee who "knowingly and willfully" violates any of the three provisions cited above "shall be fined not more than \$5,000, imprisoned for not more than 2 years, or both." 31 U.S.C. §§ 1350, 1519.
[<http://www.gao.gov/ada/antideficiency.htm>]

While GSA officials now have the authority to negotiate various types of innovative private financing arrangements, they do not have the authority to commit the government to what are effectively *new capital asset acquisitions*, under the guise of *long term capital leases* (often misrepresented as annual operating leases), without having a matching Congressional appropriation for the full cost of the long-term capital lease in the year in which the obligation is incurred. Since the FY 2008 budget has already been agreed upon, and contains no appropriation covering the \$912,000,000 cost of the "20 Year Firm" lease obligation for the new KCP campus on the Botts Road property, neither GSA nor NNSA may not enter into any such agreement, explicit or implied, in FY 2008.

While not entirely a settled question, we doubt that NRDC or other citizen's organizations are likely to gain standing to sue GSA and NNSA directly for violating the *Anti-Deficiency Act* in the course of their efforts to "lock-in" their preferred option in advance of both a congressional appropriation and the required NEPA analysis.

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But if GSANSSA do not cease and desist immediately from their ongoing and planned violations of NEPA, we can and will refer the evidence we have gathered of *Anti-Deficiency Act* violations to the DOE Inspector General and to the Comptroller General of the United States, who do have the inherent authority to pursue this matter, and to seek fines and jail time for those officials who appear to have been involved in "willful violations." It is our view that the current Administration's interpretation of OMB rules and guidelines have strayed very far from the historical norms for scoring various types of government expenditures, and that a new Administration may not take the same benign view toward the breakdown of budget-scoring discipline that has characterized the present Administration. Government officials who continue to discount this possibility do so at their own risk.

The Congressional Budget Office (CBO) has raised a number of serious concerns about agencies resorting to the kind of private financing proposed for GSA's "Preferred Option" as outlined in the KCP-EA. According to CBO, "Third-party financing arrangements have a number of negative consequences. In general, projects are more costly to the government when they use such financing." Particularly relevant in the instant case is CBO's concern that "third party arrangements may also skew decisions about how to allocate budgetary resources by giving preferential treatment to investment projects on the basis of their method of financing rather than their relative merits."

Indeed, this is precisely the dysfunctional behavior being exhibited by GAONNSA in the present case, as they go to great lengths to skew the NEPA decision process, and even NNSA's own capital improvement budget process at the Bannister Complex, to favor the private-finance option, and to penalize the consideration of more cost-effective reasonable alternatives.

And finally, of considerable concern to NRDC and anyone concerned about the current state of our democracy, CBO notes that "third-party financing allows agencies to raise capital in private markets without the full scrutiny of the Congressional appropriations process." ["Third-Party Financing of Federal Projects," CBO Economic and Budget Issue Brief, June 1, 2005, p. 1, emphasis added]

Indeed, the prospect of putting together a third-party finance deal in this case appears to have induced GAO and NNSA to duck not only the congressional appropriations process, but the legally required NEPA process as well. And while we are on matter of agencies ducking their legal obligations, there remains the very serious concern that GSA and NNSA, in their haste to leave the Bannister Complex, will simply abandon the task of cleaning-up the old KCP plant.

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VI. The Current KCP-EA Unlawfully Segments NEPA Analysis of Bannister Site Decontamination, Demolition and Environmental Remediation from the Analysis of the KCP Transformation Alternatives

The Draft KCP-EA states "...disposition and cleanup activities for the existing NNSA facility at the KCP are not part of the current proposed action and will be addressed in appropriate future environmental analyses." The EA offers no justification for this view, which flies in the face of the common sense perception that construction of a new KCP, and cleanup of the old Bannister site the agencies intend to leave behind, are inherently "connected actions." The threat of an increased dispersion of underground contaminants under the existing KCP facility, now protected from surface water intrusion by the vast roof structures of the KCP facility, increases once these buildings are decontaminated, and torn down, or allowed to decay in a manner that increases surface water intrusion.

We find it imperative, therefore, for the ongoing *Complex Transformation Supplemental PEIS* and/or a freestanding EIS to consider alternatives for the remediation of the existing site, including which federal and state agencies will have continuing jurisdiction over and financial responsibility for cleaning up the site. This analysis must provide informed estimates of the cleanup timescale, its technical requirements and costs, and assess the environmental hazards and likely disposal pathways for wastes generated by the cleanup.

The SAIC study supporting the draft KCP-EA put these cleanup costs at \$287 million [SAIC, 2007, p. 22], and given the history of such cleanup programs, that estimate is probably low. Hence the total 20 year cost to the public for "transforming" the KCP to the new privatized site is at least \$3 billion: \$912 million for the 20-yr capital lease on the new "campus," + \$287 million for the old KCP cleanup, + \$1.8 billion to maintain and equip the new factory, plus any additional public expenditures (roads, sewer connections, culverts, etc.) that are required to accommodate the plant in an environmentally safe manner at its new location. A federal action on this scale, with these types of connected impacts, is a "major federal action" that clearly rises to the level requiring consideration in an EIS.

As you know, an agency may not segment its analysis, and thus avoid preparing an EIS, by breaking down a project in smaller components, as GSA and NNSA are proposing to do by deferring analysis of environmental cleanup alternatives for the Bannister Complex and how the existing contamination will be controlled once NNSA and GSA depart the site. [Ken v. Bureau of Land Mgmt., 284 F.3d 1062, 1077 (9th Cir. 2003).]

An EIS is also required when the "environmental effects" of a planned cleanup are "highly uncertain," or when there are "substantial questions" regarding "the significance of the effect" a proposed action will have "on the local area." *National Parks & Conservation Ass'n v. Babbitt* ("NPCA"), 241 F.3d 723, 731 (9th Cir. 2001); *Anderson v. Evans*, 371 F.3d 475, 489-92 (9th Cir. 2004); *Anderson*, 371 F.3d at 492 (emphasis in original).

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It is well-established that "(a)n EIS *must* be prepared if 'substantial questions' are raised as to whether a project . . . may cause significant degradation of some human environmental factor." *Ocean Advocates*, 402 F.3d at 864 (emphasis in original); *Blue Mountains Biodiversity Project*, 161 F.3d at 1212 (EIS required if project "may have a significant effect" on the environment") (emphasis added); *Idaho Sporting Cong. v. Thomas*, 137 F.3d 1146, 1149-50 (9th Cir. 1998); *Found. for N. Am. Wild Sheep v. USDA* ("FNAWS"), 681 F.2d 1172, 1178 (9th Cir. 1982). Thus, in order to prevail on a claim that an agency has violated its statutory duty to prepare an EIS, a plaintiff need not show that significant effects *will in fact occur* [but rather] raising substantial questions whether a project may have a significant effect is sufficient." *Ocean Advocates*, 402 F.3d at 864-65 (emphasis in original) (other citations omitted).

In addition, the Council on Environmental Quality ("CEQ") – an agency within the Executive Office of the President -- has promulgated NEPA implementing regulations that are binding on all federal agencies. *See* 40 C.F.R. § 1500.3. These regulations provide for an agency to prepare an EA where it is uncertain whether an EIS is required, *id.* § 1501.4(b), but they also set forth a series of factors that govern whether an action may have "significant" environmental effects, in which case an EIS *must* be prepared. *Id.* § 1508.27. These factors include:

- "The degree to which the effects on the quality of the human environment are likely to be highly controversial;"
- "The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks";
- "Whether the action is related to other actions with . . . cumulatively significant impacts;"
- "The degree to which the proposed action affects public health or safety"; and
- "Whether the action threatens a violation of Federal [law] imposed for the protection of the environment." *Id.* (emphasis added).

The Ninth Circuit has explained that the presence of any one of these factors "may be sufficient to require preparation of an EIS." *Ocean Advocates*, 402 F.3d at 865.

It hardly seems necessary to point out that the effects on the human environment, from "transforming" KCP's non-nuclear manufacturing facilities and infrastructure with a new privately-owned "campus" at a new greenfield site, are "highly controversial," generating hundreds of public comments and sparking public protests in Kansas City. The controversy stems not only from the intimate and intrinsic association of KCP's activities with *the continued rebuilding and possible use of nuclear weapons*, which many people regard as deeply immoral in light of their devastating impacts on the human environment, but also because the proposed action is associated with the abandonment of a large heavily contaminated site by the two agencies that currently occupy it, with future responsibilities for containment of the contamination and cleanup left "highly uncertain."

Moreover, the proposed action is clearly and functionally related to the national complex that continues to maintain, design, develop, test, evaluate, and rebuild thousands of nuclear weapons, and there is no debate that these activities have "cumulatively significant impacts." The proposed departure of the agencies from the contaminated

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Bannister Complex obviously "affects public health and safety," as do the increased traffic and waste management issues at the proposed new site. Finally, the actions of GSA and NNSA not only "threaten" to violate laws protecting the environment, as detailed earlier in these comments, but they have already done so. So in fact not just one, but all of the C.E.Q. factors likely to trigger preparation of an EIS are met in the present case.

Specific Comments on the Draft KCP-EA

Since NRDC strongly objects to GSA's and NNSA's use of this EA to illegally segment NEPA review of its non-nuclear production activities from NNSA's ongoing *Supplemental PEIS on Complex Transformation*, and from consideration of inherently connected environmental remediation activities for the facility it is vacating, we will not expend a great deal of effort delineating the particular weaknesses of this document that render it completely inadequate. Suffice it to say, there are many such weaknesses, and here we will identify only a few of the most glaring:

Page iii - 3) Air Emissions: This paragraph states, "the *elimination* of chrome plating operations would result in a cumulative annual reduction of approximately 28% from current facility air emissions," but elsewhere [p. viii] the EA refers to "chrome plating" (sic) being "outsourced" under the preferred option and Alternatives 2-4. Of course, "outsourcing" of chrome plating operations would not necessarily result in their "elimination," and the EA contains no data showing this to be the case. To where is this operation being outsourced, and what are the local environmental impacts? Also it is not clear why "the use of chrome plating lines and associated pollution control equipment" "will continue" under Alternative 1, but not under any of the other alternatives? Further, in Table 1 (p.v), the formulation is "chrome plating *may* continue" under Alternative 1, which is different. Which is it, and what is the origin of the uncertainty?

Finally, on this same matter of chrome-plating operations, the claim is made on page 39 that the amount of water usage (and subsequent wastewater discharge) for regulated industrial processes would be reduced by approximately 12,800 gallons per day (primarily due to the elimination of the on-site chrome plating operations. Again, this statement is true only if these operations have been *eliminated* rather than "outsourced" to another facility in the region, in which case the environmental impacts are merely being displaced.

In the latter case, *NEPA requires consideration of connected actions*, and therefore the required EIS must include an analysis of the environmental impacts attributable to KCP's "outsourcing" operations. The Draft EA contains no information on this subject, although it is the factor most often cited for enabling the reduced size, work force, and operating expense of the proposed new plant. Also, given that this new plant will not be picking cucumbers, but rather manufacturing some of the most highly sensitive weapons technology in the entire world, the off-hand treatment of "outsourcing" to commercial suppliers many of the parts formerly produced at the secure KCP surely merits consideration in an EIS.

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-- What are the environmental impacts of the production being dispersed to commercial suppliers, where will these impacts be felt?
 -- What are the risks that this sensitive technology will become more exposed to theft, sabotage, or espionage as a consequence of this outsourcing?
 -- What would be the enabling impacts on foreign nuclear weapons programs if they were able to gain access to the designs or actual units of these components?

Again, these weighty matters cannot be assessed in a mere EA, but require a full-blown EIS, with a classified appendix if necessary evaluating the most sensitive national security risks involved in "outsourcing" nuclear weapons components to private commercial producers.

Page 1 - 1.0 Purpose: "The National Environmental Policy Act (NEPA) requires Federal officials to consider the environmental consequences of proposed actions prior to making decisions." This is a woefully incomplete description of an agency's obligations under NEPA, which are at once broader and more specific than merely "considering environmental consequences before making decisions." For example, NEPA requires that such consideration must be *timely*, and that analysis must be provided early enough in the process of formulating an agency's proposal for action that it can meaningfully inform the consideration of alternatives that would minimize adverse impacts and improve government decision-making, as opposed to serving as an *ex post facto* rationalization for decisions already made. NEPA analysis must consider *the full range of reasonable alternatives* to a proposed action that could accomplish the agency's purpose and need for action. It must consider *connected and cumulative impacts*.

NRDC is in possession of detailed information demonstrating that this EA is not timely, and that it has been developed primarily to justify decisions already made.

P. 3 the EA states, "The proposed facility would be at least 50% smaller in size than the current facility, resulting in reduced maintenance and energy costs." What is the size of the current facility, what is the size of the proposed new facility, and what is the standard used for comparison? Without this information, this statement is meaningless.

The EA (p. 8) states that "the current facilities are approximately 3 million square feet, but pursuant to the 1996 SSM-PEIS and ROD, the KCP footprint was to be reduced from 3.2 million sq. ft. to 1.8 million sq. ft. by October 2003. Does the EA's use of the "3 million sq. ft." figure mean that this mandated reduction never achieved in practice. If so, why? What is the source of the discrepancy? The EA should explain its origins and resolve it, and provide definitive data on the floor space currently utilized by KCP at the Bannister Complex, and on the space required for each of the other options.

p. 6 - 2.0 Description of Preferred Option... "GSA would issue a Solicitation for Offers to the real estate development community..." This statement is misleading, and should be revised to reflect that GSA *has already issued* this solicitation, and actually did so a month *before* announcing the availability of this draft EA in the *Federal Register*. This sequence of dates in fact raises the serious question whether this EA meets NEPA's

timeliness standard, and indeed whether the contents of this EA have been effectively predetermined by the agency's contract solicitation activities, conducted well in advance of public comment on this EA.

p.8 In connection with this Proposed Action, the General Services Administration (GSA) sought early expressions of interest for a build-to-suit lease manufacturing facility consisting of approximately 1,035,000 square feet of rentable space with 2,100 parking spaces. In addition, GSA has sought options for expansion space up to 517,500 square feet of rentable space together with another 400 parking spaces. The total requirement could therefore be up to 1,552,500 square feet of rentable space with 2,500 parking spaces. The EA (p. 8) states, "The proposed facility would cover approximately 1 to 1.55 million rentable square feet, and provide up to 2900 surface parking spaces."

These figures encompass a fairly wide range – a difference of 550,000 square feet and 800 parking spaces, and an EIS should indicate what proposed activities or planning contingencies account for these differences?

p.8 "a workforce reduction of approximately 900 employees (FY 2005 baseline) would be enacted ..." What is the point of measuring a workforce reduction from a three year old baseline? Why the use of this fiscal year?

p.12 - 3.3.2 Alternative No. 3 – This discussion lacks information on the associated workforce reduction, and the reduction in floor space from the "No Action" baseline, which itself is not clear.

p.14.- 3.4.1 This paragraph should state when GSA acquired an option to purchase and develop the Botts Road/Highway 150 property.

p. 17- 3.4.2 "...the NNSA Office of Transformation prepared an independent and objective assessment of the business case for moving non-nuclear production ... As discussed at considerable length above, this statement is false. The other statements on this page relating to the SAIC assessment likewise give a false or misleading impression of the Sandia-NM alternative. A forecast mean difference of \$289 million in the net present value of future project cash flows cumulated over 22 years is largely a function of two arbitrary and prejudicial initial assumptions, namely, that the Sandia option would have to exactly mimic the high cost features of GSA's preferred Kansas City private-finance option, and that the Sandia option would kick in 3.5 years later than the KC proposal, generating a big project "debt" from remaining longer in the high maintenance Bannister Complex that must be recouped later on. Since the KC project in this analysis gets a head start, and discounted cash flow analysis values a dollar received this year more than one received three years from now, the future savings from the NM project never "catch-up" with those of the KC project within the period of interest, which runs in this analysis until 2030. As noted earlier, using more realistic initial assumptions regarding the consolidation option in Albuquerque, along the lines indicated in the 1996 SSM-PEIS, would lead to radically different "business case" results.

Finally, the draft KCP-EA does not explicitly address why a further downsizing in place, combined with modest upgrades to a portion of the existing KCP, and the same outsourcing measures as the other alternatives, would not comprise a reasonable alternative worthy of detailed analysis. Indeed, this is an alternative that appears to have been overlooked, but in light of the uncertainties that pervade the future outlook for the entire NNSA nuclear weapons enterprise, it may in fact be a "reasonable" and realistic one, at least for the short term, until the strategic reviews now in progress can lead to the establishment of a more durable consensus on the future of the NNSA Complex, and other consolidation options can be restored to their rightful place in the NEPA analysis of alternatives.

In light of the gaping analytical deficiencies, and multiple agency violations of government regulations identified in these comments, GSA/NNSA have but two options before them that could, if pursued immediately with diligence and good faith, restore them to the path NEPA compliance. Whether or not they proceed to completion of this EA, they must either:

- (a) Restore the analysis of all reasonable alternatives for transforming and re-locating KCP non-nuclear manufacturing activities, including analysis of all the connected and cumulative impacts flowing from this action, to its rightful place in the ongoing Supplemental PEIS, from which it has been illegally excluded, or
- (b) Prepare a freestanding EIS that accomplishes the same objectives as (a), and is available in final form for consideration, in tandem with the *Final Transformation SPEIS*, in any Record of Decision to be taken on the future consolidation and transformation of the Nuclear Weapons Complex.

In sum, NNSA and GSA have already engaged in serious violations by NEPA, by:

- (1) Arbitrarily and capriciously segmenting the NEPA analysis of reasonable alternatives for transforming, consolidating, and re-locating NNSA's non-nuclear manufacturing activities from an ongoing Supplemental PEIS process in which they could easily have been included;
- (2) Depriving the citizens of the Kansas City area their due process rights under the APA and NEPA to participate in public hearings on the Scope and Draft of a complex wide SPEIS on Transformation of NNSA's Nuclear Weapons Complex. Kansas City was the only site and host city thus excluded.
- (3) Engaging in a wide array of illegal actions, ranging from employing contractors with severe conflicts of interest to prepare NEPA documentation, to issuing Solicitations for Offers and holding bidders conferences on their Preferred Alternatives before completing a draft EA and issuing it for public comment, to deliberately deferring maintenance at the old KCP plant to artificially inflate the budgetary reward for promptly abandoning KCP for their preferred option, thereby engaging in a pattern of conduct which has as its object to rig the NEPA process in favor of its preferred option.

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- (4) Arbitrarily and capriciously segmenting analysis, to unspecified later NEPA documents, of requirements for containment and remediation of contamination at the existing KCP and Bannister complex after they depart the site; and
- (5) Misusing NEPA documents and government funding set aside for NEPA analysis to falsely discredit, and preclude equitable consideration of, "reasonable alternatives" for consolidation of KCP capabilities at the Sandia National Laboratories-NM.

Numerous federal judges have set aside deficient EAs and FONSI's based on the agency's failures to satisfy the basic requirements of NEPA. See, e.g., *NRDC v. Dep't of Energy*, 2007 WL 1302498 (N.D. Cal. May 4, 2007) (permanently enjoining Department of Energy project based on deficient EA). In light of the manifest deficiencies and violations of law detailed in these comments, should GSA and NNSA, and their erstwhile "partners" in the private sector, elect to proceed with a FONSI and subsequent implementation of the preferred alternative described in this EA, please be advised that they do so at their own peril.

We are of course amenable to discussing these matters with you or representatives of NNSA to clarify these comments, or to answer any questions you may have. My contact information is below. Should you desire to contact me, please note that I will be out of the country from January 14-22.

Thank you for affording us the opportunity to comment on this draft KCP-EA, and we hope you have found the information contained herein to be useful.

Sincerely,

Christopher E. Paine
 Director, NRDC Nuclear Program

202-289-2370 (DC office phone, leave message)
 cpaine@nrdc.org

Paine, Christopher

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40

Palaszek, Kristine

Page 1 of 1

PC_587

Levens, Matthew

From: Kris Palaszek [dkokakid77@hotmail.com]
Sent: Friday, April 04, 2008 11:39 AM
To: Complex2030
Subject: "Complex Transformation"

To Whom It May Concern at the DOE,

I am writing to tell you how strongly opposed I am to this new plan called "Complex Transformation". It is clearly a reversal of the goals set forth by the nuclear Non-proliferation Treaty. How can we dare to ask other nations not to produce nuclear weapons, and indeed even threaten them if they do, and then proceed to build ours up to be bigger and better. This new plan threatens U.S. and international security by undermining calls for Iran and North Korea to halt their nuclear programs.

I urge you to scrap this plan, as it is untenable and morally wrong. Instead, I urge you to work toward having the United States government meet its own obligation to pursue disarmament as we have promised to do in the signing of so many treaties. Thank you.

Sincerely,
 A Very Concerned Citizen of the United States of America,
 Kristine M. Palaszek

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http://www.windowslive.com/skydrive/overview.html?ocid=TXI_TAGLX_WL_Refresh_skydrive_backup_042008

1

Pappano, Bill

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PC_386

Levens, Matthew

From: Bill Pappano [billpap@bellsouth.net]
Sent: Thursday, February 21, 2008 10:13 AM
To: Complex2030
Subject: Complex transformation; Environmental impact

Theodore A. Wyka
 Complex Transformation Draft SPEIS
 Document Manager
 February 21, 2008

Dr Mr. Wyka:

Thank you for including me in the mailing of DOE-NNSA information packets regarding the environmental impact statement related to the Complex transformation currently underway here, in Oak Ridge.

I am assuming that my inclusion was the result of my comments made during the initial phase of the NNSA/DOE Complex transformation, in which I supported the project and suggested that Oak Ridge had the assets, including those unique to Oak Ridge like institutional memory and experience, to walk point on this very important and necessary modernization.

My views certainly have not changed; and I'm encouraged by what I see currently underway at the Oak Ridge Y-12 facility.

Going forward, I would expect that there will be resistance to the project on several levels, not the least of which will be from knee-jerk anti-nuclear activists (KJANA) and out-of-touch-with-reality environmentalists (OOTWE); two groups that have irrationally, but effectively, stalled nuclear power research and development in our Country for decades.

I would suspect that the upcoming period of public comment will attract KJANA's and OOTWE's in droves, who, along with the tiresome "anti-war" crowd, will attempt to control the debate to unproductive ends.

My input at this juncture would be to suggest that we distinguish between "cause" and "constructive" comment and react accordingly.

Thanking you again for including me in this (pre) survey, I remain

Sincerely Yours,

William C. Pappano Jr.
 16 Raintree Place
 Oak Ridge, TN 37830

1

Parker, Marjorie

Page 1 of 1

Levens, Matthew

PC_1805

From: Marjorie Parker [mparker@stellim.org]
Sent: Friday, March 28, 2008 10:58 PM
To: Complex2030
Subject: Stop new nukes

Marjorie Parker
1702 W. Taylor Drive
Carbondale, IL 62901-2115

March 28, 2008

Complex Transformation

Dear Complex Transformation:

116A I am writing to urge you not to continue with plans to build new nuclear facilities at eight sites across the country. I am a person of faith who strongly believes this is not the path we should follow. Rather than adding to the existing stockpile, we should work to eliminate existing nuclear weapons.

213A1 The trillions spent over the last six decades have done nothing to improve the human condition or safety. Rather they have fueled a costly arms race, both in terms of money invested and opportunity lost.

116A (cont) Today the world is still faced with enormous problems. Far too many do not have enough to eat, clean water, health care, education, and opportunities to support themselves and their families. The billions proposed for this plan could literally save lives if used towards overcoming these problems. They could help meet the Millennium Development Goals which we pledged to fulfill.

Please ask yourselves, what does God want us to do?

Sincerely,

Marjorie Parker

Parker, Marjorie

Page 1 of 1

Levens, Matthew

PC_626

From: Marjorie Parker [mparker@stellim.org]
Sent: Friday, February 22, 2008 12:04 PM
To: Complex2030
Subject: Complex Transformation

Marjorie Parker
1702 W. Taylor Drive
Carbondale, IL 62901-2115

February 22, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

116A As a person of faith I strongly oppose the administration's proposal to spend \$150 billion to transform the nuclear weapons complex and build new nuclear warheads.

211 Such a development will fuel the arms race and make us less secure rather than more secure. It takes scarce funds and invests them in a project which the JASON commission declared unnecessary because our current warheads are reliable for the next one hundred years.

39B The U.S. has already spent over \$5 trillion dollars building more than 30,000 warheads. Thankfully none of them have been used. Meantime this expenditure has done nothing for the many human needs that go unmet in health care, education, the environment, and infrastructure.

48A Congress has already taken a position against funding the Reliable Replacement Warhead and the mega-scale bomb plant. It is time to accept their decision and stop wasting time and money on a dangerous, unnecessary project.

Sincerely,

Marjorie Parker

Parker, Pamela

Page 1 of 2

April 23, 2008

PC_979

Mr. Theodore Wyka
C-1 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 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. 42. 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 CFR 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.

1/140;
2/2E

3/14A

Parker, Pamela

Page 2 of 2

[Add your story here.]

I HAVE LIVED IN TIERRA NUEVA FOR 54 YEARS, AND GROWN UP EATING FOODS GROWN IN THE 'FOOD BASKET OF NORTHERN NEW MEXICO' (WITHIN SOILES OF LANL). FOODS HAVE BEEN GROWN IN THAT AREA FOR THOUSANDS OF YEARS. AT PRESENT THE HISTORIC WASTE AT LANL POSSES A SERIOUS HEALTH THREAT TO ALL CITIZENS IN THE AREA & TO FUTURE GENERATIONS. UNTILL THE DOE MEETS ITS OBLIGATION TO THE AMERICAN PEOPLE BY CLEANING & RESTORING THE Pajarito Plateau IT WOULD BE IRRESPONSIBLE TO SPEND BILLIONS OF TAXPAYERS DOLLARS TO EXPAND NUCLEAR WEAPONS PRODUCTION. HOW CAN ANYONE THINK OF CREATING ADDITIONAL DEADLY WASTE FOR WHICH WE HAVE NO REAL SOLUTIONS? -

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,
Pamela Parker

Print name and address:

Pamela Parker

637 PASCO DEL PUERTO SUR

TIERRA NUEVA MEXICO 87571

- 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

Parkman, Francheska

Page 1 of 3

Buenafior, Justin

From: Francheska Parkman [f.parkman@g2em.com]
Sent: Thursday, February 28, 2008 3:13 PM
To: Complex2030
Subject: G2 letter of support for Y-12 (3) (2).doc
Attachments: G2 letter of support for Y-12 (3) (2).doc



G2 letter of support for Y-12 ...

PC_476

Parkman, Francheska

Page 2 of 3



Engineering & Management, Inc.
Success... the only option
101 Dammer Drive
Oak Ridge, TN 37830

PC_476

February 28, 2008

Mr. Ted Wyka
U.S. Department of Energy
Office of Transformation NA-10.1
1000 Independence Avenue, S.W.
Washington, D.C. 20585

SUBJECT: Draft Complex Transformation Supplemental Programmatic Environmental Impact Statement

RE: Letter of Support of the Plan to Maintain a Uranium Center of Excellence for the Y-12 Complex in Oak Ridge, Tennessee

Dear Mr. Wyka:

G2 Engineering & Management, Inc. (G2) welcomes the opportunity to share our comments on the National Nuclear Security Administration's Complex 2030 programmatic environmental impact statement. After review of the recommendation issued in early January of this year, G2 supports the NNSA's proposed plan to maintain a uranium center of excellence for the complex in Oak Ridge which was identified as the preferred alternative.

It is our hope that the Y-12 complex remains a key facility of the nuclear weapons complex. Y-12 maintains the reputation of a Distributed Center of Excellence providing the safe and secure storage of special nuclear material and the manufacturer of secondaries and cases for the NNSA.

1|15A

We were very pleased to find that the Complex 2030 plan supports the ongoing mission of Y-12. G2 supports the following specific points contained in the draft plan:

- the transformation of the nuclear weapons complex to make it smaller, more responsive, safer and more secure.
- 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.

G2, as a contractor currently supporting of the mission and work at the Y-12 National Security Complex, we support the position which allows NNSA and the DOE to finish the clean up needed at the Y-12 site and to continue the important mission specific operations performed in Oak Ridge for the protection and security of the next generation of Americans.

Sincerely,

Francheska Parkman
Human Resources Manager

Parkman, Francheska

Page 3 of 3

f.parkman@g2em.com

PC_476

Parko, Joseph

Page 1 of 1

PC_185

STATEMENT IN OPPOSITION TO THE CIMRR PROJECT

116A
210B
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.

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. Implementing this project would send a contradictory message to other countries, such as Iran, that 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. Such hypocrisy undercuts our ability to control the nuclear arms race.

31J
41L
Congress rebuked the Energy Department's last attempts to upgrade the arsenal by defunding the Reliable Replacement Warhead project and last year's proposed mega-scale bomb plant. The CIMRR project is another irresponsible new program that should be rejected.

58A
This is more than an issue of technology. It is a political and moral issue. The United States does not need to be building more nuclear weapons. We need to be dismantling the nuclear weapons we already possess. The United States needs to be a leader in the movement toward a world free of nuclear weapons. We must say NO to weapons whose only purpose is the large-scale destruction of human life.

Joseph Parko
Tennessee member of the Friends Committee on National Legislation
2000 Otomi Drive
Crossville, TN 38572

Parras-Martinez, Jeffrey

Page 1 of 2

Parras-Martinez, Jeffrey

Page 2 of 2

PC_1770

Levens, Matthew

From: Jeffrey Parras-Martinez [jeparras@hotmail.com]
Sent: Friday, March 28, 2008 3:07 AM
To: Complex2030
Subject: Reject 'Complex Transformation' plan to build nuclear weapons

Jeffrey Parras-Martinez
6705 Gisele Dr. NE
Albuquerque, NM 87109-3707

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.

19H I, Jeffrey W. Parras-Garcia Martinez-Gutierrez, (son, grandson, great grandson and great
216A great grandson of United States Veterans of foreign wars) hereby publicly abhor the use of our taxpayer monies to be allocated to Complex
Transformation for the proposed revamping of the current nuclear arsenal. Not only is
this a complete hypocrisy to International Peace Charters including, but not limited to
the Nuclear Proliferation Agreement, but it is also morally void.

320 The Good Lord knows each and every sacred Heart that beats, and his word states that.. "a
tree is known by it's fruit..." I believe that a country is also known by it's fruit.

In this bright future we can't forget our past, and reprisal is one self-defeating
paradox, who's thirst for vengeance is inquenchable. We must look toward our wise people,
and as civil servants, we have to weigh the cost of our stewardship here on our living
planet.

216A The war-machine must stop!!! The cost of war is inconsolable, and as a human being, I
(cont) believe war is nothing more than an act of terrorism.
Violence is not a step on the narrow road to harmony.

47J Complex Transformation is an environmental hazard to human-kindfolk. The Department of
Energy should clean up its mess from past nuclear mismanagement. The father of nuclear
energy, Albert Einstein once stated "...if I knew what they were going to do with my
formula, I would have been a watch-maker." Today nuclear disarmament is a crucial
humanitarian step to the restoration of human wholeness and dignity.

51J Building up a new arsenal is Bad Foreign Policy. War is mismanagement and
misrepresentation of life.

216A We the people, sentient human beings of our planet will stand up in solidarity to insist
(cont) that representatives of our countries practice honorable stewardship, through one accord
of peace and compassion. Each civil servant will stand accountable to Moral and
International Law, in a brotherhood of mankind, thus setting the example for our misguided
societies like in Iran and North Korea, by upholding our commitments to the Nuclear
Proliferation Agreement.

Thank You.

By building up its nuclear arsenal right now, the US is essentially telling the world, "Do

PC_1770

as I say, not as I do."
Sincerely,

Jeffrey Parras-Martinez
505 944-6055

Parsons, Linda

Page 1 of 1

Page 1 of 1

PC_2039

Levens, Matthew

From: Linda Parsons [linda.jparsons@gmail.com]
Sent: Thursday, April 10, 2008 7:49 PM
To: Complex2030
Subject: Nuclear Weapons -NO

Please BAN all nuclear weapons and testing. Complete the process with the nonproliferation treaty and join the nations of the world who want no more death and destruction from nuclear weapons.

Thank you,
LP

116A;
21Q

Party, Freedom

Page 1 of 2

Buenaflor, Justin

From: Freedom Socialist Party [FSPviews@igc.org]
Sent: Friday, March 14, 2008 7:10 PM
To: FSPviews@igc.org
Subject: Five Years Too Many!

PC_480

Five Years Too Many: End the War by Building a Militant Movement!

The U.S. 'Liberation of Iraq' is a total disaster by any measure. Since the

invasion in March 2003 over one million Iraqis have died and two million have fled to neighboring countries. Almost 4,000 U.S. troops have been killed and at least ten times that number are wounded. The Iraq economy is in such shambles that four million people have no guarantee of food.

The central Iraqi government is so dysfunctional it cannot even meet U.S. demands for regional elections and turning over the oil industry to U.S. corporations.

On this fifth anniversary of the invasion, the public is fed up. Nearly two-thirds of voters want the U.S. to withdraw troops from Iraq immediately or within one year.

A new president won't end the occupation or much improve life in the U.S. People participating in Democratic Party primaries and caucuses hope the ballot box can end the horrific occupation. But just as the Democratic majority in Congress refuses to cut off war funding, none of the major presidential frontrunners is putting forward a plan for withdrawing the troops. All are bought by corporate war profiteers and talk openly about keeping huge numbers of troops in Iraq to maintain military bases, protect

the U.S. embassy and support corporate interests. If they won't risk alienating the military-industry complex in order to end the war, they won't

challenge big business to improve the economy.

The wars in Iraq and Afghanistan are costing \$10.3 billion a month. This enormous sum, plus the \$2.34 billion a year given Israel to brutally occupy

Palestine, leaves little for healthcare, rebuilding New Orleans, helping workers avoid foreclosures, or public works jobs. In addition, the perpetual drumbeat of militarism saturates U.S. society with fear, substitutes patriotism for civil liberties, breeds an anti-social

culture of individualism ber alles and encourages rabid America-Firsters. The poison spreads throughout the world and fosters Turkey's attacks on the Kurdish region, Colombia's invasion of Ecuador, and Israel's total blockade of Gaza.

Women, people of color and immigrants who bear the brunt of this attack are fighting back the hardest because they have no other choice.

A movement could stop the war on working people No individual group can succeed alone. However, by working together the U.S. working class is capable of stopping the U.S. government. It's the only force on earth that can.

People in the streets halted Jim Crow, won votes for women, attained the eight-hour day, and forced the U.S. out of Vietnam. A similar kind of movement will succeed today if it is a real coalition of antiwar groups, based on democratic decision-making and an international perspective, and works in conjunction with labor, political radicals, and military resisters in and out of uniform.

It's time for unity in action!

There are two encouraging opportunities for antiwar activists, labor militants and community groups to work together. An Open National Antiwar Conference has been called for June 28-29 in Cleveland by the National Assembly to End the Iraq

21J

19B

War and Occupation. The conveners invite "everyone, every organization, every coalition, everywhere in the U.S." all who oppose the war and the occupation -- to attend an open democratic U.S. national antiwar conference. The objective is to place on the agenda of the entire U.S. antiwar movement a proposal for the largest possible united mass mobilization(s) in the future to stop the war

and end the occupation. * Learn more at natassembly.org and plan to attend or send a representative.

In addition, the International Longshore and Warehouse Union (ILWU) has announced that it will shut down West Coast ports on May 1 to demand an immediate end to the war and occupation in Iraq and Afghanistan and the withdrawal of U.S. troops from the Middle East. The ILWU is reaching out to other labor organizations to build support for a wider international boycott.

Their announcement gives over six weeks for antiwar activists to convince their unions and co-workers to build a huge work stoppage on May Day.

We demand:

The immediate withdrawal of all U.S. troops and mercenaries from Iraq and the closing of all U.S. military bases.

Hands off U.S. troops who refuse to fight and veterans who protest the war.

Redistribution of the military budget for U.S. social services and reparations in the Middle East.

Freedom Socialist Party

U.S. Section
4770 University Way NE, #100
Seattle, WA 98105
USA

Australian Section
PO Box 266
Brunswick, VIC 3055
Australia

To subscribe to the Freedom Socialist newspaper, or see the booklist at Red Letter Press, or to find out more about the Freedom Socialist Party, go to www.socialism.com, or reply to this message. We would love to hear from you!

To subscribe to this list send an email to fsnatl@igc.org with Subscribe in the subject box.

P.S. If you prefer not to receive future mailings, please reply with Remove

in the subject line and we will take you off our list.

PC_920

Theodore Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation, NA-101
U.S. Department of Energy/NNSA
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka:

I oppose the DOE's Complex Transformation as outlined in the SPEIS draft. For one thing, it doesn't address the alternative of not having any nuclear weapons at all. The Nuclear Posture Review of the Atomic Energy Act doesn't say we have to make nuclear bombs.

And I oppose making more plutonium pits. There is a surplus of them of 14,000 at PANTEX, so we don't need more.

I'm also opposed to open air burning of toxic materials at Sandia National Laboratories. We are not being told what is being burned and also there are no effective air monitors. This lack of air monitoring at SANDIA National Labs is also of concern regarding a neutron generator facility loading thru time.

It's of major concern to me that the health and safety of children is not being considered according to requirements of presidential executive order 13045 from the SPEIS.

Please revise and re-issue the SPEIS for further public comment.

Yours truly, James Passmore - JAMES PASSMORE
712 SAGEBUSH TR. SE
ALBUQUERQUE, NM 87102

116A

270
31C

116A
(cont.)

414D

52B

Patotzka, Lori

Page 1 of 1

Patton, Nichae

Page 1 of 1

PC_1662

Levens, Matthew

From: patotzka@pacbell.net
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,

No more nuclear weapons please! Why keep playing the game of making more when we have so many already, and it only encourages other countries to try and do the same. What does destroying ea other accomplish?? We need most assistance for the people of this country, NOT possible destruction of this country. When will we learn? And this doesn't even cover the human and environmental cost of nuclear waste! Hello???

Sincerely,
 Lori Patotzka
 2066 Camel Lane #24
 Walnut Creek, CA 94596

cc:
 Senator Dianne Feinstein
 Senator Barbara Boxer
 Representative Ellen Tauscher

Page 1 of 1

PC_351

Levens, Matthew

From: Tom Patton [nicetom@netscape.com]
Sent: Tuesday, March 11, 2008 1:35 PM
To: Complex2030
Subject: Bomb Plant

Theodore Wika
 Complex Transformation
 SPEIS Document Manager
 Office of Transformation NA-10.1
 Department of Energy
 1000 Independence Ave. SW
 Washington, DC 20585

Dear Sir

I am writing to urge you strongly, to beg you, not to go forward with plans to build a new bomb plant for making nuclear warheads.

Our country needs to lead the world in the abolition of nuclear weapons, not in their manufacturing.

In the dead of night when your mind and conscience are clear, what do they tell you?

Sincerely,

Nichae Blume Patton

Netscape. Just the Net You Need.

4/18/2008

October 2008

Patty, Noelle
Page 1 of 1

Paul, Liz
Page 1 of 1

PC_685

Levens, Matthew

From: Patty, Noelle (NNP) [pattynl@y1.doe.gov]
Sent: Tuesday, February 05, 2008 1:51 PM
To: Complex2030
Subject: Safety Concern...

113A Hello. My name is Noelle and I work in Information Technology at Y-12. This is concerning something I heard about a Target store possibly being built on the hill across the street from Y-12. I was in disbelief. I don't know if this is true or if it is even possible, but I thought it was a very bad idea. I realize that to people in the Oak Ridge area having a National Security Complex right down the street is maybe not such a big deal. But I think this whole area should be as secure as possible and that is a big deal. Which at least in my mind does not include building a big shopping center right across the street. I'm sorry this really doesn't have much to do with the transformation of the Y-12 complex, but I think it is important. Thank you very much for your time.

Noelle Patty
Information Technology
B&W Y-12 National Security Complex
(865)241-7296 ph
(865)576-5793 fax

PC_2041

Levens, Matthew

From: Liz Paul [peaceonw22@gmail.com]
Sent: Thursday, April 10, 2008 7:54 PM
To: Complex2030
Subject: Citizen Comment regarding SPES, Complex Transformation

118A Mr. Wyka:
The United States should not invest any more time or money in the production of nuclear weapons. It was a grand day when nuclear weapons production came to a halt.

2140 The production of nuclear materials and nuclear weapons pollutes our air, land and water and it poses the danger of a deadly catastrophe. Past nuclear weapons production has poisoned natural resources, communities and workers. The problems continue unabated to this day, and will continue far into the future. Idaho bears a heavy burden from past nuclear weapons production.

316A The use of nuclear weapons is unconscienable, even the threat to use them is evil. The Department of Energy should not resume production of nuclear weapons or build the facilities needed to produce or maintain nuclear weapons.

Liz Paul
6152 Plantation Lane
Boise, ID 83703

Pavel, Claudia

Page 1 of 1

Levens, Matthew

From: Claudia Pavel [claudia@positiveenergysolar.com]
Sent: Monday, March 03, 2008 1:44 PM
To: Complex2030
Subject: against nuclear weapons funding

Claudia Pavel
PO Box 4163
Santa Fe, NM 87502-4163

March 3, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A I live and work in New Mexico, in the field of solar electricity. I strongly oppose any and all funding for nuclear weapons research and development. I especially do not want the fine scientists in New Mexico to further the cause of death and destruction when there is so much more important research and development in sustainable energy and sustainable societies that is not being attended to.

3|88 Eisenhower warned us about the military industrial complex that runs our society today.

I vote for a just and sustainable society that moves away from weapons of mass destruction at ever opportunity, instead of embracing fear and making death and destruction patriotic. Sincerely,

Claudia Pavel

PC_415

Pavluk, Marina

Page 1 of 1

Levens, Matthew

From: Marina Pavluk [mmatep@aol.com]
Sent: Friday, March 28, 2008 10:53 AM
To: Complex2030
Subject: nuclear weapons

Marina Pavluk
505 Preston Ct.
Exton, PA 19341-2363

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.

2|16A I am against new nuclear weapons development.

Sincerely,

Marina Pavluk

PC_1803

Payne, Sarah

Page 1 of 1

Pc_1009, Anonymous

Page 1 of 2

Levens, Matthew

From: Sarah Payne [spayne@unm.edu]
Sent: Tuesday, April 29, 2008 12:34 PM
To: Complex2000

PC_1529

To whom it may concern:

11J: I am writing to express my concern over the Complex Transformation program to manufacture nuclear weapons triggers for bombs at Los Alamos National Laboratory (LANL). The U.S. should serve as an example to the rest of the world by ceasing to proliferate nuclear weapons, not to make our world an even more dangerous place by creating more.

Sarah Payne

The Ultimate Terrorism

PC_1009

116A Thank you for the opportunity to publicly voice my protest against the plan "Complex Transformation": "Complex Bomblex", as I call it, is the latest scheme representing the larger lie which is the driving force behind this latest proposal.

Contrary to the pronouncements by our so called leaders, it is our country, the United States, which is the single greatest threat to the world from weapons of mass destruction.

Some might call this treason. It gives me no pleasure to state what has become obvious but unspoken in the climate of fear which has been promoted by many of our leaders. As proof, we only need look to our shared nuclear history.

The United States was the first nation to develop, and the only country to use nuclear weapons, twice. The US squandered four years, from 1945 until 1949 when the Soviets tested their first weapon, time which could have been used to negotiated complete disarmament with our onetime ally of as many years earlier. We did not.

Eisenhower's Atoms for Peace program was intended to offer other nations the "peaceful" use of nuclear information and technology in exchange for promising to forgo the acquisition of nuclear weapons. This has been an unmitigated disaster. Nuclear energy and nuclear weapons are married at the hip. One only needs to look at their proximity within the Dept. of Energy to realize this. And, could someone please explain to me why nuclear weapons fall under the purview of the Dept. of Energy? Our nation has serious energy problems that need to be addressed, but I am certain, a lack of nuclear weapons is not one of them.

Atoms for Peace did not stop the drive to possess nuclear weapons but instead accelerated it. Pakistan and others used the program to obtain technology, training, and information for their weapons programs. Nuclear power increases the likelihood that nuclear materials, technology, and information will be diverted to make weapons, besides being insanely costly, polluting, and dangerous. No matter what our leaders tell us, nuclear power isn't green, carbon neutral, safe, or cost effective. The entire nuclear infrastructure benefits only large multinational corporations who profit financially, and the bankrupt politicians who promote force and threats of force as a substitute for foreign policy.

Wind and Solar energy are inherently resistant to complete control by corporate interests due to their decentralized nature. Is it any wonder that these technologies were essentially cut out of the recent energy bill in terms of support when compared to nuclear power? Nuclear power has been subsidized since its inception and now we are being asked to support its resurrection with massive new subsidies and tax payer guaranteed loans. Enough is enough. I wonder what fifty years of subsidy for renewable energy would have looked like today instead of our pyrrhic war for oil.

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Pc_1009, Anonymous

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Some will point to the Nuclear Non-Proliferation Treaty and the Comprehensive Test Ban Treaty as evidence that the United States is serious about nuclear disarmament. One only has to look at our one step forward, two steps back nuclear policies to see the duplicity: The nuclear bunker buster program, the newly proposed Polish and Czech missile bases, military plans to use tactical nuclear weapons on the battlefield, and now, the Reliable Replacement Warhead Program and the "Complex Bombplex" which threaten to further institutionalize the production of nuclear weapons in perpetuity. It is clear our leaders are not pursuing disarmament and are actively working to undermine it.

In the words of Noam Chomsky, "Nuclear-armed states are criminal states. They have a legal obligation, confirmed by the World Court, to live up to article 6 of the Nuclear Non-Proliferation Treaty, which calls on them to carry out good faith negotiations to eliminate nuclear weapons entirely. None of the nuclear states has lived up to it."

With the total number US nuclear warheads standing at well over 9000, can any American truly expect our position to be taken seriously when we accuse other nations of attempting to acquire nuclear weapons? We have no moral authority in any discussions regarding nuclear disarmament.

It is no wonder that the 1947 symbolic "doomsday clock" has set its time as if some nightmare of Einstein's relativity theory has been controlling its minute hand. Sadly, it is our actions which have caused this countdown to doomsday to begin at 7 minutes to midnight in 1947, vary up and down for 60 years, and stand in 2007 at 5 minutes to catastrophic destruction.

What is more terrifying than a vision of all life on Earth, annihilated in a blinding blast of light, heat, and radiation in the blink of an eye? This is the ultimate terrorism. We face a choice between life and death. I choose life. Beat the swords of Lawrence Livermore Lab, into the plowshares of peaceful research. Stop the "Complex Bombplex".

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(cont)

Pc_1057, Anonymous

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PC_1057

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26 February 2008

Theodore Wyke
Complex Transformation SPEIS Document Mgr
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Washington DC 20585

COMMENTS PRESENTED AT THE NEW HOPE CENTER, OAK RIDGE, TN

This little light of mine, I'm gonna let it shine...

This little candle accompanied by songs of peace continues to move millions of people around our fragile planet as we grow in our commitment to stewardship of the creation not the stewardship of stockpiles nuclear weapons.

The Mayors for Peace, originating from the mayors of Hiroshima and Nagasaki, now includes over 2,000 mayors of cities around the world calling for nuclear weapon-free zones. There are thousands of organizations, coalitions, and religious bodies calling for the abolition of nuclear weapons.

I come before you as one who grew up in India as a child of missionaries working for peace, as a United Methodist peace activist, as a Sunday School teacher, and as one who assists in a public school with special needs children and earth care practices.

I am struck by the words of the U.S. (5-Star) General Omar Bradley when he spoke on Armistice Day 1948.

"We live in a world of nuclear giants and ethical infants, in a world that has achieved brilliance without wisdom, power without conscience.

We have solved the mystery of the atom and forgotten the lessons of the Sermon on the Mount. We know more about war than we know about peace, more about dying than we know about living."

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PART III

The Industry's Underside

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Bomb Production at Rocky Flats: Death Downwind

Kristen Haag was born in 1967. Rex, her father, was a well-to-do contractor in suburban Denver who did all he could to show his blue-eyed daughter the world. "She had a happy childhood," he said. "She rode horses, she rode motorcycles. She went to Hawaii, she went to the mountains. She was just a beautiful, high-spirited girl that everybody loved, that never really lacked for anything."

In March of 1979, at age eleven, Kris bumped her knee. In early May doctors found a malignancy, she was diagnosed as having bone cancer. Her leg was amputated, and she began undergoing chemotherapy. "It didn't slow her down much," Haag said. "She swam. She got her swimming certificate, her life-saving at the end of the summer." Kristen asked her parents to get her amputated leg analyzed, "so other children won't get what I've got."

Kris Haag died before the year ended. Her parents agonized over where her disease could have come from and then heard about a fire at the Rocky Flats plutonium facility, six miles from their home. "When she was just two years old I built her a sandbox in the backyard," her father told us. "I later found out that was the year they had the big fire at Rocky Flats."

In talking with us and with a film crew from *Dark Circle*, a documentary on nuclear hazards, Rex Haag outlined his fear that the same factory whose sloppy practices had killed Leroy Krumbach and his coworkers inside its walls had also claimed his daughter six miles away. "The plutonium that went out with that fire must've carried right into her sandbox. It just tears me up to think about it now. We were right downwind."^[1]

So was Denver.

Like the dozen-odd other facilities in the American nuclear weapons production chain, Rocky Flats has been plagued not only with hazardous working conditions, but with

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Albuquerque, NM

Bombs Away

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The American handling of atomic weapons in peacetime has been riddled with mishaps. The most spectacular accidents have come in the mere transport of the bombs from one place to another.

In early 1968, for example, a B-47 crashed into a fighter plane and jettisoned a nuclear weapon into the sea off Savannah Beach, Georgia. The bomb was never found.

Later that year another B-47 accidentally dropped an atomic bomb while flying over Florence, South Carolina. When it hit the ground, an explosion with the power of several hundred pounds of TNT blasted out a crater thirty-five feet deep and spread a ring of plutonium around the area. Local residents preparing for a family picnic heard it coming and barely had time to duck for cover. "It blew out the side and top of the garage just as my boy ran inside with me," said Walter "Bill" Gregg, whose family was injured in the blast. "The timbers were falling around us. There was a green, foggy haze, then a cloud of black smoke. It lasted about thirty seconds. When it cleared up, I looked at the house. The top was blown in and a side almost blown off." The government later dragged Gregg's compensation claims through the courts. He finally won fifty-four thousand dollars, but was left deeply embittered by the experience.^[2]

In 1961 two more American atomic bombs were dropped over Goldsboro, North Carolina, by a crashing B-52. One deployed a parachute, which eased its fall to earth; the other broke apart on impact. Another B-52 with four hydrogen bombs aboard crashed into an ice floe near Thule, Greenland. The entire plane and its cargo apparently disintegrated, leaving a radioactive hole nearly half a mile long in its wake. With abundant apologies to the Danish government, which rules Greenland, the military was forced to ship 1.7 million gallons of contaminated ice and snow back to the United States for disposal. In January of 1966 yet another B-52 crashed into its refueling tanker and spewed three hydrogen bombs onto the fishing village of Palomares, Spain. A fourth bomb dropped into the Mediterranean. TNT exploded in two of the bombs and spread plutonium over a square mile, forcing the U.S. to destroy local crops and remove tons of radioactive topsoil back to South Carolina for burial.

In all, the U.S. military admits to twenty-seven accidents involving nuclear weapons-- which it terms "Broken Arrows." Independent critics charge the figure is more like 125.^[3]

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largest single tritium emission ever reported in the U.S. Studies of the local water system show serious contamination, and there are preliminary indications of an escalated cancer rate among people living near the plant.[5]

Overall, the American nuclear weapons production program has been plagued with mismanagement, cost overruns, sloppy handling of radioactive materials, and low worker morale.

All of which may have found its ultimate expression at the Idaho Nuclear Engineering Laboratory (INEL), a vast outpost where research-and-development projects are conducted for the military, spent nuclear submarine fuel is recycled, and military radioactive wastes are stored.

INEL has a bleak history. In 1960 three technicians were killed there when a fuel rod blew out of a small test reactor, piercing the body of one and pinning him to the reactor containment, high above the core. The other two men were hopelessly contaminated, and pieces of their bodies had to be buried in lead caskets. An NRC official later indicated that the "accident" may have been caused deliberately by one of the technicians in a bizarre suicide-murder plot stemming from a love triangle at the plant.[6] In subsequent years INEL has been plagued with sloppy handling of nuclear wastes. Concentrated uranium was accidentally dumped on a nearby road. Far more serious, INEL management from 1962 to 1970 deliberately dumped some sixteen billion gallons of liquid wastes into wells that feed directly into the water table below.

Radioactive contamination has been found 7.5 miles away, angering local farmers and raising questions about the long-term fate of the huge Snake River Aquifer, a major underground water source for much of the American Northwest.[7]

An even more severe accident, however, occurred during the 1978 World Series. With the Yankees leading the Dodgers 7-2, the plant supervisor was engrossed in the game on a portable TV set he had sneaked, against regulations, into the facility. Had he not been so involved in watching New York win yet another World Championship, he might have noticed that an abnormal buildup of radioactivity was occurring in a small uranium-processing column nearby. No one was checking the plant's monitoring devices. One recording chart had run out of paper two weeks earlier. Meanwhile the solution in the processing column was dangerously unbalanced. As the game was getting under way, uranium concentrations in the column were sixty times what they should have been.

Suddenly, at 8:45 P.M., high-radiation alarms began ringing around the plant. The panicked supervisor abandoned the Yankees. Operators in the control room fled to a sheltered area.[8] Fortunately the column was brought under control. But official figures

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3. David E. Kaplan, "Where the Bombs Are," *New West*, April 1981, p. 80.
4. Rappoport, *Great American Bomb Machine*, pp. 22-23.
5. Robert Alvarez, *Report on the Savannah River Plant Study* (Washington, D.C.: Environmental Policy Institute, 1980) (hereafter cited as *Savannah River Study*).
6. Stephen Hanauer, NRC, interview, June 1981.
7. *High Country News*, February 8, 1980, p. 10. See also, *Progressive*, October 1980, and J. T. Baradough, et al., *Hydrology of the Solid Waste Burial Ground, as Related to the Potential Migration of Radionuclides*, *Idaho National Engineering Laboratory*, Open File Report #76-471 (Idaho Falls: U.S. Geological Survey, Water Resources Division, August 1981) (hereafter cited as *Hydrology*).
8. *Idaho Statesman*, April 25, April 28, and May 22, 1979. The bulk of the "World Series" story appears in the May 22 edition.
9. DOE, *Radioactive Waste Management Information: 1978 Summary and Record-to-Date* (Washington, D.C. July 1979), p. 12 (DOE, Nuclear Fuel Cycle Division, Idaho Operations Office, prepared by E.G. & G. Idaho).
10. *Idaho Statesman*, May 22, 1979.

Disaster at Rocky Flats

Two decades before that incident a devastating but little-known fire at Rocky Flats laced the Colorado winds with deadly plutonium.

Built in the early 1950s at a cost of \$240 million, the huge factory produces plutonium triggers for hydrogen bombs. It sprawls at the eastern edge of the Rocky Mountains, its tall stacks jutting out of the flatlands. Steady winds rush through the canyons and into those plains, often reaching blasts of up to eighty miles per hour--and quite often heading toward Denver, sixteen miles to the east/southeast.

In fact the air currents are so powerful that in the late 1970s the Department of Energy chose a patch of land just west of the plutonium plant as its prime national site for testing windmill components.

As a key link in the cold war rush to nuclear supremacy Rocky Flats was built under great secrecy. The handling of large quantities of plutonium at the plant was not made public until 1955, two years after it had opened. There was no public input into choosing

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But plutonium can catch fire spontaneously in air. In the evening of September 11, 1957, some of the "skulls" on the glove box line of Room 180 in Building 771 ignited. The fire was found by two plant production men shortly after 10:00 P.M.

The area was designed to be fireproof. But it was soon a radioactive inferno. Firemen switched on ventilating fans, but that backfired, spreading flames to still more plutonium. They then sprayed carbon dioxide into the area. That also failed. Meanwhile the filters designed to trap plutonium escaping up the stacks caught fire. The shift captain and other observers reported a billowing black cloud pouring some 80 to 160 feet into the air above the 150-foot-high stack of Building 771.

As the crisis intensified, plant officials struggled to find a solution. They knew water would destroy millions of dollars' worth of complex equipment. They also knew the intense heat might flash the water into enough steam to blast into an explosion and send even more plutonium particles flying toward Denver. But when the carbon dioxide failed, there was no alternative. In the early hours of the morning water began pouring into the blaze. Fortunately it worked. The fire went dead roughly thirteen hours after it began [12]

The damage was extensive. Initial AEC reports contended that there was "no spread of radioactive contamination of any consequence." Seth Woodruff, manager of the Rocky Flats AEC office, told the local media that "possibly" some radiation had escaped. "But if so," he emphasized, "the spread was so slight it could not immediately be distinguished from radioactive background at the plant." [13]

But--as at Three Mile Island twenty-two years later--there was no reliable equipment operable at the time to monitor the amount of radiation that actually went out the stacks. Not until a week after the fire were working gauges installed. Then, in a single day, emissions registered sixteen thousand times the permissible level--a full fifty years' worth of the allowable quota.

Some fourteen to twenty kilograms were estimated to have burned in the fire, enough to make at least two bombs equivalent to the one dropped on Nagasaki. [14] And that may not have been the worst of it. According to a study based on figures from Dow Chemical, which operated Rocky Flats at the time, some thirteen grams of plutonium were routinely deposited daily on the first stage of filters in Building 771. According to government documents obtained in a lawsuit against the plant, the 620 filters in the building's main plenum had not been changed since they were installed four years before the fire. Thus a pair of local researchers theorized that as much as 250 kilograms

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or it escaped unfiltered, thus spreading its contamination into local streams and the water table.

Through the whole crisis there had been no warning to local schools, health departments, police, or elected officials that something extraordinary and dangerous was happening at Rocky Flats. There were no backup plans for evacuation, no notification to area farmers or ranchers to safeguard their health or that of their animals. And though some of the buildings were heavily contaminated, bomb-trigger production was back under way within a few days. Over the next thirteen months, Rocky Flats's operators recorded twenty-one fires, explosions, spills of radioactive material, and contamination incidents inside the plant. [18]

11. Rocky Flats Action Group, *Local Hazard, Global Threat Rocky Flats Nuclear Weapons Plant* (Rocky Flats Action Group, 2239 E. Colfax, Denver, CO, 1977), p. 3 (hereafter cited as *Local Hazard*).

12. Carl Johnson, "Comments on the 1957 Fire at the Rocky Flats Plant, in Jefferson County, Colorado," report to the Conference on the Relation of Environmental Pollution to the Cancer Problem in Colorado, at the American Medical Center Cancer Research Center and Hospital in Lakewood, Colorado, September 1980 (hereafter cited as "Comments"), and Rapoport, *Great American Bomb Machine*, pp. 27-28.

13. *Denver Post*, September 12, 1957.

14. Johnson, "Comments."

15. For the 250-kilogram estimate, Johnson in "Comments" cites R. W. Woodward, "Plutonium Particulate Study in Booster System No. 3 (Building 771) Filter Plenum" (Golden, Colo.: The Rocky Flats Plant, January 27, 1971); and H. Holme and S. Chinn, "Pre-Trial Statement," Civil Action Nos. 75-M-1111, 75-M-1162, and 75-M-1296 (Denver: U.S. District Court for the District of Colorado, 1978). See also, J. B. Owen, "Reviews of the Exhaust Air Filtering and Air Sampling, Building 771," unpublished manuscript, Rocky Flats Plant, Golden, Colorado, March 14, 1963.

16. Rocky Flats Action Group, *Local Hazard*, p. 3; see also, F. W. Krey and E. P. Hardy, *Plutonium in Soil Around the Rocky Flats Plant* (New York: AEC Health and Safety Library, 1970), p. 36; Carl Johnson, et al., "Plutonium Hazard in Respirable Dust on the Surface of Soil," *Science*, August 6, 1979, pp. 488-490; and Jack Anderson, "Colorado Plant Eyed as Radiation Source," *Washington Post*, March 25, 1979, p. D25.

17. John C. Cobb, interview, May 1981.

18. Rapoport, *Great American Bomb Machine*, p. 28.

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quench them rather.

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Though the plant was a military facility, word of the accident soon spread. The public was told the radiation releases were harmless, and there was no danger of an explosion. Both statements were false. Radiation monitors at the plant site and in the countryside showed high levels of contamination. As at Rocky Flats, carbon dioxide could not extinguish the fire.

On its fifth day plant officials prepared to use their last resort--water.

At 9:00 A.M. two plant technicians and a local fire chief dragged a hose to the top of the containment dome and aimed it at the flaming core within. Plant workers and firemen ducked behind steel barriers and braced themselves for the worst. As water surged through the hose, radioactive steam poured out the stacks and into the wind. There was no explosion. The core was soon flooded, danger of a meltdown was over.

But by Monday, October 14, a ban on the sale of milk had been enforced over a two-hundred-square-mile area. Thousands of gallons of contaminated milk were dumped into the Irish Sea. Hundreds of cows, goats, and sheep were confiscated, shot, and buried. Farmers who slaughtered their animals for meat were told to send the thyroid glands to the government for testing.

Workers at the nearby Calder Hall reactor were ordered to scrub down with stiff brushes to remove contamination from their skin. Coal miners working in nearby shafts were replaced with "fresh" workers who had not been exposed to the radiation that had filtered through the mine ventilation systems. And in London, three hundred miles away, radiation monitors noted significantly increased levels.

Despite the national emergency that had been proclaimed, British officials told the public it was unlikely "in the highest degree" that anyone had been harmed by the accident. [19] But several months later British officials conceded to a United Nations conference at Geneva that nearly seven hundred curies of cesium and strontium had been released, plus twenty thousand curies of I-131. The admitted iodine dose represented more than fourteen hundred times the quantity American officials later claimed had been released during the 1979 accident at Three Mile Island. [20]

Like its ally across the Atlantic, the British government studiously avoided systematic follow-up studies on the health of area residents. When a local health officer named Frank Mudge used a Geiger counter to confirm abnormal radiation levels in mosses and lichens, officials from the British Atomic Energy Authority actively discouraged

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remains, including plant operations in response since time of issue. It was at this point in December 68, best, considering that the half-life of plutonium is more than twenty-four thousand years, while the "full-life" of asphalt paving is far less. [23]

Then, on Sunday, May 11, 1969--at a time when little Kristen Haag was likely to be playing in her sandbox six miles downwind--plutonium stored in a cabinet at Rocky Flats ignited. The flames leapt into the glove boxes of Buildings 776 and 777. At 2:27 P.M., when the fire alarms sounded, the blaze was out of control.

According to veteran reporter Roger Rappoport, author of *The Great American Bomb Machine*: "When company firemen reached [Building] 776-777 they found tons of flammable radiation shielding feeding the blaze. The fire-fighters donned respirators and charged into the dense smoke." Once again plant officials hesitated to use water. But when the carbon dioxide supplies ran out--after ten minutes--they had no choice. At times the smoke billowed so thickly that firemen were "forced to crawl out along exit lines painted on the floor." After four hours the fire was under control. But isolated areas continued to burn through the night.

The AEC first estimated the damage at three million dollars. It soon proved to be more like forty-five million dollars, ranking it as the most expensive industrial fire in American history at that time. It would take two years and hundreds of regular and part-time employees to clean up the mess. One regular plant janitor refused to help in the cleanup for fear of radiation poisoning. He was fired.

Far from letting a major radioactive fire slow down bomb production, Rocky Flats operators continued full-speed construction of a seventy-four-million-dollar addition designed to increase plant capacity by half. [24]

Nor were the fires the only source of contamination. Dow records showed that at least one thousand barrels of contaminated lath oil were burned in the open air during their operation of the plant, sending unknown quantities of uranium into the air. And despite assurances to the public that no radioactive waste was being stored on site, more than fourteen hundred barrels of it were found there.

When AEC officials decided to move those barrels in the spring of 1970, a Dow report confirmed that "ten percent of the drums had holes apparently caused by rust and corrosion. . . . Many of the liquid drums developed leaks during handling or after exposure to air and sun." [25]

One Dow study indicated that up to forty-two grams of plutonium had been carried off by winds blowing through the drum storage area. [26]

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Constant mishaps at Rocky Flats led to a growing distrust among area residents. As early as 1969, in the wake of the fire that spring, a group of scientists from local industries and universities asked DOE and the AEC to monitor the soil downwind. Their request was refused.

So Dr. Edward Martell, a nuclear chemist working at the National Center for Atmospheric Research, with considerable experience from the bomb-testing era, decided in the fall of 1969 to conduct some tests of his own. His findings confirmed some of the community's worst fears. Abnormal plutonium levels were clearly evident in soil to the east and southeast of the plant.

Martell quickly came under attack from plant supporters. But when the AEC did its own study of downwind soil, it also had to admit to significant contamination. "We find his results are accurate," conceded a ranking military spokesman. "We don't disagree with his new data. As far as measurements, sampling techniques, and knowledge of science, we think Martell is a very competent scientist." The AEC did, however, question Martell's health conclusions. "While it is true," they said, "that some plutonium is escaping from the plant, we don't believe it presents a significant health hazard to Denver."

Dr. Arthur Tamplin--at the time a leading AEC health researcher--strongly disagreed. The Martell study "shows about one trillion pure plutonium oxide particles have escaped from Rocky Flats," he warned. "These are very hot particles. You may only have to inhale 300 of them to double your risk of lung cancer." Tamplin calculated that if plutonium had been spread as Martell suggested, lung-cancer rates in Denver could rise over time, 10 percent. An additional two thousand Coloradans could fall victim to Rocky Flats.[28]

19. John G. Fuller, *We Almost Lost Denver* (New York: Reader's Digest Press, 1975), p. 86. The Windscale story is told on pp. 71-87.

20. Virginia Brodine, *Radioactive Contamination* (New York: Harcourt Brace, 1975).

21. *Ibid.*

22. Ernest Stenoglass, interview, October 1980. High cesium levels in people eating fish caught "in the path of the Windscale effluent" are noted in E. D. Williams, et al., "Whole Body Cesium-137 Levels in Man in Scotland, 1978-9," *Health Physics Journal* 40 (January 1981): 1-4. The contamination seems to be coming from ongoing operations at the Windscale reprocessing facility.

23. Rapoport, *Great American Bomb Machine*, pp. 91-96.

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28. Rapoport, *Great American Bomb Machine*, pp. 38-39.

A Grim Harvest

To Lloyd Nixon, Rocky Flats is an unwelcome newcomer. "I can walk out the back door twenty feet and see where I was born," he told us from his thirty-acre farm in Broomfield. "I was here a long time before that plant was." Six miles to the east, Nixon can see the tall stacks of the plutonium factory, with the winds blowing toward him "right down out of the canyon."

In 1975 he told a joint congressional-gubernatorial commission that bizarre problems had begun surfacing among his animals, problems in quantities he had never seen before. There was a calf born hairless with a body full of a watery substance and a liver "three times normal." There were pigs and fowl with mutations. There was another calf born dead with tissue that tested similar to cows exposed to radiation under experimental conditions.

Nixon later told the crew from *Dark Circle* that pigs had been born on his farm whose "nose and mouth [are] twisted, where they're not able to nurse." Some, he added, had been born with five toes instead of the normal four. Others had hips and ears badly deformed, "with eyes that were not like they're supposed to be."

"We've had chickens with no eyes," he added, "you break open the shell, they've got beaks like needles." Nixon continued, "We've had them where their legs have been so badly twisted and turned that they were unable to kick out of the shell. We had a chicken hatch with the brains right on top of his head."

State health inspectors told Nixon his problems stemmed from poor feed and hygiene. "They brought down what was supposed to be an expert, and he didn't even know how long it took for the eggs of different birds to hatch," said Nixon. But those birds that had allegedly been deformed because of poor food and hygiene had been kept in sanitary wire cages and fed commercial grain. "According to the ticket on the feed we buy, it has everything adequate in it. So it's caused from something else." Inbreeding was also suggested, but in one case "the female came out of Pennsylvania and the male came out of Texas. There's no way they could be related."

There were also charges of mismanagement. "I've had livestock ever since I've been

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mismanagement.

But Lloyd Nixon blamed Rocky Flats. "We used to have several different varieties of pheasants," he told *Dark Circle*. "We got where they wouldn't produce. The eggs were infertile. So we just went out of it. Then we had some lambs born with the guts, or the intestines hanging out. [Some would] be alive. We've had some born dead that way. We've had kid goats born with growths on them. . . ."

And, he told us, there've been "geese who would walk across the yard and all of a sudden, they'll stiffen up and die. There've been deformities in cats, and they've stopped reproducing the way they should. We've lost a couple of dogs with cancer."

The health department, Nixon added, won't release any data on other cases. But Nixon has received numerous calls from neighbors, including one who complained of eleven colts, all born in the same season, all born blind. And there was general agreement that wildlife had disappeared from the area. "You don't see a rabbit around here anymore," he said. "And people that try to raise them . . . they just stop reproducing." [29] Nixon noted that many of his neighbors prefer to keep quiet about what is happening for fear of undercutting the value of their property and their produce.

One of his neighbors who did agree to talk with us--anonymously--told us she had lost so many colts to stillbirths and deformities that she went out of the horse-raising business altogether. "The animals aren't what they used to be and nobody's is getting any better," she said. [30]

Unfortunately the problems do not seem to be limited to animals. In the late 1970s Dr. Carl Johnson began finding abnormal cancer rates among human beings downwind from Rocky Flats.

The stolid, conservative Dr. Johnson is former director of the Health Department of Jefferson County, which encompasses Rocky Flats. He is also an officer with the Army Reserve and maintains a top-secret "Q" clearance. As a public-health officer Johnson became disturbed by the constant malfunctioning of the nuclear industry and began his own studies to confirm or deny what the AEC and DOE were telling--and not telling--the public about Rocky Flats.

Dividing the downwind area into four zones and correcting for age, race, sex, and ethnicity, Johnson found male cancer rates in the zone closest to the plant to be 24 percent higher than in the zone farthest away. Intermediate zones showed excess rates

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A separate study of a large suburban area near Rocky Flats found a congenital malformation rate of 14.5 per 1000 births as opposed to 10.4 per 1000 for the rest of the county, and 10.1 for the state overall. [31]

Johnson's findings raised public awareness of Rocky Flats and helped fuel a movement to close the plant. His findings also put him in a difficult political position. Local real-estate interests began applying pressure to have Johnson fired from his job as Jefferson County health director. In May of 1981 they succeeded.

Meanwhile autopsy reports on workers at Rocky Flats showed plutonium concentrations in all organs of their bodies. And a study for the EPA by Dr. John C. Cobb of the University of Colorado School of Medicine indicated preliminary evidence of excess plutonium levels among other local human autopsy specimens plutonium that was traceable by its isotope-ratios to Rocky Flats. But in an interview Cobb warned us that plutonium might not necessarily be the chief culprit in any area health problems that might surface. "I'm not sure plutonium is the right thing to look for," he told us. "They also burned thousands of gallons of oil with uranium chips in it out there. A combination of the uranium in the cutting oil might be more important than the plutonium." [32]

Whether it was uranium or plutonium, or both, Lloyd Nixon had been directly exposed. "I had some tumors taken off my chest," he told the *Dark Circle* crew. "I've had my thyroid taken out. I'm tired quite a bit of the time, more than what was usual, and [I've] got a numbness in my left side, my shoulders. They found a growth on my right arm between my elbow and my shoulder. . . . My daughter was born with a hole in her heart," he said. Nixon also noted that his neighbors complained of being perpetually overtired, numbness in their hands, and other inexplicable health problems.

There was also talk of "children being born retarded," he told us, "of them with mental problems."

Few of his neighbors, he said, would point an accusatory finger at Rocky Flats. But, he asked us, "if it isn't that place, what is it?" [33]

For Rex Haag there wasn't much doubt. He had lived within six miles of the plutonium factory, and as a contractor had built another five dozen houses nearby "without the least bit of knowledge of that being a dangerous area." [34]

After Kristen Haag's death from bone cancer, the body was cremated. At her father's request, her ashes were sent away for testing. When the results were slow in coming

11

12.

LLOYD MASON: I'M ASKING QUESTIONS. I'VE BEEN HEARING A LOT ABOUT PROBLEMS WITH IT, IN TOLD US. "IN A FEW YEARS THINGS ARE GONNA GET A LOT WORSE."^[97]

- 29. Lloyd Mason, "Statement," Hearings of Governor Lammi's Task Force on the Rocky Flats Plutonium Facility (Boulder, Colo.: April 1975); in *Dark Circle*, and interview, May 1981.
- 30. Anonymous, interview, April 1981.
- 31. Johnson, "Cancer Incidence"; and Carl Johnson, "Evaluation of Cancer Incidence for Angios in the Period 1969-1971 in Areas of Census Tracts with Measured Concentrations of Plutonium Soil Contamination Downwind from the Rocky Flats Plant in the Denver Standard Metropolitan Statistical Area," 5th International Congress of the International Radiation Protection Association, Jerusalem, Israel, March 9-14, 1980.
- 32. John C. Cobb, et al., "Weapons Grade Plutonium in Humans Near Rocky Flats," abstract submitted for a poster session at the AAAS Annual Meeting, Toronto, Canada, January 1981; and Cobb, interview, April 1981.
- 33. Nixon in *Dark Circle*, and interview.
- 34. Haag in *Dark Circle*.
- 35. Johnson in *Dark Circle*, and interview, July 1981.
- 36. Haag in *Dark Circle*.
- 37. Nixon interview.

[Next](#) | [ToC](#) | [Prev](#)

[back to Killing Our Own radiation](#) | [radiation](#) | [radiation](#) | [radiation](#) | [Index](#) | [Search](#)



PC_114

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.

For long term national security,
The only complex transformation
we need is a complex formation
of our entire nations attitude.
Away from greed, away from empire,
away from imperialism, away from
CORPORATE DOMINATION!

We must build sustainable communities
for all people. Democracy must be
restored to a local + regional + national
level, free from corruption, and with
equal access for everyone to speak + vote!
A better world is possible, + the young generation
is building it Now! Join us + U.S. Citizens
all the nuth wackers! Peace!

116A

217A

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.complexttransformationspeis.com>

Pc_132, Anonymous

Page 1 of 1

PC_132

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.

119B

THIS COUNTRY IS FACING A PEAK OIL CRISIS - OAKRIDGE LABS COULD/SHOULD BE USED TO SOLVE THE END OF OIL PROBLEM.

THIS AREA IS UNIQUELY POSITIONED - WE NEED TO LOOK FORWARD - NOT CIRCLE THE WAGONS -

MANY MORE JOBS WILL BE CREATED.

Please use other side if more space is needed.

Comment forms may be mailed to:
Mr. Theodore Wylka
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>

Pc_134, Anonymous

Page 1 of 1

PC_134

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.

115A

The nuclear weapons program is a critical US mission. The Oak Ridge complex has historical knowledge & expertise that cannot be duplicated anywhere else. As a taxpayer, I believe it is in the country's best interest to keep uranium processing OY12.

Anonymous 7

Please use other side if more space is needed.

Comment forms may be mailed to:
Mr. Theodore Wylka
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>

PC_135

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 three reasons given to building the New Transformation Complex are as follows:
(1) jobs for the area
(2) greater security, safety and efficiency
(3) unstated, but true "be afraid of the rest of the world"

Regarding jobs is important as they are we can't sell our souls to the possible deactivation of the world. What should be the calling for any jobs? Certainly not deactivation, but service to the world.

116A

Please use other side if more space is needed.

Anonymous #8

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

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

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

Regarding Security, safety, and efficiency, timely important, however, at what cost? The military-industrial complex and all its expenditure for the "Safety and Security" of our citizens is standing our country of its Needs. Poor Tennesseeans are deprived of health care, 1st class educational opportunities and preservation of our natural beauty.



288

Regarding fear though unstated, it is the predominant theme in our outreach to the world. Now Military Spending is made by the US than all the countries combined. How foolish it is to say "ping-pong" diplomacy works in the New York Philharmonic playing in North Korea this day works. 94% of our outreach to the world is in terms of the military and only 6% is in terms of diplomacy cultural exchanges and dialogue.

31L

Pc_147, Anonymous

Page 1 of 1

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

PC_147

Written Comment Form
Must be received on or before April 10, 2008.

I am very proud to be an employee of Y-12. I know I have a minor role in our Nations security & the security of peace-loving nations everywhere. I am a 5th generation East Tennesseean & my grandmother worked here at Y-12 in the 40's. She is the dark haired girl all the way to the right in the now infamous 'Y-12 ladies' picture seen in the cafeteria & here in the New Hope Bldg. She is 81 yrs old now & still remembers the secret work that was so important. Anderson & surrounding Counties' children are raised with such a fine heritage! We are taught from an early age that what happened here in Oak Ridge brought an end to global conflict. Be proud but don't talk too much or you may get that mouth smacked! We are proud to have the heritage we have at Y-12 & can & will continue to deliver the security capabilities for our future. God Bless America & God Bless Y-12!!

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



Anonymous #9

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

115A

Pc_148, Anonymous

Page 1 of 1

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

PC_148

Written Comment Form
Must be received on or before April 10, 2008.

If the opposition to Y-12 is protesting nuclear weapons, have they protested them in North Korea, Pakistan, India, and all of the other less stable, less democratic, less human-rights oriented countries? Have the opposition convinced the dictators that possess or are trying to acquire nuclear weapons, to cease and desist that direction?

The first nuclear power has only used three weapons twice, and in one way, to save millions of lives of those who initiated the attack. Millions of other lives were saved also as a result.

Please convince us, now that nuclear weapons do exist, there is actually definite means to assure destruction of all of them, and the capability to ever produce them again. Once something is known to exist, a determined individual or group will replicate it.

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.complexttransformation.com>

115A

217E

Pc_153, Anonymous

Page 1 of 1

 **NNSA**
National Nuclear Security Administration

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

PC_153

Written Comment Form
Must be received on or before April 10, 2008.

115A

My hope is that Y-12 current mission as being the Uranium Center of Excellence will continue here in Oak Ridge. I am employed as a shift technical advisor at Y-12 for close to 2 years. I have also worked at ORNL (5 years) & ETRP (6 years). Although I appreciated my employment at ORNL & ETRP I have come to truly love the work I do at Y-12. I am proud to be associated with the mission at Y-12. The history of what has been accomplished and the speed that was come about from a large group of people being stoked of such an important task makes me very proud.

Many families have raised their children while working at the Y-12 complex. I have a daughter and hope to retire from the plant (30 yrs to go). I know the quality of life my family enjoys is in a great part due to work that many loyal & patriotic employees have performed before me. Please allow us to continue our work. May God bless this country and guide your decisions

Please use other side if more space is needed.

Anonymous #1

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

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<http://www.complextransformationpeis.com>

115A (cont.)

Pc_155, Anonymous

Page 1 of 1

 **NNSA**
National Nuclear Security Administration

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

PC_155

Written Comment Form
Must be received on or before April 10, 2008.

115A

Y-12 supports and wants this proposal. Please give it to us.

Anonymous #2

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

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Pc_157, Anonymous

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115A

PC_157

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 believe it would be best for DOE, NNSA, and the Oak Ridge community if Y-12's work stays at Y-12. My opinion is that NNSA's preferred alternative with the Distributed Alternative would be best. Y-12 is planning and in the process of a major complex transformation that I think will greatly improve Y-12's efficiency.

Anonymous #3

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

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<http://www.complextransformationspeis.com>

Pc_159, Anonymous

Page 1 of 1

219E

PC_159

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 am strongly encouraging no pleading with you to consider a No Proliferation Complex approach. Consolidating operations will help with our technology communication efforts.

There is NO NEED for further proliferation of nuclear weapons. Provide a way to disarm, dismantle, and dissassemble nuclear warheads so the US can be a model for other countries as well.

Anonymous #4

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

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<http://www.complextransformationspeis.com>


84/02/2000 09:40 0444573 SMD/IA LABS PAGE 01

PC-222



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_160**

Comment forms may be faxed 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

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

Please use other side if more space is needed.

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

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


116A

As a Volunteer Fire Fighter, Volunteer Rescue Squad Member, & former Volunteer, and a ten-year blood donor, you should realize I love my fellow man, woman, and child. I realize, however that some of my fellow men don't seem to love or like me. After the first two uses, which saved millions of lives on both sides. Another effect of that use was the subsequent avoidance of wars of the magnitude of tens of millions of lives. Although I support U.S. maintenance of nuclear weapons for deterrence, I question the advisability of its management by an administration that cannot even properly pronounce "nuclear". What is the definition of the word used by George W. Bush and the spokesperson for this program, the word "nuclear"?

211K


84/02/2000 09:40 0444573 SMD/IA LABS PAGE 01

PC-222



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_222**

Comment forms may be faxed 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

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

Please use other side if more space is needed.

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


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

111K

The purpose of the SPEIS was to reconfigure the Nuclear Weapons Complex into a more cost-effective complex for the future. It did so in the absence of "hard" future requirements; was more forward on ensuring broad Congressional support than in delivering an "optimism" solution to the public. Although there is tremendous "duplication" talent's capability within the 2 nuclear design laboratories that develop of capability's capacity appeared to be overlooked. No major laboratory or plant appeared at risk in the final preferred alternative; that is itself is very surprising in light of the stated objective of the study. Both the comprehension's credibility of this report needs to be challenged.

211A

PC_255



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.

11F I reject Complex Transformation because it is
inconsistent with our nations obligations under the
Nuclear Non-Proliferation Treaty. While Complex
Transformation would reduce our nuclear stockpile,
it would, at the same time, seek to "meet our long-term
National Security needs by "modernizing" the complex
and "enhancing our nuclear capabilities." That means, in
short, that Complex Transformation puts us on a nuclear
path for which there is no end in sight. None of the
proposed alternatives are acceptable because each of
them entrenches our intent to maintain weapons in the
long-term, which violates the Non-Proliferation Treaty,
and sets a poor example for other nuclear states. So,
instead, I suggest that NNSA consider the "No Production
Alternative" made by the Oak Ridge Environmental
Peace Alliance. Under the "No Production Alternative",
jobs will be maintained/created, our nuclear stockpile
will be reduced, and no new nuclear weapons will
be created.

21J:1

11F (cont.)

370

Comment forms may be faxed to:
Mr. Theodore W/ka
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 mailed 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.complextransformation.comspeis.com>

Please use other side if more space is needed.

Page 1 of 1

PC_864

Levens, Matthew

From: EEGpower [eegpower@yahoo.com]
Sent: Thursday, April 03, 2008 4:24 PM
To: Complex2030
Subject: Reject lit

116A: Stop Complex Transformation now. We don't need it and we can't afford it. It violates the Nuclear
21F: Nonproliferation Treaty.

Pc_901, Anonymous

Page 1 of 1

PC_901



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

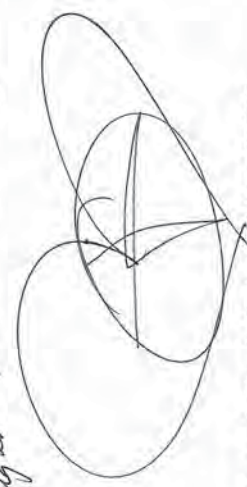


HC 81 Bq
Questz, NH.
87556



Your Additional Comments:

*Redare for Alamos a
Super Fund site NOW!*



Please print your name and address for DOE to respond to your comments

17J

Pc_982, Anonymous

Page 1 of 1

PC_982

April 24, 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

TO WHOM IT MAY CONCERN:

I am writing to protest expanded plutonium pit production at Los Alamos National Laboratory.

116A

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.

21C

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.

38B

Sincerely,

Andrew J. Hecker
2410 NW WILLIAMS LOOP
REDMOND OR 97756

Pc_989, Anonymous

Page 1 of 1



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_989



I am writing to voice my emphatic objection and horror at the proposal for Expanded Plutonium Production at Los Alamos, New Mexico. The citizens do not want this in their backyards. We do not need more weapons. Plutonium is very unstable, we have already had one major fire at Los Alamos spreading toxic smoke over all of Northern New Mexico, we don't want another.

Please stop this Madness!

P.S. Why not promote clean green energy and National energy independence at Los Alamos. We really want a change here.

116A

2140

318B

Please use other side if more space is needed.

Comment forms may be faxed to: Mr. Theodore Wyka (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

Pc_992, Anonymous

Page 1 of 1



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 30, 2008.

PC_992



WE DONT NEED ANY MORE NUCLEAR BOMBBS. IF LAND KEYS MEANS MORE BOMBS THEN HOW CAN THE US GO TO OTHER COUNTRIES TELLING THEM TO STOP PRODUCTION OF WEAPONS OF MASS DESTRICTIONS? THIS IS PURE HYPCRISY. WHAT HAS BECOME OF THE NUCLEAR NON-PROLIFERATION TREATY? THE PROTECT FOR COMPLEX TRANSFORMATION NEEDS TO BE HELD AT LEAST UNTIL THE NUCLEAR FUTURE REVIEW TAKES PLACE IN DECEMBER 2008. THE FOCUS FOR IMMEDIATE SCIENTISTS SHOULD BE ON CONSERVATION OF ENERGY, CLEAN-UP OF WASTE, AND THINGS WHICH ENHANCE THE PRESERVE LIFE OF EARTH, BIODIVERSITY, CLEAN WATER, AIR + EARTH. THERE IS NO PLACE SPACE FOR BOMB PRODUCTION BECAUSE IT IS INHERENTLY UNSAFE TO PRODUCE THEM. THE COST TO THE ENVIRONMENT + TO HUMANITY IS TERRIBLE, AND THE APE ALREADY TOO MANY OF THEM. ABSOLUTELY NOT! NO MORE BOMB PRODUCTION! MAKE A COMPLEX TRANSFORMATION + STOP THIS WASTEFUL SOCIETY IT IS TIME TO TRANSFORM INTO A PEACEFUL SOCIETY AND SET AN EXAMPLE FOR THE WORLD THAT USA IS TRANSFORMING INTO A NON-NUCLEAR LAND CLEAN + SAFE.

11U

21F

31C

49B

5140

616A

Please use other side if more space is needed.

Comment forms may be mailed to: Mr. Theodore Wyka (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

Pearsall, Ed

Page 1 of 1

Levens, Matthew

From: pearsall@charcousa.com
Sent: Monday, April 07, 2008 1:01 PM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

PC_1185

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) I want my tax dollars spent by the DOE on developing alternative energy, not nuclear weapons. We continue to transfer our wealth via oil purchases to countries that are a threat, thereby funding their military.

Upgrading the nuclear weapons complex should be based on direction from the next president, and Congress.

2) The world is unstable enough these days. Nuclear weapons need to be decreased, not increased. I do not want to see the US DOE putting any money towards enhancing nuclear weapons.

Sincerely,
Ed Pearsall
124 E 6th St
Delta, CO 81416

cc:
Senator Wayne Allard
Representative John Salazar
Senator Ken Salazar

Pearson, Martha

Page 1 of 1

Levens, Matthew

From: Martha Pearson [mailto:meripear@yahoo.com]
Sent: Tuesday, March 11, 2008 11:15 AM
To: Complex2030
Subject: Nuclear weapons don't make the world safer

PC_635

Martha Pearson
260 E. Hayes Street
Dixon, CA 95620-3525

March 11, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

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

2) If more and new nuclear weapons are deemed so necessary by our government how can we tell nations like Iran and North Korea that they can't have any at all?

The potential for disaster nuclear weapons allows can never be compensated by any profit the military industrial complex makes from this type of endeavor.

Sincerely,

Martha Pearson

Pearson, Robert

Page 1 of 2

Levens, Matthew

From: Bob and Carol Pearson (pearson@newmexico.com)
Sent: Saturday, April 19, 2008 2:06 PM
To: Complex2030
Subject: Comment on SPEIS

PC_1286

I write with my reactions to the Draft Complex Transformation Supplemental Programmatic Environmental Impact Statement (SPEIS).

116A I am concerned with the goals of the overall program, but especially with the role of the
210B Los Alamos National Laboratory (LANL) in the production of plutonium pits. The complex
Transformation Proposal claims to base its estimated production of pits on a stockpile of
nuclear weapons much lower than the present arsenal, in line with the SORT treaty signed
by Presidents Putin and Bush in 2002. The proposed production of 50-80 pits per year in a
new Chemistry and Metallurgy Research Replacement plant seems to be consistent with the
maintenance of 5000 to 8000 warheads, not even taking into account the longer-term
reliability of existing pits, according to the scientific report of the JASON panel.

31F Expanding pit production violates Article VI of the Non-Proliferation Treaty which obliges
countries to work towards nuclear disarmament. The SPEIS fails to consider an alternative
consistent with the NPT. This undermining of the NPT may lead to a new nuclear arms race
as other countries also seek to modernize their weapons. It may lead also to an end to the
moratorium on nuclear testing.

31F The last Nuclear Posture Review was issued in 2001, and now is out of date. Since then it
has become increasingly apparent that the main threats to our national security are not
nuclear, and many are responses to our nation's policies and actions. With a new
administration due to take office in less than one year, I urge that further action be
postponed until the new administration has had an opportunity to review nuclear policy.
Changes of the magnitude envisioned by the SPEIS, with a total price tag of perhaps \$150
billion, should reflect current thinking, rather than that of a decade ago. I see no need
to rush the process.

31F Connected to increased production of plutonium pits is the effort to obtain funding for
(cont) the Reliable Replacement Warhead, for which Congress wisely denied funding in 2007.
61A Production of the RRW also would violate the NPT and could contribute to a nuclear arms
race.

31F The draft Complex Transformation plan violates our treaty obligations and takes us away
(cont) from the realistic ideal of eliminating nuclear weapons. I ask that the "No Action"
61A alternative be followed until our national policies on nuclear weapons have been
considered by the next administration.

Robert E. Pearson
P. O. Box 655, Rociada, NM 87742
rpearson@newmexico.com

Pearson, Ronald

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PC_2081

Levens, Matthew

From: Pearson, Ronald S [rspears@sandia.gov]
 Sent: Thursday, April 10, 2008 11:11 AM
 To: Complex2030
 Subject: Questions
 Attachments: range closer.doc

Pearson, Ronald

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PC_2081

To: Whom it may concern.

From: Ronald S Pearson

I am a present employee with Sandia National Laboratories at Tonopah Test Range. I have been working here for about seven years, and the last three year. I have been left on the uncertainty of the range closure.

I reside in Tonopah I have lived there for the last eight years. With my wife and three kids, when the range closes the impact on my life will be very great. You see, my youngest son is mentally handy cap, which he does not like change. Trying to sell my house in a housing market that is on the border of collapse will be impossible. I also support the community by Coaching High School Wrestling. And the effect could cost the High School the wrestling program. When I got involved with the High School there was no one that would take this program over, and was looking to close. Other wrestling programs I have ran other wrestling clubs in the town of Tonopah and they have all closed when I quite, so I would be surprised if the High School program continued if I am forced to move.

110E

The issue about the range closer is a sham; it is a feather in some ones cap. It is not truly about or assuring the nuclear readiness. The amount of savings looking at the NNSA overall budget is less 0.1%. But the potential cost could be astronomical. They are taking a decision of the countries nuclear readiness very lightly.

Tonopah Test Range Mission is performing flight test for nuclear gravity bombs support weapon evaluations and reliability assessments. And the NNSA thinks this is all we do, they confirm this by asking White Sands for a cost analyses to do just this no more no less. But the other half is Perform Development and Qualification testing for weapon modifications and new weapons should the need arise, there is no cost analyses for this. In the flight testing community the highest cost is weapons modification or development. With thirty year old unit Rework will need to be done soon, to be brought up to a modern standard, it is only a matter of time. This does not look like a cost for cost, and only the feather. We have given the NNSA a proposal to cut our cost down to 7 million a reduction of 10 million over 5 years. And then NNSA know there cost will increase from 4.5 million with no concern, just the feather. If the town in Nevada closes the job goes away that's OK they can say they have saved 17 million(Less then 0.1% of there budget).

What about data analyses? Tonopah has over 400 tests to compare data to, were there is no data ever collected by White Sands of our unit type. And it will take years just to establish a base line at what cost? You could have a problem and never know it. Just like last year a test that were done at Eglin Air force base at a great cost to the NNSA, and Eglin has been doing test like us of years and is a premier testing facility for the Air Force. And then NNSA received NO USABLE DATA at this time. The cost for this test has stopped the NNSA from doing preliminary testing at White Sands. (So there going to buy a car with out a test drive. Why?) So now were going to go to an Army facility without any preliminary testing, until after the final decision is made. This sound like a decision that is based on cost, since there has not been any user agreement negotiated

Pearson, Ronald

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PC_2081

with White Sands, this creates significant uncertainty in the cost estimate for the future testing at this site.

There has not been any cost estimates for construction of a hard target in the White Sands cost estimate. A feasibility study to recover units has not been done and, at what cost?

The White Sands cost estimate does not consider manning, due to being in a war time situation manning cost is presently pick up by the range. The last time Tonopah Test Range looked at closing they looked in to White Sands Missile Range the cost to test was too high. Why don't we learn from the past, it is only a matter of time before the cost goes back up. Also if there is a problem with the aircraft or weather cancellation the NNSA will pay for a test, and how hard is it going to be to reschedule when they are not allow and hard back up day? Will test have to be put off for years? How can you certify the nuclear weapons to congress if there has not been any test due to scheduling issue? These tests will not have a high priority with White Sands. All Army test will have a higher priority. The location for our test is at another part of the range and mobilization of equipment was not factored in to the cost estimate. Also they did not estimate the cost for Neutron Detectors, this will increase the cost.

Every time we look in to the cost the cost to do a test goes higher and higher. This is why the Independent Business Team recommends that the best option was to High Tech Mobile. It guaranteed the test at the lowest cost give some time to build a customer base for work for others could help pay for the range. And still give the NNSA a greater versatility for future developments in the NNSA. And with upgrade equipment its reliability is greatly improved.

So how important is the nuclear deterrent? Is it important to have a nuclear deterrent in today's society with so many countries on the verge of having nuclear weapons? Is the feather in the cap the most important thing? These are things that need to be considered.

Ronald S Pearson

110E
(cont)

Peet, Creighton

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PC_1315

Levens, Matthew

From: Creighton Peet [tonypeet@hotmail.com]
Sent: Tuesday, April 08, 2008 1:12 PM
To: Complex2030
Subject: Reject "Complex Transformation" plan to build nuclear weapons

Creighton Peet
213 5th Street
Pacific Grove, CA 93950-3619

April 8, 2008

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

Dear Theodore Wyka:

116A The DOE should reject the Complex Transformation proposal to revamp the nuclear weapons arsenal.

We already spend half of our entire national budget on the military and are easily the most violent developed nation on earth.

28A I appeal to your inherently peaceful, loving nature as another human being: enough is enough.

I know you already know that. Please act on your deepest personal dreams for a peaceful world.

Let's take the lead in Peace, not war.

31J By building up its nuclear arsenal right now, the US is essentially telling the world, "Do as I say, not as I do."

Sincerely,

Creighton Peet
831-372-0212

Pelegrino, Joe

Page 1 of 1

Buenafior, Justin

From: joe.pelegrino@comcast.net
Sent: Thursday, March 13, 2008 12:04 AM
To: Complex2030
Subject: please don't do it

PC_546

The current DOE proposal is for "rebuilding the entire nuclear weapons complex with new facilities for maintaining an enduring stockpile of nuclear weapons, and designing, producing, and testing thermonuclear weapons of mass destruction.

The plan to build new nuclear weapons is at once frivolous, profoundly dangerous, illegal, and immoral.

13A It is frivolous because we already 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...

21J It is profoundly dangerous because it increases the likelihood of use of nuclear weapons and provokes a new arms race, with the U.S. threatening First Strike use of nuclear weapons against any country of its choosing.

31F It is illegal because it violates the Nuclear Non-Proliferation Treaty, to which the U.S. is a signatory, making it U.S. law.

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. The expense of continuing to build nuclear weapons robs the human family of sustenance and survival.

Respectfully

J.Pellegrino

Peppin, Stephen

Page 1 of 1

Levens, Matthew

From: Stephen Peppin [speppin@hotmail.com]
Sent: Friday, March 28, 2008 6:48 PM
To: Complex2030
Subject: No more nuclear weapons, Bush

PC_1865

Stephen Peppin
183 Colony Road
New Haven, CT 06511-1680

March 28, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

It is extremely disheartening to learn that the Bush administration is attempting to build plutonium pits for nuclear weapons.

If we are going to survive on our tiny planet, the United States has a responsibility to decrease its nuclear weapons capabilities.

Please do not support the plans of the administration to build such facilities.

Sincerely,

Stephen Peppin
203 432 6616

16A

Peppin, Stephen

Page 1 of 1

Perchetti, Deborah

Page 1 of 1

Levens, Matthew PC_1912

From: Stephen Peppin [s-peppin@hotmail.com]
Sent: Friday, February 01, 2008 6:25 PM
To: Complex2030
Subject: No new nuclear weapons!

Mr. Wyka:
 I am writing about very distressing news that the SPEIS intends to create 120-125 new warheads every year.
 The United States is obligated, along with every other nation in the world, to disable its nuclear weapons.
 Please disengage from this destructive policy and begin reducing the number of US nuclear warheads immediately.

Stephen Peppin
 35 Rogers Rd
 Hamden, CT 06517

Buenaflor, Justin PC_442

From: Deborah [perchetti@frontiernet.net]
Sent: Thursday, March 20, 2008 7:53 PM
To: Complex2030
Subject: Tonopah Test range

Big mistake. Big, to dose down the range...it employs alot of people that have families...I am voicing my opinion on this as I feel it is a very big mistake. People in tonopah and the surrounding areas live here to raise families and it is very safe for children.
 I raised my three daughters here, the youngest will be graduating in May. I have never seen a safer environment yet and I have traveled alot.
 Thank you, Deborah Perchetti

Perea, Alberto

Page 1 of 1

PC_331

03/23/08
226 W. Valentis Rd.
Tulsa, New Mexico
87002

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

Dear Mr. Theodore Wyka,

My comment as a native (3-18-47) New Mexican is a complete VETO to the "New vision" for LANL. "NO" to the plan to build more "new" plutonium pits. The uranium industry has done enough health damage to the people in the Southwest, especially New Mexico since 1942.

I recommend a plan of PERCE for LANL. Use all that brainpower to work on world problems like water and non-nuclear energy projects. Thank you for reading my letter. If you do, my hope is that you decide for "LIFE" not the "pits".

Sincerely

Alberto Samuel Camillo Perea
Alberto Samuel Camillo Perea

116A

2140

116A (cont.)

Perez, Karen

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PC_5

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

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

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

COMMENTS:

Complex 2030 is a step in the wrong direction. We in the United States have a moral and legal obligation to eliminate nuclear weapons. The U.S. government is not meeting its own obligations to pursue nuclear disarmament "in good faith" as the treaty calls for. This is the wrong spending priority; the \$150 billion should not be spent creating the most destructive weapons known to humanity. We need to set an example for moving toward peace. Thank you.

NAME: KAREN A PEREZ

ADDRESS: 3480 W MORGAN RD

Tucson AZ 85745-9109

SIGNATURE: Karen A Perez DATE: 2-29-08

19A

21F

21F (cont.)

316A 41J

Perigon, Marie-Claude

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PC_1452

Levens, Matthew

From: Marie-Claude Perigon [m2perigon@earthlink.net]
Sent: Wednesday, February 20, 2008 6:21 PM
To: Complex2030
Subject: Proposal to build a plant for nuclear weapons

Marie-Claude Perigon
2819 N PARK AVENUE
TUCSON, AZ 85719-2537

February 20, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

To whom it may concern,

116A No to new nuclear weapons or modification of nuclear facilities!
Any decent human being would approve of diplomatic effort and reject wasting more money on failed wars!

21K How lame that the administration would consider such a criminal project at the expense of health and education of its citizen!

39A What about spending money on public transportation, health care and research and education?

Thank you for your consideration of people,

Marie-Claude Perigon
2819 N Park Av.
Tucson,AZ

Sincerely,

Marie-Claude Perigon
520 629-8332

Perkins, Richard

Page 1 of 1

PC_1671

Levens, Matthew

From: RSPerkins@labridge.com
Sent: Saturday, April 05, 2008 12:33 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,

Dear sirs/ms,

While there are many more articulate and lengthy responses on this subject, I still would like to add my observation. The EASY THING IS TO IGNORE THESE LETTERS and push ahead and make more, bigger and exciting weapons.

12C I encourage you to think deeply about your personal responsibility and what you want YOUR legacy to be. You become what you spend your time thinking and working on. Will you be proud looking back on your involvement here and the choices you made?

I know that if you pause to reflect on your choices, you may make beter choices.

Please consider where you want the world to be in one year, five years and fifty years. You, more than many, have a big role to play.

Please make the hard stand for what is right and reduce the weapons programs and stock files.

Sincerely,

Rick Perkins

Sincerely,
richard perkins
1804 palisades drive
pacific palisades,, CA 90272

cc:
Senator Dianne Feinstein
Senator Barbara Boxer
Representative Henry Waxman

Perkins, Vivienne

Page 1 of 1

Perlin, Jonah

Page 1 of 1

Levens, Matthew

From: Vivienne Perkins [vperkins@interfold.com]
Sent: Sunday, April 27, 2008 1:17 AM
To: Complex2030
Subject: Nuclear Weapons Policy

PC_1562

116A Dear Mr. Theodore Wyka:
 Decisions about the transformation of the nuclear weapons complex in the U.S. are premature and should not be made at this time. Specifically, the decision for the U.S. to lead a world-wide effort to seriously reduce or eliminate entirely reliance upon nuclear weapons MUST BE INCLUDED BEFORE any new policies are put in place. It is a curious fact that the present presidential candidates do not even mention the need to revisit the outdated Cold War policies that our nation continues to espouse, what this means is that no national debate (that would be entirely appropriate in a functioning democracy) is taking place on policies that are of the utmost importance to the prospects for human survival on this planet. However, a number of our former Secretaries of State and Defense Secretaries have argued (and continue to argue) that now is the proper time to go in the direction of a nuclear-free world.

Considering that the United States invented nuclear weapons and was primarily instrumental in transferring nuclear technology around the world, it is ironic (to say the least) that we are now intensely worried about the prospects of such weapons falling into the hands of terrorists. By our retention of a huge arsenal on hair-trigger alert, long after the end of the Cold War, we are sending the clear message to other nations that the development of nuclear weaponry is desirable -- if only for the sake of fending off attacks by the United States. Considering our present predicament in the cases of Iran, N. Korea, and Pakistan, not to mention the fact that the prospect of a "mushroom cloud" was proposed by the Bush administration as an important reason for the entirely unnecessary and futile attack on Iraq which is costing us so much blood and treasure, it should be clear that a lot more hard thought needs to take place before we reconfigure a nuclear weapons complex that can really serve no rational purpose.

The problem with maintaining an empire is that we lose our ability to know when it is time to stop. It is far past time to re-examine our entire nuclear weapons policy, which the next president will be, by law, obliged to do. Let us, in the meantime, stop feeding the military-industrial complex--which is what this 'transformation' is really all about--and try to regain some measure of prudence and international respect before we make any more unwise decisions in such an important area. The history of the past 60 years makes it CLEAR that nearly all of the decisions we have made in the area of nuclear policy have been entirely unwise and not at all farsighted. They have always had far more to do with inter-service rivalry over control of weapons budgets and the propping up of the military-industrial complex than with the actual defense of the United States.

As Abraham Lincoln once observed, in a different context, we should tremble to remember that God is just and that we WILL reap the consequences of our actions.

Sincerely,
 V.E. Perkins, Ph.D.

Levens, Matthew

From: Jonah Perlin [jonahperlin@gmail.com]
Sent: Wednesday, April 09, 2008 5:37 PM
To: Complex2030
Subject: End Nuclear Build Up

PC_2017

Jonah Perlin
 10301 Firefly Circle
 Fairfax Station, VA 22039-2504

April 9, 2008
 Theodore Wyka

Dear Mr. Wyka:

116A As an American and a Reform Jew I strongly oppose the Administration's proposal to build a plant to produce plutonium pits for nuclear weapons.

21J The U.S. stands to gain a great deal from a world with fewer nuclear weapons and should therefore be a leader in non-proliferation efforts. As Henry Kissinger and other diplomats explained in a recent Wall Street Journal article, "the vision of a world free of nuclear weapons and practical measures toward achieving that goal would be, and would be perceived as, a bold initiative consistent with America's moral heritage."

116A (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. I understand that the Chemistry and Metallurgy Research Replacement 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. Building this new plant would send a contradictory message to other countries, such as Iran, that may be seeking nuclear weapons. While the U.S. is asking others to forego their nuclear arsenals, we are simultaneously trying to increase our own capability to produce nuclear weapons.

313A The Jewish tradition has long warned of the dangers of militarism and the need to protect innocent lives. We are also commanded to "seek peace and pursue it" (Psalms 34:15) a task which is made significantly more difficult in a world where we continue to pursue new, more deadly nuclear technology.

48A 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 CWR project is another irresponsible new program that should be rejected. For this reason, I urge you in the strongest possible terms to oppose the CWR project and to help make nuclear non-proliferation a priority in the near future.

Sincerely,

Jonah Perlin

Perlin, Jonah

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Religious Action Center of Reform Judaism

PC_944

FAX COVER SHEET

TO: Mr. Theodosios Wylya
Complex Transformation Document Manager
U.S. Department of Energy

FROM: Jonah Perlin
The Religious Action Center of Reform Judaism
(ph) 202.387.2900
(fax) 202.367.9070
jperlin@rac.org

DATE: 4/22/2008

TAX NUMBER: 703.931.9722

TOTAL NO. OF PAGES INCLUDING COVER: 8

Mr. Wylya,

Please find enclosed the Public Comments on Complex Transformation submitted by the Religious Action Center of Reform Judaism.

If you have any other questions or require any other information, please feel free to contact me directly.

Best,

Jonah Perlin
Legislative Assistant, Religious Action Center of Reform Judaism

The Religious Action Center pursues social justice and religious liberty by mobilizing the American Jewish community and working at its highest in the nation's capital.

Arthur David Greenberg Director and CEO
David J. Nisimov Associate Director
Cheryl Spitzer
Commission on Social Action of Reform Judaism
Rabbi David J. Goldstein
Commission on Social Action of Reform Judaism

The Religious Action Center promotes and leads the Commission on Social Action of Reform Judaism at the 2007 International Conference of the General Conference of the Reform Judaism with its affiliate American Conference of Centers

Association of Reform Zionists of America
Central Association of Reform Zionists
Early Childhood Education of Reform Judaism
National Association of Reform Zionists
National Association of Reform Zionists
National Association of Reform Zionists
North American Federation of Temple Institutions
North American Federation of Temple Institutions
Program Director of Reform Judaism
Program Director of Reform Judaism

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E-mail: rac@rac.org
Visit our website at www.rac.org

Perlin, Jonah

Page 2 of 8

Public Comments to the Energy Department on the Supplement to the Stockpile Stewardship and Management Programmatic Environmental Impact Statement
Complex Transformation on Behalf of the Union for Reform Judaism

The prophets of Israel first gave the world the vision of universal peace. Following in this tradition, Jewish organizations across denominations have long supported efforts to halt nuclear proliferation. Jewish groups have declared strong policies against the unnecessary proliferation of nuclear weapons, and have advocated in support of legislation seeking to limit the global presence of nuclear weapons. It is with this history that we speak out against the proposed Complex Transformation, which violates a core principle of Judaism: the pursuit of peace. If the Complex Transformation plan is carried out, and a new pit production facility, commonly referred to as the Consolidated Plutonium Center was built, the United States would have nuclear weapons manufacturing capabilities as advanced as during the cold war. We can not sit idly by while the United States spends billions of dollars, and does immeasurable damage to the environment, so that it may produce thousands of new nuclear weapons.

Jewish text commands us to "seek peace and pursue it" (Psalms 34:15). In the book of Isaiah, the prophet exhorts the people of earth to "beat their swords into plowshares, and their spears into pruninghooks" and declares that one day "nation shall not lift up sword against nation, neither shall they learn war any more." In the Talmud, it is written in Mishnah Sanhedrin 4:5 that "he who takes one life it is as though he has destroyed the

114:
216A

universe and he who saves one life, it is as though he has saved the universe." Complex Transformation is an unnecessary step backwards in the pursuit of peace, and we are determined to fight against it.

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.

We urge our political leaders to follow instead the course outlined by statements 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.

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

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/SJ120036422673480947.html

11J
(cont.);

31F

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:

- 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.

47O

Ultimately, as Jews we believe that rather than developing plans for making new nuclear weapons, the United States government should be working towards a day where nuclear weapons cease to exist. The United States must recognize that violence begets violence; that nuclear proliferation benefits no one; that we can, we will, and we must find other ways to protect ourselves, our nations and our future: for it is not sufficient to have peace in our time, but, instead, we must leave a peaceful world to our children.

11J
(cont.)

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."³ We endorse all of these stated priorities, except for a more "responsive" Complex, which we firmly reject.

5/6

"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."⁴ Or in plain terms, a responsive Complex means having the ability to quickly produce new warheads and warhead components.

6/5.C.1

According to many groups including the Union of Concerned Scientists and others 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.

"The 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

³ U.S. Department of Energy, *Depth Complex Transformation SPEIS - Summary*, December 2007, http://www.fuel.org/pdf/stockpile/SPEIS_Summary.pdf, section 8.1.
⁴ *Ibid.*, section 8.2.1

Clinton administration in 1995-1996 and was codified in Sec. 3141 of the defense authorization bill for fiscal year 2003.

7/9A (cont.)

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

6/5.C.1 (cont.)

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

7/9A (cont.)

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

⁴ U.S. Department of Energy, *Letter to Sen. John Warner*, November 28, 2006, http://www.fuel.org/pdf/warner/JASON_ReportUsing.pdf
⁵ National Nuclear Security Administration, *Responsive Infrastructure*, November 2006, http://www.fuel.org/pdf/stockpile/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.com/pdf/USNW_2005_Drell-Goodby.pdf

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.

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.

4/70
(cont.)

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.

5/66
(cont.)

Continue the nuclear testing moratorium. In the interest of national security and nonproliferation, the Energy Department should continue the nuclear testing moratorium.

4/70
(cont.)

Perner, Mary

Page 1 of 1

Mary Perner
3717 Carrigan Common
Livermore, CA 94550-4856

PC_999

My name is Mary Perner. I am a 20 year resident and homeowner of Livermore. I work as tutor, Co-Director and Interim Executive Director for a Livermore long-established learning center. I am a former Community Organizer for Tri-Valley CAREs and secretary for Tri-Valley CAREs' 2008 Board of Directors.

The "Complex Transformation", if implemented as planned, will result in new nuclear capabilities and facilities. My students and their children will inherit the environmental and fiscal legacy of DOE's and NNSA's misguided effort to "revitalize" and rebuild the nuclear weapons complex.

Livermore Lab Main Site is a superfund clean-up site that is not currently being cleaned up. Toxins are, at this moment, leaching toward the Livermore water supplies. Site 300 east of Livermore is a second Superfund site with substantial clean-up issues. This story persists in DOE facilities throughout the country. We have fouled, and DOE wants to continue fouling, our nests and sickening our people in the name of national defense.

Yet there has been no national debate or Congressional input on future US nuclear policy. There is no consensus that continued nuclear weapons development should be a necessary aspect of national defense. Development of new nuclear weapons like the Reliable Replacement Warhead series being researched at Livermore Lab has not actually been proven necessary at a practical or a policy level, yet we make decisions here (decisions that we and our children will pay for in decades to come) that lock us into future weapons development...a direction, I might note, that violates the spirit as well as the letter of our non-proliferation treaties.

For some years, I have been involved with a local and national movement supporting the efforts of sick nuclear workers made ill on the job in DOE facilities. In this work, I've heard many stories of sloppy practices, human error, or even callous disregard of worker safety at Livermore, Sandia and elsewhere. Tens of thousands have been made ill across the country and DOE/NNSA's preferred option will continue to place workers and communities in harms way.

Surely, in fabulous scientific facilities such as Livermore National Laboratory, we can find the creative genius and moral fiber to navigate away from endless nuclear weapons development, toward "green" alternatives and a curatorship alternative that keeps us safe and in compliance with the Nuclear Non-proliferation Treaty. This country has challenges galore...cancer, global warming, cleanup of the oceans and of our environmental messes. The Cold War is over. Let's address our efforts to where they are needed.

17J

28A

31F

49B;

31F
(cont.)

Livermore, CA

Perreault, Laura

Page 1 of 1

Laura Perreault
28238 E. Kalong Circle
Southfield, MI 48034
March 21, 2008

PC_345

Theodore Wyka
U.S. Department of Energy
1000 Independence Ave.
Washington, D.C. 20585

Dear Mr. Wyka:

I am dismayed, alarmed, and horrified that my country is proposing rebuilding the entire nuclear weapons complex with new facilities for maintaining an enduring stockpile of nuclear weapons and designing, producing, and testing thermonuclear weapons of mass destruction.

Surely, this action would qualify the United States of America as potentially the greatest terrorist threat to all living beings on this planet.

In the name of all God's Creation, STOP!

Instead, create Peace by building a Just World!

May there be an end to this cycle of violence!

116A

23A

Perry-Piper, Rebecca

Page 1 of 4

PC 213 Page 1 of 4
 (Copy retained, none sent out)
 March 12, 2008
 135 Rincon Valverde
 Ponderosa, NM
 87044

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

Dear Mr. Wyka; Document Manager,

I was unable to attend the March 11 2008 sessions at the Albuquerque Convention Center, in Albuquerque, New Mexico, where officials of the Nuclear Security Administration heard public comments on the proposal to make Los Alamos, New Mexico, Los Alamos National Laboratory / Security LLC the nation's permanent plutonium manufacturing center for the entire U.S. nuclear arsenal. This project is not needed. There will be no new threats requiring such security and our current nuclear arsenal will not ever need to be replaced. The painstakingly put-together International Non-Proliferation Treaty needs to be followed, to the strictest degree possible, by the

10A
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Perry-Piper, Rebecca

Page 2 of 4

Page 2 of 4
 (Copy retained, none sent out)
 March 12, 2008

United States,
 I built my home here in New Mexico, with my own hands, three years ago. I intend to watch my grandchildren grow up in this house and so does my ten-year-old daughter. My daughter and I are terribly at issue with how outgoing Senator Domenici and Bill Gates and the General Electric outsourcings in Europe are turning our state into a nuclear waste storage site and a nuclear fuel production site. We believe the nuclear power plants should not be allowed to operate anymore. We believe no more nuclear bombs should be made, nor PITs. We believe that World War II's ending meant that Sandia and Los Alamos weapons laboratories should have been closed. Please do not put anymore taxpayer money into Los Alamos Chemistry and Metallurgy Research Replacement Project, housing structures. Please make Bechtel forgive my spelling but I'm speaking of the private sector corporate partner that is aligned with the University of California) leave Los Alamos, let Los Alamos become the lovely ski resort that it could become. Don't pollute Albuquerque's water system. Don't pave Forest Road 10 and start trucking

316A
 49H
 514E

Perry-Piper, Rebecca

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 Copy retained, none sent out)

March 12, 2008

nuclear waste from the manufacturing of PITs and replacing of warheads down to the New Mexico Spaceport to be Airbussed to Germany or France. Don't pave Forest Road 10 and start trucking nuclear waste from the manufacturing of PITs and replacing of warheads down to TRU plants or LES plants in southeast New Mexico for fuel production. Don't pave Forest Road 10 and start trucking nuclear waste from the manufacturing of PITs and replacing of warheads down to WIPP for storage.

Why Forest Road 10? Well, it turns into New Mexico State Highway 290 in Ponderosa and my daughter and I live about 600 feet off of Highway 290. We don't want this waste by us, or future generations.

I would appreciate your surface-mailing me a confirmation letter as acknowledgment of your receiving my non-technical written public comment on the new vision for LANL. For the record, this letter of mine to you today is being mailed off on March 13 2008 via USPS CMR 7006 2760 0004 2045 1910. This will document that it was

Perry-Piper, Rebecca

Page 4 of 4

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 Copy retained, none sent out)

March 12, 2008

mailed off in time for you to receive it before April 10, 2008.

Please send requested response to:

Rebecca G. Perry-Piper
 135 Rincon Valverde
 Ponderosa, NM
 87044-9500

If you would like to address my daughter in your response, her name is Glenda G. Piper.

If there is a hardcopy surface-mailing list I can be placed on in order to keep me abreast of the outcome of digesting public comment, please place me on this list using the address above.

Respectfully,
 Rebecca G. Perry-Piper
 Rebecca G. Perry-Piper

Pete, Tommy

Page 1 of 1

PC_772

Levens, Matthew

From: tommpete [tommpete@hotmail.com]
Sent: Wednesday, March 12, 2008 3:13 PM
To: Complex2030
Subject: COMPLEX TRANSFORMATION

116A The current DOE proposal for "... rebuilding the entire nuclear weapons complex with new facilities for maintaining an enduring stockpile of nuclear weapons, and designing, producing, and testing thermonuclear weapons of mass destruction" is frivolous, profoundly dangerous, illegal, and immoral.

25C.1 It is frivolous because we already 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..

31J It is profoundly dangerous because it increases the likelihood of use of nuclear weapons and provokes a new arms race, with the U.S. threatening First Strike use of nuclear weapons against any country of its choosing.

41F It is illegal because it violates the Nuclear Non-Proliferation Treaty, to which the U.S. is a signatory, making it U.S. law.

116A It is immoral to contemplate, plan for, or create the means of destruction of all life and (cont) 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.

39H Thanks.

Petersen, Carol

Page 1 of 1

PC_1724

Levens, Matthew

From: CAROLLITTLEDOG@AOL.COM
Sent: Sunday, April 06, 2008 2:31 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,

WE HAVE ENOUGH NUCLEAR WEAPONS TO BLOW UP THE WORLD NOW. WE DON'T NEED ANY MORE. THE DOE SHOULD FOCUS ON MAINTAINING SAFETY AND SECURITY OF OUR EXISTING WEAPONS. PLEASE DO WHAT YOU CAN TO STOP THE DESIGNING AND PRODUCTION OF NEW NUCLEAR WEAPONS. THANK YOU.

Sincerely,
CAROL PETERSEN
8627 SW 17TH AVE
PORTLAND, OR 97219

cc:
Senator Ron Wyden
Senator Gordon Smith
Representative Darlene Hooley

Petersen, Jeff

Page 1 of 2

Levens, Matthew

From: Jeff Petersen [jpetersen@comcast.net]
Sent: Sunday, April 27, 2008 10:32 PM
To: Complex2030
Subject: SPEIS comments
Attachments: To Nuclear Weapons Complex Committee.doc



To Nuclear Weapons Complex ()
Please consider my comments when you make your final decision for the Transformation.
Please see attachment.
Jeff Petersen

PC_1380

Petersen, Jeff

Page 2 of 2

PC_1380

To Nuclear Weapons Complex Committee

I am an employee of Lawrence Livermore National Lab (LLNL) and have been for 28 plus years. As a US citizen and taxpayer, I am glad to see my government trying to reduce overhead and costs. The way it is being handled does leave me confused.

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2110C

NNSA is reducing cost by closing building and consolidating operations. This is a good idea in theory. What I don't understand is consolidating operations to a location where the capabilities do not already exist. Case in point is closing of LLNL's plutonium facility. By moving the facility to Los Alamos National Lab (LANL), a location that does not presently have the capabilities to do the job, this to me is not cost effective.

Last month I attended one of the public meetings located in Tracy Ca. The information that NNSA provided showed that LANL does not presently have the capability to produce the required plutonium parts. As a result we must pay to have their facility upgraded or even a new one built. How much will this cost. On the other hand, Livermore does have a facility that is up and running. What is their capability right now to meet the present needs? My understanding is that LANL cannot machine any plutonium or uranium parts, while LLNL is able to produce the needed high quality parts.

It just seems to me that I would be more cost effective to keep the pit production at Livermore. Upgrading their facility would be cheaper than putting the job at a location that cannot presently manufacture the needed parts.

The points I bring out also apply to other areas of the Complex Transformation process. Reducing the number of locations that research or handle specific jobs, such as High Explosives, Tritium, Hydrodynamic Testing and others, is great. But move the research to locations that have complete research facility on site so as not to have to build all new facilities. The cost of construction negates the cost savings benefits that may be enjoyed by the taxpayers.

3115A

Sincerely
Jeff Petersen

Peterson, Marshall

Page 1 of 1

Petrie, Rosemary

Page 1 of 1

Levens, Matthew

From: Marshall Peterson [whywhywhynot@hotmail.com]
Sent: Thursday, January 17, 2008 8:06 PM
To: Complex2030
Subject: Citizen Comment regarding SPEIS, Complex Transformation

Mr. Wyka:
Americans overwhelming do NOT want more nuclear weapons.

The idea that SPEIS still wants to create new warheads each year is disturbing.

117J: Beyond the fact that these bombs make the world more dangerous, they also make US soil
213A: more dangerous, as we've still not resolved the issues around safe storage.

316A: Please, we need no more nuclear weapons. Do not support their building.

Marshall Peterson
16616 East 44th
Greenacres, WA 99016

PC_634

PC_266

Theodore Wyka
Complex Transformation SPEIS Document Mgr.
U.S. Department of Energy
1000 Independence Ave. S.W.
Washington, DC 20585

Dear Mr. Wyka,

I am a sister of Mary and was terribly concerned 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, I understand, will be \$150 billion. 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. I am praying that such a plan will be dissolved.

Sincerely,
Sister Rosemary Petrie

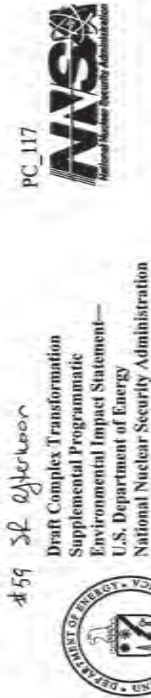
116A

29A

314C

Phelps, Kristen

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PC_117

#59 SF Johnson
 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.

Hello, My name is Kristen Phelps and I am a 19 year old first year student at Johns Scott College studying international relations. I am part of a generation well represented here today in the middle of a school day because I am part of a generation that will be affected by nuclear weapons should there be a new nuclear incident long after those who have profited from Complex Transformation have died. Now I am not an expert in economics but what could I cost less than stopping production? Some "stream lining" of our nuclear complex might cost less than we are spending now but wouldn't it ultimately cost less not to make any new nuclear weapons at all? This plan claims that the SRS has enough water, "adequate to support all facilities." Well as a life resident of Georgia I have never known there to be enough water for anything, not enough to water plants, not enough to wash cars, not enough to swim in pools, sometimes the threat of not enough to drink. Apparently there is enough water for weapons, enough water to kill other people with. When I graduate and start a career in international relations, I would like to see an international system for my generation ruled by just strict basic human rights, not nuclear weapons.

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.doc.gov

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

17M;
29A; 31
14E.2

Philip, Sarah

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Page 1 of 1

PC_729

Levens, Matthew

From: Sarah Philip [sarah.e.philipp@gmail.com]
 Sent: Tuesday, March 25, 2008 9:25 AM
 To: Complex2030
 Subject: Oak Ridge public forum comments
 Attachments: Final Nuclear Response.doc

Attached is a letter I have written in response to my experience at the community meeting in Oak Ridge. Please take the time to review it. I have been asked by the Tusculum College newspaper staff permission to put this in the next edition of our school newspaper.

Thank you,

Sarah Philipp

5/14/2008

Philip, Sarah

Page 2 of 5

PC_729

My friend Albert is allergic to peanuts. If ingested, he would go into anaphylactic shock which is a life-threatening condition. I would be wrong to offer him "options" about a peanut butter sandwich regardless if it were on white or wheat bread or if it had strawberry or grape jelly. The end result may be fatal. Why risk taking that chance when it could be completely avoided?

On February 26, 2008 the Bomber Leaders' of Tusculum college as well as some additional students joined students from Caron Newman College and Maryville College to attend the public hearing on the proposed nuclear weapons program plans for the Y-12 Plant in Oak Ridge, TN. The public hearing attempted to discuss possible options regarding how to optimize and secure nuclear weapons production. I was initially alarmed there was no option that didn't include rebuilding nuclear weapons components. I was born in 1986, long after the bomb at Hiroshima was dropped. This plant is in my geographical back yard, yet I didn't even know about it. My concern is the Complex Transformation is a "too little too late" solution, based partially on the federal government's confusing presentation during the public hearing.

Before the floor opened for the community forum, the moderator, Mr. Lawson, enforced the fire code of the building. There were more people than seats and he requested those sitting in the aisles to move to the back of the building where they could stand for the safety of everyone. He said, "Laws are laws." What a profound statement! In 1970, the United States signed the *Nonproliferation Treaty*. This treaty was designed to require disarmament. Why then, over thirty years later, is the idea of stockpiling nuclear weapons still up for discussion? Where is the plan for reducing the arsenal to zero? These are questions I asked myself before the forum began. I was prepared for a discussion over the morality of nuclear weapons and found myself extremely distraught with what appeared to be an audience with abounding appetite for nuclear war and the occasional peace activist. I wish the public hearing had been as clear as the fire code was.

One of the main points of the National Nuclear Security Administration's Complex Transformation plan was that the *Distributed Centers of Excellence* proposal would be the best choice out of the four alternatives to ensure and promote national security in the United States. I'm unsure if I agree it's the best just as I was unsure what the sticker meant that a gentleman diligently tried to stick on me as soon as I walked

411F

Philip, Sarah

Page 3 of 5

PC_729

through the entrance of the New Hope Center. He did not care to explain what the sticker meant and seemed offended when I asked him what the sticker supported. Is it possible he didn't understand either?

The *Distributed Centers of Excellence* option is certainly more of a secure proposal compared to the *No Action Alternative* but that's about the extent of what I comprehend. It would have been extremely helpful if the representative from the NNSA would have explained in lay terms the differences between each of the other alternatives. I understand that the status quo of the facilities presents America with several potential environmental catastrophes' and the goal of the NNSA is to eliminate the chance of something going wrong, maintain minimal national security standards, and save money that is currently being wasted with the existing programs. However, the *Consolidated Centers of Excellence* and the *Capability Based Alternative* proposals were not discussed or considered during the open forum. What if these offer greater safety to citizens and the environment yet they were overlooked simply because of the complexity of the language? On paper it is difficult for me to discriminate between the other three alternatives and this is where I find it especially helpful to have an expert explain to me the differences and allow me to make my own decision. The peace activists were fighting a losing battle. The forum was not over the virtue stockpiling nuclear weapons it was over how to maximize the safety of what is now in existence. The compromise is in selecting the program with the highest standards and I feel this was completely missed due to the emotional environment of the public hearing.

The introduction of nuclear weapons to war fighting has essentially rendered conventional warfare obsolete. According to national security expert, Thomas P.M. Barnett, "Global wars is not in the offing, primarily because our huge nuclear stockpile renders such war unthinkable- for anyone." The U.S. has been very clear expressing its resistance towards other countries such as North Korea and Iran attaining or building nuclear weapons in an effort to prevent "terrorism". However it is interesting to note that when America delves into nuclear research it is called "national security". I appreciate the importance of national security. I waited for what felt like an eternity to find out if my brother was still alive and safe after the 9/11 attacks. He was scheduled to be in a meeting in the section of the Pentagon that the airplane crashed into. What if it had been a nuclear

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Philip, Sarah

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PC_729

weapon instead of an airplane? Although my heart still wonders where the logic in nuclear capability ensuring national security is, I'm mature enough to understand we don't live in a perfect world. The debate over nuclear capability is old. Albert Einstein, who helped invent the first atomic bomb said, "It has become appallingly obvious that our technology has exceeded our humanity." Excluding the *No Action Alternative*, the alternatives the NNSA offers do present a much safer future. If the programs are defeated then we are left with circumstances that have a much higher risk than if change occurs. The NNSA's proposal can be seen as an essential stepping stone to a peaceful future yet due to the extreme opinions at the forum this was overlooked entirely.

Another claim in support of the program is providing more jobs and economic stimulation for the Oak Ridge community. The NNSA clearly states that overall this plan is one of consolidation. If approved, there will be a reduction from the current eight facilities down to five facilities and the parameters of those facilities will be dramatically reduced. I fear the Oak Ridge community may be locking in on false hopes. Because of the consolidation, it appears true that the Y-12 facility will complete more tasks suggesting an increase in job availability. Again, the delivery was ambiguous to me. Who will more jobs be available to? We're not talking about opening a restaurant or a department store here but manipulation of extremely hazardous materials. Looking out at the audience I saw numerous blue-collars concerned about job security and eager to support the NNSA's proposal. I can see where the community's economy would be stimulated because the consolidation will require a more unique employee who will most likely receive a comfortable salary relative to Tennessee averages. As for the current workers I am hesitant about their enthusiasm for the approval of the transformation. It may not result in an employment change for those without unique skill sets required to work with nuclear weapon stockpiles.

I could not help but notice that at the hearing before the community forum the moderator explained that each individual should try to keep his or her comments to less than two minutes. A thirty second warning would be given to the speaker. The moderator assured the audience that this would be a fair opportunity for everyone to express his/her personal views and that all opinions and options would be considered. After the first few speeches a fellow student timed each speaker. We noticed that every speaker in support

Philip, Sarah

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PC_729

of the NNSA's transformation did not receive a time warning and several went over his/her allotted two minutes. However, even protestor against the program was mildly interrupted at his/her thirty second warning. Aside the fact according to the Federal Register that each speaker should have actually been allotted 3-5 minutes, the saying "Actions speak louder than words," comes to mind. It did not look good for someone to promise an audience such as this that there will be no negative consequences of a nuclear transformation program and then immediately go against its promises of a fair discussion. It left a bad taste in my mouth, and it makes me wonder about the actual safety of the proposed transformation.

416A

I truly appreciate the fact that this process attempted to harness one of America's greatest qualities by receiving every citizen's comments on this matter. I beg you to consider all feedback with your hearts and with your consciences and do what's right for all life. *Albert does everything he knows possible to avoid peanut butter because it is simply a reality he has to deal with.*

"No problem can be solved from the same level of consciousness that created it."

--Albert Einstein

Philothea, M
Page 1 of 1

Pinela, Tia
Page 1 of 1

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

PC_1043

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.

Thank you for listening to my opinion which is based on my firm belief that our nation's store of nuclear weapons is a danger to all of the world, not just to ourselves.

Signed: *Philothea M Philothea*
1 Maria Hall Drive
Danville PA 17821

116A

25G

Levens, Matthew

PC_765

From: tiasmall@aninmail.net
Sent: Wednesday, March 19, 2008 5:41 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,

If the last 50 years have taught us anything, it is that having more nuclear weapons in the world just makes the world LESS safe.

I am relieved the Department of Energy is finally making plans to consolidate and reduce the nation's nuclear weapons complex.

However, too much emphasis is currently placed on unnecessary research, development, and manufacture of new types of nuclear weapons. The United States has thousands of viable nuclear weapons already. We do not need to make more or newer nuclear weapons.

In addition, Complex Transformation sends the wrong message to the world by instilling a false sense of confidence in the ability of these weapons to increase security. This undermines U.S. efforts to stop the spread of nuclear weapons around the world.

Instead of recreating the capacity to produce new, unnecessary nuclear weapons, the DOE should focus on shrinking the still-over-sized 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,
Tia Pinela
3565 Seafarer
Oceanside, CA 92054

119A

25D

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41J

516A

Pinkham, Shanoa

Page 1 of 2

Pinkham, Shanoa

Page 2 of 2

PC_ 1229

Levens, Matthew

From: sspinkham@yahoo.com
Sent: Friday, April 11, 2008 8:11 PM
To: Complex2008
Subject: Complex Transformation SPEISComments

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

Dear Mr. Wyka,

You're going to put Nuclear Weapons on Shoshone Land and that's not ethical. The United States has had a bad history with Indigenous People of this country, and 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). In its decision, made public March 10, 2006, and confirmed again last month, the CERD Committee urged the United States to freeze, resist, and stop actions being taken, or threatened to be taken, against the Western Shoshone Peoples of the Western Shoshone Nation. 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. The CERD decision explicitly cited ongoing weapons testing at the Nevada Test Site.

I need you to reconsider this decision and to stop breaking the Treaties that state the sovereignty of the Shoshone Nation. Lies and backstabs with policies such as this only appeal the children of today and cause bitter resentment for Native People toward the United States and generates more ignorant citizens that have no knowledge of treacherous deeds such as this. I am a teenager in high school and I believe that in order to properly say that the United is the strongest nation in the world, we need to be strong with each other. That means upholding Treaty Rights with the Nations of this Continent. Violating Treaty Law with Indian Nations is the same as breaking a Constitutional Act. Cowardice policies like these are the reason why people in foreign lands despise the United States.

Before you can change another country, trying fixing it here. If you really want to make better energy, great. Just don't do it illegally and unethically. Since Indigenous Nations in the United States have been wronged on both accounts since 1492 with annihilation, Institutionalized Boarding Schools, and the continuing unreasonable amount of ignorance about Native People taught to five year olds through the propaganda of Thanksgiving coloring books, and Disney Pocahontas's, it is obvious that the United States needs to start owning up to the damage and suffering it has caused to the "Indian" (we're not from India now are we?

Another highly broadcast misconception!) Nations across Native America. I'd appreciate, and I know "Indians," Native Americans, the future generation, which includes ALL children of all races that will have to clean up the mess of Nuclear Waste, will appreciate it if you'd cease with the "let's put all the crap on the nearest Indian Reservation, that'll get it out of the way!" attitude, and back off. It'd pay to get an example of respect that the rest of the country seems to be lacking for the remains of the once populous Indigenous Nations that still live in the United States today.

It would start a new beginning for people in this country if they learned the history of Native People and it'd make the DOE look pretty good to say that they are not one of the other federal programs that still mistreat and discriminate against Indigenous/Native American/Indian People.

Sincerely,

Shanoa Pinkham 5024 40th Ave. NE Seattle, WA 98105

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

PC_ 1229

Sincerely,
Shanoa Pinkham
5024 40th Ave. NE
Seattle, WA 98105

Piranian, Margaret

Page 1 of 1

Levens, Matthew

PC_1642

From: margaretpiranian@yahoo.com
To: Saturday, April 05, 2008 12:36 PM
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,

I ask that all nuclear weapons development cease. It is hypocritical that we don't want some countries to have even nuclear power while we develop nuclear weapons. IS THAT FAIR? DOES THAT PROHIBIT WORLD TRADE?

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,
Margaret Piranian
300 Beau Drive #6
Des Plaines, IL 60016

cc:
Senator Dick Durbin
Representative Peter Roskam
Senator Barack Obama

Pisan, Stephen

Page 1 of 1

Levens, Matthew

PC_1232

From: Stephen Pisan [spisan@unbox.com]
To: Thursday, March 27, 2008 3:01 PM
Subject: Reject 'Complex Transformation' plan to build nuclear weapons

Stephen Pisan
4704 Surrey Lane
Richmond, CA 94803-3827
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:

116A The DOE should reject the Complex Transformation proposal to revamp the nuclear weapons arsenal.

215A I disagree with the concept of unilateral disarmament.

320 However, I support only the minimum number of nuclear weapons, launchers, and throw weight in the US arsenal necessary to deter conventional conflicts with major powers. China may never plan to invade Taiwan without fear of nuclear attack. Russia may never threaten the use of nuclear weapons without the certainty of massive retaliation. No more than 300 nuclear weapons in US arsenals would offer that level of protection.

320 (Cont.) This would eliminate the possibility of our ending human civilization, while still reducing the probability of conventional wars that have killed hundreds of millions, over the course of recorded history.

41J By building up its nuclear arsenal right now, the US is essentially telling the world, "Do as I say, not as I do."

Sincerely,

Stephen Pisan
(510)262-0370

Pitre, Helen

Page 1 of 1

Levens, Matthew

From: helenpitre@hotmail.com
Sent: Saturday, April 05, 2008 12:14 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 strongly urge that we work to increase the security of the thousands of existing nuclear weapons in the US arsenal, And NOT embark on a program to increase our arsenal Complex Transformation, as I understand it, would send the wrong message and accomplish a useless and dangerous goal.

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 Pitre
PO Box 919
Trinidad,, CA 95570

CC:
Senator Dianne Feinstein
Senator Barbara Boxer
Representative Mike Thompson

PC_1614

Pittman, Julianne

Page 1 of 1

Levens, Matthew

From: Julianne Pittman [aekai55@hotmail.com]
Sent: Saturday, March 29, 2008 4:41 PM
To: Complex2030
Subject: Nuclear weapons

Julianne Pittman
10911 Grant Rd.
Fairhope, AL 36532-4555

March 29, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy,

Under no circumstances should we start making nuclear weapons, parts for such weapons or even plans for nuclear weapons. There is no imaginable scenario in which the peace and stability of the world would be improved by the use of nuclear weapons. I am totally opposed.

Every trip I make between Fairhope, Alabama and New Orleans, Louisiana is a reminder of the human cost of devastation, whether natural or inflicted by a government. Our resourcee should be used more wisely.

Sincerely,

Julianne Pittman, a voter
251-423-5510

PC_1117

Platte, Ardeth

Page 1 of 1

Plisuk, Marc

Page 1 of 1

Buenafior, Justin

From: Jonah House [jhsammow@verizon.net]
Sent: Wednesday, February 27, 2008 4:38 PM
To: Complex2030
Subject: From Ardeth Platte

PC_558

To the Department of Energy,

I have been studying the new plan being submitted by the Bush Administration for the construction of the Chemistry and Metallurgy Research Replacement plant and the projected building of 80 plutonium pits, triggers, for new nuclear warheads. This is the totally wrong direction as it rejects the treaty signed by the government, the Non Proliferation Treaty. It is the wrong direction because it makes the world more dangerous as the plan called Complex Transformation is a program of a new generation of nuclear weapons. How can the nations of the world look at the U.S. with any kind of credibility when it states that other nations can not have nuclear weapons because of the same treaty that the U.S. does not uphold.

Nuclear weapons have always made the world more dangerous and now that 35 other nations have the capacity to build them, both large and small, what is there to contain them, other than total disarmament and leadership that conducts that reality with the other 8 nuclear weapon nations and puts in place the United Nations as a body for verifiability.

All of the plans will continue also to poison earth, use unnecessary fuel consumption, etc. I pray that this program will never come to exist.

Sincerely, Ardeth Platte of Baltimore, MD

Levens, Matthew

From: Marc Plisuk [mplisuk@sasbrook.edu]
Sent: Tuesday, February 19, 2008 8:00 PM
To: Complex2030
Subject: oppose development of nuclear weapons

PC_1445

Marc Plisuk
494 Cragmont Ave
Berkeley, CA 94708-1206

February 19, 2008
Complex Transformation Department of Energy

Complex Transformation Department of Energy:

Upgrading of nuclear weapons at this time is a sure way to provoke further development of nuclear weapons in other countries. Proliferation is occurring and with it an increase in the likelihood of the disastrous use of nuclear weapons. New warheads deter nothing but do jeopardize all of our safety. As a long time student of national security and the author of a new book, *Who Benefits from Global Violence and War*, I believe that nuclear weapons development now leads us to consequences more dangerous than we would wish to consider.

Sincerely,

Marc Plisuk

Poinsette, Noella

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PC_1174

Levens, Matthew

From: Noella Poinsette [npoinsette@yahoo.com]
Sent: Thursday, March 27, 2008 11:35 PM
To: Complex2030
Subject: nuclear weapons

Noella Poinsette
165 Anderson Ferry Rd., # 74
Cincinnati, OH 45238-5916

March 27, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

116A I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons.

21U 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.

21U 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.

38A 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.

48B Besides all of the above, peace and stability will be better served by changing the focus of government spending from weapons to green technology and the economy in relation to peace jobs - not further militarization.

Sincerely,

Noella Poinsette

Politzer, Andrew

Page 1 of 1

PC_805

Levens, Matthew

From: Andrew Politzer [aristione@comcast.net]
Sent: Thursday, April 03, 2008 8:46 PM
To: Complex2030
Subject: Peace not terror

Andrew Politzer
13 Drummers LA
Bethel, CT 06801-2036

April 3, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

110 The U.S. must stop its diplomacy through terror tactics. America has a worldwide reputation of not wanting to spread democracy but state sponsored terrorism. Our nuclear arsenal is large enough building more advanced ones is not going to build a lasting peace in the Middle east. I would like to have my son grow up in a world that does not encourage terrorizing the people of smaller nations. Right now he is only five so we have more than enough time to construct a world where all religions respect each other. Sincerely,

Andrew Politzer
203-798-1670

Pollack, Laurie

Page 1 of 1

Levens, Matthew

PC_1693

From: webpoet1@aol.com
Sent: Saturday, April 05, 2008 9:23 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,

116A I applaud the Department of Energy for moving forward with plans to consolidate and reduce the capabilities of our nuclear weapons complex.

210A However, Complex Transformation does not go far enough.

I have a friend who was born in Hiroshima. Other members of her family experienced the horrors of nuclear weapons first hand.

314K It also have friends who are "downwinders": living in areas of the country subject to fallout from our nuclear tests aboveground which ended in the early 1960's: these families have high rates of cancer.

411J If we want to stop nuclear proliferation to terrorists, we must set a good example by 510 renouncing the use of these terrible weapons, which we do not need.

613A1 They will not make us safe.

720 It is because of this that every year, I walk part of the way with the walkers of the Nevada Desert Experience (www.nevadadesertexperience.org)'s interfaith peace walk in Nevada: the walk is from Las Vegas to the Nevada Test Site, a distance of 65 miles. Each year I walk the distance I am able to do but I try to do at least some of the walk.

411J (cont) Every journey begins with a single step. Can the DOE, Congress and Defense Department, together with the next President, take the first steps on a journey to build peace by getting rid of OUR weapons of mass destruction altogether?

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,
Laurie Pollack
205 E. Greenwood Avenue
Lansdowne, PA 19030

CC:
Senator Arlen Specter
Senator Rob Casey
Representative Joe Sestak

Pomata, Nicholas

Page 1 of 1

Levens, Matthew

PC_676

From: Nicholas Pomata [concerned.citizen09@gmail.com]
Sent: Saturday, February 16, 2008 11:02 AM
To: Complex2030
Subject: Vote Against New Nuclear Warheads

Nicholas Pomata
6549 Foxfire Rd.
Charleston, SC 29487-6933

February 16, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

The United States ought to--and indeed does--serve as an example to other countries. If we don't want North Korea and Iran to make nuclear stockpiles, we cannot--absolutely cannot--build up our own stockpiles, as the proposed warhead plant would.

Sincerely,

Nicholas Pomata
555-555-5555

Pomerantz, Joel

Page 1 of 1

PC_53

Joel Pomerantz
PO Box 170191
San Francisco, CA 94117-0191
February 7, 2008

Theodore A. Wyka
Complex 2030 SPEIS Document Manager
Office of Transformation, U.S. Department of Energy, N4M10.1
1089 Independence Avenue, SW
Washington, DC 20545

Re: Reject the proposed Complex Transformation, the plan to build new nuclear weapons

Dear Theodore Wyka:

The Department of Energy should reject the proposed Complex 2030 project.


Under the proposal, the DOE proposes a Consolidated Plutonium Center which would be capable of producing up to 125 plutonium pits (bomb cores) per year.

It was born near the DOE's plutonium trigger plant at Rocky Flats, Colorado. For decades we struggled with the health and moral issues of that place. It was such a relief when it closed, a relief for the world, that is.

Please consider shutting the cynicism that allows this sort of financially-motivated plan to pass as a political solution. Instead of creating more radioactive contamination, and playing into the worst of American posturing, DOE should cleanup its mess from past production of nuclear weapons, and make good on the desires of our citizens to be a peaceful, cooperative nation.

The new arsenal would be bad foreign policy, bad for the environment and bad for the futures of our children.

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

Sincerely,

Joel Pomerantz

PC_194

To the Department of Energy

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.

I am opposed to spending even a single penny of tax money on the production of more nuclear weapons.


Paula Porterfield

4428 Bowie
P. O. Box 20323
Amarillo, Tx 79114

116A:
213A.1:
31J

116A
(cont.):
49H

Posson, Kristin

Page 1 of 1

Potter, Charles

Page 1 of 1

Levens, Matthew

PC_588

From: Kristin Posson [kposson@bellsouth.net]
Sent: Tuesday, January 29, 2008 2:58 PM
To: Complex2030
Subject: Citizen Comment regarding SPEIS, Complex Transformation

Mr. Wyka:
Transforming the U.S. nuclear complex needs to reflect the will of taxpaying American people, those whose money funds the workings of government.

Please make clear, 70% believe the U.S. must do more to eliminate nuclear weapons. Today, the Department of Energy can begin allocating their monetary resources into nuclear cleanup and "green" energy research. Expanding their weapons program is false security.

It is particularly important to recognize Congress' recent rejection of the Reliable Replacement Warhead program.

Last year, the Jason's reported that the current U.S. nuclear stockpile will remain reliable for at least another 70 years.

Private companies who profit from weapons manufacturing must be behind the insanity to rush into a costly new program to build unnecessary and unwanted nuclear weapons.

Be reminded, there remain many unresolved negative consequences around nuclear waste, storage, & employee safety.

More than a strong majority of U.S. taxpayers do not want further investment in nuclear weapons facilities. Such destructive use of resources must stop now, today. I implore the DOE to use available resources for working towards true security and peace = nonviolent means.

Kristin Posson
1148 Twyla Road
Cary, NC 27519-9765

Levens, Matthew

PC_1314

From: CPJRO0@aol.com
Sent: Tuesday, April 08, 2008 8:32 PM
To: Complex2030
Subject: (no subject)

116A I say no to anymore nuclear weapons. Charles Potter,Jr

Planning
your summer road trip? Check out AOL Travel Guides.
(http://travel.aol.com/travel-guide/united-states?ncid=aoltrv00030000000016)

Poulson, Marvin

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Powell, Thomas

Page 1 of 2

PC_226

Marvin Poulson
3631 Carolyn Street
Salt Lake City, Utah 84106

March 4, 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:


I become aware of DOE's Complex Transformation Program yesterday by word of mouth and after personal investigation into the Program today, it is clear that the size and scope of The Program demands extensive and thorough investigation on my part.

I find that you began a period of public comment on the Draft Complex Transformation Supplemental Programmatic Environmental Impact Statement on January 11, 2008 for only 90 days. The announced comment period my meet legal requirements, but realistically fails to afford adequate time for the public to become aware, investigate, read, study, evaluate and formulate informed comment on such a vast and complex program.

For myself and know doubt thousands of other citizens with and interest in and concerns regarding The Program, I request a 60 day extension to the comment period beyond the proposed April 10, 2008 deadline to June 10, 2008. Such an extension is common to accommodate thorough public comment and assure openness in the process for the greatest number of interested citizens.

Considering the storied history of nuclear weapons development and testing and the extreme impact on millions of Americans, I trust that you will immediately announce a 60 day extension to the comment period for the Draft Complex Transformation Supplemental Programmatic Environmental Impact Statement.

Kindly advise me of your determination on this matter at the earliest possible time. In the meantime, I will continue my study of the available documents and the EIS to formulate an informed comment.

Regards,

Marvin Poulson

12E

PC_917

Thomas Powell
Secretary, Don Gabrino Andrade Community Acequia Association
5730 Nicodemus Ln. SW
Albuquerque, NM 87105

April 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:

I am writing to you in regards to the recent Department of Energy public hearing of Thursday, March 27 in Española, New Mexico to comment on the proposed expanded operation at Los Alamos National Laboratory to produce plutonium pits for advanced nuclear weapons development. The Don Gabrino Andrade Community Acequia Association would like our concerns to be heard in this matter, and we would like you to inform those in policy making of our position.

Our Association is a constitutionally chartered political subdivision of the State of New Mexico. It is comprised of several families in the South Valley of Bernalillo County down stream from Los Alamos who share irrigation water from a community acequia. We water our vegetables and our fruit trees directly from surface waters of the Rio Grande River. Our families eat this produce and sell the surplus at the local growers' market. We also obtain our drinking water from private wells fed directly from the river.

Recently, the President of our Association, Mr. James Maestus, attended a hearing in Los Alamos regarding the Los Alamos National Laboratory NPDES Permit No. NM0030759 surface water discharge permit. At this hearing, the Environmental Protection Agency environmental engineer, Mr. Isaac Chen, presented the current findings of toxic materials discharge into the Rio Grande surface flow from Los Alamos National Laboratory.

We are very alarmed for our health, and especially for the health of our children by the extremely high levels of toxic and radioactive contaminants listed in Mr. Chen's

1140:
214E

Powell, Thomas

Page 2 of 2

Powelson, Dave

Page 1 of 1

report which run off as storm discharge from the arroyos of Los Alamos and Pajarito Mesa into the Rio Grande and flow downstream into our gardens and wells. These contaminants include radioactive particles, heavy metals, cyanide, dioxin, pesticides, PCBs, and high explosive residues. All of these are dangerous known carcinogens.

We believe that the EPA has an obligation to protect the quality of our drinking and irrigation water from such high levels of contamination. As we are very concerned for the health of our families and our neighbors both in the short term and the long term, we formally requested in writing to the regional EPA director in Dallas, TX, Diane Smith, that our well water and our irrigation water be tested by the EPA to determine the migration of the toxic plume from Los Alamos National Laboratories down stream into our community.

We also expressed concerns to Ms. Smith about the temporary check dams being contemplated as the quick fix to ameliorate site run off. Given the uncertainty of climate change and the unusually large snow pack in the Jemez, San Juan, and Sangre de Cristo Mountains this year, spring run off is very high and check dams provide no long term solution. Site clean-up, neutralization, or proper sequestration of the toxins is the solution.

New Mexico State Law contains a provision titled The Ultrahazardous Activities Doctrine (see Saiz v. Belen School District, 113 N.M. 387) under which Los Alamos National Laboratory should be compelled to clean up its toxic waste dumps. It is morally reprehensible that LANL propose to generate an enormous new source of radioactive contamination with plutonium pit production. The Pajarito Mesa watershed must be cleaned up of its existing toxic waste. We are all aware of the horrific radioactive contamination of Rocky Flats, CO and Hanford, WA and we do not want similar site in New Mexico. LANL must become a good neighbor as a condition of new contract awards from the Department of Energy.

We respectfully request the 90 day extension for public comment on the proposed plutonium pit production facility. We further request that such public comment be scheduled in cities and communities down-wind and down stream from LANL with more advertisement and more advance public notification so that we may participate in person.

Yours Cordially,

Thomas S. Powell

Thomas Powell

cc Matt Bishop, Western Law Office, James Maestas, DGACAA, Pat McCraw, South Valley Ink, Sherri Kotowski, EYEMG, Diane Smith, E.P.A., Jeff Bingham, U.S Senate, Tom Udall, U.S. House of Representatives

1140 (cont.)

214E (cont.)

3/7J

4/2E

Levens, Matthew

From: Dave Powelson [dcpowelson@yahoo.com]
Sent: Tuesday, February 19, 2008 5:19 PM
To: Complex2030
Subject: new nuclear triggers

Dave Powelson
1067 N 1730 East
Logan, UT 84341-3080

February 19, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

116A DOE: You can vaporize any country you want. Isn't that enough?
Sincerely,

Dave Powelson

PC_434

Powers, Darryl

Page 1 of 1

Levens, Matthew

From: Darryl Ann Powers [dannpowers@bellsouth.net]
Sent: Friday, March 28, 2008 9:35 PM
To: Complex2030
Subject: No Money for Nuclear Weapons

Darryl Ann Powers
250 South Estes Drive, #100
Chapel Hill, NC 27514-7006

March 28, 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. We, the American people, are no longer willing to go along with the decisions of an administration which has continued to undermine the real interests of our country and those of the world. NO to new nuclear facility modifications. NO to more warhead production. YES to same negotiations toward a nuclear weapons free world.

Sincerely,
Darryl Ann Powers

919-942-2919

PC_1734

Powers, Michael

Page 1 of 1

Levens, Matthew

From: mppowers@bledsoe.net
Sent: Saturday, April 05, 2008 11:17 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've decided to write something of my own in this spot! I hope you don't mind.. As far as I'm concerned we have to maintain a weapons arsenal and add to it as long as all them asses in the middle east are trying to buy, or manufacture nuclear weapons of their own.. I couldnt imagine osama with a nuclear weapon, could you? In fact if you want to deter them from all this shit, go over to pakistan, where they think osama is hiding out, and in the desert where there are a few oil wells, set off a small nuclear weapon and show the folks in the middle east how to turn sand into glass, and how to stop up an oil well or two.

These people don't realize what happens in a blast like that, hell I don't but I don't to have them drop one on me so I can find out either. Or have someone from the middle east go ask Japan what happens, and whether or not if put in the situation would we nuke their asses? I don't know for sure, but I bet the answer is YES!

Thank You,

Sincerely,
Michael P. Powers
177 Birchwood St.
Apartment 305 B
Pikeville, TN 37367

cc:
Representative Lincoln Davis
Senator Lamar Alexander
Senator Bob Corker

PC_1655

11j

1

Pratt, Chris

Page 1 of 1

Levens, Matthew

PC_423

From: cpontheret@gmail.com
Sent: Tuesday, March 25, 2008 9:03 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/MNSA Washington, DC 20585

Dear Mr. Wyka,

These are difficult times in which the making the right decision can be hard to recognize. In regards to the decision to recreating the capability to research, develop, and manufacture new types of nuclear weapons, I strongly urge you to abandon this course. As a world leader, we must set an example to the rest of the world on the actions we would like them to take. How can we prevent some countries from developing nuclear weapons while at the same time building more of our own? At the same time, U.S. foreign policy and practice has left many countries around the world with the impression that the United States is no longer the peace keeping, human rights giant it once was. We are now gaining a reputation of using our unrestrained power to unjustly take what benefits us, without concern for the consequences to other countries.

With these two issues developing simultaneously, the United States is stimulating conditions that may result in a proliferation of nuclear weapon capabilities by many countries who are currently not nuclear weapon holders. Indeed, this is already happening.

Please, try to shift your perspective away from that driven by terror and fear, to a new perspective of hope, freedom, and peace. The latter is what has made us a great nation in the past, and it is the only hope for the future of our world.

Thank you for the opportunity to express my views.

Instead of recreating the capacity to produce new, unnecessary nuclear weapons, the DOE should focus on shrinking the still-over-sized 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,
Chris Pratt
705 E 1275 S
Kaysville, UT 84037-4000

2|1J (cont)
3|70

Pretlow, Theresa

Page 1 of 1

Levens, Matthew

PC_1555

From: Theresa Pretlow [tpps3@po.cwr.edu]
Sent: Tuesday, April 29, 2008 12:56 PM
To: Complex2030
Subject: No New Plutonium Pits

Dear Mr. Wyka,

The US expresses concern about the possible proliferation of nuclear weapons to North Korea and Iran, yet seeks to abandon its commitment to the Nuclear Non-proliferation Agreement that it signed. The Complex Transformation plan that centers around the production of new nuclear warheads by the US is particularly troublesome. We need to change course and pursue disarmament, not build up our stockpiles of nuclear warheads.

?Complex Transformation? would not only lead to the production of new nuclear warheads, but it would do so in the absence of a national debate on nuclear weapons policy. An overwhelming majority (73%) of all Americans, including myself, support the goal of a world free of nuclear weapons. For world security that can only be achieved in the absence of nuclear weapons, we must take the practical steps toward eliminate nuclear weapons everywhere including here in the US.

A copy of this letter is also being sent to the members of my Congressional delegation. Thank you for your attention to this grave matter.

Theresa Pretlow
3061 Chadbourne Rd.
Cleveland, OH 44120

1|1J

2|16A

1

Prince, Peggy

Page 1 of 2

Levens, Matthew

From: PEACEACTIONNM@aol.com
Sent: Friday, February 01, 2006 3:56 PM
To: Wyka, Ted
Subject: TO MR., WYKA

January 31, 2008

Dear Mr. Wyka:

We're writing on behalf of a coalition of multicultural citizen groups in Northern New Mexico regarding the schedule of Complex Transformation public hearings here in mid March. First, we stongly thank you for providing the public with online access to relevant documents relating to Complex Transformation.

We would like to discuss with you various aspects of the hearings and some suggestions to possibly make the hearings better and more inclusive.

We do a substantial amount of public education and organizing to ensure that public hearings such as these are fair, informative and well-attended.

To that end some of our proposals are as follows:

Rather than two sessions in Los Alamos, we would like to have one of those hearings in Espanola at the Northern New Mexico College. On the same day or the day after the Los Alamos event, whichever works best for your scheduling.

A change of venue for the Santa Fe hearing. The Chavez Center has been a poor choice for a previous hearing due to the limited parking, poor acoustics, relatively remote location and lack of adequate heating in the winter. We suggest that a venue such as an hotel with a large convention room would be a much better choice. There are several which we could discuss with you.

PA shorter initial presentation by NNSA/DOE.
>A timeframe that would insure that individuals who wish to speak on the
>topic have an adequate period of time (3-5 minutes) to do so.
>That even if some comments are somewhat redundant, that folks be
>allowed to
>express their opinion freely, have their comments included in the transcript and final
documents .

As to the physical setup of the venues, there should be a minimum of three sections for easy access to the microphones of which there should be two facing the hearing officers. There should be a minimum of 5 long tables at the back of the room to accommodate literature of the various citizen organizations. Also, provide adequate signage both inside the facility and outside. It would be helpful as well for you to provide water or beverage choices for the public.

Nuclear Watch New Mexico strongly supports a public hearing in Espanola.

We appreciate your consideration and correspondence with us and we'd like to meet with you in person whenever you are in our area.

Sincerely,

Peggy Prince
Executive Director
Peace Action New Mexico
Marian Naranjo Director

12E2

22F

PC_686

Honor Our Pueblo Existence (HOPE)

Sheri Katouski
Embudo Valley Environmental Monitoring Group (EVENMG)

Joni Arends
Concerned Citizens for Nuclear Safety (CCNS)

Penelope McMullan
Sisters Of Loretto

Biggest Grammy Award surprises of all time on AOL Music.
(http://music.aol.com/grammys/pictures/never-won-a-grammy?NCID=soicmp00300000002548) /HTML>

2

Prochaska, John

Page 1 of 1

Levens, Matthew

PC_1781

From: John Prochaska [johnpro@lahoesnow.com]
Sent: Wednesday, April 02, 2008 6:08 PM
To: Complex2030
Subject: Nuclear Weapon Development

John Prochaska
40382 Fremont Blvd.
Fremont, CA 94538-3409

April 2, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

116A: I strongly oppose the administration's proposal to build a plant to produce plutonium pits
21J for nuclear weapons. Our country should be taking the lead in eliminating nuclear weapons
rather than escalating their presence.

Sincerely,

Rev. John Prochaska

Procter, Rebecca

Page 1 of 1

Levens, Matthew

PC_1195

From: Rebecca Procter [rprocter@msn.com]
Sent: Tuesday, April 01, 2008 5:47 PM
To: Complex2030
Subject: Comments-Complex Transformation SPEIS

Dear NNEA staff:

I wish to post the following comments on the draft Complex Transformation Supplemental Programmatic EIS. The comments below were presented orally at the public meeting held in Santa Fe, NM on March 13, 2008, but a hard copy of the text was not posted with the recorder at that time. Thank you.

111D "Strictly in the context of NEPA, I want to say that the current summary of the Programmatic Supplemental EIS does not consider cumulative effects of the alternatives proposed, particularly the cumulative effects of concentrating weapon building and testing at three sites within a few hundred miles of each other in the single state of New Mexico. A consideration of cumulative effects is required by law, and must include such topics as cumulative changes to drinking water from materials used in weapons production or explosion, cumulative statistical probabilities of accidents, and cumulative health effects."

21A More importantly, in a broader context, I draw the attention of my fellow citizens to this fact: Although we are ostensibly attending a NEPA-mandated hearing, the action that will be taken by the NNSA on behalf of the federal government has already been explicitly and unequivocally stated on Page 7 of the summary document. It is this: Despite the overwhelming majority of citizen comments rejecting the nuclear weapons program entirely as immoral, contrary to treaty requirements, and indefensible in a practical way for sustaining the existence of the human race and other living things, the document indicates that, because "national security policy requires the existence of nuclear weapons, there will be no consideration of the alternative that calls for disarmament and disassembly of the weapons network. Please note that this means the current so-called NEPA input session is completely meaningless; your information or thoughts on disarmament are not wanted and will not enter into the serious evaluation of the operational alternatives being described here."

31K You can, however, do as I am doing now. That is to declare your independence from a corporately controlled plutocracy that masquerades as American democracy and to state unequivocally that you, as I am, will continue to call for nuclear disarmament in every public venue available to you, regardless of setting or regulatory framework."

Rebecca Procter

Santa Fe County, New Mexico

Putnam, Patricia

Page 1 of 1

Levens, Matthew

From: Patricia Putnam [patricia.putnam@etho.org]
Sent: Thursday, April 10, 2008 10:21 PM
To: Complex2030
Subject: comments

PC_2079

1/2F I am writing to comment on the Complex Transformation SPEIS that was supposedly presented at a public hearing in Espanola, NM, on March 27, 2008. Mr. Wyka's presentation at this hearing did not provide any information about the environmental impact of the proposal. For that information, I have had to turn to other sources. How can an ordinary working person study a 1400-page document in the short time period you have allowed?

As I understand it, we can expect an increase in water use and in radioactive emissions from Los Alamos National Laboratory. Given LANL's poor record of dealing with nuclear waste and emissions over the past 60 years, it is insane to increase their output of such dangerous materials. And this is a dry land in the midst of a drought; we cannot spare millions of gallons of water!

The people of Northern New Mexico are already suffering from LANL's poor care of the environment. LANL is not a safe place to produce ANY plutonium pits, let alone the increased numbers proposed by the Complex Transformation plan.

3/70 Further, I request consideration of another, unlisted option: NO PRODUCTION of plutonium pits. It is not something our nation needs to be doing, and it will decrease rather than increase our national security. Please do not expand nuclear weapons production.

Patricia L. Putnam
P.O. Box 5191
Fairview, NM 87533

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Pyles, Nathan

Page 1 of 3

Levens, Matthew

From: Nathan Pyles [pyles.nathan@gmail.com]
Sent: Sunday, April 06, 2008 12:19 PM
To: Complex2030
Subject: Altn, Mr. Theodore Wyka

Page 1 of 2

PC_675

Attachments: Complex Transformation - The Wrong Policy - open.doc

Mr. Theodore A. Wyka
National Nuclear Security Administration,
Department of Energy
Complex2030@nnsa.doe.gov

RE: Complex Transformation Funding
April, 6 2008

Dear Mr. Wyka

The Cold War is now long over. Next year will be the twentieth anniversary of fall of the Berlin Wall. But while the world has moved on - building economic, communication, and cultural bridges between the East and West at unprecedented speeds, our nation's nuclear policies remain trapped in a time loop of nuclear inertia.

Complex Transformations: The Wrong Policy
Funding of the Department of Energy's Complex Transformation project is the wrong policy, the wrong choice, and the wrong investment which will ultimately undermine, not enhance, our national security. Security for America is best assured now not by the continued development of new or improved nuclear weapons. Security for America is best assured by eliminating the proliferation and threat of nuclear weapons altogether.

1/13A 1

The Wrong Choice for Security

Since the beginning of the nuclear era, we have known that the greater the number of nuclear weapons holders, the greater the risk of nuclear war - whether by intention or by accident. The nuclear Non-Proliferation Treaty requires non-nuclear nations to cease their efforts to acquire nuclear weapons, in exchange for the nuclear nations' agreement to eliminate them. Every program we add and every dollar we spend to enhance or improve our nuclear arsenals, is a strike against our credibility as a moral force for nuclear non-proliferation.

2/1F

The Wrong Investment

Complex Transformations is a poor investment. The perceived military value of nuclear weapons lies in their possible use, not their actual use. So why spend billions of dollars for updated nuclear weapons that will never be used? These same dollars, these same scientists, could be put work on either military or civilian projects with a real return on investment.

3/9A

While funding should be provided only for the safe dismantling of our outdated nuclear weapons development facilities, no funding should be provided for the continued development, updating, or enhancement of our nuclear weapons capabilities.

The attempt to financially link funding for closing and dismantling of some current nuclear facilities, with renewed funding for new nuclear weapons development is indeed 'complex'. It is also the wrong policy.

5/14/2008

Pyles, Nathan

Page 2 of 3

Page 2 of 2

PC_675

Sincerely,
Nathan Pyles
529 College St
Lake Mills, WI 53551
pyles.nathan@gmail.com
920-648-4110

PC_675

Mr. Theodore A. Wyka
National Nuclear Security Administration,
Department of Energy
Comptons2@hlmnsta.doe.gov

April, 6 2008

RE: Complex Transformation Funding

Dear Mr. Wyka

The Cold War is now long over. Next year will be the twentieth anniversary of fall of the Berlin Wall. But while the world has moved on - building economic, communication, and cultural bridges between the East and West at unprecedented speeds, our nation's nuclear policies remain trapped in a time loop of nuclear inertia.

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The Wrong Choice for Security
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The Wrong Investment
Complex Transformations is a poor investment. The perceived military value of nuclear weapons lies in their possible use, not their actual use. So why spend billions of dollars for updated nuclear weapons that will never be used? These same dollars, these same scientists, could be put work on either military or civilian projects with a real return on investment.

While funding should be provided only for the safe dismantling of our outdated nuclear weapons development facilities, no funding should be provided for the continued development, updating, or enhancement of our nuclear weapons capabilities.

The attempt to financially link funding for closing and dismantling of some current nuclear facilities, with renewed funding for new nuclear weapons development is indeed 'complex'. It is also the wrong policy.

Sincerely,

Nathan Pyles
529 College St.
Lake Mills, WI 53551
pyles.nathan@gmail.com
920-648-4110

Queathem, Elizabeth

Page 1 of 1

Levens, Matthew

From: queathem@grinnell.edu
 Sent: Sunday, April 06, 2008 2:58 PM
 To: Complex2030
 Subject: Complex Transformation SPEIS Comments

PC_1839

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,

115a As someone who is deeply interested in peace, I am in favor of the Department of Energy's recent moves forward with plans to consolidate and reduce the facilities, workforce, and redundant capabilities within the nation's sprawling nuclear weapons complex.

21a There are serious drawbacks inherent in this approach as it now stands, however. Complex Transformation puts far too much emphasis on re-creating the unnecessary capability to research, develop, and manufacture new types of nuclear weapons. We already have plenty. 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.

41j Not only that, but Complex Transformation is actually counterproductive, in that it undermines U.S. efforts to stop the spread of nuclear weapons around the world. It violates both 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.

611b Times have changed since the Cold War. 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 such an analysis.

21a (cont) We have too many nuclear weapons as it is. 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.

As a biologist, a mom, and a voter, 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 very much.

Sincerely,
 Elizabeth Queathem, Ph.D.
 1415 Summer Street
 Grinnell, IA 50112

cc:
 Senator Chuck Grassley
 Senator Tom Harkin
 Representative Leonard Boswell

Quinlan, Margaret

Page 1 of 1

Levens, Matthew

From: Margaret Quinlan [megquinlan@yahoo.com]
 Sent: Wednesday, March 26, 2008 2:59 PM
 To: Complex2030
 Subject: Refurbishing of nuclear weapons-building capacity

Page 1 of 1

PC_1800

Dear Mr. Wyka:

The planning of the Complex Transformation program by the Department of Energy to refurbish the U.S. nuclear weapons-building infrastructure comes as a shock to me.

11a Our country must not produce more nuclear weapons. We must not do this. As you know, the half-life of nuclear material is thousands of years. There is no safe way to dispose of even the waste materials of weapons production.

316a To contemplate the use of nuclear weapons goes against both reason and conscience because of the indiscriminate loss of life and the irreparable contamination of the earth.

41j We violate our promise to the nations of the world if we disregard the Nuclear Nonproliferation Treaty which our country signed after long deliberation. On what grounds can we expect other countries like North Korea and Iran to give up their nuclear programs if we expand our own?

316a (cont) Instead of allowing the building of more nuclear weapons, I urge you to deny the environmental clearances needed for Complex Transformation to go forward.

Please let me know what action you will take in response to my profound concern.

Sincerely,

Sister Margaret Mary Quinlan
 Sister of Mercy

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5/16/2008

Quinlan, Margaret

Page 1 of 1

Levens, Matthew

From: mquinlan@mtmery.org
Sent: Tuesday, April 01, 2008 9:44 AM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

PC_1167

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

Dear Mr. Wyka,

It is important to consolidate and reduce the facilities, workforce, and redundant capabilities within the nation's nuclear weapons complex.

However, our country must not produce more nuclear weapons. The fragile balance in the world is at stake if we do this.

1|1F To produce more nuclear weapons is to violate the Nuclear Non-proliferation Treaty which our country has signed.

2|1J Instead of recreating the capacity to produce new, unnecessary nuclear weapons, the DOE should focus on shrinking the still-over-sized 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,
Sister Margaret Quinlan
625 Abbott Road
Buffalo, NY 14220

Quinlan, Susan

Page 1 of 1

Levens, Matthew

From: susana@iseup.net
Sent: Saturday, April 05, 2008 7:43 PM
To: Complex2030
Subject: It's time to retire all nuclear weapons!

PC_1683

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|1A The United States maintains thousands of nuclear weapons and has thousands more in storage -- it's time to move on to less suicidal tools for self defense. We simply do not need the capability to make more or never nuclear weapons.

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|1F We must lead the way to stopping the spread of nuclear weapons around the world. To do otherwise violates the spirit and letter of the Comprehensive Test Ban Treaty and sends

4|1J 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,
Susan Quinlan
Russell St.
Berkeley, CA 94705

cc: Senator Dianne Feinstein
Senator Barbara Boxer
Representative Barbara Lee

Raimer, Ellen

Page 1 of 1

Levens, Matthew

From: Ellen Raimer [eraim@r66.com]
Sent: Thursday, April 10, 2008 6:04 PM
To: Complex2030
Subject: In Denial of the Golden Rule of International Ethics

PC_1974

Mr. Theodore Wyka:
I attended the hearing here in Albuquerque at the Convention Center in mid-March and
listened carefully to all the speakers, including the ones in support of the Complex
Transformation. These are my concerns.
I am thoroughly baffled by the timing of this proposal for Complex Transformation in view
of the requirement that the incoming President of 2009 will need to prepare a new Nuclear
Posture Review.
I understand that we will not allow Iran to have any nuclear weapons, while we continue to
upgrade ours, while professing to support nuclear disarmament. Absolutely ludicrous!
Supporting nuclear weapons ownership in India, Israel and Pakistan, on the theory that
today they are our friends.....what happens when the politics change and these countries
are NOT our friends of today but on a different side in a few years. The thinking is so
very shortsighted, ignorant and immature and yes, arrogant.
The newspaper Albuquerque Journal features today an article by Michael Coleman entitled
" Lack of Funds May Slow IANL Cleanup" of already existing hazardous waste at Los
Alamos.....then how can we possibly justify MORE! I am most acutely aware of the
cancer producing effects of our nuclear plutonium in our backyard!
Surely this makes New Mexico a target for terrorists as well. There are so many reasons
why this project is undesirable.....and eventually deadly.....for us.

Sincerely,
Ellen Raimer, M.D.
602 Solano Dr. S. E.
Albuquerque, N.M. 87108
American Academy of Family Physicians

Ramm, Hartmut

Page 1 of 3

Buenaflor, Justin

From: Hartmut Ramm [hramm@bellisouth.net]
Sent: Thursday, March 20, 2008 10:58 AM
To: Complex2030
Subject: comment

PC_494

Attachments: Complex transformation talk.doc



Complex
information talk.do

Dear Mr. Wyka,
I recently attended your hearing on the Complex Transformation in augusta, GA. I have attached my slightly revised
comment.

Sincerely yours,
Hartmut RAMM
3887 Nowlin Rd. NW
Kennesaw, GA 30144
770-529-7338

Ramm, Hartmut

Page 2 of 3

Good afternoon

PC_494

My name is Hartmut Ramm. I am a recently retired emeritus professor of Physics, philosophy and physical geography from Young Harris College. I do not have much to add to what has already been so eloquently said, but these fields into which I poured my professional life have led me to some grim conclusions which I have not yet heard expressed.

I am convinced that nuclear bomb and nuclear energy production are fundamentally and profoundly incompatible with environmental stewardship. This is because there is no safe repository for the nuclear bombs and the nuclear waste that is produced in nuclear reactors. When President Eisenhower put the nuclear arms race into overdrive in his first term by increasing the nuclear arsenal from 1000 to 20000 warheads, the Earth seemed to be a much more stable place, and radiation was thought to be harmful only in the kinds of doses that the victims of Hiroshima and Nagasaki experienced. Not until plate tectonics came along a full decade later did we come to realize that we inhabit an unceasingly restless planet with continents riding on massive lithospheric plates which collide, rift apart, grind against each other and ceaselessly create and activate new earthquake faults and volcanoes. We have discovered there is no safe haven for our waste. Worse, the radiation that the waste emits has proven to be dangerous even in small doses, not just in the huge doses that the tragic victims of Hiroshima and Nagasaki experienced.

Thus, science has not solved the problem of disposing of the waste safely. Instead, new research keeps demonstrating the hopelessness of the task, and the solution keeps receding further into some distant future.

1|16A: 2|140: 3|14M.3: 4|14N

Ramm, Hartmut

Page 3 of 3

That is probably the best case: widespread contamination in the distant future. I know, and you know that there is a large body of unscrupulous, powerful people within the power elite who can cheerfully contemplate using the bomb to further their goal of global dominance by force. In fact, this would appear to be the real, unspoken motive behind the "complex transformation." These will be designer bombs: space weapons, bunker busters and God only knows what other fiendish designs are on the drawing boards – bombs to annihilate specific enemies.

1|16A
(cont.)

Dr. Strangelove, in the eponymously named film was a composite of Dr. William Teller and Henry Kissinger, both of whom had expressed a willingness to unleash our nuclear arsenal on our foes. But now even Henry Kissinger, along with 70% of all still-living former secretaries of state, and defense and national security have advocates the global elimination nuclear weapons.

So, now, not Kissinger, but backers of the "Complex Transformation", are the new Strangeloves. And it is the Military Industrial Complex that needs to be transformed.

Rane, Joel
Page 1 of 1

Levens, Matthew

From: Joel Rane [mailto:jbrane@yahoo.com]
Sent: Friday, February 08, 2008 3:58 PM
To: Complex2030
Subject: Please Reject the "Complex Transformation" Plan

Joel Rane
3747 Evans Street
Los Angeles, CA 90027-3329

February 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:

116A The Department of Energy should reject proposed Complex Transformation project.

23A The DOE should reject the Complex Transformation proposal to revamp the United States' 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.

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.

I am also very concerned that revamping the current arsenal could lead to renewed nuclear tests.

314C Complex Transformation would also 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.
41J Instead of creating more radioactive contamination, DOE should cleanup the mess from past production of nuclear weapons.

51J The new arsenal would also be bad foreign policy. We need American leadership in convincing countries like Iran and North Korea to forgo their 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,

Joel Rane

PC_1392

Ransom, David
Page 1 of 1

Levens, Matthew

From: David Ransom [spoos@sover.net]
Sent: Saturday, April 12, 2008 9:35 AM
To: Complex2030
Subject: Nuclear Disarmament

David Ransom
221 Shipman Road
Waterville, VT 05492-9637

April 12, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy,

116A FOR THE SAKE OF LIFE ON EARTH, STOP NUCLEAR RE-ARMAMENT HERE! NOT IN IRAN!
WAVE THE SEMAPHORE FLAGS: "N" "D"!!!! RE-COVER SOME SANITY, FOR ALL OUR SAKES!!! IF THE PRESIDENT AND CONGRESS FOOLISHLY GIVE THE DOE THE MONEY, HAVE THE MORAL COURAGE TO REJECT IT- AND BUILD NO MORE NUKES!!!

Sincerely,

David P. Ransom
802-644-8144

PC_1956

Rasche, Brian

Page 1 of 1

Levens, Matthew

From: brasche@gmail.com
Sent: Monday, April 14, 2008 12:49 AM
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,

116A Drop SPEIS, not bombs.

Sincerely,

Brian Rasche
702 E Amelia St
Orlando, FL 32803

PC_1932

Rasmussen, Nyla

Page 1 of 1

Levens, Matthew

From: Nyla Rasmussen [nylanyla@hotmail.com]
Sent: Wednesday, April 09, 2008 10:52 PM
To: Complex2030
Subject: Clean Water in Northern New Mexico

Nyla Rasmussen
605 Calle de Marcos
Santa Fe, NM 87505-7304

April 9, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

I live and vote in northern New Mexico, in Santa Fe. My adult life has been focused on helping parents birth healthy babies and children. CLEAN WATER is most important.

114E I am concerned about the pollution that migrates from the Los Alamos National Laboratory discharging into the Rio Grande and the regional aquifer, both of which are sources for drinking water. It has come to my attention that monitoring at the Site Monitoring Area is not adequate for obtaining representative samples.

Because the cultural and ecological survival of the communities of New Mexico is tied to the health of our rivers, acequias and other water bodies, I urge you to use your influence with the EPA to address these concerns.

Please give our children clean water.

Sincerely,

Nyla Rasmussen
5059661848

PC_2076

Ray, Gisela

Page 1 of 1

Reckelace, Nancy

Page 1 of 1

PC_1607

Levens, Matthew
 From: GiselaRay_7@msn.com
 Sent: Saturday, April 05, 2008 1:33 PM
 To: Complex2030
 Subject: Complex Transformation SPEIS Comments

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

Dear Mr. Wyka, U.S. DOE,

Let's not create new, unnecessary nuclear weapons. They have no rational use in warfare and only encourage other nations to create their own stockpiles. We should instead be working to reduce our number of nuclear weapons and work on persuading other nations to do the same. Perhaps, some day, we can have a nuclear-arsenal-free world!



Sincerely,
 Gisela Ray
 85 SE 16th Court
 Greabam, OR 97080

cc:
 Senator Ron Wyden
 Senator Gordon Smith
 Representative Earl Blumenthal

PC_337

Written Comment Form
 Must be received on or before April 10, 2008.

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

Dear Mr. Wyka,
 I attended the hearings held on Feb. 26th at Oak Ridge I was lucky to be there and hear so many passionate speeches against the plans to make more nuclear weapons. I also heard many fine speeches for the program. I'm sure the workers are very skilled and professional. For me, the issue is clear. We can not continue the insanity of nuclear weapon production. We have contaminated our planet with dangerous radioactive uranium, and we should be securing it to prevent accidents, not re-using it. We can't have another Chernobyl! Put those scientists to work on earth sustainability solutions. Thanks for your time,
 Nancy Reckelace
 1144 N. Pantow Creek Rd
 Sevierville, TN 37876

116A
 2140
 39B

Please use other side if more space is needed.
 Comment forms may be faxed to:
 Mr. Theodore Wyka
 (703) 931-9222
 or sent by electronic mail to:
 complextransformation@nnsa.doe.gov

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

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

Redman, Cynthia

Page 1 of 1

PC_531

Buenaflor, Delight

From: Cynthia Redman [mcredman@valornet.com]
Sent: Thursday, March 06, 2008 9:57 PM
To: DIV,Complex,Transformation
Subject: Form posted from Windows Internet Explorer.

Last Name=Redman
First Name=Cynthia
Email Address=mcredman@valornet.com
Street Address=P O Box 2637
City=Esplanola
State=NM
ZIP Code=87532

Comments=To NNSA: I am in support of your preferred alternative of LANL being the center for actinide research.

115A

Rehberg, Wes

Page 1 of 1

Levens, Matthew

From: Wild Clearing [wildclearing@wildclearing.com]
Sent: Tuesday, April 08, 2008 7:27 AM
To: Complex2030

PC_1564

116A Haven't we learned yet that nuclear bombs and nuclear war are annihilating? Evidently not. We should start here and now by rejecting this outrageous proposal.

Wes Rehberg
303 Shady Crest Dr
Chattanooga, TN 37415

Reid, Mark

Page 1 of 1

Levens, Matthew

From: Mark Reid [mailto:markreid29@verizon.net]
Sent: Thursday, March 13, 2008 7:58 PM
To: Complex2030
Subject: Draft Complex Transformation

PC_630

1154 Unlike all the protesters, I DO support you and the work you people are doing. Ronald Reagan believed that nuclear weapons were part of our "Peace Through Strength" military and I believe that still stands. Keep up the good work, keep the new bombs coming and keep us safe!

Sincerely,

Mark Reid

Reihl, Alan

Page 1 of 1

Levens, Matthew

From: Alan Reihl [mailto:alan.reihl@maryvillecollege.edu]
Sent: Wednesday, March 26, 2008 1:10 PM
To: Complex2030
Cc: "http://www.cegreen"@charter.net
Subject: SPEIS

PC_1700

Mr. Theodore Wyka:

It is my considered and logical opinion that I am in agreement with the late Reverend Martin Luther King Jr., who said "I have unequivocally declared my opposition to this most colossal of all evils".

War (and its weapons) are not healthy for children and other living creatures.

116A !NO PRODUCTION! Honor the Non-Proliferation Treaty!

I find difficulty supporting any service regarding Nuclear Weapons. Including your department. I hope, in the near future, to be able to eliminate all stockpiles of weapons which can [GOD FOREID] eliminate the human race. Funding must be the first to be eliminated.

Then the government employees who work for those who cannot see the insanity will, hopefully, find gainful employment in the betterment of life.

Alan Reihl (a sane taxpayer)

3830 Jay Kerr Rd.

Rockford, TN 37853

Rennell, Rita

Page 1 of 1

Levens, Matthew

From: Rita Rennell [rennell@hmsisters.org]
Sent: Friday, April 04, 2008 5:07 PM
To: Complex2030
Subject: New nuclear weapons

Rita Rennell
610 West Elm
Monroe, MI 48162-7909

April 4, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

As a former high school teacher and an RN I am very concerned that we are even thinking of building a plant to produce plutonium pits for nuclear weapons. I strongly oppose any attempt to rebuild the U.S. nuclear arsenal. I taught chemistry and other sciences for 20 years and am aware of the devastating effects of using nuclear bombs. I also am aware of the influence of what we do in the U.S. on the people other countries. I was a missionary in South Africa and visited many of their neighbors. They want to be like us. We need to give good example. We are sending them the wrong message. I say NO to nuclear build-up.

Sincerely,

Rita Rennell

PC_1847

Reskin, Charles

Page 1 of 1

Levens, Matthew

From: Charles Reskin [reskinc@bellsouth.net]
Sent: Friday, March 28, 2008 8:45 AM
To: Complex2030
Subject: New Nuclear Weapons Plan

Charles Reskin
3800 Van Buren Street, Apt. 408
Hollywood, FL 33021-7485

March 28, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

116A In August 2005 I was part of a coalition of religious groups who went to Los Alamos to observe the 60th anniversary of the bombing of Hiroshima and Nagasaki, and to demonstrate against the further development and use of these insane weapons of annihilation. Certainly the current administration's proposal to in any way continue, expand or develop more sophisticated nukes is not only madness, but also incredibly hypocritical for a nation which threatens to go to war with Iran (for example) over its imagined nuclear threat. 21K; What message will this send to other nations that may be considering a nuclear weapons program? We must direct our national efforts towards international nuclear disarmament, not the proliferation of yet more doomsday weapons. WE have more than enough world 31J problems without the complication and danger of more nukes. I urge you to work towards 43A their eventual eradication from the face of the earth.

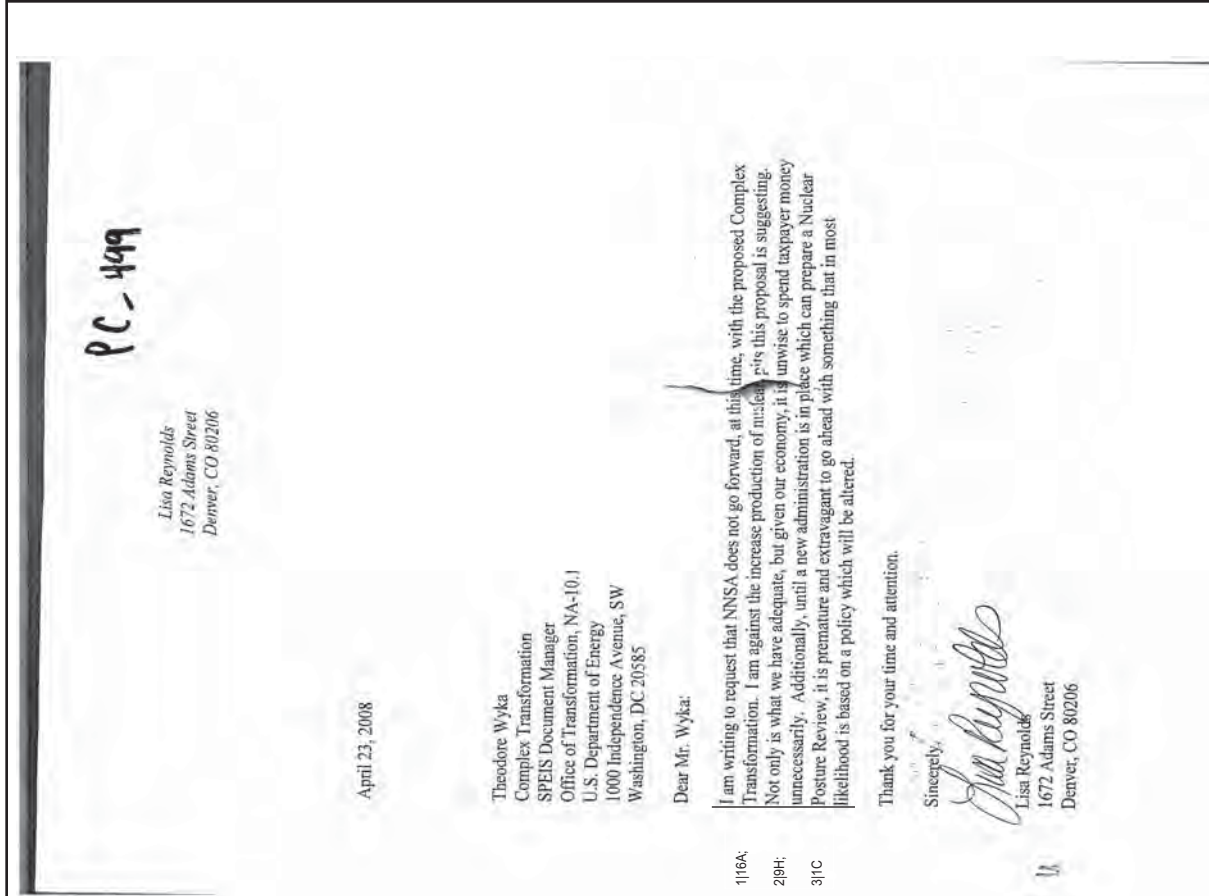
Sincerely,

Charles Reskin
561.750-4198

PC_1726

Reynolds, Lisa

Page 1 of 1



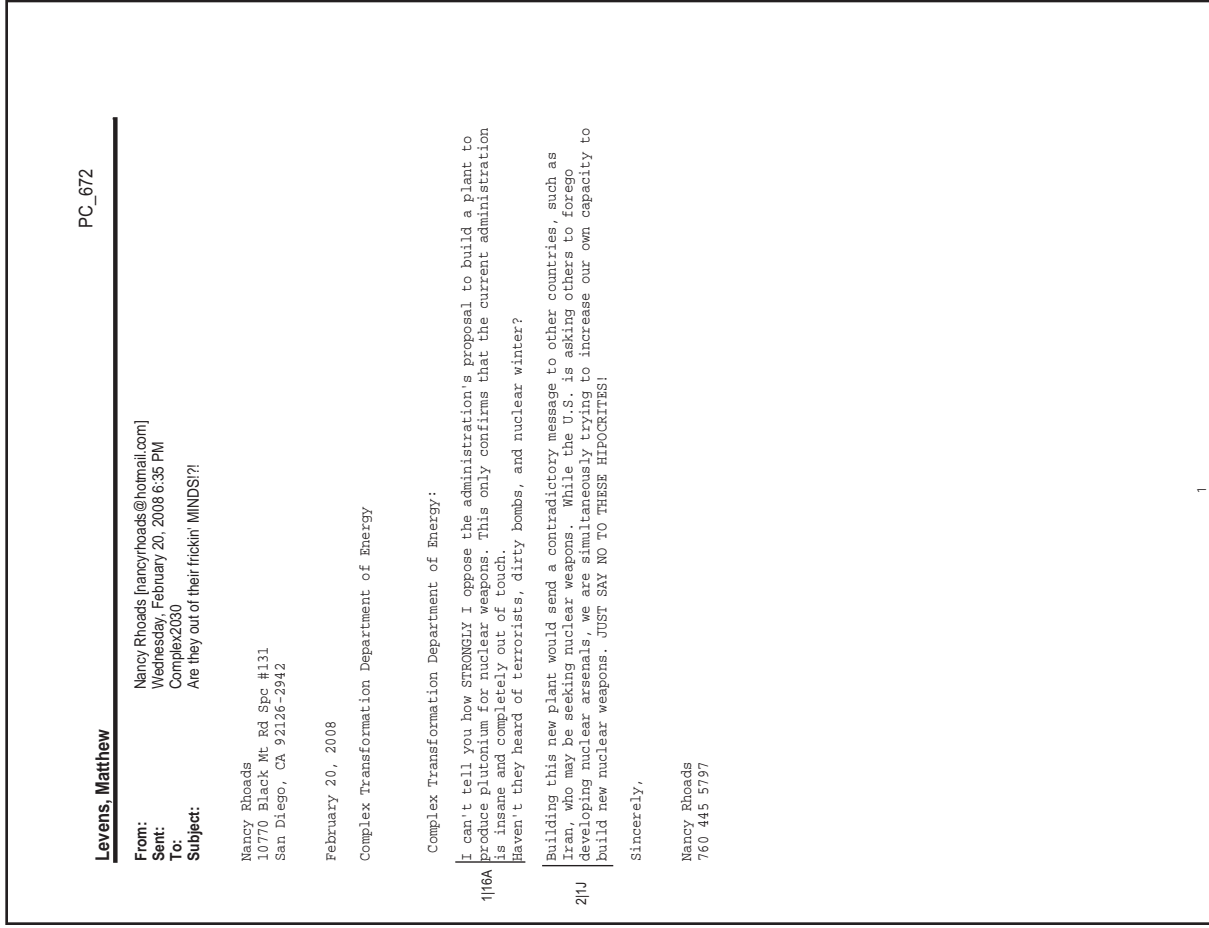
116A:

29H:

31C

Rhoads, Nancy

Page 1 of 1



Levens, Matthew

From: Nancy Rhoads [nancyrhoads@hotmail.com]
Sent: Wednesday, February 20, 2008 6:35 PM
To: Complex2030
Subject: Are they out of their frickin' MINDS!?

Nancy Rhoads
10770 Black Mt Rd Spc #131
San Diego, CA 92126-2942

February 20, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

116A I can't tell you how STRONGLY I oppose the administration's proposal to build a plant to produce plutonium for nuclear weapons. This only confirms that the current administration is insane and completely out of touch.

Haven't they heard of terrorists, dirty bombs, and nuclear winter?

21J 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. JUST SAY NO TO THESE HIPOCRITES!

Sincerely,

Nancy Rhoads
760 445 5797

Rhodes, Seda

Page 1 of 1

Levens, Matthew

From: Seda Rhodes [waywardgoblin@yahoo.com]
Sent: Sunday, March 30, 2008 5:30 PM
To: Complex2030
Subject: Depleted Uranium Testing at Lawrence Livermore

PC_1855

To whom it may concern:
 I, as a citizen of San Francisco, am appalled and outraged at the news that the testing of weapons containing depleted uranium, among other known toxins, are intended to increase at Lawrence Livermore National Laboratory in the near future.
 This testing should be halted entirely, not increased!

7M.1

There is no question of the severity and long-term consequences of releasing depleted uranium into our atmosphere. It is a known and documented fact that the horrific effects of this radioactive substance will already be affecting all life on our planet for billions of years to come.
 We should be focusing our national resources and research on remediation efforts, not on exacerbating an already very serious problem.

I know that there will be a huge public outcry over this- I for one am going to contact everyone I know and demand that they get involved. Not one of us will be able to escape the effects of this foolish and shortsighted endeavor.

Please reconsider this plan before it's too late!
 sincerely,

Seda Rhodes
 300 Chattanooga St.
 Apt. A
 San Francisco, CA. 94114

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Richards, Jean

Page 1 of 1

Levens, Matthew

From: Jean Richards [jeanrichards@raconet.com]
Sent: Sunday, April 27, 2008 7:18 PM
To: Complex2030
Subject: LANL-Los Alamos

PC_1379

SECT.Y. Bodman,
 Please give us New Mexicans who are 60 miles downwind of Los Alamos a serious decision. First to give a 90 day extension to plead our case NOT to produce plutonium pits and then NOT to construct the 2 billion dollar building to make them in. Do you want to destroy our planet? We "only" have 24,000 warheads in our state and the Texas panhandle. They last 100 years. We hear the Pentagon does not even want them. There is at least one law suit for the area to be cleaned up--an immense job of 50 years waste--it is definitely starting to pollute our water. We envision a hill with Pld's working in a clean environment for a Manhattan project to make us oil independent and how to best combat global warming. Our state, country, and planet would jump for joy if you and Bechtel or whoever could change this mission!!! Thank You.

Jean Richards
 P.O.Box 310
 Arroyo Seco, NM 87514

Richards, Linda

Page 1 of 2

Levens, Matthew

From: Linda M. Richards [lrich@mind.net]
Sent: Tuesday, April 06, 2008 9:52 PM
To: Complex2030
Subject: No more weapons

PC_ 1433

Based on the human rights abuses by the US government of the disproportionate exposure of First Nations people, no new nuclear weapons should be considered, and the path to disarmament as outlined in the Nonproliferation Treaty needs to be honored to create real security in our nation and our world. The resources that have been spent on nuclear weapons should be spent on meeting the basic needs for education and health of our communities. The health effects from the continued reliance on nuclear commerce are pernicious and the government must accept responsibility for the extent of the nuclear pollution that has already occurred. The complex as proposed, which I have read, is outdated and not forward thinking to the true needs of humanity as resources become limited, and these weapons serve no real military purpose. Scientists since the inception of nuclear weapons have opposed them based on moral grounds and their lack of providing a sound military strategy other than destruction. The proposal will increase insecurity as the work toward nonproliferation and controlling the spread of nuclear weapons would be undermined. There are practical steps to reducing weapons in the world and creating good will with our leadership to ratify the Comprehensive Test Ban Treaty and renounce development of new nuclear weapons. In addition, estimates of are that up to 80% of the effects of the US nuclear fuel cycle- which includes mining, testing, production and waste storage sites,- has occurred predominantly on remaining First Nations lands, particularly in the American Southwest, home to one fifth of the Indian population.

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.

Executive Order 12898
The environmental justice movement gained status in 1994 with Executive Order 12898. The order was issued by President Clinton on February 11, 1994 and directed Federal agencies to address, as part of their mission, environmental justice issues.[1] The EPA defines environmental justice "Fair treatment means no population, due to policy or economic disempowerment, is forced to bear disproportionate burden of the negative human health or environmental impacts of pollution or other environmental consequences" due to any activities.

Disproportionate Effects

In 1972, The Nixon administration intended to declare large swaths of America Indian lands in the Four Corner Areas, the Dakotas, Wyoming and Montana "National Sacrifice Areas". On September 13, 2007, the United Nations General Assembly nearly unanimously adopted the "Declaration on the Rights of Indigenous Peoples." The declaration is the result of twenty years of negotiations to give international legal status to First Nations. Of all the 192 nations states represented in the United Nations, only Canada, Australia, New Zealand, and the United States voted against the resolution that formally recognizes the individual, collective, and cultural sovereignty of the world's indigenous peoples. The ruling has already been integrated into local state appeals against uranium mining, in Nebraska, citing the disproportionate impacts of the nuclear fuel cycle on indigenous people. David Orr of Oberlin College writes "The great ecological issues of our time have to do one way or another with our failure to see things in their entirety. The disordering of ecological systems and of the great biogeochemical cycles of the earth reflects a prior disorder in thought, perception, imagination, intellectual priorities, and loyalties inherent in the industrial mind. Ultimately the ecological crisis is a crisis of education that purports to shape and refine the capacity of minds to think clearly, to imagine what could be and is not and to act faithfully." [13] Thank you in Peace and Love and hope for a brighter future, Linda M. Richards 200 NW 53rd Street Corvallis Oregon 97330

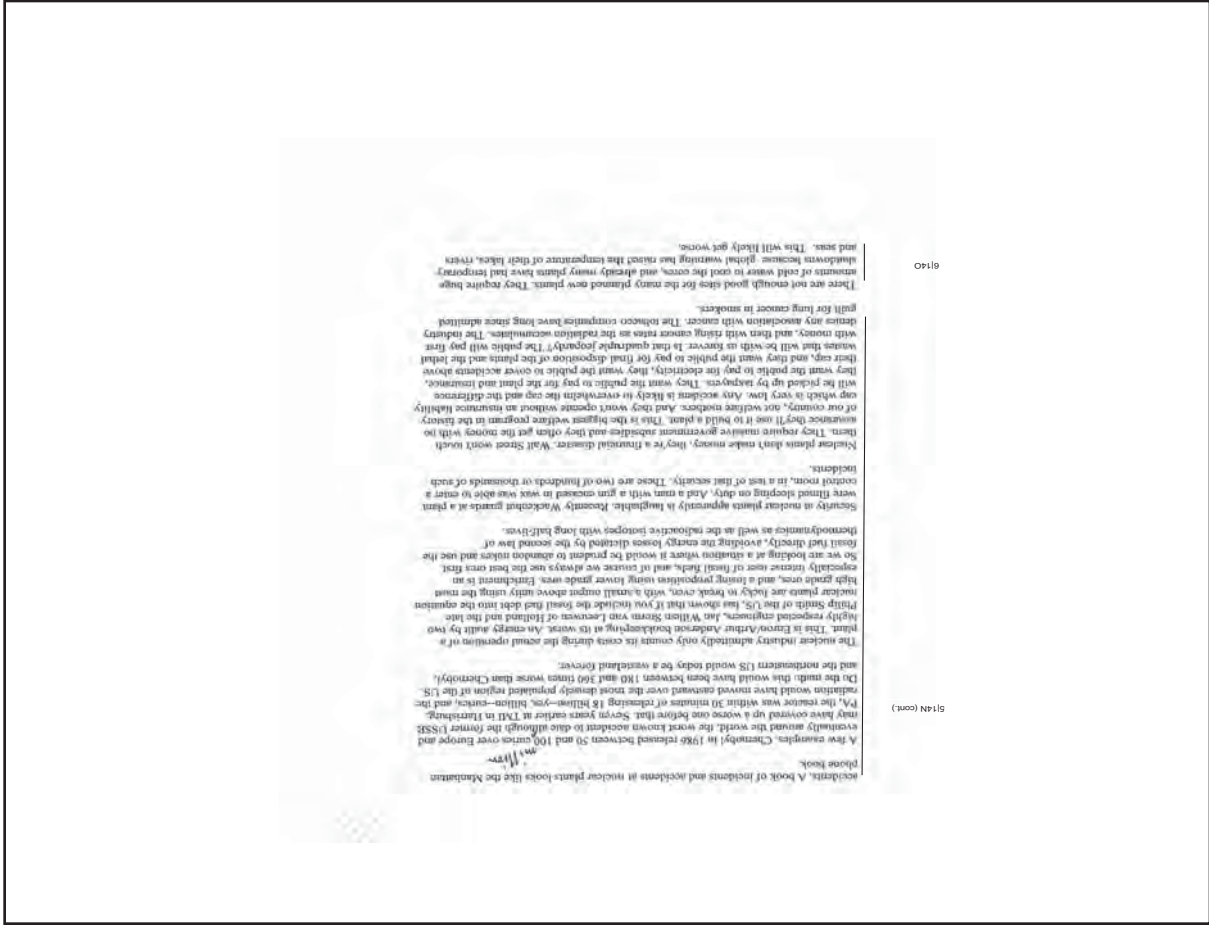
Richards, Linda

Page 2 of 2

-----PC_1433

[1] Actual text of the Executive Order is available [Online] <<http://www.ejnet.org/ej/executor.html>> [20/10/07]

[13] The Greening of the College Curriculum, pp. 11, 9



Richardson, Don

Page 3 of 3

Yet we persist in imagining that nuclear power has some advantages. Older people will remember Rubie Goldberg, a cartoonist who devised elaborate contraptions filling a whole room to accomplish simple tasks, like dropping a food pellet to a pigeon. That's nuclear power all over. It boils water. That's all, and not only that only a third of the heat generated actually makes steam. Two thirds is dissipated into our environment without doing any useful work, along with a soup of radioactive isotopes we can't see, smell or hear. No possible answer to global warming.

The same money diverted to easily deployed renewable technologies and to conservation would reduce our carbon footprint by a factor of seven times or so, produce no lethal wastes, be much cheaper, be in place in a much shorter time, and be so decentralized that none would be a target, unlike the 103 nuclear plants now in operation here. Terrorists, that is, other people's terrorists, would not bother to attack a solar panel or a windmill.

Consider also that of our total energy use, some 16-20% is electricity, and of our electricity some 16-20% is produced by nukes. Therefore, nuclear power constitutes about 2 1/2 to 4 percent of our total use. How easy it would be to reduce our profligate energy consumption by about 50%, like Europe, and eliminate the need for these monsters altogether!

In my view we are a nation of psychotics, out of touch with reality. And dangerous to ourselves and all species because we imagine we can continue this arrogant lifestyle. The warmongers in Washington notwithstanding, eventually our culture responds to economics, the bottom line. On that account nuclear power is already dead, and as Amory Lovins has said, you can defibrillate a corpse and make it jump, you can do mouth to mouth resuscitation, but you still have a corpse on a cold table.

I believe we may build a few new plants, but after that reality and economics will come together to close down this lethal, unnecessary and totally inefficient industry forever. Nuclear engineers are bright people, even if ethically challenged. They can be retrained for useful work.

Don Richardson, M.D. 828-884-3435 gaia@citcom.net

6140
(cont.)

789

116A
(cont.)

Richardson, Sheila

Page 1 of 1

Levens, Matthew

From: Sheila254@yahoo.com
Sent: Saturday, April 05, 2008 10:41 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,

116A We don't need them. We don't want them.

Sincerely,
sheila richardson
14505 CR 478
May, TX 76857

cc: Senator Kay Hatchison
Senator John Cornyn
Representative Mike Conaway

PC_1678

Richmond, Scott

Page 1 of 1

PC_507h

Benefactor, Delight

From: Scott Richmond [richmond@lanl.gov]
Sent: Monday, April 07, 2008 12:45 PM
To: DIV,Complex,Transformation
Subject: Form posted from Microsoft Internet Explorer.

Last Name=Richmond
 First Name=Scott
 Email Address=richmond@lanl.gov
 Street Address=253 Canada Way
 City=White Rock
 State=NM
 ZIP Code=87544

Comments=Please make sure LANL retains a meaningful tritium research capability. This is a very important and fundamental capability.
 Please consider placing it within CMRR rather than removing it.

1108.2/BB
 Please take the time to contact me at LANL if you want more specific details.

Thanks

Scott Richmond, Los Alamos National Laboratory, Nuclear Materials Science Group
 (505) 667-6786

Riddell, Christina

Page 1 of 1

PC_1942

Levens, Matthew

From: Christina Riddell [mrlinani@msa.com]
Sent: Wednesday, April 30, 2008 4:49PM
To: Complex2000
Subject: Citizen Comment regarding SPES, Complex Transformation

Mr. Wyka,
 It doesn't make sense for U.S. taxpayers to invest in a new generation of nuclear weapons facilities.
 Don't you get it???

Christina Riddell
 760 N. Hoover St.,
 Los Angeles, CA 90026

Rider, Marcia

Page 1 of 1

PC_61

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

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

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

COMMENTS: There should be no nuclear weapons of any kind in the hands of human beings on this planet. Period.

"No more Hiroshimas, intentionally or by accident, even."
Marcia K. Rider

NAME MARCIA K. RIDER
ADDRESS 1800 REDWOOD RD
WATSONVILLE, CA 95076
SIGNATURE Marcia K. Rider DATE 1-20-08

19A

21F

316A

Riney, Jeffrey

Page 1 of 1

PC_1772

Levens, Matthew

From: Jeffrey Riney [jrumb@levesd@yahoo.com]
Sent: Wednesday, April 02, 2008 8:56 PM
To: Complex2030
Subject: More Nukes?

Jeffrey Riney
9 Enchanted Lane
Fletcher, NC 28732-9715

April 2, 2008
Complex Transformation Department of Energy

Complex Transformation Department of Energy:

13A What the hell for? We alone have enough to blow the whole world up several times! This is 299B a waste of money when what we really need to do is help people not kill them. GROW UP!

Sincerely,

Jeffrey Riney
828-676-0201

Risburg, Kim

Page 1 of 1

Levens, Matthew

PC_1424

From: Kim Risburg [dumme@kim@yahoo.com]
Sent: Tuesday, April 29, 2008 4:35 PM
To: Complex2030
Subject: no more nukes, please

Kim Risburg
1910 18th Ave. S.
Nashville, TN 37212-3804

April 29, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

116A I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons.

21J We look like absolute hypocrites to the rest of the world when we insist that other countries halt their nuclear programs, while we at home continue to turn out these horrendous weapons of destruction.

How many generations forward will we continue on this path of madness? It is up to us to choose.

St. Francis had this to say of war:

From the child's hand always the sword should be removed.

I think every nation is an infant.

Sincerely,

Kim Risburg
615-783-1576

Ritter, Cynthia

Page 1 of 1

Levens, Matthew

PC_843

From: critter614@comcast.net
Sent: Monday, April 07, 2008 12:09 AM
To: Complex2030
Subject: Proposed CMRR bomb plant

Dear Mr. Wykat:

As a retired teacher and a grandmother of 18, I can celebrate the blessings of having many children and caring adults in my life. Because of them and the countless other people in our country and on our earth, I am deeply concerned about nuclear weaponry and its consequences. Not only is the Non-proliferation Treaty of 1996 not being honored, but an actual attempt to rebuild our nation's nuclear weapons production capabilities through the Complex Transformation plan is being considered.

11F Consolidating weapon grade nuclear materials into fewer locations is a positive element but working toward disarmament under Article VI of the treaty should be our goal...certainly not escalating our nuclear arsenal while demanding other nations to abandon theirs.

316A Please consider using the Department of Energy's resources for research and programs that reduce nuclear danger and it's proliferation. Withdraw the DOE's request for funding for the CMRR. Our domestic and international "families" will increase their opportunity to enjoy a future--a future that sees peace and safety. Thank you for your consideration.

Sincerely,
Cynthia Ritter
6602 Adairidge Dr. SE
Ada, MI 49301

Ritter, Dorothy

Page 1 of 3

Buenafior, Justin

From: Dorothy Ritter [doritter@comcast.net]
Sent: Sunday, February 17, 2008 11:58 PM
To: Complex2030
Subject: Draft Complex Transformation SPEIS Comments

Attachments: Stockpile Y-12.doc



Stockpile Y-12.doc
(34 KB)

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: <mailto:complextransformation@msa.doe.gov>
complextransformation@msa.doe.gov

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).

The Stockpile Life Extension Program at Y-12 contradicts the United States commitment to the Nonproliferation Treaty and would continue the poisoning of our planet with toxic nuclear waste. The United States is spending \$40 billion a year maintaining its deployed nuclear stockpile. Our nation's military industrial complex is like a malignant tumor growing on our nation's budget sucking life-dollars from health care, education and social programs. In an attempt to rationalize the insanity of nuclear weapons, our government tries to make the means justify the end through the myth that this "necessary evil" acts as a deterrent and is essential for our nation's security. Swallowing the 'security myth' acts as a sedative numbing the nation's psyche to the reality of a nuclear war. We must awaken from our delusion to face the truth. There is no such thing as winning a nuclear war.

The United States pre-emptive war policies include the use of first strike nuclear bombs. The U.S. plans to "upgrade" our weapons of mass destruction and continues to explore the development of new "usable" mini-nukes. The U.S. disregard for the Non-Proliferation Treaty and the U.S. violations of International Law has led to an escalation in the arms race to the point that the present global climate has all the conditions for a "perfect nuclear storm." In reality the membership into the nuclear weapons club is growing along with war profiteering. How can this possibly add to our nation's security? How can the annihilation of God's creation be justified no matter who starts the nuclear "domino" of indiscriminate death and destruction? Universal disarmament is the only sane solution to deter the power-driven desire to join the arms race. Disarmament is also the only way to prevent a nuclear cyclone of mass murder and cosmic destruction from being unleashed again. In 1970 the United States agreed to pursue complete nuclear disarmament "at an early date" in the Nonproliferation Treaty. It is time to keep our commitment and stop the escalation of the nuclear weapons club. The arms race and the human race are on a collision course approaching an intersection of calamity. Only complete disarmament and the mercy of God can prevent a head on catastrophe or global suicide.

11F:
21L:
316A

PC_452

1

Ritter, Dorothy

Page 2 of 3

Dorothy Ritter
(Member of Oakridge Environmental Peace Alliance)
17194 Anita
Fraser MI 48026

PC_452

2

Ritter, Dorothy

Page 3 of 3

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@hmsa.doe.gov

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).

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Dorothy Ritter
 (Member of Oakridge Environmental Peace Alliance)
 17194 Anita
 Fraser MI 48026

PC_452

Roach, J

Page 1 of 1

Levens, Matthew

From: J Roach [mailto:jsr121@hotmail.com]
 Sent: Sunday, April 06, 2008 1:21 PM
 To: Complex3030
 Subject: More nuclear weapons?? A bit hypocritical dont you think?

J Roach
 122 S. Ann
 Ventura, CA 93001-3013

April 6, 2008

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

Dear Theodore Wyka:

1|76A |The DOE should reject the Complex Transformation proposal to revamp the nuclear weapons arsenal.

So I guess it is OK for Iran & North Korea to have them too huh?

You cant have it both ways. Either Nukes are OK or they are NOT OK.

2|1J |Why would it be OK for the US, the most war mongering country in the world, to continue building Nukes while other countries who are legitimately scared of us and need to protect themselves from us cannot?

3|1K |I am embarrassed by our president and his ridiculous, unfair policies.

Bush is a jackass and joke. He could not critically think his way out of a box. And his cronies are greedy and evil.

'You Cannot Simultaneously Prevent And Prepare For War'

2|1J |By building up its nuclear arsenal right now, the US is essentially telling the world, "Do not as I say, not as I do."

Sincerely,

J Roach

PC_1759

Roach, Michael

Page 1 of 1

PC_154

I am for keeping the Y-12 plant in Oak Ridge for several viable reasons:

- 1) Oak Ridge already has a highly trained workforce
- 2) Oak Ridge already has undergone millions of dollars of improvements with the H/JMF building, etc.
- 3) If the facility were moved all that is stored at Oak Ridge would have to be moved at an unknown yet very expensive price to the taxpayer
- 4) To go along with the previous 2 statements the taxpayer has already paid for much in Oak Ridge and it would be a great disservice to them to pull out thereby wasting all the money that has been poured into this site
- 5) Oak Ridge and actually a large part of East TN rely on the revenue generated from Y-12
- 6) Historically it has been here since it's inception and should stay here
- 7) I am proud to work at Y-12 and I have chosen to live in East TN it is my hope that my future stays where it is.

115A

29H

115A
(cont.)

Michael Roach

Robbins, Sandina

Page 1 of 1

PC_1674

Levens, Matthew

From: sandina10@earthlink.net
Sent: Saturday, April 05, 2008 12:18 PM
To: Complex Transformation SPEISComments
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,

116A Just say no to nuclear weapons!

Sincerely,
 Sandina Robbins
 573 Aileen St
 Oakland, CA 94609

cc:
 Senator Dianne Feinstein
 Senator Barbara Boxer
 Representative Barbara Lee

Roberts, Aubrey

Page 1 of 1

Levens, Matthew PC_376

From: Aubrey Roberts III [auroberts3rd@yahoo.com]
Sent: Wednesday, February 20, 2008 7:52 PM
To: Complex2030
Subject: Stop This Madness

Aubrey Roberts III
101 N. Brookside Drive #1514
Dallas, TX 75214-7523

February 20, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

The administration's proposal to build a plant to produce plutonium pits for nuclear weapons races us backwards in time to a place where the world sat poised at the brink of self-destruction. I remember drills at my elementary school where we were told to duck under our desks and cover our heads with our hands. I couldn't understand why adults could be so willing to destroy each other. The kids in the playground could figure a way out of disagreements without resorting to amihilation, why couldn't the adults running our governments do the same.

I have children in elementary school now and hoped for a better world for them. Please oppose this effort by the administration to rebuild our nuclear arsenal.
Sincerely,

Aubrey Roberts III
214-404-1260

1/16A

Roberts, Marcia

Page 1 of 1

Levens, Matthew PC_1447

From: Marcia Roberts [mproberts@sbglobal.net]
Sent: Tuesday, February 19, 2008 10:07 PM
To: Complex2030
Subject: Nuclear weapons: new bomb plant

Marcia Roberts
1105 McDowell ST. NE
Canton, OH 44721-3138

February 19, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

Nuclear waste being one issue, my main concern is the restart of the cold war with the US being the aggressor. Other nations who are afraid of our nuclear might such as China and India already have nuclear arsenals. What is to stop them from adding to their stockpiles if we build more nuclear bombs?

As a Quaker, I am opposed to war in any form. Truly the worse form has to be the nuclear holocaust. This was a fear that I grew up with, and almost preventing me from having any children. We never knew when things would just blow up. What a legacy to leave to our children!

I was so glad when the Soviet Union said the cold war could not be won; they were losing, their people suffered and their economy was losing because of the waste of resources and dollars going into a futile nuclear cold war competition.

Unfortunately the U.S. government wants to remain in control of the world by being the biggest bully. The economy in the United States is now losing out because of current Wasteful government spending on the military -- money that could be more productively used for building infrastructure, education, and for programs supporting health and well-being of its citizenry. The CMRR project is irresponsible. Congress must reject this new plant building plutonium pits for nuclear weapons. We said No to Iran's attempts at building such a system. Say No to the US nuclear warhead production. Nuclear proliferation is a danger no matter who holds the weapons!

Sincerely,

Marcia P. Roberts
330-244-0818

2/16A

3/20

4/98;
5/9A

1/16A
(cont)

Roberts, Stan

Page 1 of 1

Levens, Matthew

From: Roberts, Stan L (XRT) [roberts@y12.doe.gov]
Sent: Tuesday, February 26, 2008 8:21 AM
To: Complex2030
Subject: SPEIS Comment in support of "Distributed Centers of Excellence"

PC_708

I wish to submit the following comment as part of the public input process to the DOE/NNNSA SPEIS on the transformation of the nuclear weapons complex:

I urge NNSA to chose the "Distributed Centers of Excellence" alternative for transformation of the nuclear weapons complex, with the Y-12 National Security complex as the Uranium Center of Excellence.

Sincerely,

Stan Bobarte
510 Melton Hill Dr
Clinton TN 37716

Robinson, Ellen

Page 1 of 1

Buenaflor, Justin

From: Ellen Robinson [ellen2736@aol.com]
Sent: Wednesday, January 16, 2008 3:15 PM
To: Complex2030
Subject: Citizen Comment regarding SPEIS, Complex Transformation

PC_459

1/16A | It is as simple as this: DO NOT BUILD NEW NUCLEAR WEAPONS!

Ellen Robinson
382 W. Coyote Lane SE
Albuquerque, NM 87123
505-323-2386

Robinson, Paul
Page 1 of 83

PC_966

Southwest Research and Information Center
PO Box 4524
Albuquerque, NM 87196-4524
Phone - 505-262-1862/Fax - 505-262-1864
www.srtc.org

May 5, 2008

George Allen
Complex 2030 SEIS Project Lead
Office of Transformation, U.S. Department of Energy
NA-10.1
1000 Independence Ave. SW
Washington, D.C. 20585

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

SUBJECT: Comments Regarding the Draft Complex Transformation Supplemental Programmatic Environmental Impact Statement (SPEIS)

Dear Sirs:

These comments concern gaps in the monitoring programs for detection of airborne radioactivity in and around Sandia National Laboratories - New Mexico (SNL-NM), one of the facilities address in the SPEIS. Reports prepared under contract to the Albuquerque Center for Peace and Justice identified critical shortcomings associated with the accurate determination of:

- 1) Emissions from SNL-NM facilities generating airborne releases of radiation and
- 2) Distribution and accuracy of ambient air monitoring in and around SNL-NM.

These reports, included as attachments to this comment letter, are:

- "Radiation Releases at Sandia National Laboratories/New Mexico: Recently Reported Radiation Releases and Other Potential Sources of Radiation Release" by Paul Robinson - November 6, 2006 - available at <http://www.clarku.edu/mtafund/prodlib/albuquerque/Robinson.pdf>,
- "Review of Environmental Monitoring for Radionuclides in Air at the Sandia National Laboratory" by Bernd Franke - June 20, 2007 - available at http://www.clarku.edu/mtafund/prodlib/albuquerque/IFEU_Review.pdf.

114.D.6

Robinson, Paul
Page 2 of 83

114.D.6
(cont)

The two research reports were supported by contracts resulting from grants to the Albuquerque [New Mexico] Center for Peace and Justice from the Citizens' Monitoring and Technical Assessment Fund. Research supported by that fund is available from the Kasperson Library at Clark University at <http://www.clarku.edu/research/kaspersonlibrary/mtafund/>.

1) Emissions from SNL-NM facilities generating airborne releases of radiation - Accurate monitoring of radioactivity emitted from facilities handling radionuclides is fundamental to accurate assessment of worker place and public doses from those facilities. Unfortunately, SNL-NM fails to conduct monitoring of actual releases from many of its facilities with potential to releases airborne radiation and instead relies on calculated emission rates, rather than sampled and analyzed emission rates as shown in Robinson 2006, P. 7. As shown in the report, in 2005 SNL-NM calculated, rather than monitored, radioactive emissions from 9 of 16 reported sources of the radiation release including the Neutron Generator Facility, SNL-NM's largest projected source of tritium (H-3) emissions and a "complex Transformation" Facility.

To address this defect in the SNL-NM monitoring of its radioactive emissions, the SPEIS should:

- include an analysis of the history of airborne radiation emissions and emission monitoring at SNL-NM,
- identify and address consequences of the failure to accurately monitor past activities - including potential for spills and leaks at facilities for which emission data were calculated not sampled, and
- provide for conduct of comprehensive monitoring of all sources of future airborne radiation releases from facilities at SNL-NM.

2) Distribution and accuracy of ambient air monitoring in and around SNL-NM - The distribution - the number of sites - and accuracy - the range of radioactive characteristics detected - of ambient air monitoring for SNL-SM is significantly poorer than the ambient air monitoring programs at other DOE sites. Unfortunately SNL has significantly fewer ambient air monitoring sites than other DOE sites, and monitors for a significantly narrower set of radioactive parameters than other DOE sites as well, as shown in Franke 2007. Franke, at p.27 concluded that:

"SNL carried out ambient air monitoring for radionuclides at far less locations compared to other DOE facilities. Tritium in ambient air is not monitored by SNL although it is monitored by all other DOE facilities that were reviewed, including those that reported less tritium emissions than SNL. Alpha activity in air is monitored at only four locations as compared to 46 locations at the LANL, even though SNL reported larger releases of alpha activity than LANL."

To address this defect in the SNL-NM airborne radioactivity monitoring program, the SPEIS should:

- analyze the history of ambient airborne monitoring of radioactivity in the SNL-NM area, compare and contrast that history with the programs at other DOE facilities - including the programs at the DOE addressed in the SPEIS, and

Robinson, Paul

Page 3 of 83

- provide for an expanded scope of ambient airborne radioactivity monitoring at SNL-NM to a insure that people living near SNL-NM benefit from a monitoring program that is similar in both the number of sampling sites and range of radioactive characteristics sampled to those at other DOE facilities.

Thank you for your attention to these matters.

Sincerely,

<signed>

Paul Robinson

Research Director

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Radiation Releases at Sandia National Laboratories/New Mexico: Recently Reported Radiation Releases and Other Potential Sources of Radiation Release

FINAL REPORT

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Radiation Releases at Sandia National Laboratories/New Mexico: Recently Reported Radiation Releases and Other Potential Sources of Radiation Release

I. GENERAL BACKGROUND ABOUT SANDIA NATIONAL LABORATORIES/ NEW MEXICO (SNL/NM)

Sandia was established as "Z Division" on Kirtland Air Force Base in Albuquerque, N.M., in 1945 during the Manhattan Project as a division of the Los Alamos Laboratory to provide engineering design, production, assembly, and field testing of non-nuclear components of nuclear weapons. On request of President Harry Truman, Sandia became an independent laboratory on Nov. 1, 1949. Since 1949, Sandia National Laboratories/New Mexico (SNL/NM) has developed science-based technologies that support our national security. (SAND 2005a)



(SAND 2006d)

On November 1, 1949, Sandia Corporation - a wholly owned subsidiary of Western Electric and, later, Bell Labs and AT&T Corporation - began managing Sandia. In 1993, Martin Marietta Corporation (now Lockheed Martin) acquired SNL/NM's management contract. (SAND 2006d)

- "Sandia's missions meet national needs in five key areas:
- Nuclear Weapons — Ensuring the stockpile is safe, secure, reliable, and can support our nation's deterrence policy
 - Nonproliferation and Assessments — Reducing the proliferation of weapons of mass destruction, the threat of nuclear accidents, and the potential for damage to the environment
 - Military Technologies and Applications — Helping to maintain superiority of our armed forces
 - Homeland Security — Helping to protect our nation against terrorism [and]
 - Energy and Infrastructure Assurance — Keeping America's resources and information flowing" (SAND 2005a)

Sandia is a government-owned/contractor-operated facility "managed by a subsidiary of Lockheed Martin Corporation for the Department of Energy's (DOE) National Nuclear Security Administration (NNSA). Sandia also works for and partners with other DOE agencies, the Department of Defense (DoD), the Department of Homeland Security (DHS), other federal, state, and local agencies and governments, private industry, and academic institutions to accomplish our missions."

"SNL applies its capabilities to the following activities:

- Associated with weapons engineering for all levels and phases of the nuclear weapons life cycle.
- National security-related tasks of nuclear materials safeguards and security, treaty verification and control, intelligence on foreign technologies and weapon systems, defense waste management (WM), and programs in support of the U.S. Department of Defense (DoD).
- R&D on (a) fossil fuels including coal, oil, and gas; (b) conservation and renewable energy, focusing largely on solar energy; (c) nuclear energy, principally in WM and reactor safety, and reliability in support of the Nuclear Regulatory Commission (NRC); (d) magnetic-confinement fusion energy, mainly on plasma/material interactions; and (e) fundamental energy research related to combustion, geosciences and material sciences." (SAND 2006e)

"Sandia designs and develops more than 90 percent of the 3,000-6,500 components in a modern nuclear weapon. Since 1993, Sandia has also manufactured some of the most complex nuclear weapon components." (SAND 2005a)

As of Fall 2005, SNL/NM employed the equivalent of 8,600 full time employees and projected an annual budget of \$2.7 billion for Fiscal Year 2006. (SAND 2005a)

II. RECENTLY REPORTED SOURCES OF RADIATION RELEASES AT SNL/NM

Sandia National Laboratory (SNL) reports sources of radiation releases, annual release rates and release estimates and locations of the resources of release in its Annual Site Environmental Reports. The most recent SNL Annual Site Environmental Reports are:

2005 Annual Site Environmental Report for Sandia National Laboratories, New Mexico, SAND2006-4509, September 2006, <http://www.sandia.gov/news/publications/environmental/05nm.pdf>. (SAND 2006)

2004 Annual Site Environmental Report for Sandia National Laboratories, New Mexico, SAND2005-4594, September 2005, <http://www.prod.sandia.gov/cgi-bin/techlib/access-control.pl/2005.05.4594.pdf>. (SAND 2005)

2003 Annual Site Environmental Report for Sandia National Laboratories, New Mexico, SAND2004-2813, September 2004, <http://www.prod.sandia.gov/cgi-bin/techlib/access-control.pl/2004.09.2813.pdf>. (SAND 2004)

Sandia National Laboratories reported 16 sources of radioactive releases in 2005. For the general location of these facilities within SNL, see Figure 1. Of the reported releases only five, the Tech Area III facilities - the Mixed Waste Landfill, one of the two Tech Area IV facility - HERMES III facility, and the Tech Area V facilities - the Annular Core Research Reactor, the Hot Cell Facility and the Sandia Pulsed Reactor, are reported by actual monitoring data, the remaining 11 are reported by calculation. Only five of the facilities reporting actual radiation release monitoring are used in SNL/NM's dose calculation data (the HERMES III facility is not included). (SAND 2006)

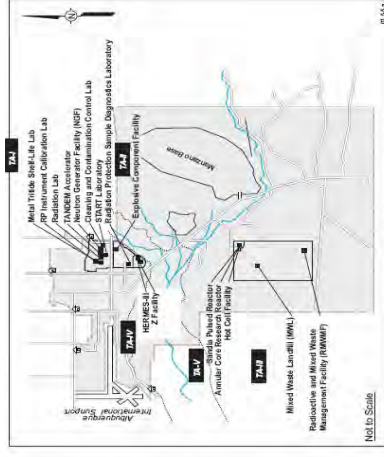


Figure 1 Locations of the 16 Facilities at SNL/NM – and associated Technical Areas (TAs) - that Provided Radionuclide Release Inventories in 2005

The 16 facilities reported as sources of radioactive releases in 2005 include:

- Tech Area (TA-I)
Sandia Tomography and Radionuclide Transport (START) Laboratory
Radiation Laboratory
Calibration Laboratory
Neutron Generator Facility (NGF)
TANDEM Accelerator
Metal Tritide Shelf-Life Laboratory
Cleaning and Contamination Control Laboratory (CCCL)
Radiation Protection Sample Diagnostics Laboratory (RPSD)
- TA-II
Explosive Components Facility (ECF)
- TA-III
Mixed Waste Landfill (MWL)
Radioactive and Mixed Waste Management Facility (RMWMP)
- TA-IV
High-Energy Radiation Megavolt Electron Source - III (HERMES - III)
Z Facility
- TA-V
Hot Cell Facility (HCF)
Annular Core Research Reactor (ACRR)
Sandia Pulsed Reactor (SPR)

The amount of radiation release reported from these facilities is presented in Figure 2. Brief descriptions of these facilities are provided below.

Figure 2 Radioactive Releases from 16 NESHAP Sources at Sandia National Laboratories in 2005

TA	Facility Name	Monitoring Method*	Used in Dose Calculation?	Radionuclide	Reported or Predicted Release (Ci/yr)
I	Sandia Tomography and Radionuclide Transport (START) Laboratory	Calculation	No	Co-60 Cs-137 Pu-238	3.4E-07 5.5E-07 1.0E-07
I	Radiation Laboratory	Calculation	No	H-3 N-13 At-41	1.0E-05 2.0E-07 1.0E-09
I	Calibration Laboratory	Calculation	No	H-3	2.2E-05
I	Neutron Generator (NGF)	Continuous	Yes	H-3	0.56
I	TANDEM Accelerator	Calculation	No	H-3	1.0E-05
I	Metal Tritide Shelf-Life Laboratory Cleaning and Contamination Control Laboratory (CCCL)	Calculation	No	N/A (C-14 in 2004)	N/A (2.7E-04 in 2004)
I	Radiation Protection Sample Diagnostics Laboratory	Calculation	No	Am-243 Cl-36 Co-60 Cs-134 Cs-137 Fr-55 H-3 Mn-54 Ni-63 Pu-236 Pu-238 Pu-239 Pu-241 Pu-242 Ra-226 Rg-228 Sr-90 Tb-99 Th-232 U-233 U-235 U-236 U-238 Zn-65	3.9E-13 1.2E-08 1.3E-10 1.0E-10 1.0E-10 1.2E-08 1.2E-08 1.3E-10 1.2E-08 1.3E-10 1.3E-10 3.9E-13 3.9E-13 3.9E-13 3.9E-13 3.9E-13 3.9E-13 1.3E-10 1.3E-10 1.3E-10 1.2E-08 1.3E-10 1.3E-10 1.3E-10 1.3E-10 1.3E-10 1.3E-10 1.3E-10 8.0E-04
II	Explosive Components Facility (ECF)	Calculation	No	H-3	8.0E-04
III	Mixed Waste Landfill (MWL)	Periodic	Yes	H-3	0.09
III	Radioactive & Mixed Waste Management Facility (RMWMP)	Continuous	Yes	Am-241 Sr-90 Cs-137	0.74 2.0E-05 5.3E-07 1.4E-07
IV	High Energy Radiation Megavolt Electron Source III (HERMES III)	Periodic	No	N-13 O-15	1.4E-03 1.4E-04
IV	Z-Facility (Accelerator)	Calculation	No	H-3 (U-238 in 2004) (U-234 in 2004) (U-235 in 2004)	6.6E-07 2.0E-07 9.2E-09 2.1E-09
V	Hot Cell Facility (HCF)	Periodic	Yes	N/A	N/A
V	Annular Core Research Reactor (ACRR) Sandia Pulsed Reactor (SPR)	Periodic	Yes	At-41	4.86 7.0E-07

NOTE: *Monitoring Method: Periodic = Based on periodic measurements; Calculation = Calculated from known parameters; Continuous = Based on continuous air monitoring results Ci/yr = curies per year; TA= Technical Area; N/A = not available

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Location: Tech Area (TA)-I

Sandia Tomography and Radionuclide Transport (START) Laboratory – This laboratory is used to perform small-scale experiments. In 2005, the facility reported emissions of plutonium-239, cobalt-60 and cesium-137. In 2004, the facility reported emission of cobalt-60 and cesium-137.

Radiation Laboratory – Small-scale radiation experiments resulted in the release of air-activation products and tritium.

Calibration Laboratory – Calibration of radiation detection equipment resulted in small releases of tritium.

Neutron Generator Facility (NGF) - Building 870 - The NGF is the nation's principal production facility for neutron generators. This facility currently emits only tritium. The facility has two stacks, but only utilizes the main stack in the Tritium Envelope North Wing. In 2005, 0.56 Curies (Ci) were reported released from the North Wing stack, based on continuous stack monitoring. This emission is approximately five times 2004 reported release of 0.11 Curies (Ci) from the North Wing stack, also based on continuous stack monitoring. Although anticipated tritium releases do not exceed the regulatory threshold requiring continuous monitoring, it is performed voluntarily at the NGF as a best management practice (BMP). Figure 3 identifies historic reported emission rates of Argon-41 and Tritium (H-3) from SNL/NM facilities.

Emissions from NGF are expected to increase over the next few years due to an increase in use of the neutron generator facility for tritium target loading associated with fabrication of nuclear weapons as proposed in the Final Environmental Assessment for the Proposed Consolidation of Neutron Generator Tritium Target Loading Production DOE/EA-1532 DOE 2005.

DOE 2005 proposes to consolidate the neutron generator manufacturing program (target loading, neutron tube and neutron generator production) by centralizing all neutron generator development and manufacturing processes at SNL/NM.

Implementing this proposed action is projected to result in an estimated tritium emission of 785 Ci/year from the NGF, more than twice the "No Action Alternative" emissions rate of 300 Ci/year. DOE 2005 identified the total amount of tritium that would be contained in the maximum number of neutron generator parts, gas standards, loaders, and the tritium capture system (TCS) contained at any given time to be 15,999 Ci for the proposed level of activity and 4,880 Ci for the No Action Alternative.

TANDEM Accelerator – This is an ion solid interaction and defect physics accelerator facility. Although the TANDEM did not operate in 2005 or 2004, the facility reported potential emissions of tritium that were being housed in the facility.

Metal Triflide Shelf-Life Laboratory – This laboratory, which conducts research on tritium materials, released negligible levels of tritium (five billionths of a curie).

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Cleaning and Contamination Control Laboratory (CCCL) – The CCCL is used for R&D of new and superior materials for government and industrial needs. Carbon-14 was the only radionuclide emission reported in 2004. No emissions were reported in 2005.

Radiation Protection Sample Diagnostics Laboratory (RPSD) – Small-scale radiometric sample analyses on an as-needed basis.

Location: TA-II

Explosive Components Facility (ECF) – Building 905 - The ECF conducts destructive testing on neutron generators. In 2005 and 2004, the facility reported emissions of tritium.

Location: TA-III

Mixed Waste Landfill (MWL) – The MWL was closed in 1988. Although a diverse inventory of radionuclides is present in the MWL, measurements indicate that tritium is the only radionuclide released into the air. In 1992, 1993, and 2003, studies were conducted to quantify the tritium emissions. The most recent value, from 2003, is used for their annual inventory.

"The Mixed Waste Landfill (MWL) is located approximately 5 miles southeast of Albuquerque International Support, and 4 miles south of Technical Area (TA) I. The site covers 2.6 acres in the north-central portion of TA 3.

"The MWL was established in 1959 as a disposal area for radioactive and mixed wastes generated at SNL research facilities. The Mixed Waste Landfill received waste between 1959 and 1988 that was disposed in roughly 50 unlined pits and trenches dug 15 – 25 feet into the soil across a 2.6-acre area, a 0.6-acre portion of which was operated as a "classified waste landfill."

Based on data provided to NMED in 2001 by SNL, the MWL contains approximately 100,000 cubic feet of radioactive and hazardous waste, including more than 10 tons of depleted uranium, estimated to have contained more than 6300 curies of radioactivity at the time of disposal. Hazardous constituents at the MWL include organic chemicals such as trichloroethylene (TCE) and carbon tetrachloride and heavy metals such as lead and cadmium. Radioactive constituents at the MWL include more than 40 radioactive isotopes such as: tritium (H-3), sodium-22, barium-133, cobalt-60, molybdenum-54, krypton-85, strontium-90, iodine-129, and cesium-137, polonium-210, radium-226, uranium-235, americium-241, thorium oxide, and plutonium-238, among other isotopes." (Citizen Action, 2006)

Radioactive and Mixed Waste Management Facility (RMWMF) – The RMWMF primarily handles low-level waste (LLW), mixed waste (MW), and some transuranic (TRU) waste. In 2005 and 2004, the RMWMF reported tritium releases, americium-241, strontium-90, and cesium-137 as determined by continuous stack monitoring. Although anticipated tritium releases do not exceed the regulatory threshold requiring continuous monitoring, it is performed voluntarily at the RMWMF as a best management practice (BMP). The increase in the tritium release again in 2005 was due to the final processing of tritium-containing oil waste at the RMWMF (begun in 2003).

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RIMMIF Glovebox

Location: TA-IV
High-Energy Radiation Megavolt Electron Source - III (HERMES - III) – Building 970 - The HERMES III accelerator is used to test the effects of prompt radiation on electronics and complete military systems. This facility produces air activation products, primarily nitrogen-13 and oxygen-15. In 2003, 2004, and 2005, the facility reported releases of nitrogen-13 and oxygen-15.

Z Facility – The Z Facility is an accelerator used for research on light ion inertial confinement fusion. Large amounts of electrical energy are stored over several minutes and then released as an intense concentrated burst (shot) at a target. In 2005, the facility reported releases of tritium. In 2004, the facility reported releases of tritium, uranium-234, uranium-235, and uranium-238.

Location: TA-V



Tech Area V

Hot Cell Facility (HCF) - Building 6580 - The HCF provides full capability to remotely handle and analyze radioactive materials such as irradiated targets. It consists of the Hot Cell itself, which contains steel confinement boxes; the glove box laboratory; ancillary analytical equipment; support areas; and fissile- and radioactive-material storage areas. The HCF primarily conducts and supports research and development activities. Therefore, the types and quantities of materials handled, the operations carried out, and the types and quantities of wastes produced vary from project to project. (Global 2006)

In 2005, there were no reportable emissions. In 2004, the facility was used for the 7% enriched project and the lead characterization project. The 7% enriched project is done in a fully enclosed and filtered glovebox; therefore there were no reportable emissions. The

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lead characterization program work is done where there is triple HEPA filtration, so again there were no reportable emissions. (SAND 2006)



HOT CELL FACILITY

Annular Core Research Reactor (ACRR) - Building 6588 - This reactor is a pool-type reactor used primarily to support defense program projects. It has a steady state peak power potential of 4 megawatts (MW) with a pulsed power peak up to 30,000 MW. Used primarily for electronics and reactor safety research, the facility has the capability to support the Medical Isotope Production Project (MIPP) by producing molybdenum-99 and other isotopes used in nuclear medicine. Argon-41, an air activation product, was the only reported releases in 2005 and 2004.



ACRR

In a pool-type reactor, activities using the reactor assembly are conducted in a pool of water. In June 2006, SNL/NM was considering re-start of the ACRR without storage pool water following repairs to reconstruct the storage pool after pool water contamination due to deterioration of depleted uranium shielding and a pool liner leak. Following problems associated with decontamination of the liner and determination that the replacement liner fails to meet specifications, SNL/NM considered operations without storage pool water to meet re-start scheduling objectives. (SAND 2006b)

The ACRR Building also houses the Old Gamma Irradiation Facility (OGIF), which consists of two adjoining irradiation cells. The sources provide a variety of radioactive source geometries for irradiating experiments. The OGIF contains approximately 150,000 Ci of Co-60 and is used mainly for radiation certification of satellites and weapons systems, electronic components, dosimetry calibration, and radiation damage to materials studies. (Global 2006)

Sandia Pulsed Reactor (SPR) - Building 6590 - The SPR, including reactors designated as SPR II and SPR III is used to produce intense neutron bursts for effects testing on materials and electronics. The SPR II and SPR III reactors provide a unique, near-fission-spectrum radiation environment in which to test technologies that support defense and

non-defense activities. The primary mission of the facility is to meet high neutron fluency or pulsed high dose requirements in the testing of electronic subsystems and components.

In 2005, release of Ar-41 was reported. There were no reportable emission released in 2004.

The future for the SPR may be very short. In May 2004, the DOE Secretary, then Spencer Abraham, asserted that after operations of three years or less, the Sandia Pulsed Reactor will no longer be need since computer simulations will be able to assume its mission. He also stated that, when the SPR mission is complete the reactor fuel will be removed from SNL/NM, though he did not indicate where that fuel would go. (DOE 2004)

As recently as June 2006, SNL/NM Vice-President Joan Woodward confirm this plan in Sandia Lab News saying, "for reasons associated with the cost of operation and security, we're going to operate SPR this year and at the end of this year it is done." (SAND 2006a)

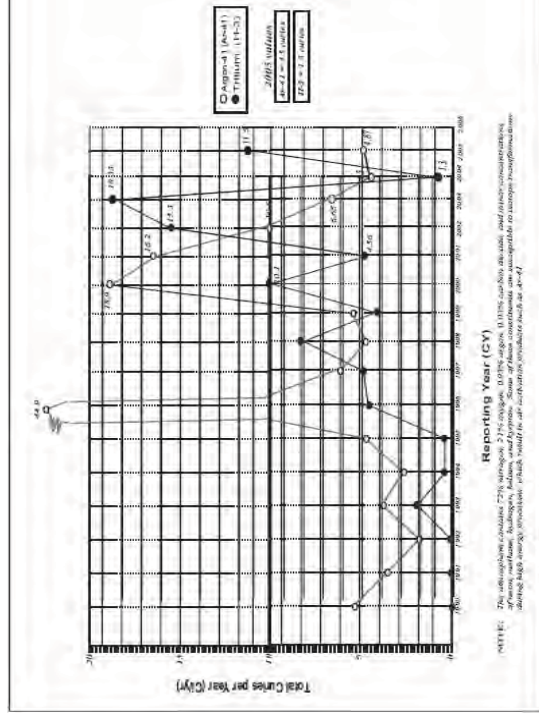


Figure 3 Summary of Atmospheric Releases in Argon-41 and Tritium from SNL/NM Facilities Since 1990 (Emissions vary from year to year based on operations within the facility)

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III. RADIOACTIVE MATERIAL AT SNL/NM NOT IDENTIFIED AS SOURCES OF RADIATION RELEASE IN SANDIA'S ANNUAL SITE ENVIRONMENTAL REPORTS

A. REACTOR FUEL AND REACTOR IRRADIATED NUCLEAR MATERIALS

Seventeen batches of reactor irradiated nuclear materials have recently been identified at Sandia National Laboratories as a result of Freedom of Information Act (FOIA) queries by Citizen Action. Upon notification of the occurrence of these materials, the New Mexico Environment Department (NMED) has begun to investigate the degree to which these material are regulated by hazardous waste management regulations or other regulatory programs at the state or federal level. (NMED March 16, 2006)

In July 2004, the NMED requested a report from Sandia National Laboratories providing specific detailed information addressing reactor fuel and reactor irradiated materials determined to occur at Sandia National Laboratories. In a May 2005 report on those materials SNL provided the NMED an inventory list of irradiated reactor fuel and RINM stored in below-grade storage facilities at Technical Area-V (TA-V) and in the Manzano Bunkers surround Four Hills.

In a March 2006 letter, to SNL/NM and DOE, NMED determined that the reactor fuel and reactor irradiated nuclear materials reported by SNL included "metal-bearing materials potentially regulated as hazardous or mixed waste under the Resource Conservation Recovery Act (RCRA). Metals include cadmium, lithium, silver and sodium; other potentially reactive materials in storage in the below-grade storage facilities were also documented." Based on that report NMED required SNL to provide NMED the information ... concerning the storage, management and characterization of irradiated reactor fuel, RINM, as well as other potentially hazardous and/or mixed waste stored in below-grade facilities at TA-V and the Manzano Bunkers."

NMED requested detailed information on six of the 18 bins, or "batches," of Reactor Irradiated Nuclear Materials that SNL reported as containing constituents that may be appropriately regulated as hazardous or mixed waste. These materials included:

Batch 5, Deuterium Materials, LiD powders containing chemically reactive Lithium;
Batch 9, Irradiated Uranium, presence of thermocouple materials in scrap and miscellaneous materials and in complete experimental parts and assemblies;
Batches 14 and 15, Sodium-bonded Uranium Materials and Spent Fuel.

Uranium fuel bonded with or surrounded by sodium and the sodium removed from the fuel;

Batch 17, Uranium Hexafluoride, exhibits RCRA reactive characteristics;
Batch 18, Uranyl Nitrate, RCRA characteristics (if any) not addressed.

In addition to those six batches of material, SNL identified 12 batches of reactor irradiated nuclear materials with significant radioactive material content that have yet to be disposed of in licensed or permitted facilities but may not include hazardous waste

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constituents along with their radioactive material content. All 18 batches of Reactor Irradiated Nuclear Materials are identified in TABLE __. (SAND 2002)

B. MANZANO STORAGE FACILITY BUNKERS

In its March 2006, letter, NMED required detailed information regarding 46 containers in the Manzano Bunkers. The Manzano Bunkers are storage facilities authorized to store nuclear material and waste. Classified nuclear and radioactive materials (fissile and non-fissile) are stored on a long-term basis. No Sandia personnel are permanently assigned to Manzano. The structures are visited randomly several times a week and inspected at least once a month. Five Manzano Bunkers are used for nuclear material storage. The material in these bunkers is currently evaluated to determine its designation as radioactive waste or non-waste material. The Manzano Bunkers materials identified for further investigation in NMED's March 2006 included:

1. Container # 185974, Control # 49559, containing UO2 in Metallic Na Matrix.
2. Container # 186001, Control # 49900, containing UO2 in Metallic Na Matrix.
3. Container # 186025, Control # 101882, containing UO2 in Metallic Na Matrix.
4. Container # 186056, Control # 49634, containing UO2 Part in Metallic Na Matrix.
5. Container # 186360, Control # 143158, containing Scrap Cutting from DF-3.
6. Container # 186735, Control # 47456, containing UO2 in Stainless Steel cladding (SS clad) + Na.
7. Container # 186872, Control # 47258, containing UO2 in SS clad + Na.
8. Container # 186957, Control # 56038, containing UO2 in SS Clad + Na.
9. Container # 186971, Control # 79, containing UCx - SS Clad in NA.
10. Container # 187008, Control # 126966, containing UCx + Metallic Na Met Samples.
11. Container # 187008, Control # 126977, containing UCx + Metallic Na Met Samples.
12. Container # 187008, Control # 126984, containing UCx + Metallic Na Met Samples.
13. Container # 187008, Control # 126991, containing UCx + Metallic Na Met Samples.
14. Container # 187008, Control # 127004, containing UCx + Metallic Na Met Samples.
15. Container # 187008, Control # 127011, containing UCx + Metallic Na Met Samples.
16. Container # 189095, Control # 47500, containing UO2 in SS with Metallic Na.
17. Container # 191098, Control # 143042, containing Sections Cut from DF-3.
18. Container # 191098, Control # 146073, containing Sections Cut from DF-3.
19. Container # 191098, Control # 143080, containing Sections Cut from DF-3.
20. Container # 191098, Control # 143103, containing Sections Cut from DF-3.
21. Container # 191098, Control # 143127, containing Sections Cut from DF-3.
22. Container # 191098, Control # 143141, containing Sections Cut from DF-3.
23. Container # 191920, Control # 143059, containing Transverse Sect/Met Sample UO2.
24. Container # 191920, Control # 143066, containing Transverse Sect/Met Sample UO2.
25. Container # 191920, Control # 143097, containing Transverse Sect/Met Sample UO2.
26. Container # 191920, Control # 143110, containing Transverse Sect/Met Sample UO2.
27. Container # 191920, Control # 143134, containing Transverse Sect/Met Sample UO2.
28. Container # 210007, Control # 189491, containing Thorium.
29. Container # 210007, Control # 189507, containing Thorium.
30. Container # 210120, Control # 185059, containing Thorium Oxide.
31. Container # 210120, Control # 185310, containing Irradiated MP-2 Exp. Debris.
32. Container # 210376, Control # 49757, containing UO2 Part in Metallic Na Matrix.

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33. Container # 210376, Control # 47771, containing UO2 Part in Metallic Na Matrix.
34. Container # 210377, Control # 86585, containing UO2 Part in Metallic Na Matrix.
35. Container # 210377, Control # 86592, containing UO2 Part in Metallic Na Matrix.
36. Container # 210377, Control # 86608, containing UO2 Part in Metallic Na Matrix.
37. Container # 210377, Control # 86615, containing UO2 Part in Metallic Na Matrix.
38. Container # 210377, Control # 86622, containing UO2 Part in Metallic Na Matrix.
39. Container # 210377, Control # 87339, containing UO2 Part in Metallic Na Matrix.
40. Container # 210377, Control # 87353, containing UO2 Part in Metallic Na Matrix.
41. Container # 210377, Control # 87377, containing UO2 Part in Metallic Na Matrix.
42. Container # 210377, Control # 87391, containing UO2 Part in Metallic Na Matrix.
43. Container # 210378, Control # 132572, containing UO2 Part in Metallic Na Matrix.
44. Container # 210379, Control # 125536, containing UO2 Part in Metallic Na Matrix.
45. Container # 210380, Control # 105866, containing UO2 Part in Metallic Na Matrix.
46. Container # 210381, Control # 97000, containing UO2 Part in Metallic Na Matrix.

C. RADIOACTIVE MATERIALS NOT YET REGULATED OR DISPOSED OF

In the same March 2006 letter, the NMED requested detail information on materials identified in 1993 at SNL but yet to be effectively regulated or disposed of:

- Manzano Storage Facility, Class "C" explosive in a non-irradiated assembly;
- Annular Core Research Reactor Storage Vault, containing lead and silver solder and lead shield;
- Hot Cell Facility Steel Confinement Boxes, Glove Box Line or Hot Cell, containing soldered electrical components and metals including cadmium, silver, lead, sodium, etc. (NMED 2006)

D. CORRECTIVE ACTION MANAGEMENT UNIT (CAMU)

The Corrective Action Management Unit (CAMU) is designed and permitted to store, treat, and permanently contain Environmental Restoration (ER) Project hazardous wastes. The CAMU is located near the southeastern corner of Technical Area III next to the site of the Chemical Waste Landfill. Waste and debris accumulated during excavation of the Chemical Waste Landfill are stored at the CAMU.

Sandia reports that "the CAMU is not a SNL-regulated radiological work permit (RWP) site or radioactive material management area (RMMA). No radionuclides above what is considered background are permitted within the CAMU except tritium. Soil moisture that contains tritium below a concentration of 20,000 picocuries per liter (pCi/L) has been accepted at the CAMU. This tritium concentration is above what is considered background (i.e., 420 pCi/L), but this referenced level is a EPA drinking water standard and therefore the concentrations present in the soil at the CAMU do not pose any significant radiological health risks.

"Some of the waste managed at the CAMU contains regulated chemical constituents that have potential toxicological and physical hazards. The main types of chemical contamination present in the soils that have been treated at the CAMU are:

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- Volatile Organic Compounds (VOCs) - 1,1,1-Trichloroethane and Acetone and O-toluidine;
- Semivolatile Organic Compounds (SVOCs) - Aniline, Bis(2-ethylhexyl)phthalate, and O-toluidine;
- Heavy Metals - Arsenic, Barium, Cadmium, Chromium, Lead, Mercury, and Selenium; and
- Polychlorinated Biphenyls (PCBs)

These organic compounds and metals can cause acute and chronic health effects. A few chemicals have been identified as known or suspected human carcinogens. Following treatment to lower contaminant concentrations, soils were placed in the CAMU containment cell." (SAND 2006f)

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APPENDIX A
**WASTE HANDLING AND DISPOSAL SITES AT
 SANDIA NATIONAL LABORATORIES/NEW MEXICO (SNL/NM)**

I. INTRODUCTION

This list identifies all hazardous and solid waste sites current listed by SNL/NM. It includes sites where both hazardous and radioactive waste constituents have been found or reported. This list has been compiled to provide a list of the status of all identified waste sites and SNL/NM projects where chemical and radioactive materials may have been deposited or handled as part of the Sandia Lab Awareness Project Phase II – SLAP II. It includes several maps that show where the sites are located.

Sandia National Laboratories (SNL) identifies and manages waste sites where radioactive or chemical materials were disposed of and projects where, potentially, chemical and radioactive materials are being handled through separate programs.

For purposes of this report, “Waste Sites” are defined as locations where radioactive and hazardous waste or debris where placed in the past but are no longer receiving material for disposal. These locations are managed by Department of Energy’s (DOE) Long-term Environmental Stewardship (LTES) Program.

For purposes of this report, projects where, potentially, chemical and radioactive materials are being handled include sites where current activities handling radioactive and hazardous materials are conducted.

II. SITES OF CURRENT AND PROPOSED RADIOACTIVE AND HAZARDOUS MATERIAL HANDLING

Sites used for radioactive and hazardous materials handling include:

- 1) Sites addressed by the SNL/NM Resource Conservation and Recovery Act (RCRA) Permit NM5890110518 issued by New Mexico Environment Department (NMED),
- 2) Sites with Air Quality Permits issued under authority of by the Albuquerque Bernalillo County Air Quality Board and
- 3) Site where radioactive materials not regulated by a RCRA Permit or other Environmental Permits.

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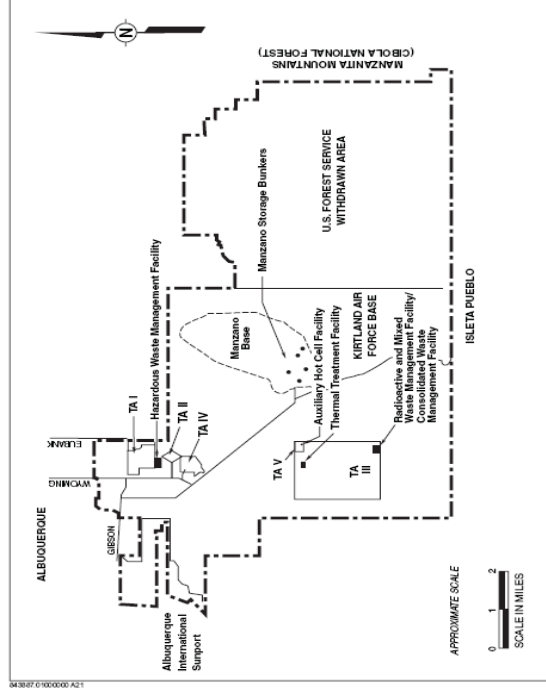


Figure A-1 Locations of Resource Conservation Act (RCRA)-Regulated waste handling and treatment facilities at SNL/NM in relationship to SNL Technical Areas (TAs) and the Kirtland Air Force Base (KAFB) Boundary

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- 1) Sites addressed by the SNL Resource Conservation and Recovery Act (RCRA) Permit are identified in the October 2005 version of the SNL RCRA Permit Application.

The locations of Resource Conservation Act (RCRA)-Regulated waste handling and treatment facilities at SNL/NM in relationship to the location of SNL Technical Areas (TAs) and the Kirtland Air Force Base (KAFB) Boundary are shown in Figure A-1. These facilities are briefly discussed below. SNL/NM RCRA Permit-related activities at these facilities are the subject of a very extensive renewal application - "Part B Application" - that has been undergoing an extensive cycle of review by NMED and revision by SNL/NM since 2002.

Hazardous Waste Management Facility (HWMF). The HWMF consists of several buildings within a fenced area located south of SNL/NM TA-I. The HWMF is used for storage and packaging of RCRA-regulated wastes. The wastes are transported to off-site RCRA-permitted facilities for treatment, storage, and/or disposal. These wastes are generated during SNL/NM operations and corrective action activities.

Thermal Treatment Facility (TTF). The TTF consists of a burn cage with ancillary equipment located in a fenced area south of Building 6715 in the northern part of SNL/NM TA-III. The TTF is used for thermal treatment of explosive wastes generated by SNL/NM operations. RCRA-regulated treatment residues (ash) are transported to off-site permitted facilities for treatment, storage, and/or disposal.

Radioactive and Mixed Waste Management Facility (RMWMF). The RMWMF consists of several buildings within a fenced area located at the southeast corner of SNL TA-III, west of the CWL. The RMWMF is used for storage, treatment, and packaging of RCRA-regulated wastes generated during SNL/NM operations and corrective action activities. RCRA-regulated wastes and treated residues are transported to off-site permitted facilities for treatment, storage, and/or disposal. The RMWMF is operated under interim status.

The plan of operation of the RMWMF in the current RCRA Permit renewal permit application reflects changes from the original RMWMF and minor technical changes and updates previously submitted to NMED in March and July 2005. The application for the RMWMF is included in the October 2005 revision to the RCRA renewal application under review.

Auxiliary Hot Cell Facility (AHCF). The AHCF is located in Building 6597 in SNL/NM TA-V. The AHCF will be used for treatment, packaging, and storage of RCRA-regulated wastes generated during SNL/NM operations and corrective action activities. The complete updated application for operation of the AHCF is included in a November 2004 revision to the RCRA renewal application.

Manzano Storage Bunkers (MSB). The MSB are concrete walled bunkers constructed into the sides of the Four Hills at the east end of KAFB used to store RCRA-regulated wastes generated during SNL/NM operations and corrective action activities. The seven MSB bunkers listed in the RCRA permit and renewal application are located within the

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former Manzano Base in the eastern part of KAFB. RCRA-regulated wastes are typically transported to other SNL/NM Units for storage and/or treatment before being transported to permitted off-site facilities for further treatment, storage, and/or disposal. The MSB are operated under interim status. SNL/NM's February 2002 Renewal Application include plans of operations for the MSB. Plans of operation for five bunkers in the MSB are included in the November 2004 revision to the RCRA renewal application.

Two of the bunkers provide extra capacity that has not been needed and they have never been used for storage of RCRA-regulated wastes under interim status. Sandia/DOE withdrew the Part B permit application for those two bunkers in April 2003. In December 2003, Sandia/DOE submitted a request to NMED for closure of the two bunkers. Sandia/DOE continue to operate the two Units under interim status until NMED approves the closure request.

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III. INACTIVE WASTE SITES

Sandia National Laboratories manages waste sites no longer being added to as Environmental Restoration (ER) Site Operable Units (OUs) as part of its Long-Term Environmental Stewardship Program (LTES) as identified at <http://www.sandia.gov/tes/index.html> as of April 5, 2006.

The full range of sites managed under the LTES Program at Sandia are identified on the Site Information Page at http://www.sandia.gov/tes/site_map.htm

The Sandia National Laboratories LTES Site Information page includes an "Operable Unit Site Map" that can be used to identify the specific location of ER sites listed. The "Operable Unit Site Map" is pasted below as Figure A-2.

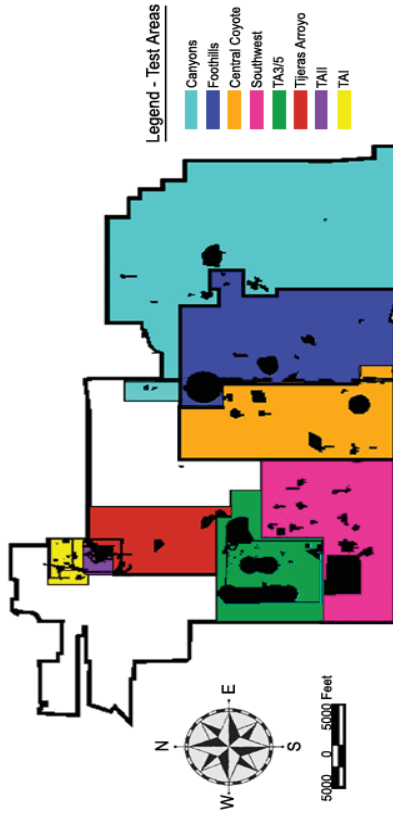


Figure A-2 Location of Environmental Restoration sites - inactive waste disposal sites - managed by the SNL/NM long-term Environmental Stewardship Program

The Environmental Restoration Site information maintained by the Long-term Stewardship Program at SNL/NM data identifies the Specific ER sites as:

- 1) "Major" ER sites - All located in the Technical Area 3 and 5 (TA3/5) portion of the Figure A-2:
 - A) Corrective Action Management Unit (CAMU),
 - B) Chemical Waste Landfill, and
 - C) Mixed Waste Landfill
- 2) Waste disposal systems:
 - A) Drainage Septic Tanks, and
 - B) Liquid Waste Disposal System
- 3) "Other" ER sites identified as:
 - A) "Areas of Concern,"
 - B) "ER Sites with Accepted No Further Action Plans (NFAs)" (No Further Action Plans are actions reviewed and approved accepted by the NMED Hazardous Waste Bureau that regulates the ER sites); and
 - C) ER Sites: "Removed from Hazardous Solid Waste Amendment Act (HSWA) Permit" and no longer being considered for remediation.

1) Major ER Sites: Sandia's LTES web site and links provides information on each of the three major ER sites. Links for the three "major" Sandia LTES Sites and portions of the site-specific information from those links are provided below:

A) **CAMU** - SNL Information Page at <http://www.sandia.gov/tes/camu.htm>.

"The Corrective Action Management Unit (CAMU) is designed and permitted to store, treat, and permanently contain Environmental Restoration (ER) Project hazardous wastes. The CAMU is located near the southeastern corner of Technical Area III, on ER Site 107. The regulations governing CAMUs were established to encourage reduction of risks at contaminated waste sites through better control of contaminant sources without the significant expense associated with offsite disposal. Public participation and stakeholder involvement were instrumental in the implementation of a CAMU at Sandia National Laboratories (SNL). This is the first CAMU for Department of Energy (DOE).

"After significant public involvement in the CAMU decision process, SNL applied for a modification to their existing permit for managing hazardous waste. The modification was granted by the Environmental Protection Agency (EPA) in September 1997. Authorization to perform soil washing and/or soil stabilization in the CAMU was granted by the EPA in November 1997. Authorization to operate a low temperature thermal desorption (LTTD) unit, originally granted by the New Mexico Environment Department (NMED) in April 1998, was reissued in September 2002. The CAMU is only permitted to store, treat, and provide long-term management for ER-derived wastes. Wastes produced from SNL's on-going mission-related activities are not allowed in the CAMU. Approval for the safe containment of TSCA-regulated soil was granted by EPA in June 2002."

B) **Chemical Waste Landfill** - SNL Information Page at <http://www.sandia.gov/tes/cwl.htm>.

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"The Chemical Waste Landfill (CWL) is approximately 1.9 acres and is in the southeast corner of TA-III. Disposal operations at the CWL began in 1962. Separate pits are reported to have been used for the disposal of acids, oxidizers, reducers, organics, reactives, bulky materials, metal, neutral compounds, and salts. Only one of the pits (for chromic acid), on the south end of the CWL, was lined. No record of disposal practices was available for operations occurring between 1962 and 1975, resulting in uncertainty concerning the actual types, amounts, and locations of waste at the site. It has been estimated that approximately 20,000 cubic yards of waste were disposed at this site.

In 1981, all liquid waste disposal in unlined trenches stopped. Liquid waste was stored next to the appropriate trench and later packaged into 55-gal (209-L) drums. Chemically-similar waste, such as oils and organic compounds, was consolidated and subsequently disposed of onsite by a hazardous waste management contractor at an approved hazardous waste disposal facility. Solid disposal into unlined trenches continued until 1985.

"The CWL operated under Resource Conservation and Recovery Act (RCRA) interim status as a hazardous waste drum storage facility with a capacity for 300 drums until 1989. Waste drums were staged in segregated areas according to waste type. Drums were repacked in the temporary repack storage area before storage. A drum-crushing machine was used to crush excess empty drums left over from repack operations.

"The CWL operation was discontinued completely in 1989, and all pits were covered with soil backfill. The lined chromic acid surface impoundment remained uncovered until April 1991. In response to a Tiger Team finding, it was covered with a sheet of plastic and approximately 2 in. of soil to minimize wind-blown chromium dust.

"To comply with RCRA 40 CFR 265.112 groundwater monitoring requirements, five groundwater monitor wells (MW-1, MW-2, MW-3, BW-1, and BW-2) were installed at the CWL during the summer of 1985 using a mud rotary drilling method. These wells were completed at various vertical depths within the aquifer, with screened intervals ranging from 70 to 460 ft (21 to 140 m) in length.

"In response to a Notice of Violation (NOV) from the New Mexico Environment Department (NMED) with regard to inadequate design and construction of the 1985 wells, four additional monitor wells (BW-3, MW-1A, MW-2A, MW-3A) were installed in 1988 with air rotary casing hammer techniques. Monitor Well MW-4 was installed in April 1990, again in response to a requirement for additional groundwater characterization from the NMED, using a combination of auger and mud-rotary techniques. MW-4 was constructed with a 20-ft (6-m) screened interval similar to that for the 1988 wells.

"In the spring of 1990 the presence of trichloroethylene (TCE) in groundwater beneath the CWL was confirmed. Since this finding, a plan for corrective action of contamination was developed and included in the Closure Plan for this site. Continued quarterly groundwater monitoring revealed the presence of TCE mostly in three of the downgradient monitoring wells at levels hovering around the Environmental Protection Agency's (EPA's) drinking water standard. The nearest water supply well to this site is four miles to the north.

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"Closure Plan negotiations between DOE/SNL began with the NMED in 1988. The Closure Plan was approved by NMED in February 1993. The discovery of TCE in groundwater caused much of the delay in getting this document approved. The approved Closure Plan has been amended to include the installation of up to eight additional monitoring wells and aquifer testing to complete the characterization of the site.

"In the winter/spring of 1994, four additional monitoring wells were installed: BW-4, MW-2B, MW-5, and MW-6. The three downgradient boreholes, MW-2B, MW-5, and MW-6, were completed as were two separate wells in one borehole, a 2-in. well and a 5-in. well (i.e., MW-5U [upper] and MW-5L [lower]) to quantify the vertical gradient at this site without installing two separate boreholes at each location. The upper well is installed in the uppermost aquifer and the lower well is installed approximately 25 to 30 ft deeper, in the next significant water-bearing zone.

"The CMS Plan was completed in February 1995. An integrated Corrective Measures Study (CMS) Plan/Voluntary Corrective Measures (VCMs) process was initiated several months later, in May 1995. Completion of the CMS Plan in parallel with extraction of vapors from the vadose zone and excavation of the landfill contents (the VCMs) was conceived to expedite removal of the most threatening contamination and advanced determination of final corrective actions. Additionally, final corrective actions are expected to be of a lesser scope due to VCM completion. RCRA groundwater assessment monitoring has been conducted continuously since 1990, and is scheduled to continue as part of the post-closure care activities.

The CMS Plan included a major treatability study and field pilot testing phase that was completed as part of the technology screening task. This work included a co-metabolic bioventing treatability study, a chromium stabilization/fixation treatability study, and vapor extraction pilot testing at various locations around the site. One series of tests involved vapor extraction and air injection tests at approximately 500 feet below grade. Catalytic oxidation and vapor-phase granular activated carbon treatment technologies were evaluated during these tests, as well as different types of vacuum pumps.

Concurrent with the remediation pilot testing, a vadose zone Partitioning Interwell Tracer Test (PITT) was performed to quantitatively characterize the dense non-aqueous phase liquid (DNAPL) beneath two organic disposal pits. This PITT was the first full-scale vadose zone test conducted and successfully improved the understanding of DNAPL presence and migration at the site. The information obtained from this testing was used to design a vapor extraction system and will be valuable during the drafting of the CMS Report.

"The first VCM conducted was the Vapor Extraction VCM (VE VCM) and was completed in June 1999. The VE VCM involved the extraction of soil gas from remediation wells screened over specific intervals of the approximately 500 feet thick vadose zone. In addition, atmospheric air was injected through two wells to promote VOC contaminant removal. Six new remediation wells were installed during the first quarter of FY97 to supplement existing pilot test and groundwater monitoring wells. A total of 11 extraction wells and two air injection wells have been operated during Stage one. Approximately 5000 lbs of TCE was removed through this system.

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“Excavation of the landfill (LE VCM) began September 30, 1998. All buried debris was removed from the landfill on June 7, 2001. All excavation was completed in February 2002. One additional hot-spot was hand excavated in January 2003. The intent of this VCM was to excavate buried waste material and associated heavily contaminated soil from across the landfill to remove the unknowns and the potential source for future leakage from the landfill and mitigate risks posed by the buried contents and associated highly contaminated soil.”

3) **Mixed Waste Landfill** – SNL Information Page at http://www.sandia.gov/tes/mixedwaste_landfill.htm.

“The Mixed Waste Landfill (MWL) is located approximately 5 miles southeast of Albuquerque International Sumpport, and 4 miles south of Technical Area (TA) 1. The site covers 2.6 acres in the north-central portion of TA 3.

“The MWL was established in 1959 as a disposal area for radioactive and mixed wastes generated at SNL research facilities. The landfill accepted low-level radioactive waste and minor amounts of mixed waste from March 1959 through December 1988. Approximately 100,000 cubic feet of radioactive wastes containing approximately 6300 Ci of activity (at the time of disposal) were disposed of at the MWL.

“The MWL consists of two distinct disposal areas. The classified area, occupying 0.6 acres, and the unclassified area, occupying 2.0 acres. Wastes known to have been disposed of in the classified area include solidified acids, solvents, and oils; DU; lead shielding; activation products; beryllium; sodium; lithium; neutron generator tubes; and empty liquid scintillation vials. Wastes known to have been disposed of in the unclassified area include assorted contaminated equipment; decontamination materials; lead shielding; construction debris; contaminated soils; and miscellaneous solid wastes. These wastes were disposed of in seven trenches, typically 15 ft deep, 20 ft wide, and 120 ft long. The exact depth of each trench is unknown.

“In 1967, approximately 271,000 gal of coolant waste water from the Sandia Engineering Reactor Facility was disposed of in Trench D. Approximately 1 Ci of total radioactivity, mainly short-lived radionuclides, was discharged into the trench with the cooling water. Because the disposal occurred in 1967, the short half-lived activation products have decayed to below detectable levels.”

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2) Waste disposal systems includes the Drainage Septic Tanks and Liquid Waste Disposal System
The facilities were used before SNL/NM facilities were connected to a sanitary sewer system of the City of Albuquerque.

A) The closed Drainage Septic Tanks Sites at Sandia include:

149 – Building 9820 Drains
101 – Explosive Contaminated Sumps, Drains (Bldg 9926)
116 – Building 9990 Septic System
137 – Bldg. 6540/6542 Septic System
138 – Bldg 6630 Septic System
140 – Bldg 9965 Septic System (Thunder Range)
141 – Bldg 9967 Septic System (Thunder Range)
142 – Bldg 9970 Septic System
143 – Bldg 9972 Septic System
144 – Bldg 9980 Septic System
145 – Bldg 9981/9982 Septic Systems
146 – Bldg 9970 Drain System
147 – Bldg 9925 Septic Systems
148 – Bldg 9927 Septic System
149 – Bldg 9930 Septic System
150 – Bldg 9939/9939A Septic Systems
151 – Bldg 9940 Septic System
152 – Bldg 9950 Septic System
153 – Bldg 9956 Septic Systems
154 – Bldg 9960 Septic Systems
160 – Bldg 9832 Septic System
161 – Bldg 6636 Septic System

B) The closed Liquid Waste Disposal System (LWDS) sites at SNL/NM include:

4 – LWDS Surface Impoundments
5 – LWDS Drainfield

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	52 - LWDS Holding Tanks

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3) The "Other ER Sites" at SNL/NM include:

A) The List of "Area of Concern" Sites includes:

TAG - Tijeras Arroyo Groundwater
BLDGS28 - Former Building 828 (TA-I)
TNT Site - TNT Site
276 - Former Bldg. 829X Silver Recovery Sump (TA-I)
277 - New Firing Site East of Optical Range
1001 - Bldg. 898 Septic System (TA-I)
1003 - Former Bldg. 915/922 Septic System (TA-II)
1004 - Bldg. 6969 Septic System (Robotic Vehicle Range)
1006 - Bldg. 6741 Septic System (TA-III)
1007 - Bldg. 6730 Septic System (TA-III)
1008 - Bldg. 6750 Septic System (TA-III)
1009 - Bldg. 6620 Internal Sump (TA-III)
1010 - Bldg. 6536 Septic System and Seepage Pit (TA-III)
1014 - Former T-12, T-42 and T-43 Septic System (TA-V)
1015 - Former MO 231-234 Septic System (TA-V)
1020 - MO-146, MO-235 and T-40 Septic System (TA-III)
1024 - MO 242-245 Septic System (TA-III)
1025 - Bldg. 6501 East Septic System (TA-III)
1026 - Bldg. 6501 West Septic System (TA-III)
1027 - Bldg. 6530 Septic System (TA-III)
1028 - Bldg. 6560 Septic System (TA-III)
1029 - Bldg. 6584 North Septic System (TA-III)
1030 - Bldg. 6587 Septic System (TA-III)
1031 - Former Bldgs. 6589 and 6600 Septic System (TA-III)
1032 - Bldg. 6610 Septic System (TA-III)
1033 - Bldg. 6631 Septic System (TA-III)
1034 - Bldg. 6710 Septic System (TA-III)
1035 - Bldg. 6715 Septic System (TA-III)
1036 - Bldg. 6922 Septic System (TA-III)
1052 - Bldg. 803 Seepage Pit (TA-I)
1072 - Bldg. T-52 and Former Bldg. 6500 Septic System (TA-V)
1073 - Bldg. 6580 Seepage Pit (TA-V)
1077 - Bldg. 6920 Septic System (TA-III)
1078 - Bldg. 6640 Septic System (TA-III)
1079 - Bldg. 6643 Septic System (TA-III)
1080 - Bldg. 6644 Septic System (TA-III)

1081 - Bldg. 6650 Septic System (TA-III)
1082 - Bldg. 6620 Septic System (TA-III)
1083 - Bldg. 6570 Septic System (TA-III)
1084 - Bldg. 6505 Septic System (TA-III)
1086 - Bldg. 6523 Septic System (TA-III)
1087 - Bldg. 6743 Seepage Pit (TA-III)
1089 - Bldg. 6734 Seepage Pit (TA-III)
1090 - Bldg. 6721 Septic System (TA-III)
1091 - Bldg. 6720 Septic System (TA-III)
1092 - MO 228-230 Septic System (TA-III)
1093 - Bldg. 6584 West Septic System (TA-III)
1094 - Live Fire Range East Septic System (Lurance Canyon)
1095 - Bldg. 9938 Seepage Pit (Coyote Test Field)
1096 - Bldg. 6583 Septic System (TA-III)
1098 - TA-V Plenum Rooms Drywell (TA-V)
1101 - Bldg. 885 Septic System (TA-I)
1102 - Former Bldg. 889 Septic System (TA-I)
1104 - Bldg. 6595 Seepage Pit (TA-V)
1105 - Bldg. 6596 Drywell (TA-V)
1108 - Bldg. 6531 Seepage Pits (TA-III)
1110 - Bldg. 6536 Drain System (TA-III)
1111 - Bldg. 6720 Drywell (TA-III)
1112 - Bldg. 6590 Reactor Sump Drywell (TA-V)
1113 - Bldg. 6597 Drywell (TA-V)
1114 - Bldg. 9978 Drywell (Coyote Test Field)
1115 - Former Offices Septic System (Solar Tower Complex)
1116 - Bldg. 9981A Seepage Pit (Solar Tower Complex)
1117 - Bldg. 9982 Drywell (Solar Tower Complex)
1120 - Bldg. 6643 Drywell (TA-III)
TA-3 - Rocket Motor Storage Area West of Site 18

B) The list of "Accepted No Further Action (NFA) Sites" includes:

6 - Gas Cylinder Disposal Pit (Thunder Range, Bldg 9966)	Accepted for NFA April 25, 2001
7 - Gas Cylinder Disposal (Arroyo del Coyote)	Accepted for NFA March 27, 2000
9 - Burial Site/Open Dump (Schoolhouse Mesa)	Accepted for NFA December 05, 2000
10 - Burial Mounds (Bunker Area North of Pendulum Site)	Accepted for NFA December 13, 1999
11 - Explosive Burial Mounds	Accepted for NFA December 06, 1999
12 - Burial Site/Open Dump (Lurance Canyon)	Accepted for NFA December 07, 1999
12A - 12A Burial Site/Open Dump (Lurance Canyon)	Accepted for NFA December 13, 1999
12B - 12B Burial Site/Open Dump (Lurance Canyon)	Accepted for NFA December 07, 1999
13 - Oil Surface Impoundment (Lurance Canyon Burn Site)	Accepted for NFA December 13, 1999
14 - Burial Site (Bldg 9920)	Accepted for NFA June 09, 1999
15 - Trash Pits (Frustration Site)	Accepted for NFA September 29, 1997
16 - Open Dumps (Arroyo del Coyote)	Accepted for NFA March 27, 2000
17 - Scrap Yards/Open Dump (Thunder Range)	Accepted for NFA December 06, 1999
19 - TRUPAK Boneyard Storage Area (NW End of Old Aerial Cable)	Accepted for NFA June 09, 1999
20 - Schoolhouse Mesa Burn Site	Accepted for NFA July 10, 1995
21 - Metal Scrap (Coyote Springs)	Accepted for NFA December 06, 1999
22 - Storage/Burn (West of DEER)	Accepted for NFA October 13, 1999
23 - Disposal Trenches (Near Tijeras Arroyo)	Accepted for NFA October 13, 1999
25 - Burial Site (South of TA-I)	Accepted for NFA July 10, 1995
26 - Burial Site (Western Part of TA-III)	Accepted for NFA October 01, 2001
27 - Bldg 9820 - Animal Disposal Pit (Coyote Springs)	Accepted for NFA June 09, 1999

28-1 - 28-1 Mine Shafts	Accepted for NFA September 29, 1997
28-3 - 28-3 Mine Shafts	Accepted for NFA September 29, 1997
28-4 - 28-4 Mine Shafts	Accepted for NFA September 29, 1997
28-5 - 28-5 Mine Shafts	Accepted for NFA September 29, 1997
28-6 - 28-6 Mine Shafts	Accepted for NFA September 29, 1997
28-7 - 28-7 Mine Shafts	Accepted for NFA September 29, 1997
28-8 - 28-8 Mine Shafts	Accepted for NFA September 29, 1997
28-9 - 28-9 Mine Shafts	Accepted for NFA September 29, 1997
28-10 - 28-10 Mine Shafts	Accepted for NFA April 12, 2001
31 - Electrical Transformer Oil Spill (TA-III)	Accepted for NFA May 05, 2000
32 - Steam Plant Oil Spill (TA-I)	Accepted for NFA July 10, 1995
34 - Centrifuge Oil Spill (TA-III)	Accepted for NFA May 05, 2000
35 - Vibration Facility Oil Spill (TA-III)	Accepted for NFA March 05, 2002
36 - Oil Spill - Hermes (TA-V)	Accepted for NFA March 13, 2001
37 - PROTO Oil Spill (TA-V)	Accepted for NFA May 05, 2000
38 - Oil Spills (Bldg 9920)	Accepted for NFA December 17, 1999
39 - Oil Spill - Solar Facility	Accepted for NFA September 29, 1997
40 - Oil Spill (6000 Igloo Area)	Accepted for NFA September 29, 1997
41 - Building 838 Mercury Spill	Accepted for NFA July 10, 1995
42 - Acid Spill Water Treatment Facility	Accepted for NFA December 07, 1999
43 - Radioactive Material Storage Yard (TA-II)	Accepted for NFA December 20, 1999

44 - Decontamination Site & Uranium Calibration Pits (TA-II)	Accepted for NFA December 06, 1999
47 - Unmanned Seismic Observatory	Accepted for NFA July 10, 1995
50 - Old Centrifuge Site (Behind TA-II)	Accepted for NFA March 27, 2000
51 - Building 6924 Pad, Tank Pit	Accepted for NFA May 05, 2000
53 - Building 9923 Storage Igloo	Accepted for NFA September 29, 1997
54 - Pickax Site (Thunder Range)	Accepted for NFA December 17, 1999
55 - Red Towers Site (Thunder Range)	Accepted for NFA September 30, 1999
56 - Old Thunderwells (Thunder Range)	Accepted for NFA December 17, 1999
57A - 57A Workman Site	Accepted for NFA December 13, 1999
57B - 57B Workman Site	Accepted for NFA December 06, 1999
59 - Pendulum Site	Accepted for NFA June 09, 1999
60 - Bunker Area (north of Pendulum Site)	Accepted for NFA December 05, 2000
61A - Schoolhouse Mesa Test Site: Blast Area	Accepted for NFA June 09, 1999
61C - Schoolhouse Mesa Test Site: Schoolhouse Bldg	Accepted for NFA September 30, 1999
62 - Greystone Manor Site (Coyote Springs)	Accepted for NFA July 10, 1995
63A - 63A Balloon Test Area	Accepted for NFA December 06, 1999
63B - 63B Balloon Test Area	Accepted for NFA June 09, 1999
64 - Gun Site (Madera Canyon)	Accepted for NFA December 06, 1999
65 - Lurance Canyon Explosive Test Site	Accepted for NFA September 30, 1999
65A - 65A Lurance Canyon Explosive Test Site	Accepted for NFA March 01, 2000
65B - 65B Lurance Canyon Explosive Test Site	Accepted for NFA March 01, 2000

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65C - 65C Lurance Canyon Explosive Test Site	Accepted for NFA March 01, 2000
65D - 65D Lurance Canyon Explosive Test Site	Accepted for NFA September 30, 1999
65E - 65E Lurance Canyon Explosive Test Site	Accepted for NFA December 13, 1999
67 - Frustration Site	Accepted for NFA February 06, 2001
69 - Old Borrow Pit	Accepted for NFA July 10, 1995
70 - Explosives Test Pit (Water Towers)	Accepted for NFA December 06, 1999
71 - Moonlight Shot Area	Accepted for NFA March 18, 1999
72 - Operation Beaver Site	Accepted for NFA February 04, 1998
73 - Bldg 895 Hazardous Waste Repackaging/Storage	Accepted for NFA July 10, 1995
77 - Oil Surface Impoundment (Behind TA-IV)	Accepted for NFA October 13, 1999
81 - New Aerial Cable Site/Burial Site /Dump/Test Area	Accepted for NFA September 30, 1999
81A - 81A New Aerial Cable Site/Burial Site /Dump/Test Area	Accepted for NFA April 26, 2001
81B - 81B New Aerial Cable Site/Burial Site /Dump/Test Area	Accepted for NFA April 25, 2001
81C - 81C New Aerial Cable Site/Burial Site /Dump/Test Area	Accepted for NFA September 30, 1999
81D - 81D New Aerial Cable Site/Burial Site /Dump/Test Area	Accepted for NFA April 25, 2001
81E - 81E New Aerial Cable Site/Burial Site /Dump/Test Area	Accepted for NFA December 05, 2000
81F - 81F New Aerial Cable Site/Burial Site /Dump/Test Area	Accepted for NFA April 26, 2001
82 - Old Aerial Cable Site Scrap	Accepted for NFA December 05, 2000
85 - Firing Site (Bldg 9920)	Accepted for NFA December 13, 1999
86 - Firing Site (Bldg 9927)	Accepted for NFA April 25, 2001
88A - Firing Site: Ranch House	Accepted for NFA July 10, 1995
88B - Firing Site: Instrumentation Pole	Accepted for NFA December 06, 1999

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89 - Shock Tube Site (Thunder Range)	Accepted for NFA December 13, 1999
90 - Beryllium Firing Site (Thunder Range)	Accepted for NFA December 14, 1999
92 - Pressure Vessel Test Site (Coyote Canyon Blast Area)	Accepted for NFA September 29, 1997
93 - Madera Canyon Rocket Launcher Pads	Accepted for NFA February 04, 1998
94 - Lurance Canyon Burn Site	Accepted for NFA September 30, 1999
94A - 94A Lurance Canyon Burn Site	Accepted for NFA December 01, 1999
94C - 94C Lurance Canyon Burn Site	Accepted for NFA March 30, 2001
94D - 94D Lurance Canyon Burn Site	Accepted for NFA March 27, 2000
94E - 94E Lurance Canyon Burn Site	Accepted for NFA March 27, 2000
94G - 94G Lurance Canyon Burn Site	Accepted for NFA April 26, 2001
98 - Bldg 863 TCA Photochemical Releases	Accepted for NFA December 05, 2000
100 - Building 6620 HE Sump/Drain (TA-III)	Accepted for NFA March 08, 2001
102 - Radioactive Disposal (East of TA-III)	Accepted for NFA May 05, 2000
103 - Scrap Yard (Bldg 9939)	Accepted for NFA December 06, 1999
104 - PCB Spill, Computer Facility	Accepted for NFA July 10, 1995
105 - Mercury (Bldg 6556) (TA-III)	Accepted for NFA July 10, 1995
107 - Explosive Test Area (SouthEast TA-III)	Accepted for NFA September 28, 2001
108 - Firing Site (Bldg 9940)	Accepted for NFA June 09, 1999
109 - Firing Site (Bldg 9950)	Accepted for NFA December 13, 1999
111 - Building 6715 Sump/Drains (TA-III)	Accepted for NFA March 12, 2001
112 - Explosive Contaminated Sump (Bldg 9956)	Accepted for NFA December 07, 1999
113 - Area II Firing Sites (TA-II)	Accepted for NFA April 25, 2001

115 - Firing Site (Bldg 9930)	Accepted for NFA December 14, 1999
117 - Trenches (Bldg 9939)	Accepted for NFA December 05, 2000
139 - Bldg 9964 Septic System	Accepted for NFA July 10, 1995
141 - Bldg 9967 Septic System (Thunder Range)	Accepted for NFA June 09, 2000
142 - Bldg 9970 Septic System	Accepted for NFA April 18, 2000
143 - Bldg 9972 Septic System	Accepted for NFA April 18, 2000
144 - Bldg 9980 Septic System	Accepted for NFA December 07, 1999s
145 - Bldg 9981/9982 Septic Systems	Accepted for NFA December 07, 1999
151 - Bldg 9940 Septic System	Accepted for NFA June 09, 2000
160 - Bldg 9832 Septic System	Accepted for NFA June 09, 2000
168 - Bldg 901 UST (TA-II)	Accepted for NFA September 01, 1994
169 - Bldg 910 UST (TA-II)	Accepted for NFA September 01, 1994
170 - Bldg 911 UST (TA-II)	Accepted for NFA September 01, 1994
171 - Bldg 912 UST (TA-II)	Accepted for NFA September 01, 1994
172 - Bldg 888 UST (TA-I)	Accepted for NFA September 01, 1994
173 - Bldg 6525 UST (TA-III)	Accepted for NFA September 01, 1994
174 - Bldg 6581 UST (TA-IV)	Accepted for NFA September 01, 1994
175 - Bldg 6588 UST (TA-IV)	Accepted for NFA September 01, 1994
176 - Bldg 605 UST (TA-I)	Accepted for NFA September 01, 1994
178 - Bldg 6587 UST (TA-III)	Accepted for NFA September 01, 1994
179 - Bldg 7570 UST	Accepted for NFA September 01, 1994
186 - Building 859 TCE Disposal	Accepted for NFA March 27, 2000

188 - Bldg 6597 Above Ground Containment Spill Tank	Accepted for NFA July 10, 1995
191 - Equus Red (Thunder Range)	Accepted for NFA April 25, 2001
192 - TA-1 Waste Oil	Accepted for NFA December 17, 1999
193 - Sabotage Test Area (Thunder Range)	Accepted for NFA December 13, 1999
194 - General Purpose Heat Source Test Area (Thunder Range)	Accepted for NFA September 29, 1997
211 - Bldg 840 Former UST 840-1	Accepted for NFA March 27, 2000
228A - 228A Centrifuge Dump Site (Tijeras Arroyo)	Accepted for NFA March 23, 2000
228B - 228B Centrifuge Dump Site (Tijeras Arroyo)	Accepted for NFA March 30, 2001
235 - Storm Drain System Outfall (Behind TA-IV)	Accepted for NFA March 27, 2000
241 - Storage Yard	Accepted for NFA October 04, 2001
275 - TA V Seepage Pits	Accepted for NFA December 13, 1999
BLDG828 - Former Building 828 (TA-I)	Accepted for NFA October 11, 2001
277 - New Firing Site East of Optical Range	Accepted for NFA April 25, 2001

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C) The list of "Removed from Hazardous Solid Waste Amendment Act (HSWA) Permit" Sites includes:

6 - Gas Cylinder Disposal Pit (Thunder Range, Bldg 9966)	Removed from Permit November 2001
6A - 6A Gas Cylinder Disposal Pit (Thunder Range, Bldg 9966)	Removed from Permit November 2001
7 - Gas Cylinder Disposal (Arroyo del Coyote)	Removed from Permit October 2000
10 - Burial Mounds (Bunker Area North of Pendulum Site)	Removed from Permit July 2000
11 - Explosive Burial Mounds	Removed from Permit October 2000
12A - 12A Burial Site/Open Dump (Lurance Canyon)	Removed from Permit October 2000
12B - 12B Burial Site/Open Dump (Lurance Canyon)	Removed from Permit July 2000
13 - Oil Surface Impoundment (Lurance Canyon Burn Site)	Removed from Permit July 2000
14 - Burial Site (Bldg 9920)	Removed from Permit July 2000
15 - Trash Pits (Frustration Site)	Removed from Permit September 1997
16 - Open Dumps (Arroyo del Coyote)	Removed from Permit October 2000
17 - Scrap Yards/Open Dump (Thunder Range)	Removed from Permit July 2000
19 - TRUPAK Boneyard Storage Area (NW End of Old Aerial Cable)	Removed from Permit July 2000
20 - Schoolhouse Mesa Burn Site	Removed from Permit December 1995
21 - Metal Scrap (Coyote Springs)	Removed from Permit October 2000
22 - Storage/Burn (West of DEER)	Removed from Permit July 2000
23 - Disposal Trenches (Near Tijeras Arroyo)	Removed from Permit July 2000
25 - Burial Site South of TA-I	Removed from Permit December 1995
27 - Bldg 9820 - Animal Disposal Pit (Coyote Springs)	Removed from Permit July 2000
28-1 - Mine Shafts	Removed from Permit September 1997
28-3 - Mine Shafts	Removed from Permit September 1997

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28-4 - Mine Shafts	Removed from Permit September 1997
28-5 - Mine Shafts	Removed from Permit September 1997
28-6 - Mine Shafts	Removed from Permit September 1997
28-7 - Mine Shafts	Removed from Permit September 1997
28-8 - Mine Shafts	Removed from Permit September 1997
28-9 - Mine Shafts	Removed from Permit September 1997
28-10 - Mine Shafts	Removed from Permit November 2001
31 - Electrical Transformer Oil Spill (TA-III)	Removed from Permit November 2001
32 - Steam Plant Oil Spill (TA-I)	Removed from Permit December 1995
34 - Centrifuge Oil Spill (TA-III)	Removed from Permit November 2001
36 - Oil Spill - Hermes (TA-V)	Removed from Permit November 2001
37 - PROTO Oil Spill (TA-V)	Removed from Permit November 2001
38 - Oil Spills (Bldg 9920)	Removed from Permit July 2000
39 - Oil Spill - Solar Facility	Removed from Permit September 1997
40 - Oil Spill (6000 Igloo Area)	Removed from Permit September 1997
41 - Building 838 Mercury Spill	Removed from Permit December 1995
42 - Acid Spill Water Treatment Facility	Removed from Permit October 2000
43 - Radioactive Material Storage Yard (TA-II)	Removed from Permit October 2000
44 - Decontamination Site & Uranium Calibration Pits (TA-II)	Removed from Permit July 2000
47 - Unmanned Seismic Observatory	Removed from Permit December 1995
50 - Old Centrifuge Site (Behind TA-II)	Removed from Permit October 2000
51 - Building 6924 Pad, Tank Pit	Removed from Permit November 2001

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53 - Building 9923 Storage Igloo	Removed from Permit September 1997
54 - Pickax Site (Thunder Range)	Removed from Permit July 2000
55 - Red Towers Site (Thunder Range)	Removed from Permit October 2000
56 - Old Thunderwells (Thunder Range)	Removed from Permit July 2000
57A - 57A Workman Site	Removed from Permit October 2000
57B - 57B Workman Site	Removed from Permit October 2000
59 - Pendulum Site	Removed from Permit July 2000
60 - Bunker Area (north of Pendulum Site)	Removed from Permit November 2001
61A - Schoolhouse Mesa Test Site: Blast Area	Removed from Permit July 2000
61B - Schoolhouse Mesa Test Site: Cratering Area	Removed from Permit September 1996
61C - Schoolhouse Mesa Test Site: Schoolhouse Bldg	Removed from Permit October 2000
62 - Greystone Manor Site (Coyote Springs)	Removed from Permit December 1995
63A - 63A Balloon Test Area	Removed from Permit October 2000
63B - 63B Balloon Test Area	Removed from Permit July 2000
64 - Gun Site (Madera Canyon)	Removed from Permit October 2000
65A - 65A Lurance Canyon Explosive Test Site	Removed from Permit October 2000
65B - 65B Lurance Canyon Explosive Test Site	Removed from Permit October 2000
65C - 65C Lurance Canyon Explosive Test Site	Removed from Permit October 2000
65D - 65D Lurance Canyon Explosive Test Site	Removed from Permit October 2000
65E - 65E Lurance Canyon Explosive Test Site	Removed from Permit July 2000
67 - Frustration Site	Removed from Permit November 2001

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69 - Old Borrow Pit	Removed from Permit December 1995
70 - Explosives Test Pit (Water Towers)	Removed from Permit October 2000
71 - Moonlight Shot Area	Removed from Permit July 2000
72 - Operation Beaver Site	Removed from Permit July 2000
73 - Bldg 895 Hazardous Waste Repackaging/Storage	Removed from Permit December 1995
77 - Oil Surface Impoundment (Behind TA-IV)	Removed from Permit July 2000
81A - New Aerial Cable Site/Burial Site/Dump/Test Area	Removed from Permit November 2001
81B - New Aerial Cable Site/Burial Site/Dump/Test Area	Removed from Permit November 2001
81C - New Aerial Cable Site/Burial Site/Dump/Test Area	Removed from Permit October 2000
81D - New Aerial Cable Site/Burial Site/Dump/Test Area	Removed from Permit November 2001
81E - New Aerial Cable Site/Burial Site/Dump/Test Area	Removed from Permit November 2001
81F - New Aerial Cable Site/Burial Site/Dump/Test Area	Removed from Permit November 2001
82 - Old Aerial Cable Site Scrap	Removed from Permit November 2001
85 - Firing Site (Bldg 9920)	Removed from Permit July 2000
86 - Firing Site (Bldg 9927)	Removed from Permit November 2001
88A - Firing Site: Ranch House	Removed from Permit December 1995
88B - Firing Site: Instrumentation Pole	Removed from Permit October 2000
89 - Shock Tube Site (Thunder Range)	Removed from Permit July 2000
90 - Beryllium Firing Site (Thunder Range)	Removed from Permit October 2000
92 - Pressure Vessel Test Site (Coyote Canyon Blast Area)	Removed from Permit September 1997
93 - Madera Canyon Rocket Launcher Pads	Removed from Permit July 2000
94A - Lurance Canyon Burn Site	Removed from Permit July 2000

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94C - Lurance Canyon Burn Site	Removed from Permit November 2001
94D - Lurance Canyon Burn Site	Removed from Permit October 2000
94E - Lurance Canyon Burn Site	Removed from Permit October 2000
94G - Lurance Canyon Burn Site	Removed from Permit November 2001
100 - Building 6620 HE Sump/Drain (TA-III)	Removed from Permit November 2001
102 - Radioactive Disposal (East of TA-III)	Removed from Permit November 2001
103 - Scrap Yard (Bldg 9939)	Removed from Permit July 2000
104 - PCB Spill, Computer Facility	Removed from Permit December 1995
105 - Mercury (Bldg 6536) (TA-III)	Removed from Permit December 1995
108 - Firing Site (Bldg 9940)	Removed from Permit July 2000
109 - Firing Site (Bldg 9950)	Removed from Permit July 2000
111 - Building 6715 Sump/Drains (TA-III)	Removed from Permit November 2001
112 - Explosive Contaminated Sump (Bldg 9956)	Removed from Permit October 2000
113 - Area II Firing Sites (TA-II)	Removed from Permit November 2001
115 - Firing Site (Bldg 9930)	Removed from Permit October 2000
117 - Trenches (Bldg 9939)	Removed from Permit November 2001
139 - Bldg 9964, Septic System	Removed from Permit December 1995
141 - Bldg 9967, Septic System (Thunder Range)	Removed from Permit November 2001
142 - Bldg 9970, Septic System	Removed from Permit October 2000
143 - Bldg 9972, Septic System	Removed from Permit October 2000
144 - Bldg 9980, Septic System	Removed from Permit October 2000

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145 - Bldg 9981/9982, Septic	Systems Removed from Permit October 2000
151 - Bldg 9940 Septic System	Removed from Permit November 2001
155 - Bldg 6597 25,000 Gallon Tank (TA-V)	Removed from Permit May 1994
160 - Bldg 9832 Septic System	Removed from Permit November 2001
168 - Bldg 901 UST (TA-II)	Removed from Permit May 1994
169 - Bldg 910 UST (TA-II)	Removed from Permit May 1994
170 - Bldg 911 UST (TA-II)	Removed from Permit May 1994
171 - Bldg 912 UST (TA-II)	Removed from Permit May 1994
172 - Bldg 888 UST (TA-I)	Removed from Permit May 1994
173 - Bldg 6525 UST (TA-III)	Removed from Permit May 1994
174 - Bldg 6581 UST (TA-IV)	Removed from Permit May 1994
175 - Bldg 6588 UST (TA-IV)	Removed from Permit May 1994
176 - Bldg 605 UST (TA-I)	Removed from Permit May 1994
178 - Bldg 6587 UST (TA-III)	Removed from Permit May 1994
179 - Bldg 7570 UST	Removed from Permit May 1994
180 - Bldg 6503 UST (TA-III)	Removed from Permit May 1994
181 - Bldg 6500 UST (TA-V)	Removed from Permit May 1994
186 - Building 859 TCE Disposal	Removed from Permit October 2000
188 - Bldg 6597 Above Ground Containment Spill Tank	Removed from Permit December 1995
191 - Equus Red (Thunder Range)	Removed from Permit November 2001
192 - TA-I Waste Oil Tank	Removed from Permit July 2000

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193 - Sabotage Test Area (Thunder Range)	Removed from Permit July 2000
194 - General Purpose Heat Source Test Area (Thunder Range)	Removed from Permit September 1997
211 - Bldg 840 Former UST 840-1	Removed from Permit October 2000
225 - AEC Storage Facility/Kirtland AFB	Removed from Permit September 1996
228A - 228A Centrifuge Dump Site (Tijeras Arroyo) [Removed from Permit October 2000
235 - Storm Drain System Outfall (Behind TA-IV) [Removed from Permit October 2000
275 - TA V Seepage Pits	Removed from Permit July 2000
277 - New Firing Site East of Optical Range	Removed from Permit November 2001



**Review of Environmental Monitoring
for Radionuclides in Air
at the Sandia National Laboratory**

Revised Final Report

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Executive Summary

This report describes work performed at the Institute for Energy and Environmental Research based in Heidelberg, Germany (IFEU) under contract with the Albuquerque Center for Peace and Justice. IFEU collaborated closely with the Southwest Research and Information Center (SRIC), Albuquerque that provided a summary of detailed description of sources of airborne radionuclides.

The Sandia National Laboratories (SNL) is a major laboratory of the Department of Energy (DOE) in the nuclear weapons complex. The purpose of this report is to assess the current monitoring system for radionuclides in ambient air at SNL in order to determine whether it is in par with other state-of-the-art systems. The report presents in chapter 2 a summary of data on sources of radioactive emissions into the air at SNL. In chapter 3, existing monitoring data for radionuclides in ambient air at SNL are described. Chapter 4 provides a comparison of ambient air monitoring at selected DOE facilities, and chapter 5 provides recommendations for an improved ambient air monitoring system at SNL.

The results can be summarized as follows:

- In 2004, 15 sources of releases of radioactive materials into the air were identified by SNL. The number and magnitude of releases varied from year to year. In addition to the identified sources, there are sources of potential releases such as buried radioactive materials and nuclear weapons stored at Kirtland Air Force Base (KAFB).
- SNL conducts limited monitoring of alpha and beta activity in ambient air at four onsite locations. SNL conducts no continuous monitoring for tritium in ambient air. Analytical procedures and reporting changed over time. The reported maximum concentrations exceed the levels for environmental compliance in 40CFR61 App. E, Table 2 for several radionuclides between 2000 and 2005.
- Given the uncertainties in the emission estimates and the likelihood of unidentified diffuse sources of radionuclide emissions at SNL, a detailed investigation of the raw data would be required for a more refined assessment.
- SNL excludes its operations as a source of measured radionuclide concentrations. For example, the 2004 Annual Site Environmental Report states, "It should be noted that the radionuclides are naturally occurring or remnants, and are not emitted from sources at the SNL/AM." This statement is not supported by the facts. Some radionuclides such as cesium-137 and uranium-238 that measured in air are also released from SNL as is evident by SNL's own emission reporting. In addition, the analysis of ambient air samples does not allow differentiating between natural background and contributions from SNL because there is no background monitoring station.
- The New Mexico Environment Department (NMED) carried out confirmatory monitoring at four locations including tritium; the results for the years 1997 to 2000 were not published by NMED until 2004.



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- The comparison of SNL's ambient air monitoring with that at six other selected DOE sites¹ indicates no definitive relationship between the reported release and the number of monitoring locations. At Pantex, TX, reported tritium emissions for 2004 were a factor of 6,800 lower than at SNL, yet tritium monitoring of ambient air is carried out at a total of 27 locations onsite and at the plant perimeter.
- Similarly, ambient levels of alpha and beta particulate activity in air are measured at more locations at other DOE sites even though the reported releases were often lower than those at SNL (for alpha: LANL, LLNL, BNL and Pantex; beta: LLNL and BNL).
- Specifically, alpha and beta activity in ambient air is monitored at only four locations at SNL as compared to 46 locations at LANL, even though SNL reported larger releases of alpha activity than LANL. There is no continuous monitoring of tritium in ambient air at SNL as compared to 46 locations that are monitored at LANL. It should be self-evident that residents in the Albuquerque metropolitan area are entitled to a level of information and assurance equivalent to residents in the vicinity of other DOE facilities, especially when compared to the Los Alamos National Laboratory (see Table 4-4 on page 25 for a comparison of key data for SNL and LANL).
- A consistent and comprehensive monitoring program for radionuclides in ambient air at and around SNL is highly recommended for a variety of reasons: (a) to demonstrate compliance with regulatory standards, (b) to be better prepared for the releases of radioactive materials in case of accidents or disasters, and (c) to establish a level of information and assurance at SNL that is equivalent to that at other DOE facilities. Isotope specific analysis for strontium-90, americium-241 and plutonium-239/240 is highly recommended.
- A minimum network of 16 stations should be placed on the plant perimeter in order to cover all wind directions. For the adequate determination of background, an additional number of four stations is recommended. Additional stations should be placed as needed as is the case at Los Alamos National Laboratory where monitoring for radioactive materials is carried out in a total of 46 stations. A precise cost estimate for the additional sampling stations is beyond the scope of this report. If an additional 20 stations for tritium and 16 alpha/beta stations with isotope-specific analysis would be installed, the additional costs are estimated to be below one million US \$ per year.
- Further, the NMED monitoring program should be expanded to provide an independent verification of SNL data. NMED should provide isotope specific analysis of their data and correct tritium sampling data for absolute humidity.
- An independent audit of the SNL monitoring activities is highly recommended.
- Since reporting of different radionuclides is inconsistent (not all are reported for all years), a detailed investigation should be carried out to determine the necessary analytical procedures to identify all relevant radionuclides.
- The next step in the process should be a detailed investigation into the design of a monitoring system (function and density of stations) that is equivalent to the one at LANL and could be relied upon to demonstrate compliance with 40CFR61 Subpart 61.

¹ The six DOE sites are: Pantex, TX; Brookhaven National Laboratory, NY; Lawrence Livermore National Laboratory, CA; Los Alamos National Laboratory, NM; Idaho National Engineering and Environmental Laboratory, ID; and Savannah River Site, SC.



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1

1 Introduction

The Sandia National Laboratories (SNL) is a major laboratory of the Department of Energy (DOE) in the nuclear weapons complex. Past and present operations have resulted in the contamination of air, soil, biosphere, groundwater and surface water with radioactive and other pollutants that pose a risk to human health and the environment. This report focuses on the monitoring of radioactive pollutants that are or could be present in ambient air, i.e. outside breathable air. Ambient air monitoring can be conducted either close to potential sources of emissions on the property of Sandia National Laboratory itself, on the perimeter of the plant, or in greater distance. This report provides an assessment of the current monitoring system for radionuclides in ambient air at SNL. The following issues are addressed: (a) whether monitoring at SNL is at par with state-of-the-art systems, and (b) whether it provides for detection of unmonitored and/or short-term releases from sources at the site.

Chapter 2 describes existing and potential sources for airborne radionuclides at and around SNL and presents the official estimates of radionuclide releases and resulting radiation exposures to members of the public.

Chapter 3 compares the existing monitoring system for radionuclides in air at SNL with the systems that exist at other DOE sites.

Chapter 4 evaluates the adequacy of the monitoring system with respect to detect unmonitored and/or short-term releases and the compliance with regulatory requirements.

Chapter 5 provides recommendations based on the analysis.



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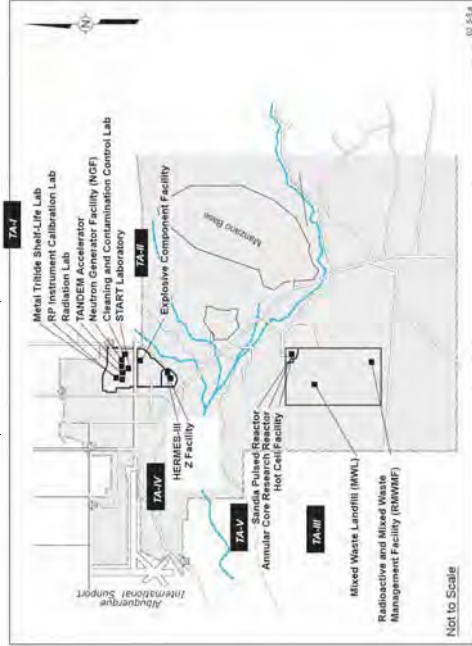
2 Sources of airborne radionuclides at SNL

A detailed description of sources of airborne radionuclides is provided in a report of the Southwest Research and Information Center – SRIC (Robinson 2006). That report was prepared for the Albuquerque Center for Peace and Justice as part of the Sandia Labs Awareness Project as well. The SRIC report includes information based on the SNL Site Environmental Report for 2005 (SNL 2006a). This chapter provides a brief summary of key information and data that was used in the review of the environmental monitoring system. The review covers officially reported releases as well as potential releases that go unreported. The reference year 2004 was selected because data for other DOE facilities was available for that year as well (see chapter 4).

2.1 Reported releases of airborne radionuclides

SNL is required to file an annual report in order to demonstrate compliance with the National Emission Standards for Hazardous Air Pollutants under 40 CFR 61, Subpart H. In the year 2004, 15 facilities were identified in the assessment. Their locations are shown in Figure 2-1. The airborne releases that were reported for 2004 are listed in Table 2-1.

Figure 2-1 Locations of the 15 facilities at SNL/NM that provided radionuclide release inventories in 2004 (source: SNL, 2005a)



A major component of reported releases of radionuclides is tritium. Table 2-2 provides a summary of reported tritium emissions over time; a graphical presentation is shown in Figure 2-2. In 2001 and 2002, the main tritium emissions were reported from the Neutron Generator



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Facility (NGF), from 2003 onwards, the Radioactive and Mixed Waste Management Facility (RMWMF) dominated the releases.

Table 2-1 Summary of reported releases of airborne radionuclides from sources at SNL in 2004 (SNL, 2005a)

TA	Facility Name	Monitoring Method*	Used in Dose Calculation?	Radionuclide	Reported Release (Ci/yr)
I	Tomography and Radionuclide Transport Laboratory (START)	Calculation	No	Co-60 Cs-137	2.5E-08 5.0E-09
I	Radiation Laboratory	Calculation	No	H-3 N-13 Ar-41	1.0E-05 1.0E-06 1.0E-09
I	Calibration Laboratory	Calculation	No	H-3	6.9E-05
I	Neutron Generator (NGF)	Continuous	Yes	H-3	0.11
I	TANDEM Accelerator	Calculation	No	H-3	1.0E-05
I	Metal Tritide Shelf-Life Laboratory	Calculation	No	H-3	5.0E-09
I	Cleaning and Contamination Control Laboratory (CCCL)	Calculation	No	C-14	2.7E-04
II	Explosive Components Facility (ECF)	Calculation	No	H-3	8.4E-04
III	Mixed Waste Landfill (MWL)	Periodic	Yes	H-3	0.09
III	Radioactive & Mixed Waste Management Facility (RMWMF)	Continuous	Yes	H-3 Am-241 Sr-90 Cs-137	1.1 1.0E-05 3.9E-07 3.6E-08
IV	HERMES III	Periodic	No	N-13 O-15 H-3	1.3E-03 1.3E-04 1.6E-07
IV	Z-Facility (Accelerator)	Calculation	No	U-238 U-234 U-235	2.0E-07 9.2E-09 2.1E-09
V	Hot Cell Facility (HCF)	Periodic	Yes	N/A	N/A
V	Annular Core Research Reactor (ACRR)	Periodic	Yes	Ar-41	4.5
V	Sandia Pulsed Reactor (SPR)	Periodic	Yes	N/A	N/A

NOTE: *Monitoring Method:
 Periodic = Based on periodic measurements
 Calculation = Calculated from known parameters
 Continuous = Based on continuous air monitoring results
 HERMES III = High Energy Radiation Megavolt Electron Source III
 Ci/yr = curies per year
 TA = Technical Area
 N/A = not available



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Table 2-2 Reported releases of tritium at SNL, 2001 to 2005 (Ci/yr) (Sources: SNL 2002, SNL 2003, SNL 2004, SNL 2005, and SNL 2006)

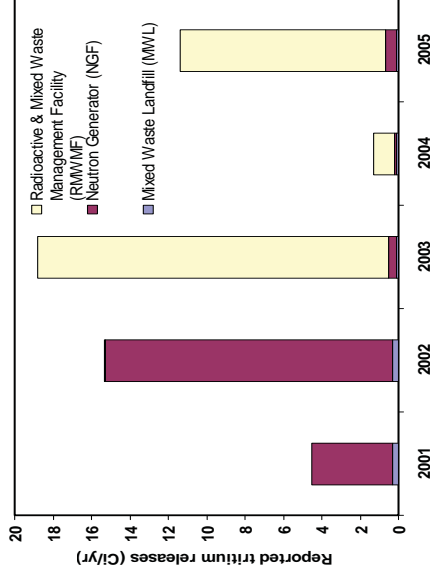
TA	Facility Name	2001	2002	2003	2004	2005
I	Tomography and Radionuclide Transport (START) Laboratory					
I	Radiation Laboratory	1.00E-05	1.00E-05	1.00E-05	1.00E-05	1.00E-05
I	Calibration Laboratory (RPICL)	2.75E-04	6.60E-05	2.00E-04	6.90E-05	2.20E-05
I	Neutron Generator (NGF)	4.20E+00	1.50E+01	4.10E-01	1.10E-01	5.60E-01
I	TANDEM Accelerator	1.00E-06	1.00E-05	1.00E-05	1.00E-05	1.00E-05
I	Metal Tritide Shelf-Life Laboratory (MTSSL)	5.00E-09	5.00E-09	5.00E-09	5.00E-09	< 5.0E-09
I	Cleaning and Contamination Control Laboratory (CCCL)					
II	Explosive Components Facility (ECF)	4.65E-04	1.13E-03		8.40E-04	8.40E-04
II	Radiation Protection Sample Diagnostic Facility (RPSD)					1.20E-08
III	Mixed Waste Landfill (MWL)	2.94E-01	2.94E-01	9.00E-02	9.00E-02	9.00E-02
III	Radioactive & Mixed Waste Management Facility (RMWMF)	6.43E-03	2.50E-02	1.83E+01	1.10E+00	1.07E+01
III	Chemical Waste Landfill (CWL)	1.31E-05	9.85E-02			
III	Corrective Action Management Unit (CAMU)		8.00E-04			
IV	HERMES III					
IV	Short Pulsed High Intensity X-Radiator Facility (SPHINX)					
IV	Saturn Facility					
IV	Z-Facility (Accelerator)		9.70E-09			6.65E-03
V	Hot Cell Facility (HCF)					
V	Annular Core Research Reactor (ACRR)					
V	Sandia Pulsed Reactor (SPR)					
CTF	Shock Thermodynamic Applied Research Facility (STAR)					



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Figure 2-2 Reported releases of tritium from major sources at SNL, 2001 - 2005



Reported quantities of airborne radionuclide releases varied by orders of magnitude over the years as summarized in Table 2-3. For example, the reported uranium releases for 2002 were more than seven orders of magnitude larger than for 2003. Releases of transuranics such as americium-241 or plutonium-239 were reported for all years.

Table 2-3 Reported releases of selected airborne radionuclides at SNL, 2001 to 2005 (Ci/yr) (Sources: SNL 2002, SNL 2003, SNL 2004, SNL 2005, and SNL 2006)

Facility Name	2001	2002	2003	2004	2005
Tritium (H-3)	4.50E+00	1.54E+01	1.88E+01	1.30E+00	1.14E+01
Argon-41 (Ar-41)	1.62E+01	1.06E+01	6.60E+00	4.50E+00	4.87E+00
Uranium	1.13E-06	1.43E-06	1.00E-13	4.19E-07	2.61E-10
Transuranics (americium, plutonium)	3.07E-07	2.53E-07	1.40E-05	1.00E-05	2.16E-05



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2.2 Potential releases of airborne radionuclides that are not reported

In addition to the reported sources of airborne radioactive releases that were reported in the NESHAP Compliance reports, there are other potential sources at and around SNL.

Nuclear warheads at KAFB

There is no information available with respect to the tritium inventory at SNL. It is likely that large amounts of tritium are contained in the nuclear weapons at KAFB. According to Zeriffi (1996), one warhead is assumed to require a minimum of three grams of tritium but contains an average of approximately four grams of tritium. One gram of tritium is equivalent to about 10,000 curies. It was estimated that 2,450 nuclear warheads are stored at KAFB (Atkin 1988). The authors conclude:

"Because of a backlog of warheads awaiting dismantlement at the DOE's Pantex facility near Amarillo, TX, the Kirtland Underground Munitions Storage Complex (KUMSC) at Kirtland AFB, Albuquerque, New Mexico has emerged as number one in U.S. nuclear warheads deployed in a single location, a rise from 2nd place in 1992 and 11th place in 1985." (Atkin 1998)

If four grams of tritium in each of the 2,450 warheads is assumed to be stored at KAFB amounts, the tritium inventory would be about 98 million curies.

Diffuse radioactivity from historic releases

For many years, the Mixed Waste Landfill (MWL) and Chemical Waste Landfill (CWL) and other facilities have been a potential source of releases of radioactive material into the air. It is likely that radioactive particles were deposited on onsite soil. There is no published inventory of such releases and the location of their deposition. They pose a potential of resuspension especially at high wind speeds.

Storage of irradiated reactor fuel

Another potential source of radionuclide emissions into the air is reactor irradiated nuclear material including plutonium, enriched uranium and other radionuclides. The New Mexico Environment department (NMED) requested information about this issue in a March 16, 2006 letter to SNL (NMED, 2006). Pending the outcome of this investigation, it is wise to assume that additional sources of airborne radionuclide emissions exist.

A comprehensive program of ambient air monitoring for radionuclides would allow identifying diffuse releases if they occur and provide information in case of accidents such as tritium releases from stored nuclear weapons.



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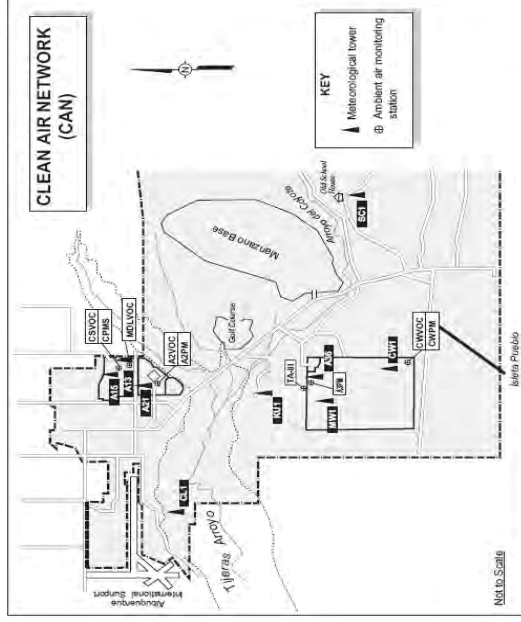
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3 Ambient air monitoring at SNL

3.1 Ambient air monitoring by SNL

According to the 2004 and 2005 Environmental Reports (SNL, 2005a, 2006a), Sandia National Laboratory carried out monitoring for selected radionuclides in particulate form in ambient air at four onsite locations (A2PM, CPMS, AWPIM and A3PM) that are identified in Figure 3-1.

Figure 3-1 Sampling locations radionuclides in air at SNL as of 2005 (SNL, 2006a)



The results of the analysis for 2004 and 2005 are summarized in Tables 3-1 and 3-2. In order to determine compliance, measured concentrations of radionuclides in air were compared to the concentration levels for environmental compliance in 40CFR61 App. E, Table 2. The SNL Environmental Reports provide only a comparison to the less strict threshold limit values (TLV) that are based on DOE derived concentrations guideline (DCG) and "assist in the control of health hazards". For uranium-238, the TLV value is 0.1 pCi/m³ or a factor of 12 larger than the 40CFR61 levels for environmental compliance (0.0083 pCi/m³). The TLV value is not legally binding. The 40CFR61 levels for environmental compliance is only binding if SNL would select environmental concentration measurements to determine compliance with 40CFR61 Subpart H.



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The following observations can be made for 2004:

- The maximum reported concentration of gross alpha activity is 470% of the level for environmental compliance in 40CFR61 App. E, Table 2 for americium-241 (Am-241). Am-241 was selected because it is the most hazardous alpha emitter for which releases into the air were reported by SNL in 2004.
- The maximum reported concentration of gross beta activity is 95% of the level for environmental compliance in 40CFR61 App. E, Table 2 for strontium-90 (Sr-90). Sr-90 was selected because it is the most hazardous beta emitter for which releases into the air were reported by SNL in 2004.
- The reported maximum concentrations of thorium-232 and uranium-238 exceed the levels for environmental compliance in 40CFR61 App. E, Table 2.

Table 3-1 Reported concentrations of radionuclides in air at SNL's onsite stations in 2004 (pCi/m³) (Source: SNL 2005a); values exceeding the 40CFR61 environmental compliance criterion in **bold** (conservative criteria used: Am-241 for gross alpha and Sr-90 for gross beta activity)

Analyte	Monitoring location			Environmental compliance level 40CFR61 App. E, Table 2	Ratio of max. concentration to 40CFR20 compliance level
	A2PM	CPMS	CWPM		
Gross Alpha	0.004	0.009	0.007	0.004	474%
Gross Beta	0.015	0.016	0.017	0.018	95%
Beryllium-7	0.145	0.159	0.132	0.153	--
Bismuth-214	0.002	0.002	0.002	0.003	< 1%
Cesium-137	0.001	0.004	0.001	ND	21%
Lead-212	0.002	0.001	0.002	0.002	< 1%
Lead-214	0.002	0.001	0.002	0.001	120
Potassium-40	0.013	0.011	0.01	0.006	N/A
Radium-226	0.002	0.002	0.002	0.003	91%
Radium-228	0.002	0.002	0.004	0.002	68%
Thorium-232	0.002	0.001	0.002	0.002	3.23%
Thorium-234	0.046	0.054	0.022	0.054	2%
Uranium-238	0.046	0.054	0.022	0.054	651%

ND = not detected, N/A = not available; a) conservatively assuming Am-241; b) conservatively assuming Sr-90

The following observations can be made for 2005:

- SNL commented on the maximum reported concentration of U-238 of 0.1906 pCi/m³ at A2PM that exceeds the concentration level for environmental compliance by a factor of 23. According to SNL, the reported value was based on the average of four positive samples (all other samples were below the detection limit), and assuming that this value is representative for the average for the entire year. Since each sample was taken over a 6-day period, the four positive samples represent 24 days or 6.6% of the year. If there was absolute no U-238 at all in the other samples during the remainder of the year, the correct annual average would be 0.013 pCi/m³ or 150% of the 40CFR61 concentration



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levels for environmental compliance. In reality, uranium would be present even in samples below the detection limit that would have to be accounted for. Therefore, the maximum reported concentration of U-238 exceeds the levels for environmental compliance in 40CFR61 App. E, Table 2 even after the correction of the conservative averaging method.

- Likewise, reported maximum concentrations of radium-228, thorium-232 and uranium-235 exceed the levels for environmental compliance in 40CFR61 App. E, Table 2. The SNL report did not provide information on the averaging method for these radionuclides. A detailed analysis would require more information.
- The maximum reported concentrations of gross alpha and gross beta activity exceed the levels for environmental compliance in 40CFR61 App. E, Table 2, if one conservatively assumes that the concentration is due to the most hazardous radionuclide in that group that was reported to be released from SNL (Am-241 for alpha and Sr-90 for beta activity). Isotope specific analysis for Am-241, Sr-90 as well as for Pu-239/240 would be required to determine whether the levels for environmental compliance are exceeded or not.

Table 3-2 Reported concentrations of radionuclides in air at SNL's onsite stations in 2005 (pCi/m³) (Sources: SNL 2006a); values exceeding the 40CFR61 environmental compliance criterion in **bold** (conservative criteria used: Am-241 for gross alpha and Sr-90 for gross beta activity)

Analyte	Monitoring location			Environmental compliance level 40CFR61 App. E, Table 2	Ratio of max. concentration to 40CFR20 compliance level
	A2PM	CPMS	CWPM		
Gross Alpha	0.0062	0.0061	0.0056	0.0047	3.25%
Gross Beta	0.0181	0.0204	0.0182	0.0197	107%
Acinium-228	0.0052	0.0061		0.0036	< 1%
Beryllium-7	0.1467	0.1401	0.1531	0.1367	--
Bismuth-214	ND	0.0017	0.0024	0.0024	< 1%
Chromium-51	ND	0.0200	ND	ND	31
Cobalt-60	ND	0.0001	ND	0.0012	0.017
Lead-212	0.0021	0.0023	0.0025	ND	6.3
Lead-214	0.0019	ND	0.0021	0.0051	120
Niobium-95	ND	0.0020	ND	0.0009	N/A
Potassium-40	0.0061	0.0083	0.0037	0.0269	N/A
Radium-224	0.0195	0.0103	0.0344	0.0261	N/A
Radium-226	ND	0.0017	0.0024	0.0024	0.0033
Radium-228	0.0052	0.0061	ND	0.0036	73%
Strontium-85	ND	ND	0.0003	0.0015	1.8
Thallium-208	0.0010	0.0007	0.0015	0.0009	N/A
Thorium-232	0.0021	0.0022	0.0036	ND	0.00062
Thorium-234	0.1906	0.0102	0.0327	0.0807	2.2
Uranium-235	0.0119	ND	ND	0.0058	168%
Uranium-238	0.1906	0.0102	0.0327	0.0807	2296%

ND = not detected, N/A = not available; a) conservatively assuming Am-241; b) conservatively assuming Sr-90



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Air monitoring data is also available for the years 2000, 2002 and 2003 (SNL 2001, SNL 2002a, SNL 2003a). Radionuclide data was not reported for 2001 "due to the lack of appropriate monthly blanks and data quality problems" (SNL 2002). The stations A2PM, CPMS, AWPM were sampled during all these years, the data is presented in Tables 3-3, Table 3-4 and Table 3-5. A fourth station sampled, labeled KUOM in 2000, was moved to KSSPM in 2002&2003 and then to A3PM in 2004.

A comparison of reported concentrations indicates that the number of radioactive analytes increased over time (example CPWS: from 5 (in 2000), to 9 (in 2002), 12 (in 2003), 13 (in 2004), to 17 (in 2005).

Table 3-3 Reported concentrations of radionuclides in air at SNL's A2PM station, 2000 through 2005 (pCi/m³); values exceeding the 40CFR61 environmental compliance criteria in **bold** (conservative criteria used: *Air-241* for gross alpha and *Si-90* for gross beta activity)

Analyte	2000	2002	2003	2004	2005
Gross Alpha	0.02085	0.0453	0.0034	0.004	0.0062
Gross Beta	0.00995	0.01289	0.01584	0.015	0.0181
Actinium-228					0.0052
Beryllium-7	0.1097	0.10899	0.10658	0.145	0.1467
Bismuth-214		0.00139	0.00438	0.002	ND
Chromium-51					ND
Cobalt-60					ND
Cesium-137			0.00047	0.001	
Lead-212			0.00066	0.002	0.0021
Lead-214		0.00109	0.00076	0.002	0.0019
Niobium-95					ND
Potassium-40	0.02098	0.01033	0.01429		0.0061
Radium-224		0.00029		0.013	0.0195
Radium-226		0.00142	0.00241	0.002	ND
Radium-228				0.002	0.0062
Strontium-85					ND
Thallium-208		0.00128			0.001
Thorium-232			ND	0.002	0.0021
Thorium-234			0.02669		0.1906
Uranium-235				0.046	0.0119
Uranium-238			0.0481	0.046	0.1906
Uranium, µg/m ³	0.00002	0.00002			

For three stations A2PM, CPMS, AWPM, the time series data for gross alpha activity, gross beta activity, uranium-238, radium-226, and thorium-232 is compared in Figures 3-2 through 3-6. Uranium values in µg/m³ were converted to pCi/m³ of U-238 using the conversion factor for natural uranium of 0.33 pCi/µg.



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Figure 3-2 Reported levels of gross alpha activity at ambient air sampling locations at SNL, 2000 through 2005

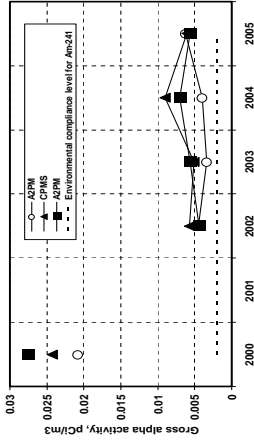


Figure 3-3 Reported levels of gross beta activity at ambient air sampling locations at SNL, 2000 through 2005

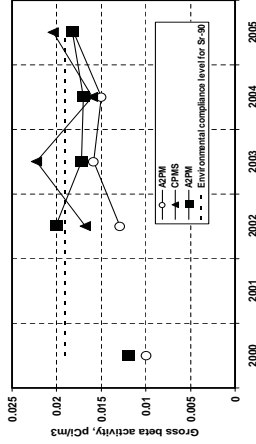
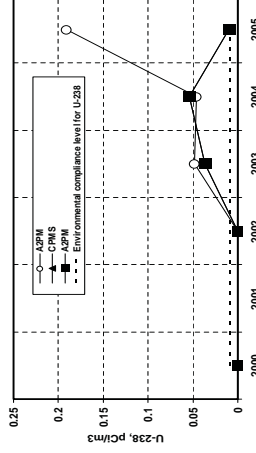


Figure 3-4 Reported levels of uranium-238 in air at ambient air sampling locations at SNL, 2000 through 2005



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Figure 3-5 Reported levels of Ra-226 at ambient air sampling locations at SNL, 2000 through 2005

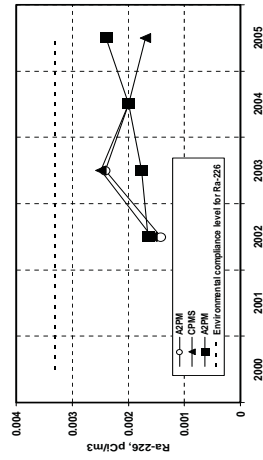
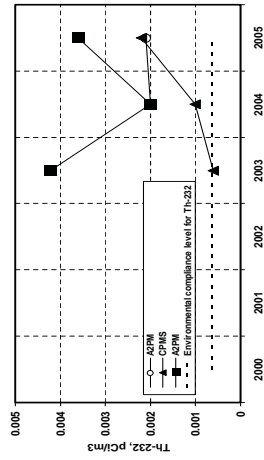


Figure 3-6 Reported levels of Th-232 at ambient air sampling locations at SNL, 2000 through 2005



The following observations can be made based on the time-series data:

- Reported levels or alpha activity in air were significantly larger in 2000 compared to 2002 through 2005. It is unclear whether this is due to changes in analytical procedures, based on natural variability or due to impacts from SNL operations. In all years, the levels exceeded the levels for environmental compliance in 40CFR61 App. E, Table 2 for americium-241.
- Reported levels or beta activity in air were significantly smaller in 2000 compared to 2002 through 2005. It is unclear whether this is due to changes in analytical procedures, based on natural variability or due to impacts from SNL operations. In 2002 and 2005, the levels exceeded the levels for environmental compliance in 40CFR61 App. E, Table 2 for strontium-90.
- Reported levels or uranium-238 were significantly smaller in 2000 and 2002 compared to 2003 through 2005. It is unclear whether this is due to changes in procedures, based on natural variability or due to impacts from SNL operations. In 2003, 2004 and 2005, the



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levels exceeded the levels for environmental compliance in 40CFR61 App. E, Table 2 for uranium-238.

- Reporting of radium-226 levels started in 2002. The reported concentrations were well below the levels for environmental compliance in 40CFR61 App. E, Table 2 for radium-226.
- Reporting of thorium-232 levels started in 2003. Levels at station A2PM was significantly larger than those reported for the other stations. With the exception of the 2003 level at the CPMS station, all reported values exceeded the levels for environmental compliance in 40CFR61 App. E, Table 2 for thorium-232.

Table 3-4 Reported concentrations of radionuclides in air at SNL's CPMS station, 2000 through 2005 (pCi/m³), values exceeding the 40CFR61 environmental compliance criterion in **bold** (conservative criteria used: Am-241 for gross alpha and Sr-90 for gross beta activity)

Analyte	2000	2002	2003	2004	2005
Gross Alpha	0.02429	0.00568	0.00514	0.009	0.0061
Gross Beta	0.01193	0.01679	0.02223	0.016	0.0204
Actinium-228					0.0061
Beryllium-7	0.08831	0.09856	0.13001	0.159	0.1401
Bismuth-214		0.00324	0.00095		0.0017
Chromium-51					0.02
Cobalt-60					0.0001
Cesium-137			0.00076	0.004	
Lead-212			0.00062	0.001	0.0023
Lead-214		0.00131	0.00176	0.001	ND
Niobium-95					0.002
Potassium-40	0.01879	0.00838	0.00837	0.011	0.0083
Radium-224					0.0103
Radium-226		0.00158	0.00249	0.002	0.0017
Radium-228				0.002	0.0061
Strontium-85					ND
Thallium-208		0.0009			0.0007
Thorium-232			0.00061	0.001	0.0022
Thorium-234			0.04718	0.054	0.0102
Uranium-235					ND
Uranium-238			0.03693	0.054	0.0102
Uranium, µg/m ³	0.00002	0.00003			



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Table 3-5 Reported concentrations of radionuclides in air at SNL's CWPM station, 2000 through 2005 (pCi/m³); values exceeding the 40CFR61 environmental compliance criterion in **bold** (conservative criteria used: Am-241 for gross alpha and Sr-90 for gross beta activity)

Analyte	2000	2002	2003	2004	2005
Gross Alpha	0.0275	0.00446	0.00561	0.007	0.0056
Gross Beta	0.01193	0.02011	0.0172	0.017	0.0182
Actinium-228					
Beryllium-7	0.06119	0.08204	0.11831	0.132	0.1531
Bismuth-214		0.00097	0.00131	0.002	0.0024
Chromium-51					ND
Cobalt-60					ND
Cesium-137		0.01113	ND	0.001	
Lead-212			ND	0.002	0.0025
Lead-214			0.00301	0.002	0.0021
Niobium-95					ND
Potassium-40	0.01386	0.004	0.0061	0.01	0.0037
Radium-224					0.0344
Radium-226		0.00165	0.00176	0.002	0.0024
Radium-228		0.00055		0.004	ND
Strontium-85					0.0003
Thallium-208		0.00089			0.0015
Thorium-232			0.00423	0.002	0.0036
Thorium-234			0.01616	0.022	0.0327
Uranium-235					ND
Uranium-238			0.0206	0.022	0.0327
Uranium, µg/m ³	0.00002	0.00001			

Table 3-6 Years in which reported concentrations of identified radionuclides in ambient air exceeded 40CFR61 environmental compliance levels

Radionuclide	Years in which concentrations in ambient air reported by SNL exceeded 40CFR61 environmental compliance levels at least in one location
Uranium-238	2002, 2004, 2005
Radium-226	none
Thorium-232	2003, 2004, 2005

SNL excludes its operations as a source of measured radionuclide concentrations. For example, the 2004 Site Environmental Report states, "It should be noted that the radionuclides are naturally occurring or remnants, and are not emitted from sources at the SNL/NM." (SNL 2005a, p.5-8). This is statement is not supported by the facts. Some radionuclides such as cesium-137



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and uranium-238 that measured in air are also released from SNLs as is evident by their own emission reporting (see Table 2-1). The analysis of ambient air samples does not allow differentiating between natural background and contributions from SNL.

Given the uncertainties in the emission estimates and the likelihood of unidentified diffuse sources of radionuclide emissions at SNL, a detailed investigation of the raw data would be required for a more refined assessment. Isotope specific analysis for Am-241 and Sr-90 would be required to determine whether the levels for environmental compliance for these radionuclides were exceeded or not. It would be appropriate to perform isotope specific analysis on other transuranic isotopes such as plutonium as well since plutonium releases were reported for 2005 (SNL 2006a).



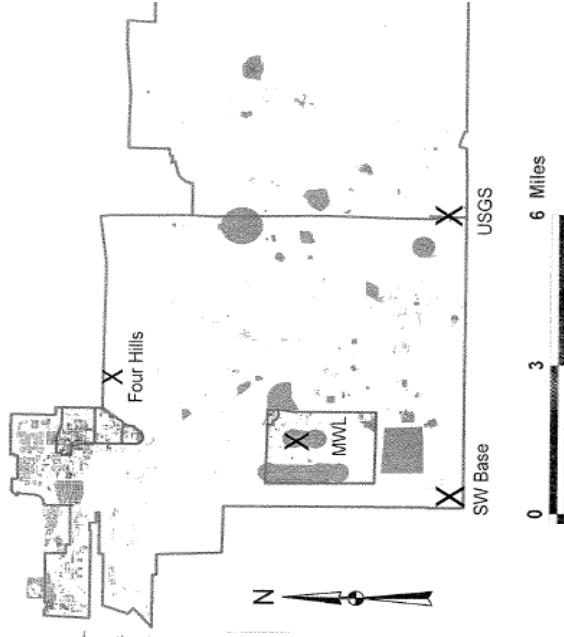
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3.2 Ambient air monitoring by NMED

Confirmatory monitoring was carried out by the New Mexico Environment Department DOE Oversight Bureau. Results for the years 1997 to 2000 were published in 2004 (NMED 2004). Monitoring took place at three perimeter stations (Four Hills, United States Geological Service - USGS, KAFB Fire Station #4 at Southwest Base - SW Base) and a background station (University of New Mexico - UNM). As of 2002, the UNM background station was moved to SNL's Mixed Waste Landfill (NMED, 2004a), four stations were still in operation in 2003 (NMED, 2005).

Figure 3-7 NMED air sampling locations at SNL as of 2002



According to NMED, air samplers were continuously operated to collect airborne particulate matter on a glass fiber filter and water vapor into a silica gel filled cartridge. Quarterly, the filters are analyzed for gross radioactivity, isotopic radioactivity, gamma spectroscopy and the silica gels are analyzed for tritium in water vapor. As of 2002, uranium and plutonium analysis was



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performed on particulates collected at the SW Base and Mixed Waste Landfill station. The results of isotope specific analysis other than tritium are not available through the website (<http://www.nmenv.state.nm.us/DOE/Oversight/pubs.htm>) and cannot be found in any published NMED report. The results of gross alpha/beta and tritium activity for the years 1997 to 2000 were published in the year 2004 and are summarized in Table 3-6.

Table 3-6 Results of NMED monitoring of ambient air around SNL, 1997 to 2000 (pCi/m³) (Sources: NMED 2004)

Year	Location			
	Four Hills	USGS	SW Base	UNM
Gross alpha activity				
1997	0.00635	0.00438	0.00427	0.00578
1998	0.00424	0.00400	0.00424	0.00435
1999	0.00295	0.00362	0.00432	0.00367
2000	0.00332	0.00462	0.00443	0.00267
Gross beta activity				
1997	0.0121	0.0122	0.0115	0.0125
1998	0.0144	0.0110	0.0162	0.0151
1999	0.0176	0.0195	0.0172	0.0156
2000	0.0144	0.0145	0.0163	0.0130
Tritium activity				
1997	11	10.5	11.7	13.2
1998	2.27	4.69	5.43	2.63
1999	3.33	1.62	1.93	1.83
2000	5.10	4.54	10.5	5.03

The NMED summary report concludes:

"The Oversight Bureau's tritium based dose values ranged approximately 14 to 56 times greater than Sandia's modeled dose values at the same locations using the CAP-88 computer code for a variety of radionuclides. Even at UNM, which is the background station, indicated a greater dose value based on tritium in relation to Sandia's highest modeled dose values. However, all measured dose values were approximately 1,200 to 18,000 less than the applicable regulatory criteria."

From the above, it appears that NMED's conclusion is limited to measured levels of tritium and does not consider the contribution of alpha and beta emitters. In order to determine compliance, measured concentrations of radionuclides in air should be compared to the levels for environmental compliance in 40CFR61 App. E, Table 2. The results if the comparison are summarized in Table 3-7.

The NMED 2004 report provided only data for gross alpha and gross beta activity. Therefore, one does not know which specific radionuclides were responsible for the measured



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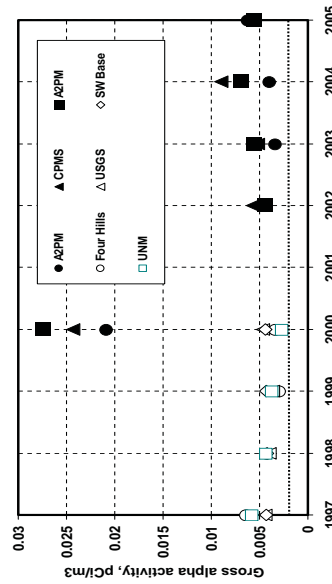
concentration. In such a case, it is prudent to use as reference the critical radionuclide, i.e. the radionuclide with the lowest value for environmental compliance of those alpha and beta emitters for which releases into the air were reported for the year 2004 (see Table 2-1).

Table 3-7 Comparison of maximum annual levels of gross alpha, gross beta and tritium in ambient air with the compliance level for the critical radionuclide

Type	(A): Highest measured concentration (Table 3-1)	(B): Environmental compliance level for critical radionuclide identified in Table 2-1	Ratio (A / B)
Gross alpha activity	0.00635 pCi/m ³	0.0019 pCi/m ³ (Am-241)	334 %
Gross beta activity	0.0195 pCi/m ³ (Sr-90)	0.019 pCi/m ³ (Sr-90)	103 %
Tritium activity	13.2 pCi/m ³	1,500 pCi/m ³	0.9%

A comparison of SNL and NMED data is presented in Figures 3-8 for alpha activity and in Figure 3-9 for beta activity. In general, the level for alpha activity reported by NMED are lower than those values reported by SNL. In 2000, the only year for which data was available from both sources, the average alpha activity reported by SNL were a factor of 6.4 larger than those reported by NMED whereas the average beta activity reported by SNL was 23% smaller than that reported by NMED.

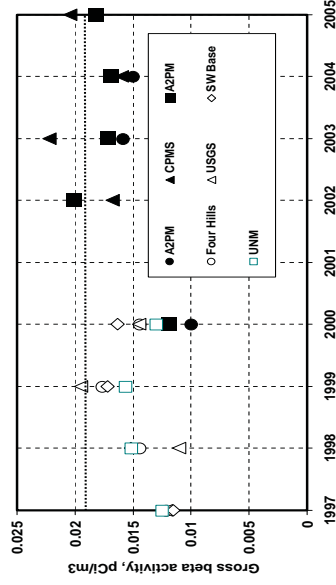
Figure 3-8 Comparison of reported data for gross alpha activity in air at locations sampled by SNL (A2PM, CPMS, A2PM) with those sampled by NMED (Four Hills, USGS, SW Base, UNM); the 40CFR61 level for environmental compliance for Am-241 is indicated with a dotted line.



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Figure 3-9 Comparison of reported data for gross beta activity in air at locations sampled by SNL (A2PM, CPMS, A2PM) with those sampled by NMED (Four Hills, USGS, SW Base, UNM); the 40CFR61 level for environmental compliance for Am-241 is indicated with a dotted line.



For tritium in air, the highest measured annual average concentration in air (13.2 pCi/m³ at UNM in the year 1997) represents about 0.9% of the compliance level, or a factor of 111 below the compliance level (not a factor of 1,200 to 18,000 as was calculated by NMED. Further, the reported tritium concentrations are likely to be biased on the low side due to the poor efficiency of silica gel to capture water at low humidity.

At Los Alamos National Laboratories the amount of water collected in the dry season was less than a quarter of the amount expected from measured humidity levels (Eberhardt 1999). Therefore, the reported data had to be adjusted by a factor of ~4. The NMED tritium sampling data was not corrected for absolute humidity (Skibiski, 2006) and are therefore likely to be too low. Given the lower humidity levels in Albuquerque, the adjustment factor may even have to be larger than ~4.

The highest measured annual average concentration of alpha activity in air (0.00635 pCi/m³ at Four Hills in the year 1997) is a factor of 3.3 times the compliance level for Am-241. The highest measured annual average concentration of beta activity in air (0.0195 pCi/m³ at USGS in the year 1999) is roughly equivalent to the compliance level for Sr-90. Therefore, the NMED monitoring program cannot serve as proof of compliance with 40CFR61 dose limit in the absence of isotope-specific data.



4 Comparison of monitoring for radionuclides at DOE sites

A suitable way to evaluate the environmental monitoring system at SNL is to compare it to monitoring systems at other DOE facilities. In the following, this is done separately for monitoring of tritium, as well as for monitoring of alpha and beta activity in particles. The following DOE facilities were selected because the environmental reports were readily available:

- Pantex, TX (Pantex 2005)
- Brookhaven National Laboratory, NY (BNL 2004)
- Lawrence Livermore National Laboratory, CA (LLNL 2005)
- Los Alamos National Laboratory, NM (LANL 2005)
- Idaho National Engineering and Environmental Laboratory, ID (INEEL 2005)
- Savannah River Site, SC (SRS 2005)

Table 4-1 contains the summary data for SNL as well as for six other facilities for which tritium emissions in 2004 were reported, ranging from 0.00019 curies (Pantex) to 61,300 curies (Savannah River Site). The number of ambient air monitoring stations for tritium of non-SNL facilities ranged from 7 to 46.

Table 4-1 Ambient air monitoring for tritium at selected DOE facilities in 2004

Facility	Reported tritium release (Ci) ^{a)}	Number of ambient air stations sampling tritium ^{a)}	Population in 50 mile radius ^{b)}
Pantex, TX	0.00019	27 (5 onsite, 22 perimeter)	260,000
Sandia National Laboratories, NM	1.3	0	500,000
Brookhaven National Laboratory, NY	4.1	9 (7 onsite, 2 perimeter)	5,200,000
Lawrence Livermore National Laboratory, CA	40.4	18 (12 onsite, 6 offsite)	5,300,000
Los Alamos National Laboratory, NM	789	46 (15 onsite; 24 perimeter, 7 offsite)	160,000
Idaho National Engineering and Environmental Laboratory, ID	1,210	7 (2 onsite; 5 offsite)	103,000
Savannah River Site, SC	61,300	15 (1 onsite; 10 perimeter, 4 offsite)	550,000

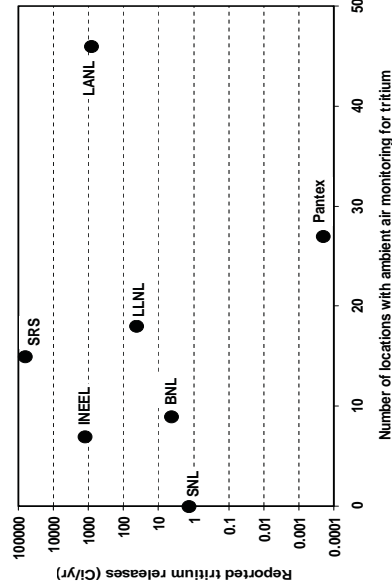
a) Based on environmental reports for the respective facility
b) Based on data in CAP88-PC



Figure 4-1 illustrates that there is no definitive relationship between the tritium release and the number of sampling locations. The lack of ambient tritium monitoring at SNL does not meet the de facto standard established at other DOE facilities. The prime example is the Pantex site where the reported tritium emissions for 2004 were a factor of 6,800 lower than at SNL, yet tritium monitoring of ambient air is carried out at 27 stations at Pantex.

At SNL, tritium emissions are expected to increase over the next few years due to an increase in use of the neutron generator facility for tritium target loading associated with fabrication of nuclear weapons (Robinson 2006).

Figure 4-1 Number of locations at selected DOE facilities with ambient air monitoring for tritium as a function of the reported releases of airborne tritium



Similarly, the relationship between reported releases of airborne alpha particulates and the monitoring of alpha particulate activity in ambient air is presented in Table 4-2 and Figure 4-2. Whereas SNL reported alpha activity releases of 1.1E-05 curie in the year 2004 and carried out ambient air monitoring at only four locations, ambient air monitoring is carried out at four DOE facilities that reported lower or no releases of particulate alpha activity (LANL, LLNL, BNL, and Pantex). The most extensive network exists at Los Alamos National Laboratory with a total of 46 locations while having smaller reported emissions of alpha activity compared to SNL.

The relationship between reported releases of airborne beta particulates and the monitoring of beta particulate activity in ambient air is presented in Table 4-3 and Figure 4-3. Whereas SNL reported emissions of beta particle activity of 8.1E-07 curie in the year 2004 and carried out ambient air monitoring at only four locations, ambient air monitoring was carried out at two DOE facilities that reported lower or no releases of particulate beta activity (LLNL and BNL). The most



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extensive network exists at Los Alamos National Laboratory with a total of 46 locations for which reported emissions of beta activity are a factor of 10,000 larger compared to SNL.

As the result of the comparison, there is obviously no linear relationship between the reported releases of radioactive materials into the air and the extent of environmental monitoring carried out. While there are only four ambient air monitoring stations at Sandia National Laboratories in Albuquerque, a much larger number of locations (up to 11 times) are monitored at other DOE facilities.

A comparison of key data for SNL and LANL is provided in Table 4-4.

Table 4-2 Ambient air monitoring for alpha activity in particulates at selected DOE facilities in 2004

Facility	Reported alpha particulate emissions (Ci)	Reported radionuclides from monitored facilities	Number of ambient air monitoring stations	Reported radionuclides in air
Pantex, TX	2.20E-09	Th-232 U-233/234 U-238 Pu-239/240	27 (5 onsite, 22 perimeter)	Th-232 U-233/234 U-238 Pu-239/240
Sandia National Laboratories, NM	1.10E-05	U-234 U-235 U-238 Am-241	4 (all onsite)	U-234/235/238 Th-232
Brookhaven National Laboratory, NY	0	N/A	6	gross alpha
Lawrence Livermore National Laboratory, CA	5.14E-09	gross alpha gross beta	24 (15 onsite, 9 offsite)	gross alpha Pu-239/240 U-234/238
Los Alamos National Laboratory, NM	6.60E-06	Am-241 U Pu Th	46	gross alpha U-234/238 Pu-239/240 Am-241
Idaho National Engineering and Environmental Laboratory, ID	8.96E-03	Isotopes of Am, Cf, Cm, Pu, U, Ra, Th	29 (15 onsite, 8 perimeter, 6 offsite)	gross alpha Pu-239/240 U-234/238
Savannah River Site, SC	3.01E-04	U-234 U-235 U-238 Pu-238 Pu-239 Am-241 Cm-244	15 (1 onsite, 10 perimeter, 4 offsite)	gross alpha U-234/238 Am-241 Cm-244

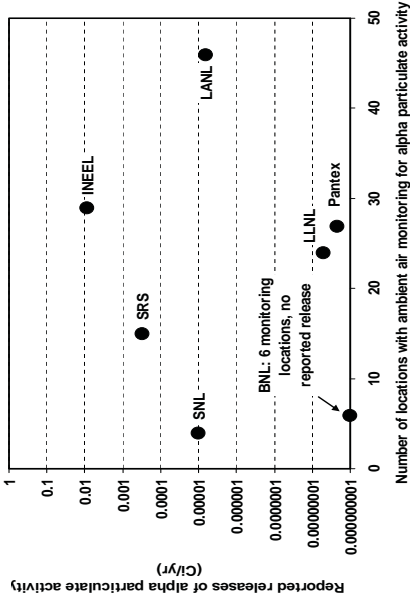


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Figure 4-2 Number of locations at selected DOE facilities with ambient air monitoring for alpha particulate activity as a function of the reported releases of airborne alpha particulate activity



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5 The need for improved ambient air monitoring at SNL

There are many reasons to improve the ambient air monitoring system at SNL:

- Like any other Department of Energy Facility, SNL has to comply with Subpart H of the National Emission Standards for Hazardous Air Pollutants (40CFR61). Ambient air monitoring is the preferred method to demonstrate compliance in the case of diffuse source emissions.
- For point sources, compliance with 40CFR61 Subpart H can be established with computer models such as CAP88 (for details see CAP88-PC 2006). In such a case, ambient air monitoring will provide supplemental verification because monitoring results can be compared with model predictions.
- Ambient air monitoring can provide a precautionary measure for the event of accidental releases of radioactivity.
- Ambient air monitoring can improve public relations with surrounding communities.

5.1 Compliance with regulatory requirements

With respect to releases of radioactive materials at SNL, compliance with the regulatory requirement in 40CFR61 Subpart H has to be ensured. For sources, this can be done on the basis of measured or conservatively estimated release data and modeling with CAP-88. SNL has selected that method in its compliance reporting (SNL 2002, SNL 2003, SNL 2004, SNL 2005 and SNL 2006).

This method requires, of course, that the emissions of all point and diffuse sources are well characterized. If that is not the case, or if measurements at the source are unfeasible, 40CFR61.93(f) allows that *“[e]nvironmental measurements of radionuclide air concentrations at critical receptor locations may be used as an alternative to air dispersion calculations in demonstrating compliance with the standard.”*

As explained in chapter 2, SNL has potential diffuse sources of radioactive materials (the Mixed Waste Landfill, resuspended activity from historical releases, and potentially unidentified sources). The application of the precautionary principle suggests ambient air monitoring that would allow identifying all radionuclides in air no matter where they originated. Thus, the presence (or absence) of diffuse sources could be confirmed well as compared to the current situation where no monitoring is carried out at all.

5.2 Precautionary monitoring because of possible accidental releases of radioactive materials

There is no publicly available inventory of radioactive materials at SNL that would allow determining the possibility of accidental releases of radionuclides into the air. The presence of nuclear warheads at KAFB was confirmed at least for the year 1998 (Atkin 1998). A comprehensive ambient air monitoring system would be of benefit in case of accidental releases.



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5.3 Establish a level of information and assurance at SNL that is equivalent to that at other DOE facilities

It was demonstrated in Chapter 4 that SNL carried out ambient air monitoring for radionuclides at far less locations compared to other DOE facilities. Tritium in ambient air is not monitored by SNL although it is monitored by all other DOE facilities that were reviewed, including those that reported less tritium emissions than SNL. Alpha activity in air is monitored at only four locations as compared to 46 locations at the LANL, even though SNL reported larger releases of alpha activity than LANL. It should be self-evident that residents in the Albuquerque metropolitan area are entitled to a level of information and assurance equivalent to residents in the vicinity of other DOE facilities, especially when compared to the Los Alamos National Laboratory (see Table 4-4 on page 25 for a comparison of key data for SNL and LANL).

In addition to the monitoring of radionuclides in ambient air, a NEWNET (Neighborhood Environmental Watch Network) system is established near Los Alamos National Laboratory as well as along transportation routes for nuclear waste. NEWNET is a network of environmental monitoring stations with public access to the data through the Internet (<http://newnet.lanl.gov>). Most stations have sensors for monitoring wind speed and direction, ambient air temperature, barometric pressure, relative humidity and ionizing gamma radiation. Such a system would be beneficial for SNL as well.

5.4 Recommendation

Based on the foregoing, it is highly recommended to install a comprehensive monitoring system of radioactive materials in ambient air at and around SNL. The system should be based on the following principles:

- Ambient air monitors should be placed in a dense network at the plant perimeters covering all wind directions;
- Tritium should be sampled as well as particulate activity in air on a weekly basis (supplemented by monthly or quarterly isotopic analysis of alpha and beta activity);
- The data should be rapidly made public on SNL's website and be subject to independent quality assurance;
- SNL should involve the local community in the planning process;
- Ambient air monitoring at SNL should be coordinated with efforts to establish a NEWNET system in the vicinity of SNL;
- The NEMED monitoring program should be expanded to provide verification of SNL data; data for absolute humidity;
- NEMED should provide isotope specific analysis of their data and correct tritium sampling data for absolute humidity;
- An independent audit of SNL monitoring activities is highly recommended.

A minimum network of 16 stations should be placed on the plant perimeter in order to cover all wind directions. For the adequate determination of background, an additional number of four stations is recommended. Additional stations should be placed as needed as is the case at Los



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Alamos National Laboratory where monitoring for radioactive materials is carried out in a total of 46 stations.

Since reporting of different radionuclides is inconsistent (not all are reported for all years), a detailed investigation should be carried out to determine the necessary analytical procedures to identify all relevant radionuclides.

A precise cost estimate for the additional sampling stations is beyond the scope of this report. If an additional 20 stations for tritium and 16 alpha/beta stations with isotope-specific analysis would be installed, the additional costs are estimated to be below one million US \$ per year. This estimate is based on the assumption of \$50,000 annual operating and write-off costs per station.

The next step in the process should be a detailed investigation into the design of a monitoring system (function and density of stations) that is equivalent to the one at LANL and could be relied upon to demonstrate compliance with 40CFR61 Subpart 61.



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Levens, Matthew

From: TomRobinsonCitrix@yahoo.com
Sent: Sunday, April 06, 2008 12:53 AM
To: Complex2030
Subject: Why more nukes?

PC_1879

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,

There is no need for more nuclear weapons. Please stop the "Complex Transformation" initiative.

16A

Thank you.

Sincerely,
Tom Robinson
5473 Entrance Dr.
Soquel, CA 95073

cc:
Senator Dianne Feinstein
Senator Barbara Boxer
Representative Sam Farr

PC_92

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

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

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

COMMENTS: *Why do you think plan B "is not being pursued? Who do you think should determine the future policy on nuclear weapons?*

My answer would be, lobbying by weapons manufacturers, and voting citizens, the electorate

NAME Dolores Rodriguez
ADDRESS 5917 Arlington Blvd.
Richmond, CA 94805
SIGNATURE Dolores Rodriguez DATE 2-21-08

19A

21F

316A:
417M

PC_1036

SPEIS Complex Transformation

Statement by
Los Alamos Committee on Arms Control and International Security
Cheryl Rofer, President

The Los Alamos Committee on Arms Control and International Security believes that the total number of US nuclear weapons should be in the 200-300 range, with equivalent reductions negotiated for Russia and other nuclear nations. Once this level is reached, further reductions may well be possible. Overall, the number of nuclear weapons in the world has been decreasing for several decades and can be expected to decrease further in the future.

The plan is to have a few hundred of

A stockpile of a few hundred nuclear weapons can be maintained easily within today's operational capacity at TA-55, particularly with the addition of the CMR Replacement Building.

If a decision is taken to produce a new Robust Replacement Warhead (RRW), it may be desirable to rework pits at a higher rate. However, a stockpile of 200-300 could be replaced in ten years with rework of 20-30 a year. Again, such levels should be attainable at the Los Alamos plutonium complex.

Nonproliferation programs at Los Alamos and across the complex should be continued at least at present funding levels or increased. Such programs help to prove to the world that the United States is following its obligations under the Nuclear Nonproliferation Treaty and other arms control treaties.

Contact information:
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Cheryl Rofer: crofer@lanl.gov

115A

Rogers, Lola

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Rohlik, Harold

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PC_1144

Levens, Matthew

From: lolarr@u.washington.edu
Sent: Monday, April 07, 2008 11:52 AM
To: Complex2030
Subject: Complex Transformation

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 support the streamlining of our weapons programs, but I do not feel that new nuclear weapons should be developed. Such a plan would be worse than wasteful, because it would be a provocation and a spur to greater proliferation around the world.

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,
Lola Rogers
2111 E. John, #103
Seattle, WA 98112

cc:
Senator Patty Murray
Representative Jim McDermott
Senator Maria Cantwell

PC_344

Harold E. Rohlik
1960 Substation Road
Brunswick Hills, OH 44212-3236
hrohrlik@aol.com

March 20, 2008

Theodore Wyka
Complex Transformation SPEIS Manager
Department of Energy
1000 Independence Ave., SW
Washington, DC 20585

Subject: Complex Transformation SPEIS Comments

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, but I believe that it's time to move the entire world toward total nuclear disarmament.

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

Sincerely,

Harold E. Rohlik

119

29A

313A.1

498

Romeo, Clare

Page 1 of 1

Levens, Matthew

PC_414

From: Clare Romeo [clareo3@yahoo.com]
Sent: Monday, March 17, 2008 8:21 AM
To: Complex2030
Subject: New Nuclear Weapons

Clare Romeo
125 Oakland Street
Wellesley Hills, MA 02481-5338

March 17, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|18A I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons.

Sincerely,

Clare Romeo
781-997-1168

Rosak, Scott

Page 1 of 1

Levens, Matthew

PC_1221

From: Scott Rosak [scotrhk@hotmail.com]
Sent: Thursday, March 27, 2008 1:34 PM
To: Complex2030
Subject: how many nuclear weapons is enough?

Scott Rosak
365 Old Hickory Rd.
New Lenox, IL 60451-1689

March 27, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A We must determine our course for the future: will it be constructive or destructive? Nuclear weapons are counterproductive to our responsibility to our self and the rest of the world. It is a waste of money and a step backward in the journey of civilization. I encourage you to help this country come to its senses and oppose any plans to expand our nuclear weapons. Furthermore, I would applaud you fervently if you showed true leadership and set an example to the whole world by initiating steps to disarm all of our nuclear weapons. Thank you for your consideration and God bless you.

Respectfully,

Scott Rosak

Rose, Kathryn

Page 1 of 1

Rosen, Louis

Page 1 of 1

Levens, Matthew

From: Kathryn Rose [mkizkats2@msn.com]
Sent: Tuesday, April 29, 2008 5:22 PM
To: Complex2030
Subject: Nuclear Weapons Are (Still) A Bad Idea

Kathryn Rose
2749 Lafayette St.
Denver, CO 80205-4448

April 29, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

!! Nuclear weapons are unsafe for anybody. They are difficult to control, difficult to protect and, of course, extremely expensive to produce.

3A1 Surely, the American taxpayers could find some other use for all that money!

19B Sincerely,

Kathryn Rose
303-297-1664

PC_1416

Draft Complex Transformation
SPEIS Public Hearing
Hilltop House, March 13, 2008

PC_1060

I have witnessed the evolution of LANL from 1944 to the present.

LANL remains a unique multidisciplinary science-based laboratory. It was a key player in ending WWII and in bringing to the fore the promise of nuclear energy. Had we vigorously pursued that option, as was done in France and Japan, we would not now be at the mercy of foreign oil sources with attendant challenges to our physical and economic security. Nor would we be the world's largest polluter of the environment. The world, today, faces numerous critical challenges.

Interdisciplinary solutions are increasingly required. LANL is making and can continue to make vital contributions, not only to military security, but also to energy, environmental, homeland, water and health security of our nation and the world. Not only should it not be downsized. It, in my opinion, should be upsized for the sake of peace and improving the human condition.

L Rosen
Louis Rosen

115A

Roshek, John

Page 1 of 1

Roshek, John

Page 1 of 1

Buenafior, Justin

From: John Roshek [jerome444@hotmail.com]
Sent: Sunday, February 24, 2008 2:46 PM
To: Complex2030
Subject: Restarting the US nuclear weapons program

John Roshek
PO Box 1521
Mt. Shasta, CA 96067-1521

February 24, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

STOP the administration's proposal to build a plant to produce plutonium pits for nuclear weapons.

Also STOP all their plans to modify nuclear facilities across the country, which would make it easier for the U.S. to rebuild its nuclear arsenal.

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.

Building this new plant would continue to convey to the major nations of the world that the US government is only a lethal, warlike, rogue nation that is bent on a murderous take-over of the nations of the world using nuclear holocaust, if need be. Fifteen times since WWII the US gov has threatened the use of nuclear weapons ,if it's will was not done. I have documentation of each of those despicable acts. 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. Scumbag hypocrisy!

Again stop the Administration's and leadership of both parties from further creating the means of mass murder and by those actions actively forcing the nations of the world to also insanely "defend" themselves with the same weapons made by a psychopathic civilization. Yes, that IS US.

Sincerely,

John Roshek

116A

21J

PC_552

Buenafior, Justin

From: John Roshek [jerome444@hotmail.com]
Sent: Wednesday, January 16, 2008 10:10 PM
To: Complex2030
Subject: SPEIS, Complex Transformation

Mr. Wyka:
It is imperative that 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,seriously dismantling nuclear weapons per the Nuclear Arms Agreement with Russia and "green" energy research, not expanding their weapons program. All this should be accompanied by an Executive Administration and Congress that is 100% committed to peace and justice with the nations and peoples of the world. Right now the US government is a rogue, terrorist state that is the greatest threat to peace in the world. With your deepest conscience take these dangerous weapons out of the hands of these psychopathic individuals running this country, before they manifest their beliefs in "Armageddon"

108B

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. Insanely!! As you know the current nuclear stockpile will remain reliable for at least another 70 years.

23A:
38A

John Roshek
PO Box 1521
Mt. Shasta, CA 96067

Ross, Candace

Page 1 of 1

Page 1 of 1

PC_865

Levens, Matthew
 From: elaine ross [mailto:peacevolunteer@yahoocan]
 Sent: Monday, April 07, 2008 12:37 PM
 To: Complex2030
 Subject: Proposed Complex Transformation

I recently attended a meeting on Complex Transformation at the Atomic Museum in Las Vegas, Nevada. The gentleman explaining it was personable, knowledgeable and easy to understand. It was presented as a simple economical "shuffle".

Right.
 In reality, I believe this *shuffling* would be *done* to further the research and development of *even more* nuclear weapons.

I support the complete shut down of research and manufacture of nuclear weapons, not the shuffling around of facilities.

I recently borrowed from my local library a DVD put out by PBS that tells of a nuclear submarine (the *Thresher*) that sank over 40 years ago and was never recovered, as well as a spilled shipment of over 50 nuclear warheads that sit at the bottom of the Atlantic Ocean.

This is outrageous. Instead of making more, you should be cleaning up the mess!
 I understand that the planet already has enough nuclear weapons to completely obliterate life on Earth several times over!

Why would we have any possible reason to develop more?
 If Complex Transformation was going to develop a way to neutralize nuclear waste, clean up the spills in the ocean, round up the depleted uranium left on battle fields all over the planet, I'd think it was a grand idea.

But none of those projects are even "on the table", are they?
 [We do not need "Complex Transformation", we need "Complex Closure and Nuclear Clean Up".
 Candace Ross
 Indian Springs, Nevada

You rock. That's why Blockbuster's offering you *one* month of Blockbuster Total Access. No Cost.

116A
 2/7

116A (cont.)

5/15/2008

Ross, Marc

Page 1 of 1

PC_1446

Levens, Matthew
 From: Marc Ross [mailto:mhross@umich.edu]
 Sent: Sunday, April 27, 2008 11:05 AM
 To: Complex2030
 Subject: Complex Transformation SPEIS Comments

When the budget for continuing a major federal program is at issue, defenders of the budget are active. The employees, the facility staffs, and the powerful people associated peripherally with the program, bring out arguments for continuation of the budget. In the face of such budget inertia, few government programs can be curtailed and redirected, even when the most thoughtful observers find it is past time for such curtailment and redirection. The US nuclear weapons program is such a case if there ever was one. This proposal is mindless budgetary inertia - and probably dangerous for our future as well.

Marc Ross, professor emeritus of physics, the University of Michigan

116A
 2/13A1

1

Roybal, Leon
Page 1 of 1

Roybal, Leon
Page 1 of 5

Buenafior, Justin

From: Jill rounds [jrounds@raznet.com]
Sent: Monday, March 03, 2008 11:57 AM
To: Complex2030
Subject: I oppose plans to rebuild its Nuclear Arsenal

Jill rounds
PO Box 424
Arroyo Seco, NM 87514-0424

March 3, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

As a long time resident of New Mexico, I care deeply about the effects of nuclear weaponry facilities and the associated negative effects of this industry on our standard of living. We are working towards the elimination of proliferation, and not the proposed plans. I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons.

11J

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.

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.

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.

3/8A

Sincerely,

Jill rounds
505 776-5550

PC_532



Leon T. Roybal
Governor

PC_342
Paul Rainbird
1st Lieutenant Governor
Terrence Garcia
2nd Lieutenant Governor

Pueblo de San Ildefonso
Office of the Governor

SIGC08-059

March 25, 2008

Theodore A. Wyka, Complex Transformation SPEIS Document Manager
Office of Transportation, NA-10.1
US Dept. of Energy/NNSA
1000 Independence Avenue, SW
Washington, D.C., 20585

Dear Mr. Wyka:

The Pueblo de San Ildefonso (Pueblo) Department of Environmental and Cultural Protection (DECP) has received the *draft Complex Transformation Supplemental Programmatic Environmental Impact Statement (SPEIS), DOE/EIS-0236-SA*.

Given the remarkable size of the SPEIS, it is unreasonable for a small department such as DECP to be expected to review it in the time provided. However, our staff has attempted to discern the issues most pertinent to the Pueblo, and our comments and concerns are provided in the attachment.

Thank you for providing the opportunity to address our concerns.

Sincerely,

PUEBLO DE SAN ILDEFONSO

Leon T. Roybal
Governor

Attachment

CC: GC file

Route 5 Box 315-A · Santa Fe, NM 87506 · (505) 455-2273 · (505) 455-4153 Fax

Roybal, Leon

Page 2 of 5

Comments on the Draft Complex Transformation Supplemental Programmatic Environmental Impact Statement

General Comments

1. The Tribe wishes to point out that increasing plutonium pit production at TA-55 will increase the potential for contaminant releases, and because this facility sits at the head of Mortandad Canyon, which drains onto the Tribe's Sacred Area, this could have disproportionate negative impacts on the Tribal members and resources.
2. The Environmental Justice methodology used here is flawed. The document discusses populations in which greater than 50% of the populations are below the poverty level. NEPA guidance states that "minority populations should be identified when either: The minority population exceeds 50%, or the minority population is meaningfully greater than the minority population in the general population." That is the case with the Pueblo de San Ildefonso, which borders LANL. Further, note that as the *Computer Assisted Environmental Justice Methodology* (US EPA Region 6, 1994) states: "The methodology user should realize that even an index ranking of zero can have significant EJ concerns. For example, an unpopulated area will rank a zero, but if owned by minority and/or low income groups, the site may have significant EJ importance."

11/4/13

2/14/12

Specific Comments by Section

Text in italics and quotes is taken from the draft SPEIS.

S.3.17 Preferred Alternatives

Restructuring SNM Facilities Preferred Alternatives

"Plutonium Manufacturing and R&D: Los Alamos (50/80 Alternative) would provide up to 80 pits per year enabled by construction and operation of the Chemistry and Metallurgy Research Replacement - Nuclear Facility (CMRR-NF). Other national security actinide needs and missions would be supported at TA-55 on a priority basis (e.g., emergency response, material disposition, nuclear energy)."

Comment: See General Comment 1.

Restructuring R&D and Testing Facilities Preferred Alternatives

"LANL would produce HE detonators and conduct contained HE R&D."

Comment: Please clarify if this would mean an increase or decrease in HE activity.

3.8 HIGH EXPLOSIVES R&D

3.8.1 Alternative 1 -- No Action Alternative

Roybal, Leon

Page 3 of 5

3.8.1.2 Los Alamos National Laboratory

"TA-14 - This site is currently permitted to treat waste through open detonation or open burning under the RCRA."

4/14/06

Comment: TA-14 is NOT RCRA permitted. If RCRA OB/OD treatment is occurring at TA-14 it would be illegal.

3.17 PREFERRED ALTERNATIVES

"Plutonium Manufacturing and R&D: Los Alamos (50/80 Alternative) would provide up to 80 pits per year enabled by construction and operation of the Chemistry and Metallurgy Research Replacement - Nuclear Facility (CMRR-NF)."

Comment: See General Comment 1.

CHAPTER 4 AFFECTED ENVIRONMENT

4.1.10 Environmental Justice

"Census tracts were considered low-income census tracts if the percentage of the populations living below the poverty threshold exceeded 50 percent. Based on 2000 Census data, Figure 4.1.10-3 shows low-income census tracts within the 50-mile radius where more than 50 percent of the census tract population is living below the Federal poverty threshold. According to 2000 census data, there were no census tracts within the 50-mile radius of LANL where more than 50 percent of the census tract population was identified as living below the Federal poverty threshold. In 2000, 18.4 percent of individuals for whom poverty status is determined were below the poverty level in New Mexico and 12.4 percent in the U.S."

Comment -- See General Comment 2.

4.2.8.3 Native American Consultation

Comment -- It would be appropriate to include this section in the LANL section also.

4.2.10 Environmental Justice

Comment -- See General Comment 2.

4.3.10 Environmental Justice

Comment -- See General Comment 2.

4.4.10 Environmental Justice

Comment -- See General Comment 2.

Roybal, Leon

Page 4 of 5

4.5.10 Environmental Justice

Comment – See General Comment 2.

4.6.10 Environmental Justice

Comment – See General Comment 2.

4.7.10 Environmental Justice

Comment – See General Comment 2.

4.8.10 Environmental Justice

Comment – See General Comment 2.

4.9.10 Environmental Justice

Comment – See General Comment 2.

CHAPTER 5 ENVIRONMENTAL IMPACTS

5.0 ENVIRONMENTAL IMPACTS

5.1 LOS ALAMOS NATIONAL LABORATORY

5.1.10 Environmental Justice

"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, NNSA expects the impacts to affect all populations in the area equally. There were no discernible adverse impacts to land uses, visual resources, noise, water, geology and soils, biological resources, cultural, and archaeological resources. As shown in Section 5.1.1.1, Human Health and Safety, there are no large adverse impacts to any populations."

Comment: If LANL pit production increases and the CMRR increases its activities, then the Pueblo de San Ildefonso will face a disproportionate risk from having the facilities with the greatest capability for releasing contaminants upgradient from the Tribal Sacred Area.

114.13
(cont)

Appendix A ALTERNATIVES

PROJECT-SPECIFIC ALTERNATIVES

A.6.1.2 Los Alamos National Laboratory

Roybal, Leon

Page 5 of 5

414M6
(cont)

TA-14 – "This site is currently permitted to treat waste through open detonation or open burning under the RCRA."

Comment: TA-14 is NOT RCRA permitted. If RCRA OB/OD treatment is occurring at TA-14 it would be illegal.

Rozzano, Janet

Page 1 of 2

Page 1 of 2

PC_1766

Levens, Matthew

From: Janet Rozzano [jrozzano@yahoo.com]
Sent: Sunday, April 06, 2008 4:48 PM
To: Complex2030
Subject: Draft Complex Transformation SPEIS Comments

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

Dear Mr. Wyka:

It has come to my attention that the Department of Energy is planning to refurbish our country's nuclear weapons-building capacity at a cost of at least \$150 billion.

116A: I want you to know that I am strongly opposed to this plan. The toxic nature of these weapons has the
2140 potential to do irreparable damage to our planet earth, not to mention to damage the weapons could
cause to human beings.

31J I am concerned that our country follows a double standard by sanctioning other nations for attempting to
build nuclear weapons while exempting ourselves from the nuclear nonproliferation treaties we have
signed.

By continuing to develop such destructive weapons, we heighten fears of terrorism in our world, and we bear some responsibility for acts of terrorism that occur.

49A I would feel much more secure knowing that we were putting money and expertise into peacemaking
and international cooperation rather than into more sophisticated nuclear weapons.

5/16/2008

5/16/2008

Thank you for the opportunity to respond.

Sincerely,

Sister Mary Janet Rozzano
Sister of Mercy


You rock. That's why Blockbuster's offering you one month of Blockbuster Total Access. No Cost.

Page 2 of 2

PC_1766

Rudolph, Gerald

submitted by *Dr. Gerald Rudolph (47 SR afternoon)*



SOUTH CAROLINA CHRISTIAN ACTION COUNCIL
 Ministry of Justice & Reconciliation
 PC_192_Ministry of Justice & Reconciliation
 Ministry of Health & Pence
 Mailing Address: PO Drawer 3248, Columbia, South Carolina 29230 • Office: 4209 North Main Street
 (803) 786-7115 • FAX: (803) 786-7116 • e-mail: resource@scacouncil.net • Web Page: www.scacouncil.net

SOUTH CAROLINA CHRISTIAN ACTION COUNCIL
Statement Opposing the Complex 2030 Plan and Any Additional Production of Nuclear Weapons

Religious communities in America have long advocated for a world free of nuclear weapons. The teachings of the Bible, the Qur'an and other sacred texts are clear that as people of faith, we must be committed to the task of peacemaking. Jesus told his followers, "Blessed are the peacemakers for they shall be called children of God" (Matthew 5:9). Psalm 34 calls us to "seek peace and pursue it." The Qur'an equates killing a single person unjustly with killing all humanity and saving a single life with saving the life of all humanity (5:32). Guided by texts such as these, we cannot envision a situation in which we could support the indiscriminate destruction of human life from the use of a nuclear weapon.

While we come from separate religious traditions, we speak with one voice to say that we oppose the construction of a new nuclear weapons complex or the production of any additional nuclear weapons. The production of nuclear weapons brings with it a legacy of health problems and environmental degradation, borne in large part by the poorest of the poor. The renewal of the nuclear weapons complex as described in the Complex 2030 plan would add to the devastation that these communities are already experiencing.

The impact of the Complex 2030 plan and any additional production of nuclear weapons would be felt internationally. The underlying premise of international efforts to stop the spread of weapons of mass destruction is that the U.S. and other nuclear weapons states will also work to reduce their own stockpiles. The U.S. cannot call on other nations to stop the production of new nuclear weapons while American scientists are spending billions to develop a new generation of deadly nuclear bombs. Given that the U.S. arsenal of nuclear weapons has the destructive power to unleash an estimated 50,000 times the devastation of Hiroshima and Nagasaki combined, the U.S. should be working to reduce its stockpile of nuclear bombs, not devising new ways to spend billions of taxpayer dollars to build new weapons.

Adopted by
 Board of Directors of the South Carolina Christian Action Council
 May 17, 2007

The sixteen member bodies (listed at foot of stationery) of the Council are represented by 21 judicatories with nearly 4,000 congregations. Individual members of these congregations total approximately 1 million of South Carolina's 4 million citizens.

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African Methodist Episcopal Church • Alliance of Baptists • Baptist Educational and Ministry Association • Christian Church (Disciples of Christ) • Christian Methodist Episcopal Church • Church of the Nazarene • The Cooperative Baptist Fellowship of South Carolina • Episcopal Church • Evangelical Lutheran Church in America • Evangelical Presbyterian Church • United Methodist Church • U.S. Methodist Episcopal Church • Wesleyan Church • Religious Society of Friends • Roman Catholic Church • The Salvation Army • United Methodist Church • Wesleyan Church

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Rudolph, Gerald

And signed by the following

South Carolina Judicatory Heads and Religious Leaders

The Rev. Dr. Marion Altridge, Coordinator Cooperative Baptist Fellowship of SC
 The Rev. Alan Arnold, General Presbyter, Trinity Presbytery, SC
 The Columbia Meeting of the Religious Society of Friends
 Bishop David Donges, SC Synod, Evangelical Church in America
 The Rev. Dr. Albert H. Keller, Pastor, Circular Church, Charleston
 The Rev. Brenda Lynn Kucera, Executive Minister, SC Christian Action Council
 The Rev. Sotello Long, Regional Minister, Christian Church (Disciples of Christ), SC
 The Rev. T. Mark Verbery, General Presbyter & Stated Clerk, Providence Presbytery, SC
 The Rev. Donnie Woods, Executive Presbyter & Stated Clerk, Charleston Alliance Presbytery, SC

Also signed by the following

Individual Members of the Faith Community of South Carolina

	NAME	EMAIL OR MAILING ADDRESS	PHONE	EMAIL OR MAILING ADDRESS
1	Stephanie Morris	Stephanie.morris@bcs.rr.com	21	Pam Light 134 Peachful Ln, W. Columbia, SC 29170
2	Tom Morris	tomorris@bcs.rr.com	22	Frank Bender 3947 Platt Springs Rd W. Columbia, SC 29170
3	Elizabeth Zboran	3947 Platt Springs Rd W. Columbia, SC 29170	23	Cor Zboran 1010 Pinecliff Rd W Columbia, SC 29170
4	John F. Thomas	1010 Pinecliff Rd W Columbia, SC 29170	24	Patricia P. Thomas 173 Idlewood Cr. W. Columbia, SC 29170
5	Beth Tidwell	1418 South Lake Dr. Lexington, SC 29023	25	Frances Byrson 1230 Pendleton St, Apt 8A Columbia, SC 29201
6	Nell Morris	3117 Dudley rd W Columbia, SC 29170	26	Samantha 'Sant' Walton 6605 St. Andrews Rd Columbia, SC 29212
7	Zack Morris	275 Candlelight Dr W. Columbia, SC 29170	27	Rev. W. Stewart Rawson rmassey@ministryonline.com cmoody121@gmail.com
8	Reagan O'Leary, Sr.	rolroy@bellsouth.net	28	Dick Massey
9	Sandy Jones	YvonneB@bellsouth.net	29	Chris Moody
10	Sandra Chibbers	sajohn@bellsouth.net	30	Charlie Hyman
11	Elizabeth M. Walker	emwalker@bcs.rr.com	31	Ken Connor
12	Jane Corner	emwalker@bcs.rr.com	32	Flynn Herrell
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15	Jane A. Arter	libyalford@bcs.rr.com	35	Jane A. McCleop Joanne28206@yahoo.com
16	Elizabeth M. Allord	bobwill@yahoo.com	36	Joanne Williams jmassey@ministryonline.com
17	Robert V. Williams	Freesman2420@bellsouth.net	37	Jane Massey G3PE@aol.com
18	Sara Freeman	700 Dr. Verna Dr, Unit 135 Lexington, SC 29073	38	Guy White
19	Lily Ernsley	Lexington, SC 29073	39	Karl Heider heider@bc.edu
20	Michael E. Berg	836 Ohio St. Columbia, SC 29201		

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 2 of 2

Rugh, Jim
Page 1 of 2

Buenafior, Justin

From: Jim Rugh [jimrugh@mindspring.com]
Sent: Thursday, February 28, 2008 8:22 AM
To: Complex2030
Subject: comment on Complex Transformation SPEIS

Dear Mr. Wyka,

I attended the hearings in Oak Ridge on Tuesday, but had to leave before my turn to speak. So permit me to share my ideas through this letter.

It was obvious to me that there were two main groups of people speaking there. Both are passionate in presenting their views, and both groups are speaking from perspectives of self-interest.

One group, represented by union folk, local businesses and politicians, are focused on preserving their jobs. The other group, with a variety of perspectives coming from various locations, are concerned about moral issues, such as the threat nuclear weapons pose to humanity, as well as the huge expenses involved. Their self-interest is in preserving life.

I got the impression from your initial presentation that the decision for the United States to build more nuclear weapons had been made by higher authorities, i.e. the Administration and Congress; that the scope of the SPEIS was simply to determine how to implement that policy, and where.

The first group I referred to above, in keeping with that more limited scope, were advocating that whatever other locations should be selected among those where the new facilities will be built, Oak Ridge should be one of them.

The second group were more focused on challenging the policies of those higher authorities, i.e. whether or not the United States should be building more nuclear weapons, no matter where.

The difference between these two scopes of work or paradigms is that one addresses questions on how to do the job of building more nuclear weapons; the second questions whether or not the United States should be building more, rather than getting rid of its existing arsenal in keeping with the 1970 nuclear disarmament treaty.

While I appreciate the desire of my East Tennessee neighbors to preserve their jobs, I think they and all of us need to recognize two main things:

- 1) Jobs at Y12 are paid for by huge amounts of the taxes of citizens all around the United States. I.e. this is not a local issue, even in economic terms. And 2) the goal of reducing nuclear proliferation around the world is seriously compromised by the hypocrisy of the United States continuing to have a massive stockpile of nuclear weapons, and making plans to build even more, while urging other nations not to develop nuclear weapons, and even threatening those who might consider doing so. That paradigm would only work if the people of the rest of the world were comfortable in allowing the United States to be the only super power, with more nuclear power than all other nations combined. We know that that is not the case. The people of the world do not trust the benevolence of the United States, nor should they. At least not until we show by example that we are really getting rid of nuclear weapons, not building more. No matter where they are built.

11J

PC_535

Rugh, Jim
Page 2 of 2

Jim Rugh
JimRugh@MindSpring.com
Home/Office phone: +1-865-908-3133
Mobile phone: +1-865-696-0401
451 Rugh Ridge Way #1
Sevierville, TN 37876-1383 USA

PC_535

Rummel, John

Page 1 of 1

Levens, Matthew

From: jrummel@cpusa.org on behalf of jrummel@pww.org
Sent: Monday, February 11, 2008 3:53 PM
To: Complex2030
Cc: dan@msibc.org
Subject: Re 'Complex Transformation'

PC_1402

I am one-hundred percent opposed to the building of new nuclear weapons. More pressing concerns are those that do cause havoc throughout the world: sickness, environmental degradation and poverty. Nuclear weapons programs not only do not solve such pressing problems, they make them worse.
And we know all too well what will happen when we upgrade:
it will give the green light to friend and foe alike to do the same. Why does such madness continue? We have no God given prerogative to be the nation with the most deadly weapons no matter what profits are made and power gained.
In this era of globalization, technology transfers quickly around the world. No nation is an island and no nation can keep others from doing the same. But we can lead and convince others to join with us in doing away with these instruments of terror. Many have already asked us to do so. That is the only sane approach and the only one that will recient our nation and the world to truly tackle the real problems facing humankind.

John Rummel
3109 Linwood Ave
Royal Oak, MI 48073

Rumschlag, Catherine

Page 1 of 1

Levens, Matthew

From: CATHERINE RUMSCHLAG [crumschlag@embarqmail.com]
Sent: Friday, February 22, 2008 11:26 AM
To: Complex2030
Subject: plans for nuclear bombs

PC_407

I want to register my conviction that we should not be about improving the nuclear arsenal, but destroying it. As long as we keep building and improving bombs we will have no success in convincing other nations to forego or destroy their bombs. This is a matter of life or death for our planet earth. Thank you.

Catherine Rumschlag, 291 Highland St., Abingdon, VA 24210.

Rundstrom, Susan

Page 1 of 1

APR 30 2008 WED 08:51 AM GHOST BANCHE SANTA FE FAX No. 505-988-1917 P. 001/001

PC_940

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 urge a "No Action Alternative" direction on the proposed Complex Transformation. It is important not only to have the input of our citizens, but our legislative leaders. There are many critical issues at stake, including the agricultural farmlands in the vicinity and the downstream water quality affecting many communities and pueblos.

170:

22C

I support the New Mexico Environment Department's request for the "No Action Alternative" for the sake of the long range environmental, health, and cultural longevity. I hope that a newly revised draft can be submitted to the public by the DOE once more input is compiled. This is a critical issue and should not be compromised through at the expense of our current and future citizens and our environment.

Thank you,

Susan Rundstrom

Susan Rundstrom
1510 Cerro Gordo Road
Santa Fe, NM 87501

Ruppe, Becky

Page 1 of 2

Feb 25 2008 6:28PM

4239465740

PC_19

P. 2



Morgan County Executive
Becky Ruppe

P.O. Box 387
Warburg, Tennessee 37887
Tel 423/346-6288
Fax 423/346-9707
becky@morgancountyttn.com

February 25, 2008

Mr. Theodore Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation, NA-10.1
Department of Energy/NNSA
1000 Independence Avenue SW
Washington, D.C. 20585
1-703-951-9222 (fax)

Ref: Y-12 Jobs

Dear Mr. Wyka,

I am writing this letter on behalf of the many citizens who live in Morgan County and work at Y-12. I also write on behalf of their families and all others whose lives are affected by the jobs that Y-12 provides. I fully support Oak Ridge's role in the nuclear weapons complex and I certainly endorse improvements at the Y-12 National Security Complex. Over 800,000 citizens and 7,000 employees are represented in East Tennessee by me and other county mayors. We know the importance of these jobs and also realize the devastation that any loss of jobs would cause in our counties.

1115U

I am sure it has been told to you by others that Y-12 has been supported by county leaders for many years, the Y-12 employees of our region have a long history of safe and secure performance and each and every time our nation has faced a crisis requiring our region's support, Y-12 with it's unique capabilities and skilled workforce has readily stepped forward to serve. We are now asking for your support in return as you make decisions that affect the lives of working men and women in this region.

Please don't hesitate to call me with questions. (423) 346-6288

Respectfully,

Becky Ruppe
Becky Ruppe
Morgan County Executive

Ruppe, Becky

Page 2 of 2

Feb 25 2008 6:28PM

4233465740

P. 1

Morgan County Executive
PO Box 387
Worburg, TN 37887



FAX

To: Theodore Wyka

Phone:

Company Name: Complex Transformation

Fax: 703-931-9222

From: Becky Ruppe
Morgan County Executive

Phone: 423-346-6288

Company Name: Morgan County Executive

Fax: 423-346-9707

Number of Pages:

Comments:

Ruppe, Patsy

Page 1 of 1

PC_714

Levens, Matthew

From: Ruppe, Patsy R (PDZ) [ruppepr@y12.doe.gov]
Sent: Wednesday, February 27, 2008 2:35 PM
To: Complex2000
Subject: Comments on SPEIS

In the 1940's the landscape of Oak Ridge, and the surrounding area was forever changed. Thousands of acres of land were confiscated and many, many families were literally evicted from their homes, which also included their livelihood, in just a few short months. Very few complained, as they were doing it for the protection and safety of their country.

We, here at Y-12, are continuing that legacy. We are working for the protection and safety of our country. We take great pride in what we do. If you were to do a family tree of Y-12, you would find many of the people who work here, are children and grandchildren of the people who first came to work here. And why is that? Because, we are a family and we encourage our kin to continue the tradition and the mission that began in the 1940's and we take what we do very seriously.

Over the years, many of our slap together buildings have become obsolete and many have even been torn down, but we also have many facilities that are still going strong 24/7. Last year we accomplished every goal we were tasked with.

We have the history, the facilities, the knowledge, the workforce, the experience, and the perseverance. What we need is support. Why spend billions of dollars to move the mission and our jobs somewhere else? We say there is no feasible reason. Keep Y-12 going strong, continue to support us, continue to funnel weapons projects our way.

WE WON'T LET YOU DOWN!

Patsy Ruppe CFS
9204-2E, MS-8131
241-3210, FAX 574-3677
FOR 873-4565

15A

Rush, Richard

Page 1 of 1

Levens, Matthew

PC_700

From: Richard & Pam Rush [rush@chrterfm.net]
Sent: Tuesday, February 19, 2008 7:52 PM
To: Complex2030
Subject: SPEIS

I think that the Distributed Centers of Excellence Alternative is the direction that the NNSA should take. The Y-12 complex has an excellent safety record, is a good corporate citizen for the community and has an outstanding reputation for it's engineering and manufacturing capabilities.
I would like to see the Y-12 complex continue its mission as a leader in the Nuclear Weapons Complex.

Richard Rush

Ruthenberg, Mary

Page 1 of 1

Levens, Matthew

PC_1813

From: Mary Ruthenberg [ruthenberg@insightbb.com]
Sent: Friday, March 28, 2008 3:53 PM
To: Complex2030
Subject: NO MORE NUCLEAR WEAPONS FOR THE USA

Mary Ruthenberg
6540 Echo Hill Dr.
Evansville, IN 47720-2510

March 28, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

We do not need any more nuclear weapons. We have enough to kill the world as it is. Further, how dare we tell others they can't have nuclear weapons and we go ahead and create more ourselves. What hypocrites we would continue to be. Further, we do not need to further waste our money on that which will NOT serve our people!

1|J

Nuclear power to help MAY be a good idea. But nuclear weapons are a STUPID and IRRESPONSIBLE effort.

We need to become a responsible and helpful world member, not a terrorist nation ourself!

Thanks you,
Mary Ruthenberg

At 65 I long to be proud of my country once more. More nuclear weapons will NOT do that!

Sincerely,

Mary

Rutkaus, Christina

Page 1 of 1

Levens, Matthew

From: Chrissy Rutkaus [rutkaus@gmail.com]
Sent: Sunday, April 27, 2008 8:34 PM
To: Complex2030
Cc: senator_bingaman@bingaman.senate.gov
Subject: LANL EIS Plan for expanded Pit Production

PC_1304

Greetings,

Here in Northern New Mexico we are blessed to live in an area where people have sustained themselves agriculturally for untold generations, first the peoples of the pueblos and then later, waves of immigrants who also found land to raise their crops and animals and feed their families. This area has not only functioned as a bread basket due to wheat, oats and rye production in the past, but is also a cradle of genetic crop diversity for the important food crops that have come from our south such as corn, chilies and tomatoes.

Though you may have seen Los Alamos' neighbor, Chimayo, on the front page of the New York Times recently due to the prevalence of drug use and resulting deaths and violence, you might also note that there are a number of youth groups that have been fostered to combat this degeneration, who have passed down knowledge of local agriculture, sustainable farming and are now making a huge difference in the lives of many young people as they begin to find a way to support themselves with organic farming and training for green collar jobs. What we could have here, in a time of nationwide financial crisis, global food shortages, extremes in weather due to global warming and the global threat of terrorism, it is a showplace that offers hope to many and that would be a lifeline for local communities.

1) I am respectfully writing to ask that the Los Alamos plan for expanded plutonium pit production be swiftly and strongly denied, that in fact LANL be denied the ability to produce any radioactive bombs at this time. We already know that the labs at Los Alamos are behind in their schedule of toxic clean-up and have evidence of local plutonium contamination as well as the "exceptional" levels of radioactive substances that can be traced to Los Alamos, we also know that the labs were not even willing to do reasonable sampling when the wildfires of the Cerro Grande were burning areas that were possibly creating airborne toxicities that are not associated with our normal wildfires.

The clear mandate of the people is for LANL to concentrate on the clean up of it's current radioactive and chemical contamination of the area. Our nation is better served by encouraging local sustainability and supporting the healthy industry of small scale family farms and the alternative energy economy that our area is known for. Increasing the plutonium pit production at Los Alamos would virtually ensure the failure of this work.

Thank you,
 Christina Rutkaus
 Box 818
 Arroyo Seco, NM 87514

Rutt, Wilmer

Page 1 of 1

Levens, Matthew

From: Wilmer Rutt [wilrutt@sbcglobal.net]
Sent: Tuesday, April 29, 2008 3:28 PM
To: Complex2030
Subject: No new nuclear weapons

PC_1568

Wilmer Rutt
 33537 Home Ave.
 Berwyn, IL 60402-3331

April 29, 2008
 Complex Transformation Department of Energy

Complex Transformation Department of Energy,

1) I wish to oppose further development of nuclear weapons.
 I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons.

2) As an alternative we should be developing peaceful uses of nuclear..nuclear power!
 Sincerely,

Wilmer Rutt

Ryan, Bud
Page 1 of 5

Ryan, Bud
Pg. 2.773

PC_1029

My name is Bud Ryan and I am the co-coordinator for Pax Christi New Mexico, which is part of Pax Christi USA an International Catholic Peace Group.

Well it is certainly good to hear from the NNSA report that the number of nuclear weapons has been reduced so drastically. But, until we reduce that number on our Planet to zero, none of us will be safe from nuclear terrorism which the World has lived under since Hiroshima and Nagasaki.

I was amazed at the cool, calm, presentations given here this evening by the NNSA, when after all, what we are really talking about when we talk about nuclear weapons is DEATH!

I wonder how many of these scientists, who make these weapons of death, have ever visited Hiroshima or Nagasaki so they can see what their products can actually do. I wonder if they have ever spoken with a hibakusha, an atomic bomb survivor, so they could hear firsthand what their products have actually done. So I would ask all the scientists and workers at our nuclear bomb factories, and those who do the work of promoting their products of death, to visit Hiroshima and Nagasaki, so they can see the fruits of their labor. Maybe when they see and hear of the horror of August 6th and August 9th 1945 they will become like some of their predecessors in the scientific community who advocated the demonstration of the atomic bomb on an uninhabited place and formed the Franck Committee who wrote the following in June 1945. "If the United States

11140

Ryan, Bud
Page 2 of 5

were to be the first to release this new means of indiscriminate destruction upon mankind, she would sacrifice public support throughout the world, precipitate the race for armaments, and prejudice the possibility of reaching an international agreement on the future control of such weapons. Much more favorable conditions for the eventual achievement of such an agreement could be created if nuclear bombs were first revealed to the world by a demonstration in an appropriately selected uninhabited area." How we all wish the Franck Committee had been listened to, especially the people of Hiroshima and Nagasaki.

So I would ask again that all the scientists, administrators, spokespersons, lobbyists, the CEOs of Bechtel, BWX Technologies, and Washington Group International, OUR Senators, congresspersons, OUR President, and all of you who work at OUR Countries nuclear weapon facilities, or promote their nightmare products, make a pilgrimage to Hiroshima and Nagasaki, in hopes of restoring your heart and soul to the realization, that we are all children of God. Therefore we are all sisters and brothers, and by building these weapons to be used against anyone in this family of God, we are in turn using these weapons against ourselves. / Jesuit priest Richard McSorley said, "Can we go along with the intent to use nuclear weapons? What it is wrong to do, it is wrong to intend to do. If it is wrong for me to kill you, it is wrong for me to plan to do it...Likewise, if I intended to use nuclear weapons in massive retaliation; I have already committed massive murder in my heart."

Santa Fe, NM

Ryan, Bud
Page 3 of 5

I would like to read a passage from the Commencement Speech at American University that President John F. Kennedy gave on June 10, 1963: "I have therefore, chosen this time and place to discuss a topic on which ignorance too often abounds and the truth too rarely perceived. And that is the most important topic on earth: peace. What kind of peace do I mean and what kind of peace do we seek? Not a Pax Americana enforced on the world by American weapons of war. Not the peace of the grave or the security of the slave. I am talking about genuine peace, the kind of peace that makes life on earth worth living, and the kind that enables men and nations to grow, and to hope, and build a better life for their children – not merely peace for Americans but peace for all men and women, not merely peace in our time but peace in all time."

"I speak of peace because of the new face of war. Total war makes no sense in an age where great powers can maintain large and relatively invulnerable nuclear forces and refuse to surrender without resort to those forces. It makes no sense in an age where a single nuclear weapon contains almost ten times the explosive force delivered by all the allied air forces in the Second World War. It makes no sense in an age when the deadly poisons produced by a nuclear exchange would be carried by wind and water and soil and seed to the far corners of the globe and to generations yet unborn."

"Today the expenditure of billions of dollars every year on weapons acquired for the purpose of making sure we never need them is essential to the keeping of the peace. But

Ryan, Bud
Page 4 of 5

surely the acquisition of such idle stockpiles – which can only destroy and never create – is not the only, much less the most efficient, means of assuring peace. I speak of peace, therefore, as the necessary, rational end of rational men. I realize the pursuit of peace is not as dramatic as the pursuit of war, and frequently the words of the pursuers fall on deaf ears. But we have no more urgent task."

Oh how I wish we had such leadership in OUR Country today, when it comes to Peace and nuclear disarmament!

So *We the People* of the United States refuse to pay one more dollar and add it to the 7+ trillion dollars, when adjusted for inflation that has already been wasted on these weapons of death. *We the People* of planet Earth refuse to live one more day under the tyranny of nuclear terrorism.

So we say NO to Complex Transformation and nuclear weapons, but we say YES to the NPT Treaty and a World free of all nuclear weapons!

In closing I would just like to read Article 6 of the Nuclear Nonproliferation Treaty: *Each of the Parties to the Treaty undertakes to pursue negotiations in good faith on effective measures relating to the 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.*

The NPT was ratified by the U.S. Senate in 1970 and according to OUR Constitution it thus became U.S. Law. So these people from the NNSA, LANL, DOE, Sandia, and

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Ryan, Bud
Page 5 of 5

Ryan, Kate
Page 1 of 1

anyone else here promoting this Complex Transformation, which advocates the building of new nuclear weapons, is in fact, breaking U.S. Law. If Father Louie Vitale and Father Steve Kelly could be arrested and imprisoned for five months for crossing the line at Fort Huachuca in Arizona, where they kneeled and prayed for an end to torture by representatives of the United States, I wonder why this same adherence to the Law by OUR Government is not used to arrest these people here tonight who are endorsing the breaking of U.S. Law? So I would ask any Law Officer in the audience tonight to do your sworn duty to uphold the Constitution and arrest these people who are supporting the breaking of U.S. Law.

PC_1413

Levens, Matthew

From: kate ryan [kjryan39@dmcom.net]
Sent: Tuesday, April 15, 2008 4:40 PM
To: Complex2030
Subject: nuclear weapons

kate ryan
87 sal bren rd
delhi, NY 13753-1440

April 15, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy,

11F If we want the U.S. to be a leader it must lead by example. Therefore if we expect other countries to abide by the Nuclear Non-Proliferation Treaty we have to decrease our nuclear stockpile and NOT start making new weapons or start 'upgrading' our arsenal.

216A We have to start cooperating with other nations rather than bullying them. Military might is not the answer to problems. As the old song says, "When will we ever learn."

31J Please speak out strongly against the mad intentions of the military industrial complex that Eisenhower warned us about ages ago.

The idea of using nuclear weapons is suicidal. I want the world to continue to exist - for my new grand daughter and all the children and grandchildren in the world!

Sincerely,

kate ryan
607 746 6503

Rydberg, Carole

Page 1 of 1

Levens, Matthew

From: carydberg@comcast.net
Sent: Sunday, April 06, 2008 11:52 AM
To: Complex2030
Subject: Defense

PC_1725

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,

116A It is appropriate that the Department of Energy consolidate and reduce the facilities, workforce, and redundant capabilities within the nation's nuclear weapons complex.

28A 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 do not need the capability to make more or newer nuclear weapons.

31J 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.

516A Instead of recreating the capacity to produce new, unnecessary nuclear weapons, the DOE should focus on shrinking the still-over-sized 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 include my comment as part of the official record for the Supplemental Programmatic Environmental Impact Statement for the "Complex Transformation" project. Thank you.

Sincerely,
Carole Rydberg
3225 Wellington Lane N.
Plymouth, MN 55441

cc: Representative Jim Ramstad
Senator Norm Coleman
Senator Amy Klobuchar

Rystrom, Barbara

Page 1 of 1

Levens, Matthew

From: Barbara Rystrom [brystrom@gfrcceable.com]
Sent: Wednesday, February 13, 2008 2:12 PM
To: Complex2030
Subject: NO new nuclear warheads

PC_1888

Barbara Rystrom
138 Summerall Court
Aiken, SC 29801-7224

February 13, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy,

116A We do not need additional nuclear weapons and should not strive to get them. Our national hypocrisy on the subject of nuclear weapons is shameful and terribly detrimental 21J to our efforts to reduce the threat of such weapons to the world.

Sincerely,

Barbara Rystrom
803-642-8332

Saffir, Arthur

Page 1 of 1

Salcido, Eric

Page 1 of 2

Levens, Matthew

From: arthur1066@comcast.net
Sent: Saturday, April 05, 2008 4:24 PM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

PC_1577

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,

116A We need to get rid of almost all nuclear weapons. Two were enough to end WWII, thousands don't contribute to our protection from terrorist threats.

You know that this is a spending program, not a defense program.

End this nonsense now.

Regards,

Arthur J Saffir

Sincerely,
Arthur Saffir
10409 NW Burkhardt Ct.
Portland, OR 97229

cc: Senator Ron Wyden
Senator Gordon Smith
Representative Earl Blumentauer

April 7, 2008

PC_972

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 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.

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 CFR 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.

1140

2/E

3/14A

Salcido, Eric

Page 2 of 2

[Add your story here.]

I live in Taos and have good friends and family that live in El Rancho and San Idelfonso Pueblo which are downstream and downwind from LANL. Well water sampling in those areas have confirmed that chemical pollutants originating from LANL have already migrated into the ground water of those neighborhoods. With the tons of chemical wastes stored at LANL in open trenches exposed to the elements it is certain that this contamination will only increase. This is a criminal act. 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, Eric Salcido
PO Box 302
El Prado NM 87529
 Sincerely, Eric Salcido considered, LANL must be cleaned up! This has already been mandated and the managers refused to do so is clear CRIMINAL NEGLIGENCE!

cc: Senator Pete Domenici at (505) 988-6511, fax (505) 988-6514 SHAME ON THE
 Senator Jeff Bingaman at (505) 988-6647, fax (505) 992-8435 DOE! CLEAN
 Representative Tom Udall at tom.udall@mail.house.gov
 Representative Heather Wilson at (505) 346-6781, fax (505) 346-6723 UP YOUR ACT
 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 NOW!

4/14E
11/4O
(cont)

5/2B

Saley, James

Page 1 of 1

Levens, Matthew

From: James Saley [jls@saley1.net]
 Sent: Thursday, March 27, 2008 12:34 PM
 To: Complex2030
 Subject: No More Nukes

James Saley
 190 Ford Ave. apt. 7
 Wyandotte, MI 48192-4044

March 27, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy

116A No More Nukes! Not in any way shape or form! Nuclear energy is the most dangerous! The most Carcinagenic. It kills one hundred thousand years after it become waste.

Sincerely,

James Saley
 734-770-1425

PC_1090

Sam, Deborah

Page 1 of 1

Levens, Matthew

From: deborah sam [ds30@ighlink.com]
Sent: Tuesday, April 08, 2008 8:47 AM
To: Complex2030
Subject: Complex Transformation Draft NEPA Written Comment Submission

PC_1329

I was standing on our town square along with the Quakers and Veterans for Peace members in our weekly peace vigil-to bear witness to the fact that we are in a military conflict, a fact so easy to forget, even when we have lost over 4,000 young men and women, and that our soldiers are not receiving adequate physical and mental care upon their return, among other things-when a gentleman, not young, not old, slowly drove his truck by-he may or may not have had a child with him, I really don't remember-and said all it takes is one bomb.

To me that summed up why we need to eliminate our nuclear stockpile, not maintain or build. If an average fellow citizen can have the arrogance to believe-he wasn't saying it for shock value-that we have a right to drop a nuclear weapon on a country we attacked, invaded, destroyed, and now occupy against at least some if not most of their will, to get ourselves out of a costly mess we created, then we are not ready to handle possession of weapons of such massive power.

deborah sam
Tennessee

116A

Sanborn, Hugh

Page 1 of 1

Levens, Matthew

From: Hugh Sanborn [hwsanborn@comcast.net]
Sent: Wednesday, February 20, 2008 12:11 AM
To: Complex2030
Subject: Nuclear Weapons

PC_1371

Hugh Sanborn
6006 Southridge Greens Blvd.
Fort Collins, CO 80525-9152

February 20, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

111 I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons. The last thing we need are more nuclear weapons and a new arms race. Not only would it demonstrate our unwillingness to uphold the nonproliferation treaty; it would only encourage other countries like Iran to produce their own weapons.

216A 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 CWRB project is another irresponsible new program that Congress should reject.

Sincerely,

Hugh Sanborn
960-225-0983

Sanchez, Helen

Page 1 of 1

Buenafior, Justin

From: Helen Sanchez [hsanchez444@hotmail.com]
Sent: Friday, March 14, 2008 8:01 AM
To: Complex2030
Subject: defense

Helen Sanchez
219 No. Third St
Hammonton, NJ 08037-1735

March 14, 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. We have had enough money wasted on such weapons!

Sincerely,

Helen Sanchez
609-561-0347

PC_496

Sanchez, Kathleen

Page 1 of 3

Levens, Matthew

From: Kathy Sanchez [ksawawu@msn.com]
Sent: Wednesday, April 30, 2008 3:39 AM
To: Complex2030; warpov@hotmail.com
Subject: Letter from Tewa Women United

It to nnsa.doc



t to nnsa.doc
(53 KB)

TewaWomen United P.O. Box 397 Santa Cruz, NM 87567-0397
Mr. Theodore Wyka-T. SPEIS Document ManagerOffice of Transformation, NA-10, U.S. Department of Energy/NNSA1000 Independence Avenue, SSWashington, DC 20585 Re: Public Comment to the draft Complex Transformation Supplemental Programmatic Environmental Impact Statement, DOE/EIS-0236-S4 DearMr. Wyka, I understand that the Department of Energy (DOE) is proposing a program calledComplex Transformation SPEIS to expand the manufacture of plutonium "pits" for nuclear warheads at Los Alamos National Laboratory (LANL) here in New Mexico.Naming is a deception. SPEIS is what it is named not complex transformation. Thesection in your Environmental Impact Statement (p.4-2) that "there are no agricultural activitiespresent at LANL, nor are there any prime farmlands in the vicinity." is darkignorance. Our Tewa tribal homelands have sustained us for the past 100 yearsplus and I share with other families of farmers, gardeners, fruit growers andbeekeepers who grow crops or tend back yard gardens and orchards within a fifty-mile radius of Los Alamos. We the Tewa people were here during the Cerro Grande fire and saw the windpatterns that the smoke revealed. The smoke lay heavily in our tribal lands inland around Espanola, Chimayo, Alcalde, Abiquiu and other communities for atleast ten days at the height of that fire. Why the laboratory wants to seat upon basalt mesas and have the contaminated air currents follow direct routedown the canyons right into our farmlands and communities is beyond humanconsciousness. Los Alamos is not isolated and istill doing deadly for-profit business. Where is the clean up? Wehave witnessed the damage of the CerroGrande fire on the sacred elements of our now bare mountains. We need to be allowed all meets necessary tokeep our Earth mother from dying from nuclear business' radioactive contamination. Westrongly state and request that DOE retract the draftComplex Transformation Supplemental Programmatic Environmental Impact Statementand reassess the LANL impacts to our ways of ancestral ways of being. Our bondsto land, air and water through agriculture, eco-systemic sustenance, ways ofsacred energy understandings are not even mentioned or maybe deliberatelyomitted. I invite representatives from DOE to visit our farmlands and ask thefarmers if they believe that "there arenot agricultural activities" in the vicinity. I would also ask you toconsider whether we as a country need more plutonium "pits". We are homelandcasualties of war. Rare cancers are not so rare in our poverty red linedcommunities. It seems to me that we need more agricultural independence andfood security for our population. NO more war products for corporate businessprofits. Our women need to be healthy farmers. Our children need you to have a heart, a conscience, a will to follow your spirited-rooted vision of wellnessfor all.

Sincerely, KathleenM. SanchezExecutiveDirectorTewaWomen United 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 RepresentativeHeather Wilson at (505) 346-6781, fax (505) 346-6723 Representative Steve Pearce at (505)1522-2219, fax (505) 522-3099 Governor Bill Richardson at(505) 476-2200 Representative Pearce at (505)1522-2219, fax (505) 522-3099 (575) 623-8331, fax (575) 623-9378 HouseSpeaker Ben Ray Lujan at ben.lujan@nmlegis.gov

Back to work after baby-how do you know when you're ready?
http://lifestyle.msn.com/familyandparenting/article.cfm?documentid=5797498
&ocid=T067MSN40A0701A

Sanchez, Kathleen

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Sanchez, Kathleen

Page 3 of 3



Tewa Women United
P.O. Box 397
Santa Cruz, NM 87567-0397

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-0238-S4

Dear Mr. Wyka,

I understand that the Department of Energy (DOE) is proposing a program called Complex Transformation SPEIS to expand the manufacture of plutonium "pits" for nuclear warheads at Los Alamos National Laboratory (LANL) here in New Mexico. Naming is a deception. SPEIS is so.

The assertion in your Environmental Impact Statement (p.4-2) that "there are no agricultural activities present at LANL, nor are there any prime farmlands in the vicinity," is dark ignorance. Our Tewa tribal homelands have sustained us for the past 100 years plus and I share with other families of farmers, gardeners, fruit growers and beekeepers who grow crops or tend back yard gardens and orchards within a fifty mile radius of Los Alamos. We the Tewa people were here during the Cerro Grande fire and saw the wind patterns that the smoke revealed. The smoke lay heavily in our tribal lands in and around Espanola, Chimayo, Alcalde, Abiquiu and other communities for at least ten days at the height of that fire. Why the laboratory wants to seat up on basalt mesas and have the contaminated air currents follow direct routes down the canyons right into our farmlands and communities is beyond human consciousness. Los Alamos is not isolated and is still doing deadly for-profit business. Where is the clean up?

We have witnessed the damage of the Cerro Grande fire on the sacred elements of our now bare mountains. We need to be allowed all means necessary to keep our Earth mother from dying from nuclear business' radioactive toxic contaminations.

We strongly state and request that DOE retract the draft Complex Transformation Supplemental Programmatic Environmental Impact Statement and reassess the LANL impacts to our ways of ancestral ways of being. Our bonds to land, air and water through agriculture, eco-systemic sustenance, ways of sacred energy understandings are not even mentioned or maybe deliberately omitted. I invite representatives from DOE to visit our farmlands and ask the farmers if they believe that "there are no agricultural activities" in the vicinity. I would also ask you to consider whether we as a country need more plutonium "pits". We are homeland casualties of war. Rare cancers are not so rare in our poverty red lined communities. It seems to me that we need more agricultural independence and food security for our population. NO more war products for corporate business profits. Our women need to be healthy farmers. Our children need you to have a heart, a conscience, a will to follow your spirited-rooted vision of wellness for all.

Sincerely,

Kathleen M. Sanchez
Executive Director
Tewa Women United

PC_2025

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 Ray Lujan at ben.lujan@nmlegis.gov

PC_2025

Sander, Doug

Page 1 of 1

Buenafior, Justin

From: Doug Sander [Doug.Sander@okstate.edu]
Sent: Thursday, February 14, 2008 9:52 AM
To: Complex2030
Subject: Citizen Comment - nuclear weapons programs

Mr. Wyka:
The U.S. should not expand our nuclear weapons programs. There is no need; the current stockpile will remain viable for 116A, 6 decades or more and the American people want the stockpile to be reduced and eventually eliminated along with the 23A; other stockpiles in the world. The DOE should use its resources for clean and renewable energy research. Don't make 3|9B new warheads.

Doug Sander
124 S Ridge Dr
Stillwater, OK 74074

PC_453

Sanderson, Siena

Page 1 of 1

Levens, Matthew

From: Siena Sanderson [spon@klicarson.net]
Sent: Tuesday, April 29, 2008 10:15 AM
To: Complex2030
Subject: complex transformation

<mailto:ComplexTransformation@mnsa.doe.gov>

April 29, 2008

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

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 option to follow at this time. It is important for our political leaders to be
involved, and to be in favor 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 MNSA to embark
upon a project of such magnitude at such an unstable time in our politics, environment and
economy.

170 The only "Action Alternative" that will benefit the well-being and safety of the citizens
(cont) 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,
Sienna Sanderson

PC_1538

Sandford, Tom

Page 1 of 2



PC_246
Retired Public Employees Association
300 T Street, Sacramento, CA 95814
1-800-443-7732 • Email: rpeahq@rpea.com

3/14/08

Mr. Nye:
I was unable to attend the Public
Comment Meetings in Los Alamos on
3/12 & 13. I had intended to probe
the statement on the attachment, as it
would appreciate your entering it in
the record. Thank you.

Tom Sandford
505-662-4107

Compliments of Burks Printing • 916-344-0652

Sandford, Tom

Page 2 of 2

My name is Thomas Sandford and I am a LANL retiree. My career at the Laboratory spanned more than 36 years, and I considered myself one of thousands of Cold Warriors who helped bring an end to the Cold War. I worked in programs involving high explosives, nuclear weapon engineering, underground testing, vulnerability and hardening of weapons, safety and health, pure fusion energy research, materials research, and nuclear non-proliferation. I am pleased to have this opportunity to comment on the complex restructuring plan. I believe this effort is at least seven years overdue, and I am glad to see this effort now being taken very seriously by NNSA.

I believe that the policy of "peace through deterrence" has been and is an effective policy for the United States. While I agree that our nuclear stockpile can be much smaller, as long as there are several other countries that have nuclear weapons, I firmly believe that the US must keep the capability to maintain, repair, and replace weapons that are in our stockpile. We should also continue to push the envelope of our understanding of the materials, physics, modeling, and engineering issues associated with nuclear weapons. To me, this is no different than the quest for more understanding in areas of biology, medicine, space and chemistry research. The spin-offs from nuclear technology are legendary in their number and efficacy, and I expect them to continue.

To me, the capabilities that I understand LANL will be involved with in the complex transformation are appropriate. The US has a huge investment in human resources, facilities, and knowledge at LANL that must not be compromised or lost, for sake of our nation's security and for the sake of science and technology in general.

Thank you for your attention.

Thomas Sandford 3/11/08

Thomas Sandford
Los Alamos, NM
March 12, 2008

115A

Sandine, A.

Page 1 of 1

PC-96

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

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

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

COMMENTS: ~~Answer~~ The U.S. commitment to nuclear "modernization" greatly increases the likelihood of an eventual nuclear catastrophe. We miss an opportunity for disarmament that may never present itself again.

NAME A. SANDINE
ADDRESS 383 Corsentry Rd., Kensington, CA 94707
SIGNATURE [Signature] DATE Jan 19, 2008

119A

21F

313A.1

Santistevan, Miguel

Page 1 of 1

PC_1475

Levens, Matthew

From: Miguel Santistevan [miguel@laacequias.org]
Sent: Thursday, May 01, 2008 9:19 PM
To: Complex2030
Subject: LANL expansion

Dear Mr. Wyka,

I wanted to comment on the plans to expand LANL into a plutonium pit producing facility, especially in regard to the potential impact to farmland surrounding the area.

Northern New Mexico is home to age-old irrigation systems known as the acequias which originated in Central Asia over 11,000 years ago and made their way to our arid highlands with the coming of the Spanish over 400 years ago. Our area is still home to Native Americans who also continue agricultural traditions of thousands of years. Our agriculture relies on water sharing, native crops adapted to climate extremes, in an environment that is subject to late and early frosts, hail storms, droughts, floods, and the like.

In times of climate change and with an awareness of the sensitivity of our population to food security issues, it behooves us to promote the kind of agriculture we have in this area and not supplant it with potential plutonium and other chemical contamination. Northern New Mexico can be considered the seat of agriculture for North America, a region that was end point of crops from Mexico over the ages and distributed to peoples across the continent.

I trust you are an intelligent man of reason and are concerned about the future. I know there is only so much you can do within the DOE, but please use your influence and reason in a responsible way and challenge this proposal to manufacture plutonium pits in Los Alamos.

Please contact me if you have any questions or would like to dialogue this further. Thank you for your time.

Sincerely,

Miguel Santistevan
908 Sol Feliz
Taos, NM 87571
(575) 770-8307

1

Santoyo, Marlana

Page 1 of 1

PC_1808

Levens, Matthew

From: Marlana Santoyo [marlsan@cavtel.net]
Sent: Friday, March 28, 2008 11:16 PM
To: Complex2030
Subject: marlsan@cavtel.net

Marlana Santoyo
515 Glen Echo Rd
Philadelphia, PA 19119-2917

March 28, 2008

Complex Transformation

Dear Complex Transformation:

116A 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.

Sincerely,

Marlana Santoyo
215-247-4385

Sargent, Nancy

Page 1 of 1

PC_1823

Levens, Matthew

From: Nancy Sargent [04jrsargent@ktusa.com]
Sent: Friday, March 28, 2008 3:41 PM
To: Complex2030
Subject: proposal for new facility for triggers for nuclear warheads

Nancy Sargent
1913 SW Warner Ct.
Topeka, KS 66604-3266

March 28, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

116A I am Nancy Sargent from Topeka, Kansas. I am a grandmother, wife and mother with family members who have been and are presently in Iraq. We do not need more nuclear weapons. Therefore, I oppose plans for a new facility to produce plutonium pits for nuclear weapons. While we are asking other countries to abstain from building nuclear weapons, we should not be increasing our own, already superior, nuclear arsenal and capacity to build new nuclear weapons.

Sincerely,

Nancy Sargent

Sarvis, Patricia

Page 1 of 1

Levens, Matthew

From: Patricia Sarvis [ejerics@goldrush.com]
Sent: Thursday, March 27, 2008 5:41 PM
To: Complex2030
Subject: Reject "Complex Transformation" plan to build nuclear weapons

PC_1178

Patricia Sarvis
P.O. Box 1737
Murphys, CA 95247-1737

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.

At this dangerous time, our country's highest priority should be rebuilding relationships of trust, and taking the lead in disarming the world of its most devastating weapons. It is a total misplacement of priorities to spend resources on still more nuclear weapons when so many domestic needs are going unmet and when other nations' regard for the United States is at such a low ebb.

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

Sincerely,

Patricia Sarvis
209-728-0710

Scallan, Janet

Page 1 of 1

Levens, Matthew

From: Tom Scallan [tomscallan@earthlink.net]
Sent: Wednesday, March 26, 2008 12:18 PM
To: Complex2030
Subject: Draft SPEIS

PC_1878

Not one of the four alternatives in the NNSA plan makes sense for the economy, for national security, or for future generations. Nor do I want the ethically challenged (remember the NPR?) using my considerable taxes for a Stockpile Life Extension Program or any other program by another name. We devastate one country and threaten another in the name of stopping WMDs while building up our own arsenal. Hypocrisy undermines national security. Get rid of nuclear weapons and the Pentagon won't have to worry about misdirecting detonators or errant B52s loaded with nuclear-armed missiles. I have watched preschool-aged boys who chewed their peanut butter sandwiches into the shape of guns grow up to lose their fascination with weapons. Apparently not everyone does.

Sincerely,

Janet D. Scallan
Grosse Pointe Park, MI

Scanton, Julie

Page 1 of 1

Levens, Matthew

From: Julie Scanton [julie@pci.lv]
Sent: Tuesday, April 08, 2008 3:26 AM
To: Complex2030
Subject: Reject "Complex Transformation" plan to build nuclear weapons

Julie Scanton
 7345 greylock
 Riverside, CA 92504-4900

April 8, 2008

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

Dear Theodore Wyka:

1|10A The DOE should reject the Complex Transformation proposal to revamp the nuclear weapons arsenal.

2|140 Complex Transformation would be environmentally hazardous. Under the
 3|7J proposal, the DOE proposes increasing the number of plutonium pits we can produce in a year. Instead of creating more radioactive contamination, the DOE should clean up its mess from past production of nuclear weapons.

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,

Julie Scanton

PC_1408

Scarl, Donald

Page 1 of 1

Levens, Matthew

From: Donald Scarl [scarl.d@doe.oris.com]
Sent: Friday, April 11, 2008 10:51 AM
To: Complex2030
Subject: Complex Transformation Proposal

Mr Wyka,

I strongly oppose the Complex Transformation Proposal.

1|16A Nuclear weapons are useless. The entire world will turn against any country that uses a nuclear weapon. It is far more important to reduce the number of countries who have or want nuclear weapons and to reduce the number of warheads the United States and Russia have in their arsenals.

8000 nuclear warheads are far too many. Zero would be the right number, but any reduction would be a step in the right direction.

2|3A The current United States nuclear warheads are reliable enough. Studies by knowledgeable non-government science groups have shown that plutonium pits are unlikely to deteriorate and that there is no need to replace them.

3|1K Our national government has an eight trillion dollar debt and cannot afford unnecessary expenses. Building a research, development, and production facility for nuclear weapons is an amazingly unnecessary expense.

3|1K (cont) The United States spends more on its military than all the other countries of the world combined. Political, economic, infrastructure, and intellectual competition have become much more important than military might. Let's invest in the important things.

Please do what you can to stop the Complex Transformation Proposal.

Donald Scarl
 8 Woodland Road
 Glen Cove NY 11542
 516-671-0686

PC_855

Scarl, Donald

Page 1 of 1

Buenafior, Justin

From: Donald Scarl [scarl.d@dosois.com]
Sent: Wednesday, February 27, 2008 5:48 PM
To: Complex2030
Subject: Citizen Comment regarding SPEIS, Complex Transformation

PC_450

1|16A Mr. Wyka:
The Department of Energy should not expand the United States nuclear weapons program. Building a new facility to produce nuclear weapons is wrong.
2| Nuclear weapons have no use. They are useless against terrorists. They are useless against non-weapons states. They are useless against states that have a small number of nuclear weapons. The Soviet Union no longer exists. Russia, the European Union, and other industrialized nations will never use their nuclear weapons and will be glad to reduce their stockpiles when we reduce our stockpile.
3|9B Nuclear weapon research and development waste our country's diminishing resources of fossil fuel and capital while they contribute to massive and unnecessary pollution of the environment.

4|5C.1 It is particularly disturbing that, in the face of Congress' recent rejection of the Reliable Replacement Warhead program,
5|8A; and the recent JASON report on the reliability of current weapons, the SPEIS still refers to a goal of creating 120-125 new
6|8E warheads every year.

7|9H For these and other reasons it does not make sense for U.S. taxpayers to invest in a new generation of nuclear weapons facilities.

Donald Scarl
8 Woodland Rd
Glen Cove, NY 11542

Schaefer, Charlotte

Page 1 of 1

Levens, Matthew

From: Schaefer, Charlotte D (CS9) [schaefercd@y12.doe.gov]
Sent: Monday, April 07, 2008 2:46 PM
To: Complex2030
Subject: We need and want Y-12 in Oak Ridge, TN

PC_1220

1| We need to keep the Y-12 operations in Oak Ridge, TN where we have the expertise for Y-12
15A1 to be the Uranium Center of Excellence. Y-12 has a proud & loyal employee base that is
necessary to continue our work. The
Y-12 employees have dedicated their life to the successful and safe operations of the
plant. Don't let us all down by taking our work away.

2|4 Closing Y-12 will make Oak Ridge, TN a ghost town and severely hurt the surrounding
counties. We have played such an important role in the history of our country, we deserve
a chance to keep working where we
3|8A have already invested so many years. You'd be losing a mountain of
experience and wasting thousands and thousands hours training if you close our plant.

Charlotte Schaefer
Charlotte Schaefer
Analytical Chemistry Organization
FIS/OA BBS Facilitator
YES Long Travel Coordinator
576-8825 or 576-8908

Schaffer, Craig

Page 1 of 1

Levens, Matthew

From: Craig Schaffer [shina@waradoo.fi]
Sent: Thursday, January 17, 2008 3:41 AM
To: Complex2030
Subject: Whats up with SPEIS? A-Bomplex ?

PC_425

Mr. Wyka:

There is no reason to create a costly new program to build unnecessary and unwanted nuclear weapons. In addition, the congressional nuclear policy reviews are not yet completed and there is a strong popular will to reduce nuclear weapons. With so many unresolved issues around nuclear waste, storage, employee safety and compensation it doesn't make sense for U.S. taxpayers to invest in a new generation of nuclear weapons facilities.
The decision to transform the U.S. nuclear complex must reflect the will of the American people, 79% of whom want the U.S. 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.

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 ! OUTRAGEOUS ! These new warheads are not only unwanted, they are also unnecessary.

Craig Schaffer
37 Woodmere Dr.
Dothan, AL 36301

Schallenberg, James

Page 1 of 1

Levens, Matthew

From: Schallenberg, James C [jschnak@sandia.gov]
Sent: Tuesday, March 25, 2008 12:14 AM
To: Complex2030
Subject: Down sizing of TTR

Page 1 of 1

PC_730

Dear Sir, I am writing this email as a 23 year employee of USA Security. I have seen many changes during my 23 years, but none of these has concerned myself and fellow employees as much as the downsizing and possible closure of TTR. We find ourselves in a very difficult situation. Many of my fellow employees have invested over 15 to 25 years in the community of Tonopah and have deep roots to our community. We have raised families and have become members of various volunteer aspects of our small town. Many of us are still raising our families and enjoy the safety of small town living. Closing or severely downsizing TTR would devastate our community. We are hopeful that you and others will realize the negative impact that TTR's closure or downsizing would bring to Tonopah. We do not want our town to become a ghost town! Please consider other options and keep TTR alive. Thank You, J.C. Schallenberg

1/70

5/14/2008

Schatz, Steve

Page 1 of 1

PC_1861

Levens, Matthew

From: sjchatz@earthlink.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,

This Complex Transformation will only encourage and lead to the development of more nuclear weaponry. This would only make the world a much more dangerous place for us and generations to come. I implore you to abandon this endeavor and become a leader in working toward a world free of nuclear 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,
Steve Schatz
11509 216th St. #116
Lakewood, CA 90715
CC: Senator Dianne Feinstein
Senator Barbara Boxer
Representative Linda Sanchez

Schauer, Susan

Page 1 of 1

PC_2101

Levens, Matthew

From: schauer[schauer@cybermesa.com]
Sent: Wednesday, April 30, 2008 11:01 AM
To: Complex2030
Subject: speis comments

Hello,

I live in Los Alamos and I have two comments:

1) DOE has a commitment and obligation to clean up and reclaim contaminated property in Los Alamos. Lengthy negotiations with the state of New Mexico resulted in a schedule for nuclear waste cleanup that DOE is now renegeing on, saying it doesn't have the funds to maintain the cleanup schedule. DOE must meet its prior commitments for cleanup and reclamation before it puts money into new facilities and operations. If money needs to be diverted from new operations to nuclear waste cleanup, then it must be done. It is bogus to say there isn't funding for cleanup and there is funding for pit production. Nuclear pit production, and it's assessed waste production, should not begin until the cleanup of legacy waste is completed and there is a safe repository for high-level nuclear waste materials!

2) The continued production of nuclear pits at the LANL facility or any other federal facility should be halted. I believe it goes against the spirit if not the letter of the Nuclear Nonproliferation Treaty. It is hypocritical to discourage nuclear weapons development in other nations while continuing weapons development in the U.S.

Thank you.
Susan Schauer

Scheff, Jim
Page 1 of 1

Page 1 of 1

PC_1385

Levens, Matthew

From: Jim Scheff [quercusstellata@gmail.com]
Sent: Tuesday, April 08, 2008 11:05 AM
To: Complex2030
Subject: DOE Complex Transformation

116A While I could write volumes, I will simply state this: The U.S. should produce no more nuclear weapons. Period.

Sincerely,
Jim Scheff
20 Crabapple Ct.
St. Louis, MO 63132

Visit www.grantrtoolsaiaa.net/

Schilling, Scott
Page 1 of 2

PC_1517

Buenafior, Delight

From: Scott A. Schilling [schilling@lanl.gov]
Sent: Thursday, April 10, 2008 9:30 AM
To: DIV,Complex Transformation
Subject: Form posted from Windows Internet Explorer.

Last Name=Schilling
First Name=Scott
Email Address=schilling@lanl.gov
Street Address=1294 A 46th Street
City=Los Alamos
State=NM
ZIP Code=87544

Comments=I think one of the greatest challenges in complex transformation is the cultural change required to be flexible and responsive to a new threat. The time from initial requirements, ideas, through fielding a new weapon need the optimized through all aspects of the product development process. Industry is struggling with this to be the first to market with a new idea or product. It can be life and death for the company if they are first, or not. For the NWC it could mean life or death of the American life and lifestyle. We have worked on this in the Readiness Campaign and had many successful pilots for pieces of the process. I think a small team dedicated to the development of this process could develop a template for the future of business in the NWC. I also think the process could be leveraged by American industry as a competitive advantage for innovation and small scale production.

What is needed is a Single Linked Process with Digital Pedigree from start to finish. The NWC is in a unique position to develop and test this process partnering with Parametric Technology Corporation, the product development company.

Some example characteristics of the process:

- MCAD models from Physics data files
- NC, inspection toolpaths auto updating
- Process documentation, automated or assisted
- Inspection reports, electronic data capture associated to the design model, as-built definition
- Surveillance data matching with production as-built definition
- Annual assessment report linked to surveillance and design models
- Modeling with as built data
- SFI linked to digital pedigree
- Technical Manual
- Operation and maintenance instructions with illustrated parts breakdown automated from the digital pedigree and updated automatically as part of the design change process
- Analysis, inspection, quality acceptance, and surveillance
- Single raw data format that feeds all uses
- Design Analysis generates the nominal and tolerance band
- Inspection returns the as-built which can feed back to exact analysis
- Quality can easily compare desired to actual for acceptance and reporting

Schilling, Scott

Page 2 of 2

11 Surveillance does not have to spend months/years piecing a
7M system back together in order to determine if it has changed and can effect certification
(co
nt.)

PC_1517

Schlick, Haim

Page 1 of 1

116A There is no doubt in my mind, that the U.S.A. must maintain its protection from any
enemy determined to destroy us and our allies, however if in doing so we destroy
ourselves, I see no point.

PC_10

Haim Schlick
21743 E Valley Woods Drive
Beverly Hills, MI 48025

February 27, 2008

Theodora Wyka
Complex Transformation SPEIS Document Mgr.
U.S. Department of Energy
1000 Independence Ave. SW
Washington, DC 20585

I heard from a friend that there exists a proposal to build a new nuclear weapons facility
named "Complex Transformation".

Of course I am not aware of the pertinent details of this proposal, nor of the existing
arsenal of nuclear weapons; except that they are humongous and able to destroy many
times over the world population.

There is no doubt in my mind, that the U.S.A. must maintain its protection from any
enemy determined to destroy us and our allies, however if in doing so we destroy
ourselves, I see no point.

I am very concerned about Iran's nuclear weapons plans and their declaration of wanting
to destroy Israel and the U.S.A., while the world organization decides how to react, even
though these familiar declarations were prevalent from the mouth of another dictator,
Hitler. Nobody paid attention to him then, when he spoke against Jews. In the end he
nearly conquered the whole world and killed millions. And it appears that the world is
not paying much attention to this mad man from Iran as well, till(O-d forbid)

The U.S.A. is involved in proposing sanctions to stop Iran from continuing their race to
nuclear weapons capability, however it is also pursuing to build this new complex. So I
think that although sanctions may appear like they will work (and as we know did not
work in Iraq), we should also try a policy of a NUCLEAR-FREE WORLD.

If the U.S.A. did promote such a policy of "NUCLEAR-FREE WORLD", we would have
first the moral collateral to DEMAND that Iran stop its nuclear race, and of course, there
would be no need for a "Complex Transformation", with the benefits of using this big
expense towards our well-being.

Sincerely yours,

J:\PERSONAL\NuclearFreeWorld.doc

21J

21J
(cont)
39B

Schmal, Joan

Page 1 of 1

Buenafior, Justin

From: Joan Schmal [jschmal2@comcast.net]
Sent: Sunday, March 16, 2008 4:54 PM
To: Complex2030
Subject: Nuclear Weapons

Joan Schmal
1014 Darby Road
Prospect Park, PA 19076-2513

March 16, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

Please help me to understand the reason that our country may build a plant to produce plutonium pits, but any other country is suspect. As usual, the current Administration has a double standard.

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.

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,

Joan Schmal

116A

21J

PC_542

Schmid, Jennifer

Page 1 of 1

Levens, Matthew

From: litternot@windstream.net
Sent: Wednesday, March 19, 2008 5:41 PM
To: Complex2030
Subject: Mushroomrooms are for omelettes

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

Dear Mr. Wyka,

It won't matter how much we spend on a new, improved nuke - if they get us first, it'll be for nothing anyway. Let's build houses for the homeless, and get better mental and physical healthcare going.

198B

Instead of recreating the capacity to produce new, unnecessary nuclear weapons, the DOE should focus on shrinking the still-over-sized 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,
Jennifer Schmid
447 Hebron Road
Commerce, GA 30530

PC_607

1

Schmidt, Thomas

Page 1 of 1

Levens, Matthew

PC_1243

From: Thomas Schmidt [levtom@hagray.com]
Sent: Thursday, March 27, 2008 10:17 AM
To: Complex2030
Subject: EIS comment

To: Mr. T. Wyka

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.

116A Secondly, DOE is putting forth this proposal in the absence of a plan for re-examining the current role or quantity of these weapons.

37J Thirdly, DOE's main goal should be cleaning up the huge current nuclear waste instead of increasing it.

Yours in Peace,

The Rev. Thomas Schmidt

24 Lakeside Drive

Bluffton, SC 29910

Schneider, Franz

Page 1 of 1

Levens, Matthew

PC_881

From: fschneid@ihollister.net
Sent: Monday, April 07, 2008 1:05 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,

11J As nearly as I can understand it, what the "Complex Transformation" project proposes to do is pretty much what we are all but threatening war with Iran to prevent them from doing. We have successfully avoided using nuclear weapons for over half a century, and to Donald Rumsfeld there aren't many good targets left. We don't need these weapons. We don't have enemies we could feasibly use them on, and if we did use them we would sign our own death certificate. Please focus on safely decommissioning existing nuclear weapons. That is the path to greater security for ourselves and the rest of 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,
Franz Schneider
1044 Monterey St.
Hollister, CA 95023

cc: Senator Dianne Feinstein
Senator Barbara Boxer
Representative Sam Farr

Schoene, William

Page 1 of 1

Levens, Matthew

PC_1259

From: William Schoene [william.schoene@eradata.com]
Sent: Thursday, April 03, 2008 5:33 PM
To: Complex2030
Subject: Fund no more nuclear weapons

William Schoene
1519 Oak Street
Santa Monica, CA 90405-4847

April 3, 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.

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.

What are the scenarios for the acceptable use of nuclear weapons in the 21st century? There are none! Only a terrorist group would use a nuclear device against us, and then against whom could we retaliate. Without killing huge numbers of innocent people and wreaking incredible destruction?

With no credible case for building new nuclear weapons, there is even less of a case for spending precious public resources on the capacity to do so. Many real, urgent problems, both here at home and abroad, need financial support. Spending any money on new nuclear capacity is a direct blow to any American who needs government assistance and has been told, essentially, that "we can't afford it."

To continue to devote human resources -- both financial and intellectual -- to making weapons of unimaginably horrific destructive power is an insult to every person who died fighting to end war and to every person living today.

Please do NOT vote to fund any more nuclear weapons!

Sincerely,

William Schoene

116A (cont)

1

Schoerke, Andrew

Page 1 of 1

Levens, Matthew

PC_1702

From: Andrew Schoerke [capnandy06@comcast.com]
Sent: Wednesday, April 02, 2008 3:59 PM
To: Complex2030
Subject: No funding for Complex Transformation

Andrew Schoerke
212 Middle Road
Shaftsbury, VT 05262-9305

April 2, 2008
Complex Transformation Department of Energy

Complex Transformation Department of Energy:

Sir, I am a retired Navy Captain living in Shaftsbury. Fifty years ago I was attached to Heavy attack Squadron One, as a Bombarrier/Navigator. In the event of war, our mission was to launch from an aircraft carrier and deliver a nuclear weapon on a target in the Soviet Union.

In 1962, during the Cuban Missile Crisis, the United States and the Soviet Union came within a hair of immolating the world. If it had not ben for the refusal of a Soviet submarine commander to launch a nuclear torpedo at the aircraft carrier, USS Wasp, WW III would have begun.

Nuclear weapons can destroy life on this planet. Funding for the Complex Transformation Project as called for in President Bush's budget will only bring total destruction closer to reality.

I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons. Abololish all nuclear weapons.

Sincerely,

Andrew Schoerke, Capt. USNR (ret.)
802-447-0829

216A

1

Scholtes, Nick

Page 1 of 1

Schrader, Don

Page 1 of 2

PC_1575

Levens, Matthew

From: alrichia@gmail.com
Sent: Saturday, April 05, 2008 12:25 PM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

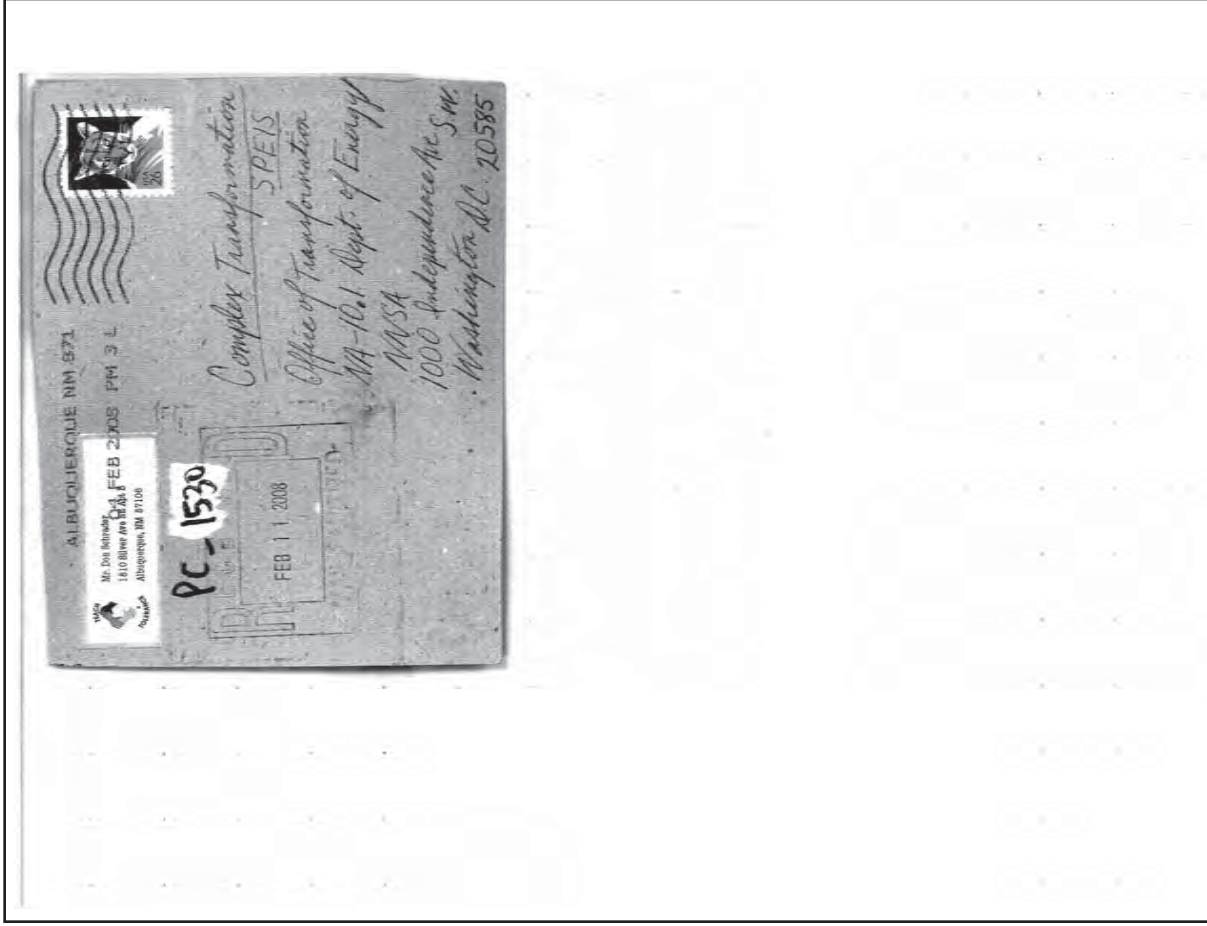
Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

I116A I urge for the immediate and continued reduction of our nation's nuclear stockpile, in conjunction with that of other nations. Do not build more nuclear weapons.

Sincerely,
Nick Scholtes
170 Wayzata Blvd East
#2
Wayzata, MN 55391

cc:
Representative Jim Ramstad
Senator Norm Coleman
Senator Amy Klobuchar

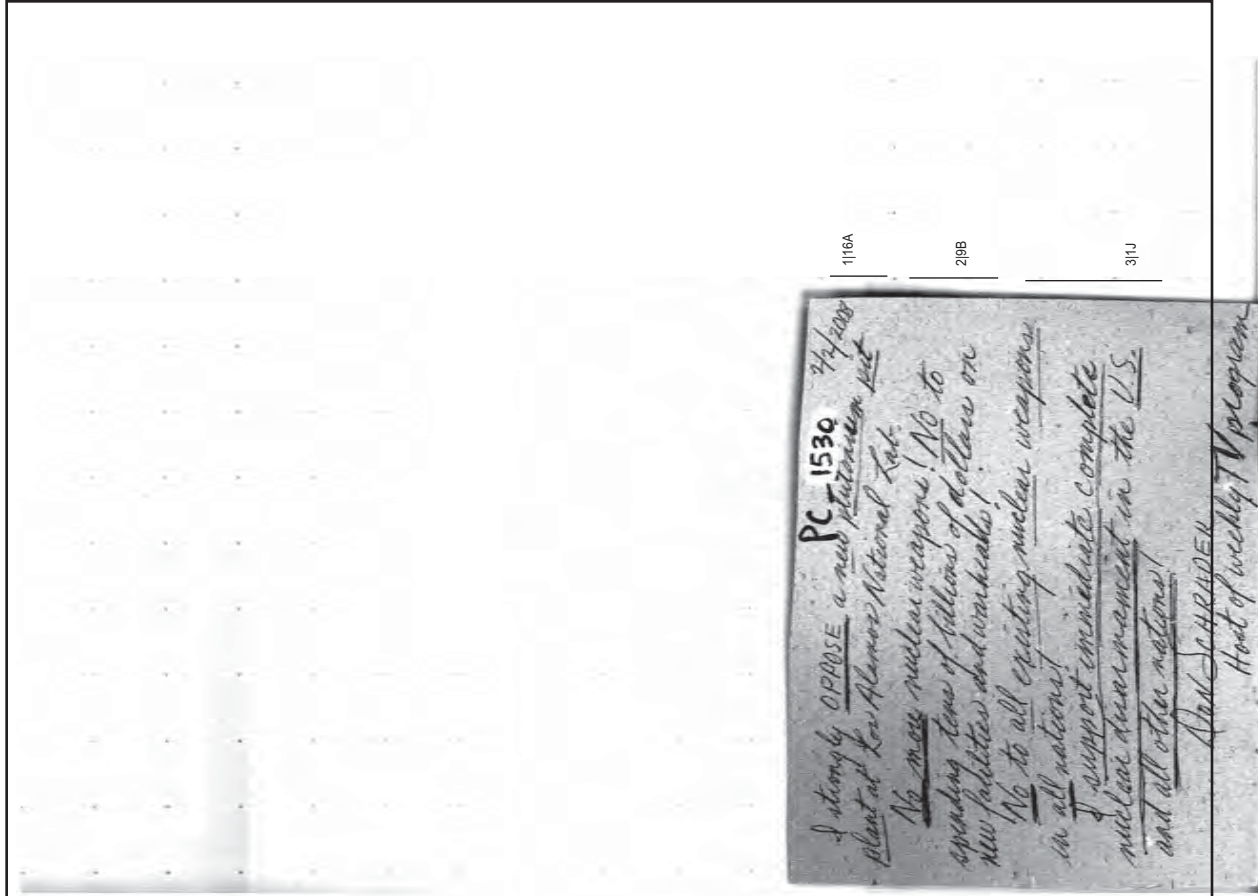


Schrader, Don

Page 2 of 2

Schroeder, Tre

Page 1 of 1



116A

28B

31U

Levens, Matthew

PC_1688

From: treschny@hotmail.com
 Sent: Saturday, April 05, 2008 1:52 PM
 To: Complex Transformation SPEISComments
 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,

116A Please consider becoming a leader in world peace by disarming yourselves of nuclear weapons, not creating more.

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,
 Tre Schroeder
 12013 32nd St.
 New York, NY 10102
 cc: Representative Jerrold Nadler
 Senator Charles Schumer
 Senator Hillary Clinton

Schumacher, Johanna

Page 1 of 1

Buenafior, Justin

From: Johanna Schumacher [sjphanna@hotmail.com]
Sent: Monday, March 17, 2008 11:49 AM
To: Complex2030
Subject: "Complex Transformation"

Johanna Schumacher
110 28th Ave SE #206
Watertown, SD 57201-8419

March 17, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

[As an ordinary American citizen I strongly oppose the latest attempt by the administration to expand our nuclear capacity
-NO, NO, NO to the porposed 'Complex Transformation'!]

116A

PLEASE do not allocate any funds to expand this deadly proposal.

Thank you Johanna Schumacher

Sincerely,

Johanna Schumacher
6058826640

PC_549

Schumacher, Johanna

Page 1 of 1

Levens, Matthew

From: sjphanna@hotmail.com
Sent: Wednesday, April 02, 2008 10:35 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,

[NO, NO, NO to Complex Transformation - Please do not EXPAND our nuclear capabilities - we
116A] have more than enough to destroy our world!!! Further expansion of our nuclear facilities
27J will only accelerate the 'nuclear race to destruction'. How can we dictate to other
countries that they may not expand their nuclear capabilities if we do it???
[It undermines the efforts to stop the spread of nuclear weapons around the world.

Please, direct your efforts to makeine PEACE no War.

Sincerely

Johanna Schumacher

Instead of recreating the capacity to produce new, unnecessary nuclear weapons, the DOE
should focus on shrinking the still-over-sized 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,
Johanna Schumacher
110 28th Ave SE #206
Watertown, SD 57201

PC_1864

Schuurman, Susan

Page 1 of 1

PC_2121

Levens, Matthew

From: Susan Schuurman [sussanschuurman@hotmail.com]
Sent: Wednesday, April 30, 2008 10:57 AM
To: Complex2030
Subject: No To Plutonium Pitmaking

Mr. Theodore WykaComplex Transformation SPEIS Document ManagerOffice of Transformation,
NA-10,U.S. Department of Energy/NNSA1000 Independence Avenue, SWashington, D.C. 20585,
Dear Mr. Wyka,

I am writing to urge the DOE not to retool the Los Alamos National Lab nuclear weapons
complex via the Complex Transformation Supplemental Programmatic Environmental Impact
Statement (SPEIS) proposal.

faster than manufacturing more nuclear weapons or parts of them, our country should be
dismantling our stockpile in order to motivate other nations to do the same and for those
nations who have no program not to start one.

It's really very simple: the golden rule. Do unto others what you would have them do unto
you.

Let's also use our tax dollars for badly needed infrastructure: school buildings, roads,
bridges, and even army barrack plumbing. Let's invest in food pantries for the poor, and
make health care accessible to all Americans. These are more important priorities than
plutonium pits.

Sincerely,
Susan Schuurman
2112 Charlevoix NW
Albuquerque NM 87104
(505) 842-0535

In a rush? Get real-time answers with Windows Live Messenger.
http://www.windowslive.com/messenger/overview.html?ocid=FXI_TAGLM_WL_Refresh_realtime_
042008

Schwartz, Al

Page 1 of 1

PC_353

Levens, Matthew

From: Al Schwartz [als@taosnet.com]
Sent: Monday, April 07, 2008 12:30 PM
To: Complex2030
Subject: Citizen Comment regarding SPEIS, Complex Transformation

Mr. Wyka:
IT IS A QUESTION OF LIFE OR DEATH.
IF WE CONTINUE TO DUMP WORKERS TAX DOLLARS INTO NUCLEAR WEAPONS DEVELOPMENT WE ENSURE
GLOBAL DEATH. THIS WILL BE BECAUSE OF LACK OF MONEY TO FUND GREEN ENERGY COMBINED WITH A
RAPIDLY GROWING CANCER EPIDEMIC FROM NUCLEAR WASTES THAT ARE ALREADY POLLUTING THE ENTIRE
EARTH. THERE WILL BE NO NEED TO DROP BOMBS FOR THE "SCORCHED EARTH" BELIEVERS.

IF WE GET OFF OUR BUTTS, NOW, WE MAY BE ABLE TO SAVE OURSELVES BY CONCENTRATING ON
DEVELOPING GREEN POWER SOURCES & BY CLEANING UP OUR PLANET. OF COURSE, IT MAY BE TOO LATE,
ALREADY.

NO SAME HUMAN WILL WILLINGLY & KNOWINGLY VOTE, WORK OR PAY FOR DEATH.
THE POPULAR MANDATE ALREADY EXISTS TO END NWD DEVELOPMENT. TO NOT ABIDE BY THIS MANDATE IS
UNCONSTITUTIONAL & AS UNETHICAL AS ANYTHING CAN BE.

The decision to transform the U.S. nuclear complex must reflect the will of the American
people. The majority of us, 79%, 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.

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 Report showed that the current U.S. nuclear stockpile
will remain reliable for at least another 70 years.

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.

AL Schwartz
POBox282
ArroyoSeco, NM 87514

Schwartz, Alexander

Page 1 of 2

Schwartz, Alexander

Page 2 of 2

April 25, 2008

PC_978

Mr. Theodore Wyka
C-1 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 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.

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 (Farm Land Protection Act of 1981, 7 CFR 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.

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[Add your story here.]

I am a very busy building contractor and I need to be able to find time to review & comment on this document that has just been brought to my attention.

Please extend the public comment period for the full 90 days originally requested!

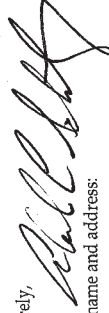
Thank-you

21E (cont.)

412B

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:

Alexander C. Schwartz

H.R. 71, Box 2113

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

Sciarrino, Maralynn

Page 1 of 1

Scoccia, Vincent

Page 1 of 1

11/03 09 11:15a SISTERS OF MERCY OF THE R 7168261518 P.1
SISTERS OF MERCY OF THE AMERICAS
 NEW YORK, PENNSYLVANIA, PACIFIC WEST COMMUNITY

Our Lady of the Sacred Heart Convent
 3140 Abbott Rd.
 Orchard Park, NY 14127
 April 2, 2008

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

Dear Mr. Wyka:

As Sisters of Mercy, we are deeply 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. While it will bring jobs and income to many who are suffering from our low job market and economy, 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. The benefit is pitiful!

Furthermore, this program clearly violates the Nuclear Nonproliferation Treaty, to which the United States is a signatory. It also provides further evidence that the United States intends to continue developing and expanding its nuclear arsenal while demanding that other countries such as Iran and North Korea abandon their nuclear ambitions. It will deal another blow to our integrity and leadership as a nation.

It is time for the leaders of the United States to lead other nations in nuclear disarmament instead of continuing to build arsenals aimed at destruction. We urge you to deny granting environmental clearances needed for the Complex Transformation to proceed.

Please let us know the outcomes of your discussions in this matter, and be assured we are praying that your strength, wisdom and integrity will prevent this program from continuing.

Sincerely yours,

A. Maralynn Sciarrino
 S. Maralynn Sciarrino, RSM
 S. Mary Elaine Malloy, RSM
 S. Mary Caritas Quinn, RSM
 S. Norma T. Wind, RSM
 S. Joan Chachula, RSM

A. M. Cecilia, P. 1/24
 S.M. Cecelia, RSM
 S. Joan Chachula, RSM

S. Marie Muldoon
 S. Marie Muldoon, RSM

1140

21F-31U

13 08 10:37a Vincent F. Scoccia (775)482-5719 P.1
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-75

I AM A VOTING EMPLOYEE. I AM A USUAL RESIDENT SINCE I AM AN AMERICAN WHO IS DOMESTIC.

I AM CONCERNED ABOUT THE UNORGANIZED SPENDING OF RESOURCES AND DEVELOPMENT OF RUSSIA, CHINA AND INDIA. IT SEEMS WE ARE DENUNCIATING OUR OWN EXPENSIVE R&D EFFORTS.

THE LOSS OF JOBS NATIONALLY, NOT TO MENTION LOCALLY HERE IS DEVASTATING! WHO DOES AMERICA DO AND WHO DO WE STAND FOR?

THE DEFENSE BUDGET IS MORE THAN 1/3 OF THE OTHER NATIONS IN THE WORLD COMBINED. WE ARE THE BEST NATION IN THE WORLD. WE ARE THE GOVERNMENT THAT NOT FORGET THAT. LET US NOT RETREAT BUT ADVANCE. CLASH THE TIE IS STRATEGIC IN AN AMERICAN. NOT THE MONEY. WE CAN BOREAW MORE FROM CHINA!

DR. VINCENT SCOCIA 735-482-0733

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/NNNSA
 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.complextansformation.speis.gov>

Mr. Vincent Scoccia
 P.O. Box 891
 Tonopah, NV 89049

198

214

318B (cont.)

Scott, Madison

Page 1 of 2

PC_100



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.

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.

More specifically, we support Pantex remaining the Assembly/Disassembly/High Explosives (HE) production (formulation, processing and testing) and manufacturing (machine) 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 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.

1/15H

2/5D.1

Scott, Madison

Page 2 of 2

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.

3/5C

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.

4/14M

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,

Madison Scott, City Commissioner
City of Amarillo, Texas

5/15H
(cont.)

Seaman, Lorraine

Page 1 of 1

PC_2140

Levens, Matthew

From: WALTER&LORRAINE SEAMAN [mailto:walt4ui@charterh.net]
Sent: Thursday, April 10, 2008 8:40 AM
To: complex2030
Subject: nuclear weapons

Now can we want other countries to not developed nuclear weapons when we propose to extend production of the weapons and produce new bombs. This is in opposition of the treaties we have signed. We can already kill everyone and destroy the world. Let's use the money to feed the people. Lorraine Seaman

--
 I am using the free version of SPAMfighter for private users.
 It has removed 1357 spam emails to date.
 Paying users do not have this message in their emails.
 Get the Free SPAMfighter here: <http://www.spamfighter.com/1on>

Seclearr, Sheila

Page 1 of 1

Page 1 of 1
PC_1226

Levens, Matthew

From: Sheila Seclearr [mailto:shesec11@yahoo.com]
Sent: Monday, April 07, 2008 2:00 PM
To: Complex2030
Subject: Plutonium Bomb Trigger Hearing

To ComplexTransformation@mmsa.doe.gov

To whom it concerns,
 I see no reason why the Plutonium Bomb Trigger production program should be expanded nor should it be done at all in New Mexico. As a resident, I have not seen adequate care given to the sensitive issues of toxic waste disposal or hazardous materials handling. When there is such hazardous potential, there should be more care and information, not less. Please do not expand or continue this program.

Thank you,
 Sincerely,
 Sheila Seclearr
 El Prado, NM 87529

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114M
216A

5/15/2008

Segez, Connie

Page 1 of 1

Feb 29 08 08:57a

Connie Segez

5057474192

p. 2

PC_936

To my Representatives and those setting policy:

I want to register my strong opposition to the planned expansion at the Los Alamos facility in New Mexico. As a nearby resident I strongly object to the production of nuclear weapons/products at this facility. In this country the LAST thing we need is more nuclear weapons. How many is enough? We have enough right now to wipe out the ENTIRE world and if we only wiped out half the other half would be uninhabitable anyway. This has got to stop. There are so many brilliant minds at LANL they could be pointed in the direction of finding sustainable solutions to our energy problems and figuring out how to adequately clean up the refuse from the current nuclear production.

Please take this note as my strong vote for NO MORE nuclear production at LANL.

Thank you for your time.
Sincerely,

Connie Segez
398 County Road 114
Española, NM 87532

116A

2/98

Seitz, Ann

Page 1 of 1

PC_284

March 23, 2008

Mr. Ted Wyka, NNSA
Office of Transformation NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka,

I have one comment regarding Complex Transformation:

At a recent public hearing I heard all kinds of talk about safety, security, excellence and respect but these were just the public relations "branding" words used to shape the reality of what's being sold that isn't needed. Actually, employees of NNSA and DOE nuclear facilities are just hanging on to their livelihood while continuing to build more nuclear weapons and contaminate the world with more radioactive waste. It was once said, "never mess with a man's living." Complex Transformation is just another make-work "gravy train." The National Ignition Facility (to name just one plan) had good funding for about 10-12 years, but Congress wised up to its ballooning budget, schedule slippages and false promises. New schemes are always needed, ergo Complex Transformation, to insure the continued money flow. Again, promises will be made to Congress, funding will be secured, results will be less than hoped or absent and in 10 or 12 years we will have a new "plan," all so weaponizers can make a living.

I disagree with your plans for Complex Transformation despite your glossy color photos, your apparently highly organized manner and your pretence that more bombs bring security.

Ann Seitz
22103 Main Street
Hayward, CA 94541

Cc: Representative Pete Stark
Senator Barbara Boxer
Senator Dianne Feinstein
Marylisa Kelley, Tri-Valley CAREs

4/13A.1

2/1K, 3/9A

Seliger, Kel
Page 1 of 2

Seliger, Kel
Page 2 of 2

PC_87



**The State of
Texas**

SENATOR KEL SELIGER

CAPITOL
P.O. Box 12068
AUSTIN, TEXAS 78711
PHONE: (512) 463-4151
FAX: (512) 478-3733
DIAL 711 FOR RELAY CALLS

February 27, 2008

DISTRICT 31
DISTRICT OFFICES:
P.O. Box 9185
AMARILLO, TEXAS 79105
PHONE: (806) 434-4000
FAX: (806) 434-4007
1400 N. FM 1700
MIDLAND, TEXAS 79707
(432) 853-0031
FAX: (432) 385-0683
SOUTH PLATO
BIG SPRING, TEXAS 79720
(432) 268-9609
FAX: (432) 268-9899

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:

Thanking you for the opportunity to comment on this matter. The Department of Energy's (DOE) 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 we are fortunate to have it in our community. 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, support awarding 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.

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.

4/154

2/50.1

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 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. The 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 the transportation of special nuclear materials (SNM), and its attendant costs and risks.

3/3C

I strongly believe that the 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.

4/14M

As an elected representative, I am intune 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. The DOE must have this strong, broad-based political support to accomplish anything relating to new missions dealing with SNM. The DOE has the necessary support from local elected officials to help the DOE's initiatives succeed.

5/15H

Thank you for giving me the opportunity to illustrate why I believe that the 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,

Kel Seliger

Seminario, Marybeth

Page 1 of 1

PC_1158

Levens, Matthew

From: Marybeth Seminario [mbsem@aol.com]
Sent: Monday, March 31, 2008 1:16 PM
To: Complex2030
Subject: Stop new nukes

Marybeth Seminario
32 Deepwoods Dr.
Amherst, MA 01002-3248

March 31, 2008

Complex Transformation

Dear Complex Transformation:

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.

In addition, it is irresponsible to build more nuclear facilities when we don't have a safe way to transport the waste from the existing ones. We will end up as a nation with hundreds of nuclear facilities dotting the country "rotting" in place.

Sincerely,

Marybeth Seminario

1

Sessions, Lee

Page 1 of 1

PC_1429

Levens, Matthew

From: leessessions@comcast.net
Sent: Tuesday, April 08, 2008 1:02 PM
To: Complex2030
Subject: Complex Transformation--STOP THE BOMBS!

Dear Mr. Wyka and other decision makers at DOE and NNSA:

I reject all proposals suggested by the Department of Energy regarding Complex Transformation and request that all parties involved start abiding by the Nuclear Nonproliferation Treaty to which the United States is a signatory and thus required by law to follow. Clean up and dismantlement should become DOE's main priority not building and refurbishment. Clean up and dismantlement alone could provide jobs for years to come.

The proposed new arsenal would also be bad foreign policy. We need American leadership in convincing countries like Iran and North Korea to forgo nuclear weapons. A good start on the way to true security for the United States would be taking care of the basic needs of its citizens rather than figuring out how to best blow up other parts of the world and alienating itself from the world community by being such a hostile selfish bully. I suggest using the money instead for housing, education, food, health care, betterment of the environment, etc. PLEASE think about future generations and use a little more compassion in making such HUGE decisions.

And, in case you did not quite hear them the first time, I suggest you watch the following video featuring some very brave young people who also think your plans are a pretty bad idea.

http://www.knoxtube.com/view_video.php?viewkey=305ca9ad266f53bc8251

Thank you for your time and attention. I hope you will truly take to heart ALL the pro peace comments you receive and not just ignore what the people want.

Lee Sessions
4222 Ellen St.
Knoxville, TN 37920

"Nuclear weapons today present tremendous dangers, but also an historic opportunity. U.S. leadership will be required to take the world to the next stage -- to a solid consensus for reversing reliance on nuclear weapons globally as a vital contribution to preventing their proliferation into potentially dangerous hands, and ultimately ending them as a threat to the world.Reassertion of the vision of a world free of nuclear weapons and practical measures toward achieving that goal would be, and would be perceived as, a bold initiative consistent with America's moral heritage. The effort could have a profoundly positive impact on the security of future generations.We endorse setting the goal of a world free of nuclear weapons." -- George P. Shultz, William J. Perry, Henry A. Kissinger and Sam Nunn, January 4, 2007, Washington Post

"A nation that continues year after year to spend more money on military defense than on programs of social uplift is approaching spiritual death." --Dr. Martin Luther King, Jr.

"I think that people want peace so much that one of these days government had better get out of their way and let them have it." --Dwight D. Eisenhower

1

Seymour, Mary

Page 1 of 1

Levens, Matthew

PC_654

From: meseymour@ameritech.net
Sent: Wednesday, March 12, 2008 9:38 AM
To: Complex2030
Subject: DOE proposal

116A I am writing to express my opposition to the DOE proposal Complex Transformation which lays out the agency's vision for the future of U.S. nuclear weapons production, research and testing.

20A I do not believe this proposal should be moved forward for the following reasons:
- It is a waste of money, time, resources, etc. We already have more than enough nuclear weapons in our stockpile with a life expectancy of over 100 years.

31U - More efforts spent on this proposal only increases the likelihood of using nuclear weapons, possibly provoking a new arms race. This is very dangerous with the U.S. threatening the first strike use of these nuclear weapons against any country it chooses.

41F - Enacting this proposal puts the U.S. directly in violation of the Nuclear Non-Proliferation Treaty. The U.S. has signed this treaty and it is U.S. law. This makes us a country of double standards.

31U (cont) - It is wrong to plan for and create the means of mass destruction. By doing so, the U.S. holds the world hostage to the threat of destruction. Is this the kind of world leadership and example we want to set?

I urge you abandon this proposal.

Thank you,
Mary E. Seymour

Shaffer, Margaret

Page 1 of 1

Levens, Matthew

PC_1449

From: Margaret Shaffer [mailto:shafferpost@yahoo.com]
Sent: Tuesday, April 15, 2008 4:53 PM
To: Complex2030
Subject: No New Nukes

Margaret Shaffer
2238 Sherril Court
Arcata, CA 95521-9682

April 15, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

Please do all you can to forestall the building of new plants and upgrading of existing facilities so that new nuclear weapons can be added to the U.S. arsenal.

In our efforts to slow nuclear weapons production around the world, the best thing we can do is set an example by reducing our stockpile and not adding new weapons. All thinking people know that no nuclear weapon can make the world safer.

Please know that you have my support in your effort to stop the administration's move to increase nuclear production, and let me know what I can do to help.

Sincerely,

Margaret Shaffer

Sincerely,

Margaret Shaffer
(707) 826-7233

Shainline, Anne

Page 1 of 1

Sharkey, Virginia

Page 1 of 2

PC_262

4-1-08

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

Our country already has the capacity to blow up the world many times. Why would our government want to add to that capacity? That is without rationality, is dangerous, and violates the Non-Proliferation Treaty. It is wrong, wrong, wrong. NO New Nukes!!

Anne Shainline
 15 South 1st St. A520
 Minneapolis, Mn, 55401

116A:
 23A:
 31F

PC_302

Virginia Sharkey
 157B North Star Dr.
 Santa Rosa CA 95407

U.S. Dept. of Energy
 Bombs/Complex
 Transformation Comments
 Ted Wyka, NA-10.1
 1000 Independence Ave. , SW
 Washington D.C. 20585

Ted Wyka:

The DOE's proposal, Complex Transformation, must not proceed for the following reasons:

The DOE claims that this policy will reduce the number of new facilities while increasing capacities. So many alternatives are built into the proposal that the opposite could easily happen. The world's goal is to eliminate nuclear weapons, not explore new possibilities.

The national security policy, established in 2001, is a policy, not a law. Complex Transformation locks the current policy in place rather than allowing the complete policy open to debate. The complex policy should be open to debate in Congress and with public debate leading to a policy of non-proliferation and disarmament.

Although the proposal includes a section on safety and security, safety and security are the main priorities, not an incomplete afterthought.

Complex Transformation proposes without alternatives to other proposals. No consideration is given to a process of disarmament, nor the protection of the present stockpile as it exists now. No new ideas are proposed for dismantling older warheads as they become unusable. Doing this would mean no new nukes, a much better proposal.

Current treaties are ignored in the PEIS. Building new nukes undermines the Non-Proliferation Treaty of which we are a part.

The DOE has dismissed the suggestion of Curatorship as it would do all the above. New weapons appear to be the DOE's goal.

If the world's goal is to decrease the stockpile, new facilities and methods are not the answer.

116A
 21J
 311A
 470
 51F
 65H2
 116A (cont)

Sharkey, Virginia

Page 2 of 2

Sharpe, Chip

Page 1 of 1

11/6A
(cont.)

If we truly want a peaceful world, creating new nuclear weapons is a threat in itself.

No matter under what guise, methods or language, Complex Transformation is detrimental to our security and world peace. Please do not implement it.

Sincerely,

Virginia Sharkey
Virginia Sharkey

PC_412

Levens, Matthew

From: Chip Sharpe [chipsharpe@stcglobal.net]
Sent: Monday, March 24, 2008 9:41 PM
To: Complex2030
Subject: Nuclear Weapons need to be eliminated

Dear Theodore Wyka:

Any added nuclear warheads or nuclear weapons of any kind would be a betrayal of the Non-Proliferation Treaty and of our citizens' hopes for peace and safety. Please let me know that you are doing what you can to direct our nation's resources toward real human needs.

Thank you for wrestling with these issues.

Sincerely,

Chip Sharpe
chipsharpe@stcglobal.net
1644 Old Arcata Rd, Bayside CA 95524

Shaughnessy, Diane

Page 1 of 1

Shaw, Emil

Page 1 of 1

Buenafior, Justin

From: Diane Shaughnessy [dshau2@aol.com]
Sent: Tuesday, February 19, 2008 11:46 PM
To: Complex2030
Subject: CMRR project

Diane Shaughnessy
1528 22nd ST NE
Auburn, WA 98002-3439

February 19, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

116A | I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons.

21J | 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,

Diane Shaughnessy
253-931-1296

PC_445

**GRAY PANTHERS
OF GREATER ALBUQUERQUE**
PO Box 37322
Albuquerque, NM 87176-7322

April 23rd, 2008

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

Re: Draft Complex Transformation SPEIS


Dear Mr. Wyka:

The Gray Panthers of Greater Albuquerque has voted to oppose the DOE's Bombplex ("Complex Transformation"). We take this position because the United States does not need new nuclear weapons, and we do not need a massive nuclear weapons infrastructure for the next century, as the draft Supplemental Programmatic Environmental Impact Statement (SPEIS) proposes as its "preferred alternative."

The United States is a party to Article VI of the Nonproliferation Treaty, which 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." The alternative of not having nuclear weapons is a reasonable, and, indeed, a required alternative, according to the treaty our country has signed.

We also specifically oppose the draft SPEIS "preferred alternative" of having plutonium pit manufacturing and research and development at Los Alamos Lab. The US 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 US nuclear bombs.

Sincerely yours,


Emil Shaw
Legislative Director
Gray Panthers of Greater Albuquerque

116A:

21A

31F

417N:
21A
(cont.)

Sheldon, Sayre

Page 1 of 1

PC_1219

Levens, Matthew

From: sayre sheldon [cemsps@verizon.net]
 Sent: Tuesday, April 01, 2008 9:51 AM
 To: ccomplex2030
 Subject: program


116A I am writing to oppose the Complex Transformation proposal. It has some good parts to it but overall, embarking on any plan for new nuclear weapons is wrong at this time. World opinion and many prominent conservative thinkers in this country are promoting total abolition of nuclear weapons. Secondly we cannot afford to devote the billions required for the proposal, Sayre Sheldon

20A


Shelley, D.G.

Page 1 of 1

PC_161



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.

19E

It would be an expensive mistake to consolidate all the aspects of nuclear weapon maintenance, maint, & storage in one location. As the saying goes "you don't put all your eggs in one basket"

D. G. Shelley

Please use other side if more space is needed.

Comment forms may be mailed to:
 Mr. Theodore Wyke
 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.complextransformationispets.com>

Shelton, Todd

Page 1 of 1

Shem, Azwyn

Page 1 of 2

PC_168

Comments for Environmental Impact Statement

My name is Todd Shelton and I live at 3111 Foster Lane in Knoxville, TN. I am very much opposed to the Stockpile Life Extension Program at Y-12or any other location. I feel that it is in direct contradiction to the 1970 Non-Proliferation Treaty agreed on by the people of this country and other large and small countries in the world.

To this date there is no greater immediate threat to the entire environment of our country and the environment of the world, than the manufacturing, refurbishing and proliferation of nuclear weapons. Nuclear weapons are the ultimate in Weapons of Mass Destruction! There is no justification for such weapons today. The only people who benefit from manufacturing them are those who are motivated entirely from an economic point of view and those who find fear mongering a satisfactory way of life.

Concerning the economic benefits to huge corporations and some individuals who make up the US military industrial complex, there are so many other fields of economic development such as alternative energy sources and the reduction of global warming that can be substituted for nuclear weapons production. Oak Ridge, for example, need not suffer in loss of jobs due to the stoppage of nuclear weapons production. Oak Ridge has many important scientific technical industries going on now and there is need for many more.

For those who continue to try and scare the rest of us into thinking we must have nuclear arms to be safe, there is nothing safe about them. For me, I would prefer a much smaller military and a larger effort towards the solutions of the social and economic injustices that create war climates. But for those who are convinced that our military might is our savior, the USA has the largest and most lethal military in the world. There is no military or militant group that can match the non nuclear firepower of the US military machine.

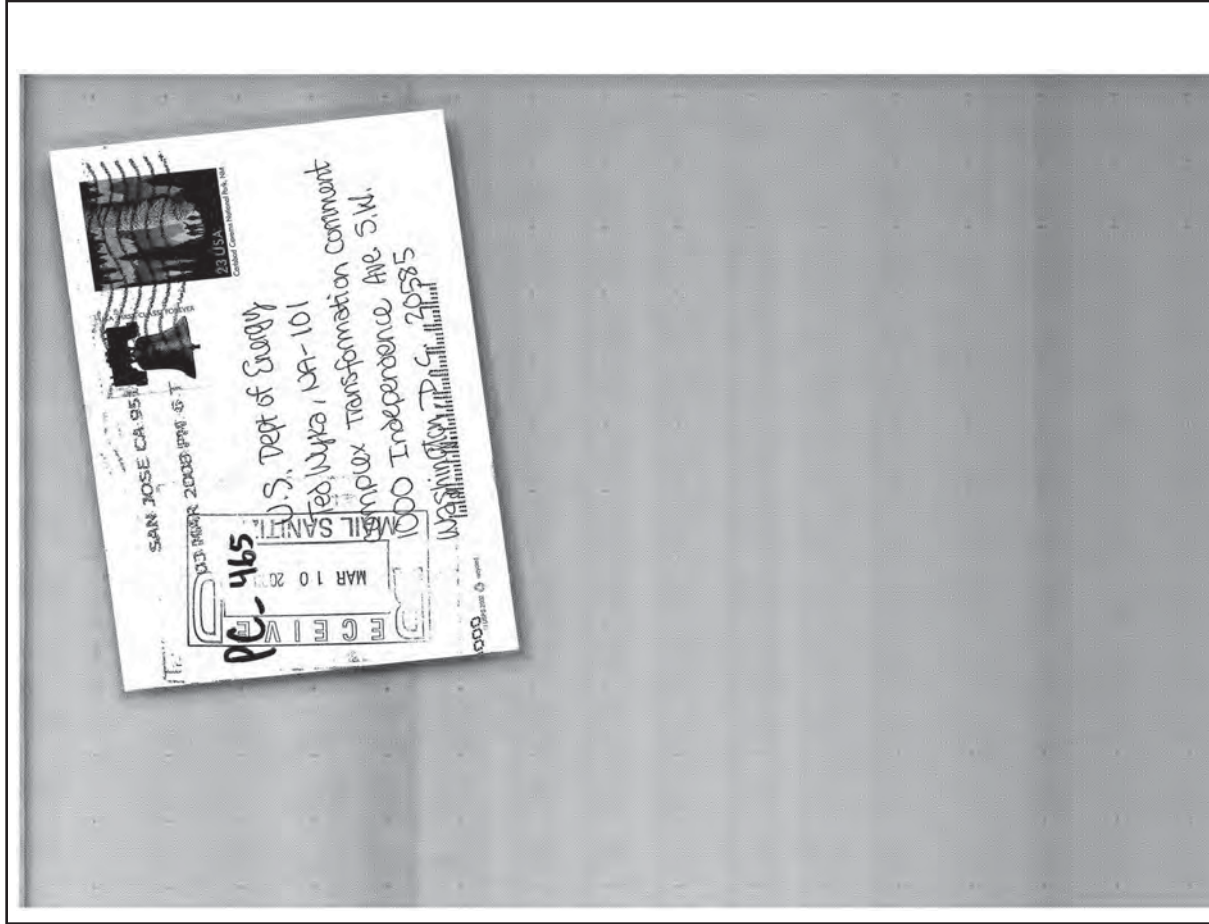
What we do not have is the capability to contain nuclear proliferation in the world as long as we are producing and upgrading nuclear weapons. It happens that we are the only country that has ever used a nuclear weapon against people. No matter what the arguments are made for or against dropping nuclear weapons on the Japanese people in world War II, we can be assured, that who ever uses them in the future will have a justification, they feel, is just as good. We can also not plead ignorance about the indiscriminate mass destruction of millions of people. We have seen what nuclear weapons can do and people, young and old, are still dying from those bombs.

The USA has the potential of not only setting an example by not increasing production or refurbishing nuclear weapons, but we could reduce the greatest threat to the environment of the whole world by being the leader in disarmament. We could shift our impetus to encouraging others to do the same and by securing and dismantling the existing nuclear weapons which are out there, This is the largest positive environmental impact statement that we could make.

I ask our current and future leaders and the every day citizens in the country to get in touch with your spiritual being and stand up to the false fears and money hungry arguments that a few people put forth in favor of nuclear weapons. I urge you stop the huge drain on our economy from their production. We, in this country, must do what we can to stop this craziness and disrespect for life. We must make wind mills, solar collectors, clean fuels and protect the air and water and stop making nuclear weapons. Our children and our grand children want this.

Todd Shelton

COPY

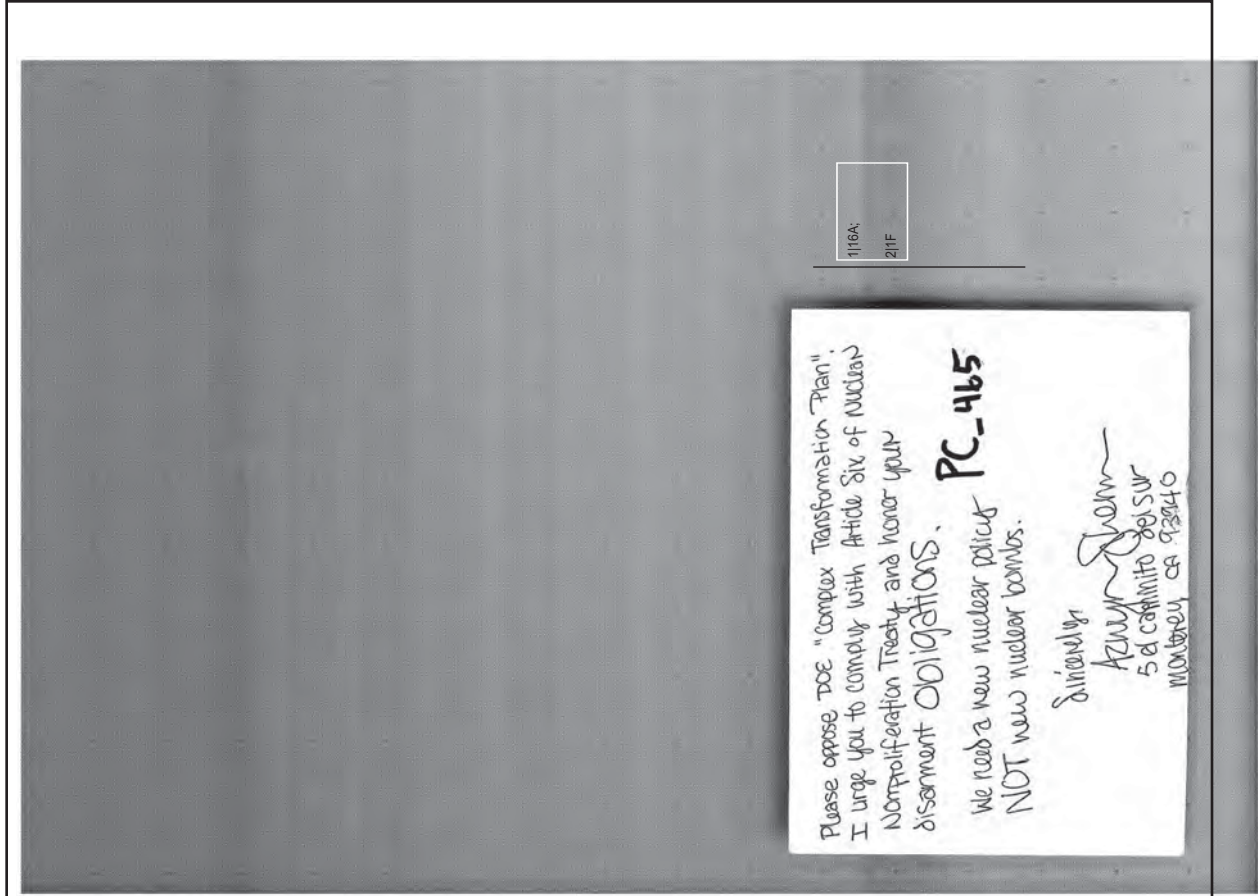


Shem, Azwyn

Page 2 of 2

Sherman, Ann

Page 1 of 1



PC_2146

Levens, Matthew

From: Wine Lake [winelake@earthlink.net]
 Sent: Thursday, April 10, 2008 10:48 AM
 To: Complex2030
 Subject: opposition to more nuclear plants

I would like to express my strong opposition to building new nuclear weapons plants. We are at a turning point in history and at a crucial time with our impact on the environment. The United States already has enough nuclear weapons to destroy the entire world many times over. Scientists from the National Center for Atmospheric Research just determined that even utilizing the meager nuclear arsenals of India and Pakistan in a nuclear exchange would bring about catastrophic damage to the ozone layer impacting the entire planet. Stop the insanity. Reverse course. No to more nuclear weapons plants!

Ann Sherman
 566 Camp Eden Rd
 Golden, CO 80403

Sherman, Janette

Page 1 of 1

Shiner, Dawn

Page 1 of 1

PC_2000

Levens, Matthew

From: Janette D. Sherman, M. D. [mailto:jd@sherman.net]
Sent: Thursday, April 24, 2008 3:49 PM
To: Complex2030
Subject: Nuclear Weapons

Janette D. Sherman, M. D.
POB 4605
Alexandria, VA 22303-0605

April 24, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy

1140 We have not yet recovered from earlier years of building nuclear weapons. Hanford in WA State is a testimony to the hazardous and futile activity of building nuclear weapons. It can never be cleaned up. It is leaking into the Columbia river now.

There is NO permanent place to store long half-life nuclear waste.

218A Our country is financially in deep trouble. We cannot afford such a dangerous, wasteful and morally repugnant program.

Sincerely,

Janette D. Sherman, M. D.

PC_1679

Levens, Matthew

From: shilly@swva.net
Sent: Saturday, April 05, 2008 3:40 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,

116A As if nuclear weapons increase security for anyone. Weapons are only necessary when one doesn't want to work with others. MADATION and DRINGOG make peace, should the US choose to LISTEN and NOT PRACTICE TERRORISM on itself and other countries.

218A 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.

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,
dawn shiner
121 turtle rock drive se
floyd, VA 24091

cc: Senator John Warner
Representative Rick Boucher
Senator Jim Webb

Shipley, Rick

Page 1 of 1

Levens, Matthew

PC_739

From: Shipley, Rick E (S45) [shipleyr@y12.doe.gov]
Sent: Wednesday, February 27, 2008 1:07 PM
To: Complex2030
Subject: Support for Y-12

17N: I support the Preferred Alternative Plan which makes Y-12 the site for building the
210I: Uranium Processing Facility.

Rick Shipley
2212 Highland Dr.
Knoxville, TN 37918

Silver, Dorothy

Page 1 of 1

Levens, Matthew

PC_1961

From: delsilver@earthlink.net
Sent: Thursday, April 10, 2006 2:49 AM
To: Complex2030
Subject: Stop the Nuclear Arms Race

Dear Mr. Wyka

1140: I have been reading some of the transcripts posted on the internet of the Atlanta
216A: Georgia hearings. It's been wonderful reading people's speeches about the dangers of
nuclear bombs and the new arms race. I really believe the people involved in making this
race need to slow down and take a look at what these transcripts are saying about the
damage to the earth and our bodies and think about the right of all living creatures to
inhabit the earth, free of toxins and in joy and peace. Our right to this kind of life is
being taken away by building bombs and making nuclear waste as a result. Nukes are just
too dangerous to have around. Add my voice as one who would not only add a vote against
any new nuclear weapons being built, but also speak to the hearts of those who love life.

320: Back in the Vietnam war demonstration era, people stood up and created a whole culture
around a new vision of peace. People were driven to protest due to the immediate friends
and family members being drafted. People also just loved life and did not want to see
death and destruction prevail through such violence as the Vietnam war. Now we have only
the intellectual material about the problems of these weapons and the environmental
concerns to drive us. We are a many individuals and we are trying our best to spread the
knowledge and raise social and cultural consciousness about the problems resulting from
building new nuclear weapons.

Thank you for listening. Please do whatever you can to stop this madness.

Sincerely,

Dorothy Silver

Silver, Mary

Page 1 of 1

Buenafior, Delight PC_1330

From: Mary Silver [mary@barnhillbolt.com]
Sent: Thursday, April 03, 2008 10:48 AM
To: DIV.Complex.Transformation
Subject: Form posted from Microsoft Internet Explorer.

Last Name=Barnhill Bolt Co., Inc.
 First Name=Attrn: Mary Silver
 Email Address=mary@barnhillbolt.com
 Street Address=2500 Princeton Dr NE
 City=Abuquerque
 State=NM
 ZIP Code=87107

Comments=For the past 48 years, Barnhill Bolt has strongly supported the Los Alamos National Laboratory, and we are very proud of our longstanding relationship with the Lab. The security and prosperity of the United States depend to a great extent on the kinds of work performed at the Lab: contributions to medical research, development of alternative energy sources, ecological improvements, nanotechnology breakthroughs, and the development of weapons for defense. This list cannot begin to identify all the fields in which Los Alamos National Laboratory has garnered recognition and obtained significant results.

These achievements provide the nation with security and scientific developments that ultimately benefit each citizen. To continue in its role as a world leader, the United States must capitalize on the unique and invaluable assets provided by the Los Alamos National Laboratory.

1/16A
 2/10B

Silverstorm, Mercale

Page 1 of 1

Page 1 of 1

Levens, Matthew PC_2061

From: Mercale SilverStorm [mercale@yahoo.com]
Sent: Thursday, April 10, 2008 8:19 AM
To: Complex2030
Subject: Bombsites comment

1/16A

No more nuculear weapons!!! Period.

Do You Yahoo!?
 Tired of spam? Yahoo! Mail has the best spam protection around
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Simmons, Ellen

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Simmons, Ron

Page 1 of 1

PC_1745

Levens, Matthew

From: Ellen Simmons [elissimmons1@comcast.net]
Sent: Wednesday, April 02, 2008 2:33 PM
To: Complex2030
Subject: No New Nukes

Ellen Simmons
 5728 39th Ave
 Hyattsville, MD 20781-1715

April 2, 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.

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.

How about using some money for things that might actually help the people of America? Better Education, Better Health Care and Insurance for all.
 Fight Poverty, Medical Research to find causes of and treat disease.
 There are a billion better ways to spend this kind of money than to start a new Cold War.

My name is Ellen Hoopes Simmons and I live in the suburbs of Washington, DC and have an 8 month old child who I would like to see grow up in a world of peace and where the world is a better place and the USA can figure out how to get along with the rest of the world's nations without nuclear weapons.

Sincerely,
 Ellen Hoopes Simmons

PC_1518

Levens, Matthew

From: Ron Simmons [rns@cybermesa.com]
Sent: Sunday, April 13, 2008 10:47 PM
To: Complex2030
Subject: LANL: The Future of Energy Research

In two years Santa Fe will get its drinking water from the Rio Grande, a short distance downstream from the canyons where LANL intends to increase plutonium pit production for nuclear weapons.

Whether or not modern practices will avoid a repeat of the contamination that happened at Rocky Flats in Colorado is Issue # 1. Issue # 2 is the opinion of some scientists that existing pits are viable for another 40 to 80 years. Issue #3 is whether the United States should be leading in abiding by the Nuclear Non-proliferation Treaty, or that the international law of the NPT can be enforced on all countries. I don't believe we can be successful in preventing developing countries from pursuing nuclear weapons unless we engage with them top-to-top in disarmament.

Issue #4 relates to the existing contamination on-site at LANL. I encourage the Energy Department to finish the clean-up of the last 65 years of nuclear work at Los Alamos, preferably by removal of all waste to approved waste sites. The porous volcanic strata and geology of canyons and tributaries that empty into the Rio Grande just north of the Santa Fe drinking-water diversion argue for quick and complete removal of waste.

Issue #5 is the urgent need for our nation to transform our Energy Department labs to the task of renewable energy research and development.

Our scientists at Los Alamos are a national resource and treasure. Let's use them and the Los Alamos lab to make our nation the leader in solar photovoltaics, solar thermal, wind, geothermal, battery, cellulosic ethanol, clean coal and energy storage research and development. Implement partnerships with New Mexico colleges and businesses to create new jobs for New Mexico. Let's follow the lead of Germany in this regard.

Thank you,

Ron Simmons
 Santa Fe business owner
 P.O. Box 22542, Santa Fe, MN 87502
 rns@cybermesa.com
 (505) 470-3014

Simms, Jim

Page 1 of 2

Simms, Jim

Page 2 of 2

PC_99



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.

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.

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 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.

115A:

27N

35D.1

410F

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.

51C:

410F (cont.)

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.

65D

715H

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 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 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,

Jim Simms

John Simms, City Commissioner
City of Amarillo, Texas

515H (cont.)

Simon, Maia

Page 1 of 1

PC_1149

Levens, Matthew

From: Maia Simon [mailto:maiasimon@verizon.net]
Sent: Tuesday, April 01, 2008 8:55 AM
To: Complex2030
Subject: NO NEW NUKES

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

Dear Mr. Wyka:

110A: I understand that you are accepting public comment on the nuclear weapons Complex
210A: Transformation proposal. Please understand that I and many others believe that
31F: increasing our nuclear capacity is not in our national security interest. It shows the
41M: world that we don't feel constrained by the Non-Proliferation treaty and increase
environmental hazards in our homeland. Please deny the proposal out of hand.

Sincerely,
Maia Simon
6 Collins Rd
Trenton, NJ 08619-4319

Simons, Anne

Page 1 of 1

PC_1859

Levens, Matthew

From: simons@isa.ucsf.edu
Sent: Sunday, April 06, 2008 9:10 PM
To: Complex2030
Subject: public comment-Complex Transformation

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 plan for re-evaluation and direction of our nuclear policy and arsenal must focus on
safe storage and maintenance of our existing weapons and safe destruction of those that
are no longer needed. WE DON'T NEED NEW AND "BETTER" NUCLEAR WEAPONS.
We already have adequate deterrent capacity. Upping the ante will only accomplish more
buildup of antagonism and weaponry by those countries that we fear.

1/7F

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 Simons
568 Alvarado Street
San Francisco, CA 94114

cc: Senator Dianne Feinstein
Senator Barbara Boxer
Representative Nancy Pelosi

Singleton, John

Page 1 of 1

PC_1782

Levens, Matthew

From: John Singleton [jsin@pitt.edu]
To: Friday, March 28, 2008 9:12 PM
Subject: Complex2030
Facilities to build new nuclear weapons

John Singleton
7536 Graymore Rd.
Pittsburgh, PA 15221-3116

March 28, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy

116A This is to register my strong opposition to the proposal to build a new facility to make triggers for nuclear weapons. In general, I oppose any plans to rebuild the US nuclear arsenal.

21J While the U.S. is asking Iran, North Korea, and other countries to forego developing nuclear arsenals, we cannot justify an increase in our own capacity to build new nuclear weapons.

Nuclear disarmament is our only path to peace.

Sincerely,

John Singleton
4122436141

Sinnock, Jevan

Page 1 of 1

PC_1384

Levens, Matthew

From: Jevan Sinnock [evndrael@yahoo.com]
To: Tuesday, April 29, 2008 3:46 PM
Subject: Complex2030
Nuclear War-Mongering Is Inherently Destabilizing

Jevan Sinnock
525 24th Ave SE #6
Albany, OR 97322-4283

April 29, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy

More nuclear weapons? There are two things that always strike me about such proposals.

1.) It is an inherently destabilizing measure as other countries seek to create a defense or a deterrent to the use of such weaponry upon them.

11J This often involves creating or buying nuclear weapons technology themselves, because history has proven that the United States will not attack a nuclear armed country. This brings us to point 2.

2.) The United States is a signatory to the Nuclear Non-Proliferation Treaty, and has continually claimed (up until the Bush administrations took office) that it will dismantle its nuclear arsenal on the grounds of point 1 above. By re-initiating nuclear arms research and continuing to deny that the rest of the world has any right to nuclear technology, whether for peaceful or armed use, the United States becomes both a hypocrite of the highest order as well as an international pariah.

Sincerely,

Jevan Sinnock
5033361616

Sirag, Leslie

Page 1 of 1

Sitongia, Leonard

Page 1 of 1

PC_2037

Levens, Matthew

From: Leslie Sirag [siragwatkins@yahoo.com]
Sent: Wednesday, April 30, 2008 1:16AM
To: Complex2030
Subject: No new nukes

Leslie Sirag
7337 Greendale Court SW
Olympia, WA 98512-2436

April 30, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy

13A Our old nukes could destroy the earth 45 times at last count. This seems more than sufficient.

29B Let's use the money to provide health care, slow global warming, & fight famine, restoring some of the positive image our administrator's warmongering has so badly tarnished.

Sincerely,

Leslie Sirag
(360)705-2082

PC_2035

Levens, Matthew

From: Leonard Sitongia [sitongia@onebeam.net]
Sent: Thursday, April 10, 2008 9:46 AM
To: Complex2030
Subject: Don't build more nuclear weapons plants

11J: We are in a challenging era for economic and political stability throughout the world. Building more nuclear weapons will restart arms races of the past and further destabilize the world. Don't build more nuclear weapons plants.

==Leonard E. Sitongia
One Inextricable Beam
http://www.onebeam.net/

Slattery, Leda

Page 1 of 1

Levens, Matthew PC_596

From: Leda Slattery [lslatt1396@aol.com]
Sent: Tuesday, February 19, 2008 4:13 PM
To: Complex2030
Subject: Financing again for nonsense

Leda Slattery
1713 Bonanza Way
Modesto, CA 95350-1963

February 19, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

116A I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons.

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

21J 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.

Stop this ridiculous madness. What is wrong with you?

38A: 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 OMR project is another irresponsible new program that Congress should reject.

Sincerely,

Leda Slattery
209-578-0414

Slivka, Terri

Page 1 of 1

Levens, Matthew PC_1242

From: Terri Slivka [slivkas@gmail.com]
Sent: Thursday, March 27, 2008 2:10 PM
To: Complex2030
Subject: No more nuclear weapons

Terri Slivka
945 S. Elizabeth Street
Denver, CO 80209-5113

March 27, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

116A I am writing to oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons, and plans to modify other nuclear facilities. Nuclear weapons are in no nation's best interests.

21J If the United States wants other nations to end nuclear weapon proliferation, they must take the lead and do what they ask others to do.

It is important we consider the consequences of our actions.

Sincerely,

Terri Slivka
303-738-4719

Smith, Brooke

Page 1 of 1

Levens, Matthew

PC_1862

From: SmithWrite@yahoo.com
Sent: Sunday, April 06, 2008 2:46 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,

Why on earth (especially given we only have one Earth) do we need new types of nuclear weapons? Who are we planning to use them on?

If we keep developing nuclear weapons, it's really hard to tell other countries that they can't as well. We don't need them--and we certainly don't want them to have them.

Please include my response in any official Comments.

11J

Sincerely,
Brooke Smith
5619 Knobby Knoll
Houston, TX 77092

cc:
Senator Kay Hutchinson
Representative Sheila Jackson Lee
Senator John Cornyn

Smith, Christopher

Page 1 of 1

Levens, Matthew

PC_1309

From: christopher.smith[at]turk8@yahoo.com
Sent: Monday, February 18, 2008 7:03 PM
To: Complex2030
Subject: Really?

19A As a veteran, I'm thinking we should use the funds needed to combat insurgencies and solve
29A the problems of guerilla warfare. We have enough nukes, I know, I've seen them.


Thanks,
Christopher Smith

Looking for last minute shopping deals?
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1

Smith, Ellen
Page 1 of 2

PC_904



**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.

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,

 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.

Anderson • Meigs • Rhea • Roane • City of Oak Ridge • Knox • Loudon • Morgan
 102 Robertsville Rd., Suite B • Oak Ridge, TN 37830 • Phone (865) 483-1333 • (888) 770-3073 • Fax (865) 483-6872 • bej@loc.net • www.local-overnight.org

Smith, Ellen
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PC_904

T. Wyka
 04/09/08
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- Pat Halsey, FFA Coordinator, DOE ORO EM
- Senator Lamar Alexander
- Representative Zach Wamp
- Representative John J. Duncan, Jr.
- Representative Lincoln Davis

Smith, Kathryn

Page 1 of 1

PC_2026

Levens, Matthew

From: kathysmith [kathysmith@bioscience.utah.edu]
Sent: Thursday, April 10, 2008 12:42 PM
To: Complex2030
Subject: Nuclear Program

We are so far ahead of the other countries regarding nuclear proliferation. It is hypocrisy to ask other countries not to produce nuclear weapons while we are the major nuclear weapon holder and producer. Nuclear proliferation is not in our best interest. We should be thinking about nonproliferation and encouraging other countries to opt for nonproliferation rather than producing "more powerful" nuclear weapons that could kill the world many times over." If there was to be a nuclear war, the consequences would be devastating to the world.

--
Sincerely,

Kathy Smith
1265 Waxwing
Salt Lake City, UT 84123

11J

Smith, Kathryn

Page 1 of 1

PC_2027

Levens, Matthew

From: kdsmith@vmission.com
Sent: Thursday, April 10, 2008 12:29 PM
To: Complex2030
Subject: Nuclear

I am very concerned about the planned storage of nuclear waste in Utah. I believe that if any country or state wants nuclear energy they should be willing to store their own nuclear waste in their own vicinity. It is very unsafe to ship, let alone bury this toxic waste. We are told that all of these terrorist groups are targeting America, what better way to target us than to target this toxic waste shipment. This presents a health risk problem for Utahns - we have already gone through the radiation poisoning that many Utahns have sustained from the Nuclear testing, and now we are expected to believe that this is a viable and safe alternative. I am very much opposed to this plan.

Sincerely,

Kathryn Smith
1265 Waxwing
Salt Lake City, UT 84123

1

Smith, Marla

Page 1 of 1

PC_631

Levens, Matthew

From: Marla Smith [mailto:marlasmith@centurytel.net]
Sent: Tuesday, January 29, 2008 10:02 PM
To: Complex2030
Subject: Complex Transformation

Mr. Wyka:

It is particularly disturbing that, in the face of Congress' recent rejection of the
118A 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
215C.1 unnecessary. Last year, the Jason's reported that the current U.S. nuclear stockpile will
be remain reliable for at least another 70 years.

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
3116A policy reviews are completed. With so many unresolved issues around nuclear waste,
49A 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.

Marla Smith
13917 Pohl Road SW
Vashon, WA 98070

Smith, Marla

Page 1 of 1

PC_632

Levens, Matthew

From: marlasmith@centurytel.net
Sent: Saturday, April 05, 2008 2:31 PM
To: Complex2030
Subject: 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,

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.
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.

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111J
Instead of recreating the capacity to produce new, unnecessary nuclear weapons, the DOE
should focus on shrinking the still-over-sized 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,
Marla Smith
13917 Pohl Road SW
Vashon, WA 98070
cc: Senator Patty Murray
Representative Jim McDermott
Senator Maria Cantwell

Smith, Timothy

Page 1 of 1

Smithee, John

Page 1 of 2

Levens, Matthew

From: trngayes@gmail.com
Sent: Monday, April 07, 2008 12:20 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,

116A Hi. We need to be managing the careful reduction of our nuclear stockpile, not researching and developing new nuclear weapons.

218B We need to find appropriate energy sources for our children to use - not develop new weapons which will make the world a more dangerous place.

311U We need to be an example to other nations who may be interested in nuclear weapons - they are "not" the solution; their terrible destructive power comes with terrible responsibility and terrible consequences. The fabric of our society is woven too tightly with other peoples around the world, and we cannot continue to escalate the fear.

419B The gravest threats to our national security are not military ones. We are no longer in the Cold War. We must stop escalating our nuclear arsenal, and start looking at the pillars of our society - budget reform, and reliable energy sources which will leave our planet healthy for future generations.

517Q How can we oppose nuclear testing by other nations, and yet endorse further R & D by our own Department of Energy?

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,
Timothy Smith
PO Box 2223
Dolores, CO 81323

CC:
Senator Wayne Allard
Representative John Salazar
Senator Ken Salazar

PC_773

PC_74



The State of Texas
House of Representatives
Austin, Texas

John Smithee
State Representative
District 99

Dellam
Orel Smith
Harley
Olliam
Randall

February 20, 2008

Committee
Insurance
Chairman
Ways & Means

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 Texas Panhandle.

As a State Representative representing Amarillo and the Western Panhandle 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.

More specifically, I support Pantex remaining the Assembly/Disassembly/High Explosives (HE) production (formulation, processing and testing) and manufacturing (maching) 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

115A

260.1

Capitol P.O. Box 2910 • Austin, Texas 78768-2910 • 512-463-0702 • FAX 512-476-7036
320 S. State Lobby, Box 20 • Austin, Texas 78701 • 512-475-3327 • FAX 512-462-0327

Smithie, John

Page 2 of 2

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 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.

315C

415C

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.

515D

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 these 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.

615A;

710F

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.

Yours very truly,

John Smithie

Snider, Hideko

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PC-78

March 15th, 2008

Mr. Theodore Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation, NA-10.1
U.S. Department of Energy/NNNSA 1000 Independence Ave. S.W.
Washington, DC 20585
Fax (703)931-9222
E-mail: ComplexTransformation@nnsa.doe.gov

Dear Mr. Wyka:

Our civilization has come to possess tools powerful enough to exterminate itself without the sufficient moral guidance to prevent the catastrophe. Now is the time for us all to face reality of the unacceptable cost of nuclear arms. Once produced, they will be used and the whole world will be at risk; for the producer, in time, may well become a target. You can see this eminent possibility simply from the A-bombs used in Hiroshima and Nagasaki, now replicated in far more lethal numbers and capability, proliferated around the world and in unfriendly hands. Better yet, we need a Manhattan Project resolve to find ways of turning the power competition to modes of reconciliation.

11J;
2140;
313A.1

Please seriously mark the warning of the ancient text, "What ye sow, ye shall also harvest" for extermination or Life.

Hideko Tamura Snider,
A child survivor of Hiroshima

Sniezko, Dana

Page 1 of 1

Snow-Davis, Katherine

Page 1 of 1

PC_1952

Levens, Matthew

From: Dana Sniezko [dsniezko@yahoo.com]
Sent: Wednesday, April 30, 2008 4:50 PM
To: Complex2030
Subject: Complex Transformation

Dear DOE,
[0]ot only would Complex Transformation be a disaster for the environment and send the wrong
[1]6A message to those we are trying to discourage from developing their own nuclear
[2]U capabilities, but it would do little to actually address security concerns of the 21st
[3]40 century!

[2]U [S]top this project, spare the taxpayers, spare the environment. The money and talent are
(cont) better spent developing a next generation of defensive technologies to thwart the
[3]40 technological, biological, chemical and nano-scale attacks we are far more likely to
(cont) encounter in the future.

[4]8B
Sincerely,
Dana Sniezko
584 Castro St #364
San Francisco, CA 94114

PC_576

Levens, Matthew

From: Katherine Snow-Davis [kaysnowdavis@yahoo.com]
Sent: Tuesday, February 19, 2008 11:54 PM
To: Complex2030
Subject: Direct our tax dollars towards the wellness of our nation.

Katherine Snow-Davis
Box 1569
Kapa'a, HI 96746-7569
February 19, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

[1]6A [I] strongly oppose the administration's proposal to build a plant to produce plutonium pits
for nuclear weapons.

Based on the world wide events, it is clearly evident....WAR IS NOT AN ANSWER.

[2]8B [S]top creating weapons that threaten all life on this planet and begin investing NOW in a
[3] sustainable world for the future of our children and all life on this planet.

[3A.1] You and your grandchildren depend on the air we breathe and the water we drink...be a
conscious representative of the true voice and choice of the citizens of America.

Sincerely,

Katherine Snow-Davis
808-822.4332

Snyder, Ed
Page 1 of 1

PC_860

Levens, Matthew

From: Ed Snyder [edsnyder@prexar.com]
Sent: Thursday, March 27, 2008 3:29 PM
To: Complex2030
Subject: CMRR

Ed Snyder
15 Otter Cliffs Road
Bar Harbor, ME 04609-7607

March 27, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

I have followed the issue of the proliferation of nuclear weapons ever since it became active in the early 1960's. At one time the United States was a leader in developing the Nonproliferation Treaty.

1|F

Today the United States seems to be one of the world leaders in undermining this absolutely essential policy to protect our national security.

It is the height of hypocrisy for the United States to be engaging in threats and military action to try to stop other countries from getting or developing nuclear weapons while we are actively involved in trying to expand and improve our immense stockpile of nuclear weapons.

2|J

I strenuously oppose the proposal to build a plant to produce plutonium pits for nuclear weapons.

Sincerely,

Ed Snyder

Sollitt, Shannyn
Page 1 of 1

PC_2104

Levens, Matthew

From: Shannyn [networks@networkearth.org]
Sent: Monday, April 28, 2008 12:49 PM
To: Complex2030
Subject: 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,

It is premature to bring any change to the nuclear complex in New Mexico. 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 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|C

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.

2|O

The New Mexico Environment Department requested "Fence to Fence Clean Up". This alternative is what the Department of Energy needs to focus upon if you are serious about receiving input from citizens. Otherwise it is obvious that you are only conducting a "Kangaroo Court" when you hold hearings.

Sincerely,

Shannyn Sollitt

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.

Dwight D Eisenhower, 1953

PAX

Promote the Abrogation of Xenophobia

Networks Productions

PO Box 9509

Santa Fe, NM 87504

Telefax (505) 989-4482

www.networkearth.org

Solomon, Harvey

Page 1 of 1

Levens, Matthew

From: H4020@adl.com
Sent: Thursday, May 01, 2008 11:32 AM
To: Complex2030; editor@laosnews.com
Subject: PresidentBushs "Vision"?

PC_1364

I am writing to protest both the need for the production of any additional plutonium pits and for the construction of a facility at Los Alamos National Laboratory to participate in this project.

The contamination of surface and underground water by radioactive elements in the vicinity of Los Alamos is well known and it's extension to the water supply of Espanola, NM and to the Rio Grande river is only a matter of time. This is a serious biohazard to the current inhabitants of the Espanola valley and to future generations in and around this area do the long half-lives of the radio nuclides.

The number of thermonuclear weapons currently available in the stockpile of the United States is more than sufficient to destroy the entire population of the earth. Moreover, the life time of the pits in these weapons is reliably known to be no less than one hundred years. There are no rational reasons to increase the components of weapons which are highly likely never to be used.

To quote Dwight D. Eisenhower, " 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 is a truth which appears to be lost to our President and to the Secretary of the DOE. If, for one, cannot think of a more irresponsible act then this proposed increase in the production of plutonium pits.

The so called economic benefits to the communities of northern New Mexico which are envisioned by the proposed plan are far outweighed by the environmental damage that will occur as a result of this activity as well as the additional threat to world peace that will result.

It is imperative that additional meetings be held so that those of us who live in the shadow of Los Alamos have an opportunity to comment in public on this highly destructive proposal.

Harvey M. Solomon
El Prado, NM

*****Need a new ride? Check out the largest site for U.S. used car listings at AOL Autos. (http://autos.aol.com/used?NCID=aolcmp00300000002851)

Solomon, Kay

Page 1 of 1

Levens, Matthew

From: BEJOU@aol.com
Sent: Tuesday, April 29, 2008 3:16 PM
To: Complex2030
Subject: It's the pits!!!

PC_1284

What a perfect time to turn lam1 into an R and D facility for green energy. Everyone knows that We have an arsenal that would annihilate the earth and nuclear waste to fill the oceans, yet the govt. continues to bankrupt it's citizens. Propagating the airwaves with hate-mongering and fear to enrich the coffers of Bectel and it's ilk are insanely criminal.

I for one will not vote for a candidate who endorses any more polluting and pilfering in NM.

Kay Solomon
27 Mirlo Dr.
El Prado, NM 87529

*****Need a new ride? Check out the largest site for U.S. used car listings at AOL Autos. (http://autos.aol.com/used?NCID=aolcmp00300000002851)

Sommer, Cynthia

Page 1 of 1

Levens, Matthew

PC_1586

From: cesom@comcast.net
Sent: Saturday, April 05, 2008 9:51 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,

Overall, The Complex Transformation plan to move to a smaller, safer, more secure nuclear weapons program has merit with one exception.

198 The emphasis on developing new types of nuclear weapons spends funds that could be shifted elsewhere for more positive environmental impact of our national priorities--developing more fuel-efficient military vehicles or rebuilding levees in New Orleans, for example.
29H The United States still maintains and stores thousands of nuclear weapons that are an adequate deterrent without wasting our tax dollars to create new ones.

31E Also, creating new types of nuclear weapons would be against the provisions of the Comprehensive Test Ban Treaty.

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,
Cynthia Sommer
57 Farmington Ave
Longmeadow, MA 01106
cc: Senator Edward Kennedy
Senator John Kerry
Representative Richard Neal

Sorgen, Phoebe

Page 1 of 1

Levens, Matthew

PC_1503

From: PhoeBe sorgen(phobeso@earthlink.net)
Sent: Tuesday, April 29, 2008 7:36 PM
To: Complex2030
Subject: Stop the nuclear insanity!

PhoeBe sorgen
1053 Cragmont
Berkeley, CA 94708-1445

April 29, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

Even since earning my B.S. in biology, I have had a cloud hanging over me and the best antidote is lobbying. The most important course I took in college was "The Impact of the Nuclear Age on Society" at the University of NC. I learned all about plutonium from a nuclear physicist.

The administration's proposal to build a plant to produce plutonium pits for nuclear weapons is insane. Please do all you can to oppose it.

11J While the U.S. is asking others to forgo developing nuclear arsenals, we are simultaneously trying to increase our own. What hypocrisy. Building this new plant would send a contradictory message to other countries an reignite the nuclear arms race worldwide. INSANE!

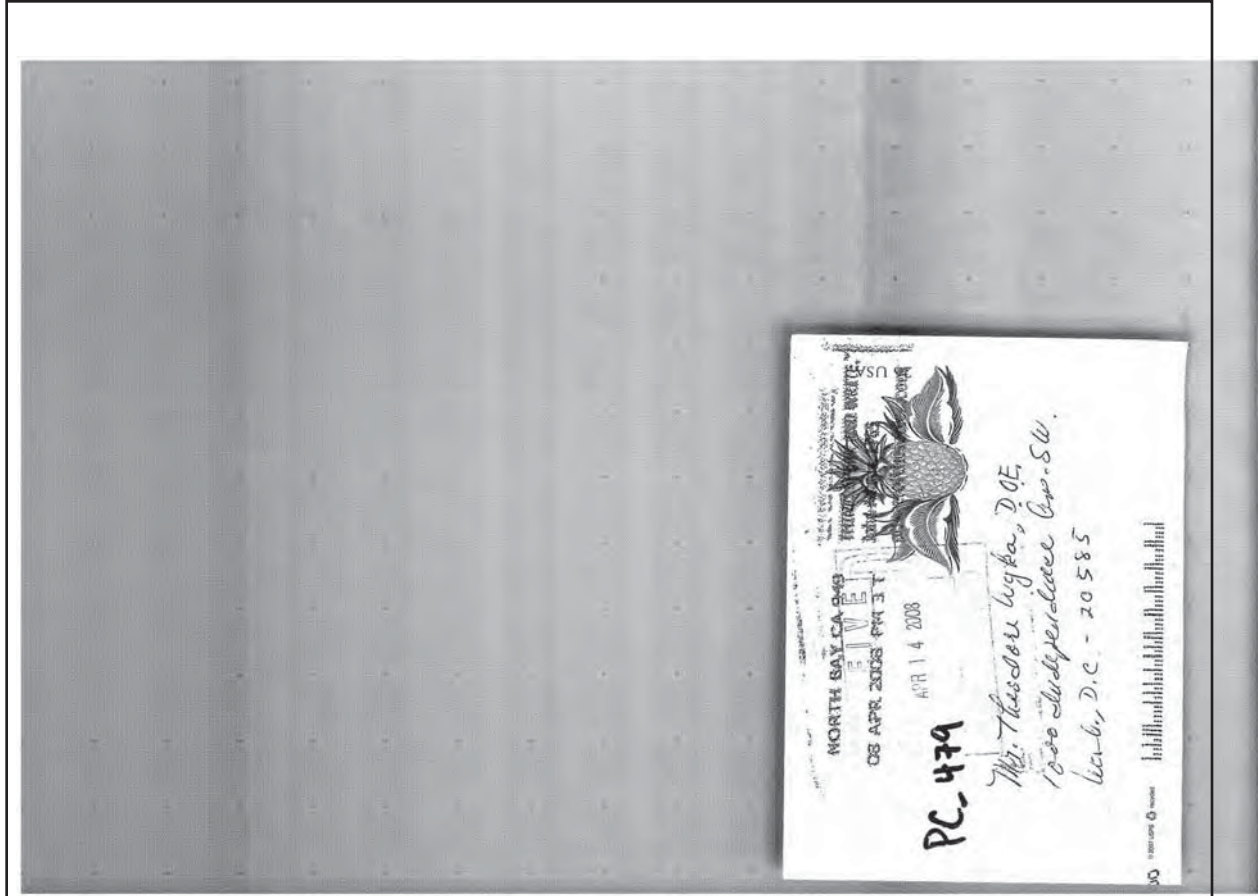
Clear the thick cloud from your constituents' and your fellow citizens' minds. We know we are on the brink, and even more so since GW's reign.

Sincerely,

PhoeBe sorgen

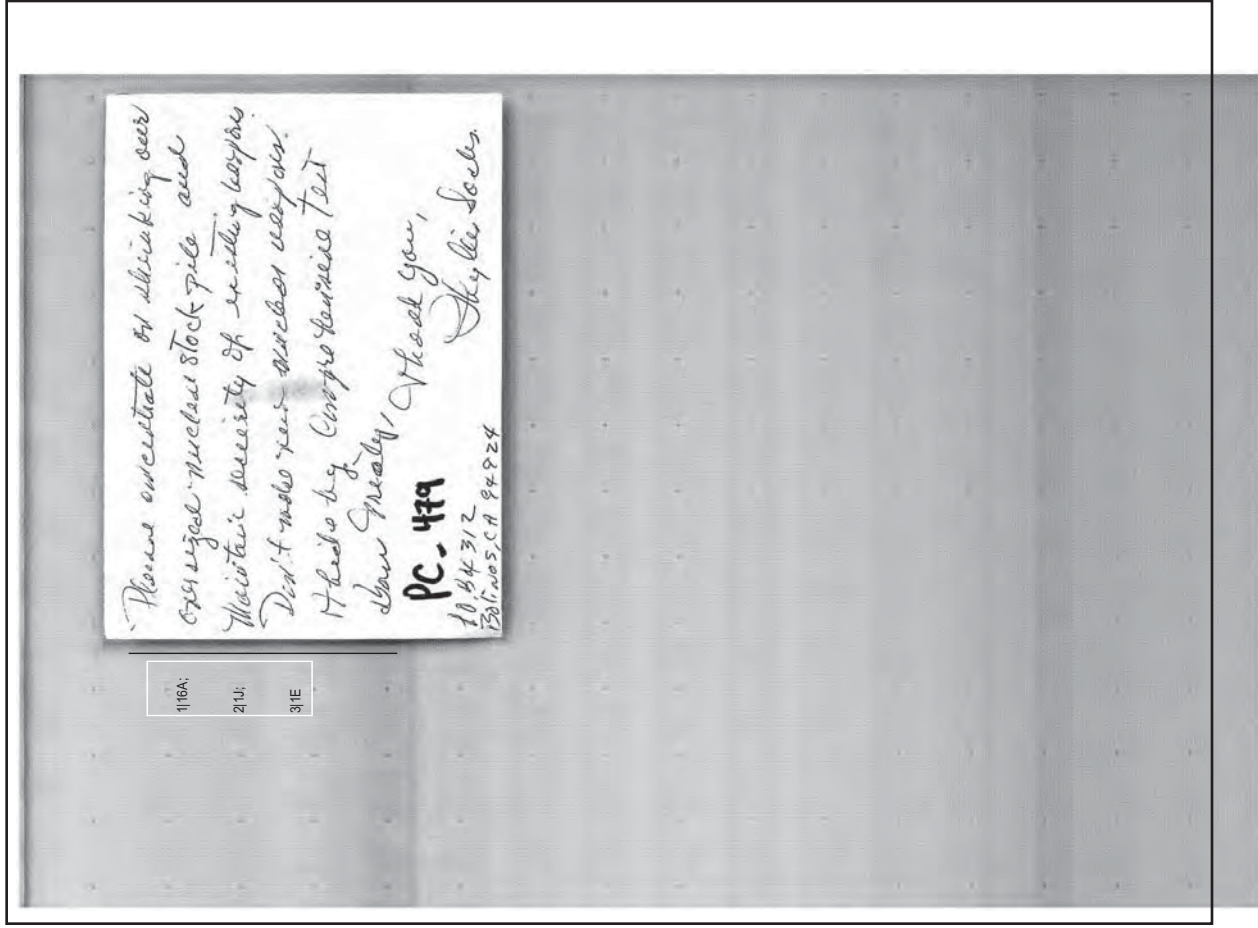
Sosles, Phyllis

Page 1 of 2



Sosles, Phyllis

Page 2 of 2



Soutar, Justin

Page 1 of 1

PC_2022

Levens, Matthew

From: Justin Soutar [justin_86@earthlink.net]
Sent: Thursday, April 10, 2008 11:21 AM
To: Complex2030
Subject: Please Shut Down Complex Transformation

Mr. Wyka:
 10B: The decision to transform the U.S. nuclear complex must reflect the will of the American
 216A: people. The majority of us, 79%, want that the U.S. to do more to eliminate nuclear
 3/JJ: weapons. Simply put, the Department of Energy should be putting their resources into
 nuclear cleanup and "green" energy research, not expanding their weapons program.
 43A: It is particularly disturbing that, in the face of Congress' recent rejection of the
 55C: Reliable Replacement Warhead program, the SPEIS still refers to a goal of creating 120-125
 88A: new warheads every year. These new warheads are not only unwanted, they are also
 unnecessary. Last year, the Jason's Report showed that the current U.S. nuclear stockpile
 will remain reliable for at least another 70 years.

71C: 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
 216A: storage, employee safety and compensation, as well as the popular will for reducing
 (cont.) nuclear weapons it doesn't make sense for U.S. taxpayers to invest in a new generation of
 nuclear weapons facilities.

814M: Justin Soutar
 5188 Co. Rd. 130
 Huntsville, OH 43324

Sowden, Melissa

Page 1 of 1

PC_1472

Levens, Matthew

From: Melissa Sowden [melisangels@ca.rr.com]
Sent: Thursday, February 07, 2008 1:51 PM
To: Complex2030
Subject: Please, reject "Complex Transformation" plan to build nuclear weapons

Melissa Sowden
 1040 Linden Pl.
 Costa Mesa, CA 92627-4008
 February 7, 2008
 Theodore A Wyka
 Complex 2030 SPEIS Document Manager
 Office of Transformation, U.S. Department of Energy, NA-10.1 1000 Independence Avenue, SW,
 Washington, DC 20585

Dear Theodore Wyka:

116A The Department of Energy should reject proposed Complex 2030 project.

21J We need to lead by example; to discourage others from trying to obtain nuclear abilities
 while simultaneously revamping our own abilities, makes for an unconvincing argument and
 smacks of the hypocrisy the US is increasingl known for. Furthermore, we have yet to
 figure out what to do with existing nuclear waste. How can one justify creating more? Not
 only does the plan fail to strengthen national security, it weakens it. Thank you for your
 time and consideration of the opinions of the public whom you serve.

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,

Melissa Sowden

Spearow, Jimmy

Page 1 of 4

Levens, Matthew

PC_2006

From: Physicians for Social Responsibility [webmaster@psr.org] on behalf of Jimmy Spearow [jspearow@stcglobal.net]
Sent: Thursday, April 10, 2008 2:57 AM
To: Complex2030
Subject: Comments on the Complex 2030 Transformation SPEIS

Apr 10, 2008

Mr. Theodore Wyka
1000 Independence Avenue, SW
Washington, DC 20585

Dear Mr. Wyka,

Mr. Theodore Wyka
Complex Transformation SPEIS Document Manager, Office of Transformation, NR-10.1 U.S.
Department of Energy/NNSA 1000 Independence Avenue, SW Washington, D.C. 20585
ComplexTransformation@nnsa.doe.gov
I would like to submit the following comment on the Draft Complex Transformation PEIS (DOE/EIS-0236-84).

My name is Jimmy Spearow. I am a Geneticist and Toxicologist and I am presenting testimony on behalf of the Sacramento Chapter of the Physicians for Social Responsibility.

1. As required by section 1508 of (National Environmental Policy Act (NEPA) (http://ceq.eh.doe.gov/nepa/neps/nepaactia.htm) and the Regulations for Implementing NEPA (http://ceq.eh.doe.gov/nepa/neps/reg/nc_cep.htm) this PEIS needs to consider the direct, indirect and cumulative effects of the proposed project in conjunction with the policies and the reasonably foreseeable future actions of other agencies or persons.

2. Nuclear Proliferation - The proposed NNSA Complex Transformation "Bombplex", undermines and violates the Non Proliferation

Treaty (NPT). Even though the US is demanding other countries renounce nuclear weapons, the Bombplex plan would renege US commitments to nonproliferation. NNSA needs to consider that the Complex Transformation Bombplex plan along with US preemptive first-strike policies will increase fears that US nuclear weapons will be used: 1) to preemptively attack other nations, and; 2) to back up attacks with conventional weapons to gain control of resources, i.e. oil. Such Fears of nuclear hegemony and nuclear backed imperialism will force many other nations to build nuclear weapons, thereby resulting in multilateral nuclear proliferation and global insecurity. NNSA must not violate US commitments to international treaties including the

NPT. Rather than locking the US and therefore the world into a policy

of continued nuclear proliferation, NNSA should examine and debate how US security can be maintained while meeting nonproliferation treaty commitments. In short, the NNSA Complex Transformation PEIS has not considered how the Complex Transformation will transform the nuclear proliferation policies of many other nations.

3) Since our treaty commitments call for reducing nuclear weapons, the argument that Complex Transformation is needed to maintain future

capacity is a red herring designed to lower the standard of proof that additional nuclear weapons production will add value to U.S. national security. The JASON independent analysis suggests that at least 85 years of service remain in the existing plutonium "pits" arsenal and there is a growing consensus, even by Henry Kissinger, that the most appropriate future number of nuclear weapons is zero.

1

Spearow, Jimmy

Page 2 of 4

There is no reason to believe that the Complex Transformation proposal will provide to national security.

4) Just as the US is considering attacking nuclear facilities of other nations, the PEIS needs to consider and openly report the environmental effects of other groups or nations attacking Complex Transformation sites. NNSA's Bombplex will be targeted both by

terrorist groups and especially by other nations should war break out. The NNSA strategy for mitigating intentional destructive acts or terrorism is woefully inadequate and opaque. What are NNSA plans for "providing timely and adequate responses to emergency situations and for progressive recovery through long-term response in the form of monitoring, remediation, and support for affected communities and their environment." The NNSA cannot hide this under the cloak of preventing terrorism. The NNSA Bombplex plan makes nuclear proliferation, nuclear terrorism and nuclear war more likely. How

will NNSA respond to an attack or retaliation with a nuclear weapon on one or all Bombplex sites? The public has a right to know the levels

and duration of nuclear fallout downwind of each Bombplex site in case of attack with airplanes, or with conventional or nuclear weapons.

This information is critically needed for NNSA facilities that are in, or upwind of densely populated regions. These environmental consequences of the Bombplex are dire and need to be disclosed to the public and openly discussed to more clearly reveal the alternatives.

5. The proposed Complex Transformation program endangers the environment and human life and health. Last summer, the Rocky Mountain News reported government figures showing that The U.S. nuclear weapons program has sickened 36,500 and killed more than 4,000 Americans. The PEIS report for the Complex Transformation program underestimates and fails to adequately report the true environmental and human health impacts of this plan. To start with, cancer risk estimates from different exposure (waste, water and air emissions) pathways need to be summed not calculated separately.

The most recent National Academy of Sciences Biological Effects of

Ionizing Radiation (BEIR VII) report on radiation risk, estimated that women and especially pregnant women and small children, are at much greater risk of radiation exposure than the "reference man" considered by NNSA. So the NNSA fails to adequately protect vulnerable populations from radiation exposures.

The Department of Energy (DOE) continues to underestimate the release of radioisotopes and the exposure of its workers and the public. The DOE's failure to correct the high level of uranium, plutonium and other radioisotope releases was a major reason for the FBI had to

force closure of the Rocky Flats facility several years ago. LLNL has also released approximately 800,000 Curies of tritium since the 1960s (according to Tri-Valley Cares) and yet would continue to conduct R&D with large amounts of tritium in the highly populated SF Bay Area. NNSA also needs to reveal the full extent and health consequences of human exposures to DU, tritium and other toxicant releases from site 300.

6) The NNSA has accepted an unacceptable level of exposure for both the workers and the surrounding communities to each proposed site. The report states that acceptable and safe amount of radiation exposure to neighboring communities is 5 REMs or 0.05 Sievert per year. The most recent Biological Effects of Ionizing Radiation

committee report (BEIR VII) calculated the expected cancer risk from a singular exposure of 0.1 Sievert. The committee found that in a lifetime approximately 42 out of 100 people will be diagnosed with cancer and one cancer out of these 100 people could result from a single exposure to 0.1 Sievert of low-level radiation above

background. That is an incremental risk of 1 x 10^-2. An exposure to 0.05 Sievert would result in an estimated incremental risk of 5 x 10^-3, which is far greater than that allowed by US EPA or California communities is 5 REMs or 0.05 Sievert per year. The most recent Biological Effects of

study of the cancer risk among radiation workers that used exposure and health data from

2

15 countries that included over 5.2 million
 person years of follow-up. This rigorous investigation found that the excess relative risk for all cancers excluding leukemia to be statistically compatible with but higher than the Beir VII risk estimate used to set the assumptions of cancer risk for this DOE PEIS report. This landmark study found that all of the increase in deaths from all causes and all cancers resulted is from doses of less than 0.05 Sievert or 5 REM, which is the set US standard for annual radiation exposure . This study reinforces the assumption that there
 14M3
 Cont: is no safe exposure level to radiation in which we would not expect to see an observable effect. The NNSA needs to consider the exposed population resulting from normal operation, likely unplanned accidental releases, terrorist attacks, and nuclear attacks by other nations who are transformed into nuclear proliferation by the NNSAs

Cont: Complex Transformation program. How many people would be exposed to 5 REM, to 50 REM to 500 REM following each of the above events at each NNSA Complex Transformation Bombplex site? What is the resulting number of cancers that would result? How many would be exposed and at what level if the Complex transformation project results in nuclear proliferation by other nations and an eventual war with the US?
 7) The final PEIS should include a human health risk assessment to take into account the newest research of health effects of radiation exposure and risk for sensitive populations on each proposed Complex transformation site. Since these issues are not addressed in the current PEIS, this report is not adequate for demonstrating safety of the Complex Transformation plan.

8) Nuclear Winter. New research in 2007 by Professors O. B. Toon of the University of Colorado at Boulder and Alan Robock of Rutgers University demonstrates, even a limited, regional nuclear war such as between India and Pakistan would have globally significant climatic effects. In addition to the devastation and radioactive fallout from the limited nuclear war, firestorms and injection of pollutants and debris into the upper atmosphere are very likely to result in crop-killing frosts for at least a year, resulting in mass famines.

Dr. Ira Helfand of Physicians for Social Responsibility has calculated that the shading of the sun and cooling of the earth could be considerably greater than was found after the eruption of Mount Tambora in 1815 (see <http://www.psr.org/site/PageServer?pagename=Nuclear+Study>). This resulted in multiple crop killing frosts in much of the Northern Hemisphere throughout the summer of 1816. Even without such a calamity, we are already experiencing a world-wide shortage of grains resulting in increased grain prices and increased hunger in many nations. Today these global climate effects resulting from a nuclear winter are likely to lead to famine and disease claiming more than one billion human lives around the world.

9) The proposed alternatives offered by the NNSA are not acceptable. Rather than proliferating by building the proposed Bombplex, The NNSA needs to consider using a "Curatorship" approach as proposed by Tri-Valley Cares. This Curatorship approach would maintain and

Repair US nuclear weapons to insure their reliability without invoking international fears of a renewed nuclear arms race. Furthermore, any Bombplex design should make far less than the 50 to 80 nuclear weapon/year alternative considered by NNSA so that US commitments to the NPT are not violated.

10) Physicians for Social Responsibility specifically requests that:
 a) 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 be conducted;
 b) the future role of nuclear deterrence and nuclear weapons in support of U.S. national security be articulated by the U.S. Department of Energy with appropriate support from other departments and agencies;
 c) the U.S. Department of Energy compile and disseminate the results of epidemiologic

studies of radiation health of workers and communities, updating its Comprehensive Epidemiologic Resource program of the early 1990s; and
 d) the U.S. Department of Energy abandon the effort to redevelop nuclear weapons production capabilities as costly, destabilizing, unnecessary and unhealthy and 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. NNSA should be committed to cleaning up Hanford, Rock Flats and other legacy nuclear weapons production sites.

Sincerely,
 Dr. Jimmy Spearow
 911 Pennsylvania Pl Apt 3
 Davis, CA 95616-2350

Spence, Joyce

Page 1 of 1

PC_1400

Levens, Matthew

From: Joyce Spence [vitaemp@kic.com]
Sent: Wednesday, February 20, 2008 1:55 PM
To: Complex2030
Subject: plutonium pits

Joyce Spence
 233 Earl Garrett
 Kerrville, TX 78028-5304

February 20, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy

116A I strongly object to the proliferation of nuclear weapons by the United States. I AM the United States, and I join with millions of like-minded Americans to:

21J strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons.

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

Sincerely,

Joyce Spence
 830-896-4122

Spencer, Dane

Page 1 of 2

PC_123

#22 SR afternoon

Dane Spencer
 219 W Bolton Street
 Savannah, Georgia 31401
 912-696-1354

I'm a human being, God Damn it! My life has value. -Network, 1976

I am tritium, wandering this dark world looking for adventure and the American Dream. I kill everything but I don't mean to. I have a weird uncle named polonium and a crazed half-sister named cesium.

Boy, one time when we got drunk, cesium and polonium and I climbed up a huge above ground oil tank. Don't even know how many gallons were in there, but we were high up. You could see all the stars from there, and it got me to thinking about the vast beauty of the night sky.

As we lay on our backs looking up, I say, "You know, I bet if we put our heads together we could come up with something like that."

So, that's what we did. A great experiment gone awry. And, now only madmen worship at our feet. -Dane Spencer

My name is Dane Spencer, from Savannah Georgia.

I have come to comment on the Bomb complex transformation. The way that I want to comment is by oratory inflection. I will be speaking loudly, please don't be frightened.

120

Spencer, Dane

Page 2 of 2

We have 10,000 nuclear warheads in this country and deployed across the world. Much of this arsenal is of 5 megaton bombs of greater magnitude. We have delivery systems of submarines, intercontinental ballistic missiles, cruise missiles, and aerial bombs.

One bomb can potentially vaporize a million people if dropped on a city. Why?

It has been 62 years since the first two nuclear weapons were dropped on Nagasaki and Hiroshima. Another nuclear bomb has not killed since. Another 62 years will not unfold so fortunately.

With technology increasing in ever complexity, hypersonic torpedoes, and supersonic missiles it will be impossible to avoid the next nuclear bomb from exploding.

One nuclear bomb exploding anywhere in this world will create an unending retaliation regardless of who is responsible for the bomb. The world will be thrown into emotional chaos and retaliatory strikes will end life on this planet.

Therefore it is imperative that a massive stand down of all nuclear weapons begin immediately. We have no time to loose.

Killing indiscriminately, polluting our planet with plutonium, and destroying the dreams of civilization are on our shoulders. Stop this
Madman Nuclear Priesthood NOW.

2/8A

4/1J

5/14O

Spencer, Nancy

Page 1 of 1

Levens, Matthew

From: Nancy Spencer [nanspen@minichel]
Sent: Thursday, April 10, 2008 6:27 PM
To: Complex2000
Subject: nuclear weapons

PC_2074

1/16A PLEASE -- Stop nuclear weapons and pollution! Support nonproliferation and disarmament!
REJECT Complex Transformation!

Thank you, Nancy Spencer

Levens, Matthew

From: Christine [eldoradosf@yahoo.com]
Sent: Wednesday, April 30, 2008 1:42 PM
To: Complex2030
Subject: 90 day comment extension

[To whom it may concern--More nuclear development & storage is not in the best interests of our state, its people, its animals & the total environment. PLEASE rethink this option. Solar & wind power would be ideal alternatives.
A 90 day extension for comments is needed. Thank you.
Christine Spigarelli.....Santa Fe

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

116A
2140
312E

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/ANSA BY APRIL 30, 2008
Mail: Mr. Theodore Wyka, Complex Transformation SPEIS Document Manager, Office of Transformation, MA-101; U.S. Department of Energy/ANSA; 1000 Independence Ave., SW, Washington, DC 20585
Fax: (703) 931-8222. E-mail: ComplexTransformation@nrsa.doe.gov

MEASURES SUBMITTED TO THE VOTERS
NATIONAL

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

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

COMMENTS:

(nuclear weapons' victims)
No more H-bombs!
Feed the people not the Pentagon
The military-industrial complex, including the nuclear weapons component of it.

NAME Jeff Stack

ADDRESS P.O. Box 268

Columbus Mo 65205

SIGNATURE Jeff Stack

DATE 21 April '08

119A

211F

3116A

419B


Stack, Jeff
Page 2 of 2

Stannard, R.E.
Page 1 of 2

COUNTDOWN TO ZERO PRESENTS
TELEPHONE THEATRE

MY NAME IS RACHEL CORRIE

"FOUR STARS" - ROYAL COURT THEATRE
"IMPASSIONED" - LONDON TIMES



TAKEN FROM THE WRITINGS OF RACHEL CORRIE
EDITED BY ALAN RICKMAN AND KATHERINE VINER

A ONE-WOMAN PLAY

THURSDAY, APRIL 17 AT 7:00PM

FREE ADMISSION

HISTORIC SENIOR HALL
STEPHENS COLLEGE
(CENTER OFF WAUGH STREET,
HALF BLOCK SOUTH OF BROADWAY)

FEATURING JULIE RADA
DIRECTED BY BRIAN FREELAND

PANEL DISCUSSION
TO FOLLOW PERFORMANCE

ON SUNDAY MARCH 16, 2003 IN RAFAH, OCCUPIED GAZA, 23-YEAR-OLD AMERICAN PEACE
ACTIVIST RACHEL CORRIE FROM OLYMPIA, WASHINGTON WAS CRUSHED TO DEATH BY A
US-MADE ISRAELI BULLDOZER, AS A VOLUNTEER WITH THE INTERNATIONAL SOLIDARITY MOVE-
MENT, RACHEL WAS IN GAZA NON-VIOLENTLY OPPOSING THE DIMOLITION OF PALESTINIAN
HOMES BY THE ISRAELI MILITARY.

THIS PLAY TELLS THE STORY OF THESE EVENTS FROM ONE WOMAN'S PERSPECTIVE

PRODUCED BY SPECIAL ARRANGEMENT WITH DIAMATISTS PLAY SERVICE, INC.
Sponsored by Stephens College Liberal Arts and the Columbus Peace Coalition.
For more information please contact (573) 409-3383 or (618) 696-7258.

Levens, Matthew

PC_1665

From: Physicians for Social Responsibility [webmaster@psr.org] on behalf of R E STANNARD JR
[restannardjr@yahoo.com]
Sent: Saturday, April 05, 2008 1:00 AM
To: Complex2030
Subject: The U.S. doesn't need new nuclear weapons

Apr 5, 2008

Mr. Theodore Wyka
1000 Independence Avenue, SW
Washington, DC 20565

Dear Mr. Wyka,

What kind of mad momentum seeks to preserve and escalate the MAD strategies of the Cold War beyond its end, when the greatest security for America and the world lies in the direction of increased nuclear arms control and steady reduction and elimination of nuclear weapons systems?

Especially in an era of free-lance non-state terrorism, we need to rapidly lower the stockpiles to minimize the risks of theft or hijacking of a nuclear weapon, as well as to sharply reduce the risks of inadvertent or demented unleashing of one of our own.

Measures risking the return of a global nuclear race, but with many more players, cannot be allowed without the fullest public examination of the issues and assumptions that underlie the idea. Old knee-jerk assumptions can be deadly to us and to all mankind in the 21st Century and beyond. It is time we grew up. I would like to submit the following comment on the Draft Complex Transformation FEIS (DOE/FEIS-0236-S4).

1|16A

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

2|14K

radiation. In 2000, the U.S. Government admitted that workers had been harmed by activities at Department of Energy and other facilities, and those deemed injured were to be offered financial and other compensation.

I believe 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 deterrence and nuclear weapons in the

U.S. must be clear. A full and thorough nuclear posture review should be completed prior to any final decisions about complex transformation.

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

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.

4|11D

Thank you for your time in considering these concerns and comments.

Sincerely,

Stannard, R.E.

Page 2 of 2

Mr. R. E STANNARD JR
4328 Frances Ave
Bellingham, WA 98226-8735

PC_1665

2

Stansbury, Kendyll

Page 1 of 1

PC_1128

Levens, Matthew

From: kendyll_s@yahoo.com
Sent: Monday, April 07, 2008 3:53 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,

I am very concerned about nuclear proliferation. No one wins a nuclear war. I was hopeful that by signing the Nuclear Nonproliferation Treaty, the United States would take the lead in reducing the stock of nuclear weapons in return for pledges of near-nuclear nations to renounce their development.

Instead, I find that the United States plans to expand its research on nuclear weapons and develop even more. Coupled with our recent tendency toward pre-emptive strikes -- unless the country has nuclear weapons -- this has resulted in even more countries trying to go nuclear. This is the opposite of the direction in which we should be going if we value life on this earth.

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.

Instead of recreating the capacity to produce new, unnecessary nuclear weapons, the DOE should focus on shrinking the still-over-sized 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,
Kendyll Stansbury
210 Cypress St.
Redwood City, CA 94061

cc:
Senator Dianne Feinstein
Senator Barbara Boxer
Representative Anna Eshoo

1

Stanton-Fuja, Mollie

Page 1 of 1

Stark, Walter

Page 1 of 3

Page 1 of 1

PC_663

Levens, Matthew

From: Mollie [fjladyfan2@yahoo.com]
Sent: Thursday, March 13, 2008 12:16 PM
To: Complex2030
Subject: New Nuclear Weapons

To Whom it May Concern,

[Building another nuclear weapons plant is unnecessary, immoral, and inflammatory/provocational.

116A 1. Unnecessary: We already have enough nuclear weapons, to kill every person on the planet several
 23A times over. The nuclear weapons we have will last 100 years. That should be enough.

116A 2. Immoral: Half our budget already goes for war and all costs associated with it. Since we already
 (cont.) have enough weapons, and there's so much domestic need that is not being met, is it not immoral to
 39B build more weapons, instead of using the money to alleviate suffering? A great nation is one which
 49H takes care of its own, including its poor. We have been a great nation, and can be so again, but the path
 520 is not through war technology.

61J 3. Inflammatory/provocational--How can we expect other nations to disarm, or not to pursue nuclear
 weapons technology, if we're busy increasing our arsenal? What moral ground would we have to stand
 on? None. When we arm to the teeth and attack other countries, we aren't seen as the 'good guys'
 anymore.

71L [We can regain our standing in the world, but the path lies through diplomacy and reestablishing trust.

Sincerely,
 Mollie Stanton-Fuja

Looking for last minute shopping deals? [Find them fast with Yahoo! Search.](#)

B.O. Box 154 PC_177
 Pleasant Hill, Tennessee 38578
 February 26, 2008

Shodorol, Wayne
 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. Wayne:

On March 5, 1970, as a signatory of the Nuclear
 Nonproliferation Treaty, the United States committed
 itself along with other nuclear nations to pursue
 complete nuclear disarmament "at an early date."
 What has happened to this commitment? The United
 States has done very little about it in the past 38
 years. In fact, we have more nuclear weapons now
 than we had in 1970. Both the U.S. and Russia
 still possess thousands of these weapons pointed at
 each other, maintained at Cold War levels of hair
 trigger alert. In 1995, Russia, mistakenly identified
 a British rocket as a nuclear missile, moving toward
 Moscow. The Russians came within minutes of launching
 their nuclear missiles at U.S. cities. Since then, the contin-
 ing deterioration of Russian nuclear systems has only
 increased the danger. Keeping thousands of nuclear mis-
 siles on hair-trigger alert is an accident waiting to hap-
 pen. The chance of a nuclear war starting, by mistake
 or miscalculation between Russia and the United States is
 simply too great to ignore and not do anything about by
 not to prevent it from happening.

11F

27M:1
 313A:1

Stark, Walter

Page 2 of 3

Stark, Walter

Page 3 of 3

71A

898

Instead of producing more nuclear weapons, the appropriate function of the Y-12 Plant and the Los Alamos National Laboratory would be to do the needed work of safely dismantling our nuclear weapons and those of other nations, such as Russia, disposal of the bomb materials, and safe storage of highly enriched uranium until it can be down-blended.

In addition, when we consider the billion upon billions of dollars and resources that are wasted in maintaining nuclear weapons capability and other weapons for mass destruction, suffering, and grief that have been used for meeting real human and environmental needs, how can we honestly justify what we have been doing?

With my 60+ years of investment, many times more people could be employed in weapons related employment.

Currently working on weapons related employment.

Sincerely,
Walter Stark

71A

816A (cont)

898

41U.1

51U

616A

81U (cont)

91U (cont)

101U (cont)

111U (cont)

121U (cont)

131U (cont)

141U (cont)

151U (cont)

161U (cont)

171U (cont)

181U (cont)

191U (cont)

201U (cont)

211U (cont)

221U (cont)

231U (cont)

241U (cont)

251U (cont)

261U (cont)

271U (cont)

281U (cont)

291U (cont)

301U (cont)

311U (cont)

321U (cont)

331U (cont)

341U (cont)

351U (cont)

361U (cont)

371U (cont)

381U (cont)

391U (cont)

401U (cont)

411U (cont)

421U (cont)

431U (cont)

441U (cont)

451U (cont)

461U (cont)

471U (cont)

481U (cont)

491U (cont)

501U (cont)

511U (cont)

521U (cont)

531U (cont)

541U (cont)

551U (cont)

561U (cont)

571U (cont)

581U (cont)

591U (cont)

601U (cont)

611U (cont)

621U (cont)

631U (cont)

641U (cont)

651U (cont)

661U (cont)

671U (cont)

681U (cont)

691U (cont)

701U (cont)

711U (cont)

721U (cont)

731U (cont)

741U (cont)

751U (cont)

761U (cont)

771U (cont)

781U (cont)

791U (cont)

801U (cont)

811U (cont)

821U (cont)

831U (cont)

841U (cont)

851U (cont)

861U (cont)

871U (cont)

881U (cont)

891U (cont)

901U (cont)

911U (cont)

921U (cont)

931U (cont)

941U (cont)

951U (cont)

961U (cont)

971U (cont)

981U (cont)

991U (cont)

1001U (cont)

41U.1

51U

616A

81U (cont)

Starr, Mirabai

Page 1 of 1

Levens, Matthew

PC_1476

From: mirabai@earthlink.net
Sent: Tuesday, April 29, 2008 11:07 AM
To: Complex2030
Subject: No Action 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,

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 NNSA to embark upon a project of such magnitude at such an unstable time in our politics, environment and economy.

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,
Mirabai Starr

14A

Staun, Nicole

Page 1 of 1

Levens, Matthew

PC_2075

From: Nicole Staun [jadzia649@hotmail.com]
Sent: Wednesday, April 09, 2008 8:51 PM
To: Complex2030
Subject: Stop new nukes

Nicole Staun
1112 Fuller St #1
Cincinnati, OH 45202-1715

April 9, 2008

Complex Transformation

Dear Complex Transformation:

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.

29B We should spend the billions proposed for this plan on programs to eliminate nuclear weapons.

Sincerely,

Nicole Staun

Steele, Debbie

Page 1 of 1

Steele, Joanne

Page 1 of 2

Levens, Matthew

From: debbie steele [debbiesteele81@yahoo.com]
Sent: Friday, April 25, 2008 1:38 PM
To: Complex2030
Subject: military

debbie steele
766 Forest Lane
Kissimmee, FL 34746-4915

April 25, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

I am strongly opposed to any facilities being constructed or used for nuclear weapons. The rationals have been shown to be continuously false. They do not bring security to citizens here in this country or anywhere else. The immense damage done to the environment, the health problems around these facilities and the obscene risks that these weapons represent has to be stopped. Disarmament is what is necessary if you believe in having a sane world. It is a disgrace that these weapons are still being pushed by the Pentagon and weapon makers. How hypocritical to say other countries can't make nuclear weapons (with I believe shouldn't, however that also goes for this country) but it is acceptable to add to the obscene number that have already been made here in this country. Also the continued use of depleted uranium weapons after they have been banned by the UN is deplorable.

Sincerely,

debbie steele
4073909120

PC_1327

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



PC 236



Written Comment Form

Must be received on or before April 16, 2008.

Now accogants and dangerous these four
exposed alternatives for restructure of SNM
facilities are. Shameful proposed. Nuclear
weapons must be dismantled and disabled
permanently to ensure any security. I
like the proposal of disarming our nuclear
weapons & burying them in the middle sea
side - weapon generates wear concrete -
sort of atomic bomb / cement pellet as
these sites to be monitored into the future
while we turn our attention to clean up the
mess of radio active waste we've already made.
The status quo is not acceptable. ~~It is~~
center of excellence is a Pie - concolitated
center of a box - there is no safe or moral
future in production of nuclear weapons,
An electronic industrial complex.
How dare you steal our grandchild's future
with such evil. Find that core of goodness
(over)

11F

27U

316A

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

Comment forms may be mailed to:
Mr. Theodore Wyle
Complex Transformation SPEIS Document Manager
Office of Transformation, NA-101
U.S. Department of Energy/NNSA
1080 Independence Avenue, SW
Washington, DC 20585

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

Steele, Joanne

Page 2 of 2

*within you that trusts in doing what is
right. The true Complex Transformation
needs to happen in your minds for us to
have any national or international nuclear
security*

*Respectfully,
Joanne Steele
320 Sal Mtn. River Rd,
Sauter-Yacovchee, Ga. 30571*



Steele, Mary

Page 1 of 1

PC_642

Levens, Matthew

From: Mary Isabel Steele [mary@maryis.com]
Sent: Wednesday, March 12, 2008 10:57 AM
To: Complex2030
Subject: 3/11 hearing

1|5N After no small effort to get downtown, find a parking place and locate the hearing, I was disappointed when i was not permitted to sign in!!!
| I am strongly opposed to any storage of plutonium in NM for several good reasons.

Mary
Mary Isabel Steele
Mary Isabel Steele Enterprises
309 Beeson St SE
Albuquerque
NM 87123-3123
(505) 899-3858
Visit my website: <http://maryis.com>

Stein, Cletus

Page 1 of 1

Stephens, Nancy

Page 1 of 1

PC_108

February 28, 2008

Dear Sir:


The questions regarding the plan for Complex 20/30 are fundamentally moral ones. Should we continue spending vast amounts of time, money and resources on a weapons system that ought to be abolished? Many people of great experience and influence have spoken out recently to eliminate that deadly system throughout the world. We now have the opportunity to rid our world of this scourge and to provide hope for the people of new generations instead of continued fear.

The Catholic Church, in its supreme teaching at the Vatican Council II, over 40 years ago, said, "Every act of war directed to the indiscriminate destruction of whole cities or vast areas with their inhabitants is a crime against God and humanity, which merits firm and unequivocal condemnation." We have leaders who have threatened to use these weapons, and therefore have threatened to commit a crime against God and humanity. But all of us, in assenting to build and maintain these weapons, participate in that decision.

The Council continues, "The hazards peculiar to modern warfare consist in the fact that they expose those possessing recently developed weapons to the risk of perpetrating crimes like these and, by an inexorable chain of events, of urging men to even worse acts of atrocity. To obviate the possibility of this happening at any time in the future, the bishops of the world gathered together to implore all humans, especially government leaders and military advisers, to give increasing consideration to their immense responsibilities before God and before the whole human race."

Today I add my small voice to the multitudes demanding an end to these weapons of mass destruction and their underlying institutions. In justice, we need to retrain and offer comparable jobs to those workers that we have demanded so much from in this industry up to now. But the time has come to eliminate nuclear weapons from the earth. Let us have leadership that is courageous enough to start a new direction. Those leaders will go down in history as some of the greatest ever, never to be forgotten.

The Vatican Council continues, "Therefore, we declare once again: the arms race is one of the greatest curses on the human race and the harm it inflicts on the poor is more than can be endured." So let us bless each other, and especially the poor. Let us not continue with the curse that we have perpetrated now for over 6 decades. Let us build a different program, a "Simplex 20/30", that realistically outlines the steps necessary to obliterate nuclear weapons from the earth forever. It can be done. It must be done, if there is any greatness left in us. May God reward our efforts and intentions according to the direction we pursue.

Sincerely,

 Cletus G. Stein
 5113 SW 16th
 Amarillo, TX 79106

116A
29A
31J

31J
(cont.)

116A
(cont)
31J
(cont)

PC_103


To the Department of Energy

I am opposed to spending a single penny, much less \$150 billion, in taxpayer money to develop and produce new nuclear bombs.

I am a Unitarian Universalist, and we have historically, and officially, morally opposed the use and proliferation of nuclear weapons, because of the unspeakable destruction they present.

We should be leading the world in eliminating nuclear weapons, not building more.

Nancy Stephens



6102 Palmetto Trail
 Amarillo, TX 79106

116A
29H


3200

41J

Stevens, Jean


Page 1 of 1

116A



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

PC 291



Written Comment Form
Must be received on or before April 10, 2008.

STOP IT! Go GREEN!

Jean Stevens
PO Box 1702
Rancho de Jaro
87557 J.M.

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.complextransformation.com>

Stevens, Michael

Page 1 of 1

115A

Buenafior, Delight

Michael F. Stevens [mfs@lanl.gov]
 Wednesday, March 05, 2008 6:00 PM
 Div. Complex Transformation
 Form posted from Windows Internet Explorer.

PC_512

Last Name=Stevens
 First Name=Michael
 Email Address=mfs@lanl.gov
 Street Address=7 Sunflower Dr
 City=Santa Fe
 State=NM
 ZIP Code=87506

Comments=Like all Americans, I want our country secure, and able to negotiate with other world powers on an equal footing. Many of our allies and rivals alike are reinforcing their commitment to nuclear deterrence. The US is the only country that does not have the ability to update an aging stockpile. This is not to say that such a commitment cannot be made while vastly reducing the numbers of weapons, and the cost of maintaining them. This is the heart of the proposed SPEIS put forth by NNSA, and it is therefore a responsible and appropriate action on behalf of national security, deterrence, and fiscal responsibility. At this point in time, Los Alamos National Lab is uniquely positioned to provide the right level of pit manufacturing competency to the nation, while also contributing valuable technologies to support stockpile reductions. In over 20 years of employment at LANL, several of them as a plutonium worker, I have witnessed the sense of public responsibility and respect for plutonium safety enforced by this lab; I therefore see the SPEIS as a sensible decision on the consolidation of these necessary material technologies.

Stevens, Patrice

Page 1 of 1

PC_511

Buenafflor, Delight

From: Patrice Stevens [pstevens@lanl.gov]
Sent: Tuesday, March 04, 2008 1:11 PM
To: DIV.Complex.Transformation
Subject: Form posted from Microsoft Internet Explorer.

Last Name=Stevens
First Name=Patrice
Email Address=pstevens@lanl.gov
Street Address=7 Sunflower Drive
City=Santa Fe
State=NM
ZIP Code=87506

Comments=Since the US will maintain a strategic deterrent for the foreseeable future, LANL's mission is to provide safe, secure and reliable nuclear warheads in support of the nation's deterrent. To accomplish this, we will need to retain the fundamental capabilities such as Pu and U component manufacturing and world class science at LANL in response to the full spectrum of national security challenges. We ensure our weapon are safe and must maintain this ability to ensure safety, security and reliability without UGI.

1115A

Steward, Ronald

Page 1 of 1

Levens, Matthew

From: Steward, Ron (RS1) [stewardig@y12.doe.gov]
Sent: Thursday, April 10, 2008 8:27 AM
To: Complex2030
Subject: Comments

PC_2116

To Whom It May Concern,
Despite the views of several groups that oppose the work at Y-12, these groups represent a few and the overwhelming majority of the people in the Oak Ridge area support the work at Y-12. They support this work for the economic boost it gives to the area, but greatest support is for the national security that this work provides to the area.
Don't let the opinion of uninformed few influence the decision to bring more work to Y-12 and continuation of present work.
The greater good for this area and for the country lies in the work done here. This work should not diminish.

Sincerely,
Ronald G. Steward
(Y-12 employee for 31 yrs)
114 Iona Circle
Oak Ridge TN, 37830

1115A
2101

1

Stewart, Lisa

Page 1 of 1

Levens, Matthew

From: Lisa Stewart [mlsstewart@verizon.net]
 Sent: Tuesday, April 29, 2008 4:08 PM
 To: Complex2030
 Subject: Controlling Nuclear Weapon

Lisa Stewart
 73 W. Shawnee Trl
 Wharton, NJ 07885-2942

April 29, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

116A I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons.

21J 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.

38A 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 CWR project is another irresponsible new program that should be rejected.

I also am asking you to block the sale of nuclear technology to Turkey. This is a dangerous attempt by the President to cover the pre 911 alleged black market sale of nuclear secrets from the U.S. through Turkey to Pakistan, Iran and North Korea. Such reckless activity should be investigated immediately.

Thank you for attention to nuclear weapons which should be controlled with a worldwide moratorium, starting with the United States.

Sincerely,

Lisa Stewart

PC_1436

Stoeckel, Rod

Page 1 of 1

Levens, Matthew

From: Rod Stoeckel [rstoeckel@netinsnet]
 Sent: Thursday, March 27, 2008 3:56 PM
 To: Complex2030
 Subject: Reject "Complex Transformation" plan to build nuclear weapons

Rod Stoeckel
 4333 Larkin Rd.
 Bernard, IA 52032-9776

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:

116A The DOE should reject the Complex Transformation proposal to revamp the nuclear weapons arsenal.

21B We must stop all these wars which waste our children and our wealth!!! Instead of looking for more wars we need to look for more ways to stay out of wars and improve our way of life. Who are we to go around threatening other countries and killing INNOCENT PEOPLE????? If leaders want to fight then it is time we put them in an arena and let them fight it out!!! But they never get really involved but involve innocent people that want to be left alone and free.

31J NO MORE WMD for the greedy elite to use against innocent people!!!!!!!!!!!!

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

Sincerely,

Rod Stoeckel

PC_1207

Stone, Lane

Page 1 of 1

PC_1787

Levens, Matthew

From: Lane Stone [lanestone@comcast.net]
Sent: Wednesday, April 02, 2008 9:30 PM
To: Complex2030
Subject: Stop new nukes

Lane Stone
203 Yoakum Pkwy #908
Alexandria, VA 22304-3724

April 2, 2008

Complex Transformation

Dear Complex Transformation:

I am opposed to plans to modify nuclear facilities for many reasons. The most important is that independent experts have said our current stockpile can last over 1,000 years and still be effective.

I live in Alexandria, VA.

Thank you.

Sincerely,

Lane Stone
703 751 1774

Stone, Marissa

Page 1 of 1

PC_1234

Levens, Matthew

From: Stone, Marissa, NMENV [Marissa.Stone@state.nm.us]
Sent: Tuesday, March 25, 2008 7:40 AM
To: Complex2030
Subject: Espanola NM Meeting, info on speakers

Hello,

New Mexico Environment Department Secretary Jon Curry would like to speak at the meeting Thursday, March 27 in Espanola NM and we are wondering if he can speak at the beginning of the presentation. Can you please get back to me as soon as you can?

Thanks,

Marissa


Marissa Stone
Communications Director
New Mexico Environment Department
(505) 827.0314 (o)
(505) 231.0475 (c)

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Stone, Marissa

Page 1 of 1

PC-10715



NEW MEXICO
ENVIRONMENT DEPARTMENT
Office of the Secretary
Harold Runnels Building
1199 Saint Francis Drive (87505)
PO Box 20110, 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 13, 2008
For Immediate Release

Contact: Marissa Stone, NMED Communications Director
Telephone: (505) 827-4014 or (505) 231-0475

Environment Secretary Issues Statement on Department of Energy's Plans for Expanded Pit Production at Los Alamos
Lab Must Clean Up Legacy Waste before Embarking on New Missions

(Santa Fe, NM) New Mexico Environment Department Secretary Ron Curry issued the following statement today on the U.S. Department of Energy's plans for expanded pit production at Los Alamos National Laboratory:

"At a time when DOE is coming up short on needed cleanup funding at Los Alamos, we shouldn't even be talking about increased production of plutonium pits. Addressing and correcting LANL's legacy of pollution should be job number one for the lab. That is why we put a state-enforceable fence to fence clean up order in place in 2005.

Before it looks at new missions, the lab must meet its cleanup commitments to the people of New Mexico. It's unacceptable that the Department of Energy and its contractors at Los Alamos are even considering funding additional pit production while at the same time refusing to put the required funding towards cleanup. They can't expect the citizens of New Mexico to continue to potentially be exposed to new pollution when their 60 year legacy of contamination remains unaddressed. They must fully fund and implement the cleanup order before any new missions are considered. It is the lab's legal and moral responsibility to implement that order."

For more information, call Marissa Stone at (505) 827-0314.

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Strand, Jeff

Page 1 of 1

PC_1098

Levens, Matthew

From: Jeff Strand [jeffstrand@hotmail.com]
Sent: Thursday, March 27, 2008 4:17 PM
To: Complex2030
Subject: No More Nukes

Jeff Strand
1212 N 15th St
Princeton, MN 55371-1072

March 27, 2008
Complex Transformation Department of Energy

Complex Transformation Department of Energy,

I am writing today to strongly oppose the Bush administration's proposal to build a plant to produce plutonium pits for nuclear weapons. The weapons we have today should be dismantled and disposed of along with the rest of the world's nuclear weapons. If we continue building nukes, we are putting at risk all future generations. Thank you for your attention in this matter.

Sincerely,

Jeff Strand
763-389-9414

PC_287

Comments on the NNSA Complex Transformation Proposal

William R. Stratton, 1001 Oppenheimer Drive, #220
Los Alamos, NM 87544
505-661-3706
wstrat505@comcast.net

The comments enclosed herein are an extension of those that I offered orally at the NNSA hearing in Los Alamos on March 12, 2008.

1. Work with Nuclear Weapons:
1. Fission was discovered in Germany at the end of 1938. The scientific paper published that reported the results did not provide an explanation for the observations.
2. The phenomenon (fission of uranium) was explained by Lise Meitner and Otto Frisch who were in Sweden at the time.
3. This discovery and explanation of fission was carried to England and to the United States by Niels Bohr, one of the foremost and highly respected physicists in the world.
4. Once discovered, there is NO turning back; the fission process can not be undiscovered. All of the real and potential benefits and all the real and potential dangers are here to stay. It is our responsibility to arrange matters so that we have the benefits and not suffer the dangers or hazards.
5. Because WWII was in progress, the first major application of fission was to produce a weapon of war.
6. This effort was achieved at Los Alamos (Manhattan Project) and was successful in bringing WW-II to an end. I was personally benefited at the time but did not really appreciate its significance. However, a great many service persons who were expecting to invade Japan did appreciate their reprieve.
7. Following the collapse of Germany in 1945 Europe was divided into two regions; the east was occupied by the USSR and the west was occupied by the Allied forces.
8. After the end of the war with Japan, Western Europe was in extreme danger of occupation by USSR troops. One by one the countries of Eastern Europe fell to domination by the USSR.
9. Western Europe was saved by the fact that the United States possessed nuclear weapons and had the capability of delivering these weapons. Western Europe was saved by the efforts of Hanford, Oak Ridge and Los Alamos.

120

215A

120 (cont.)

10. The Los Alamos Laboratory was seriously depleted of their top scientists (returning to Universities) after WW-II and there was talk of closing the facility. This did not happen, in large part, because of the efforts of director Norris Bradbury who recognized the need for the United States. He brought new, young scientists to the laboratory to continue the wartime effort. He recognized that the first devices were essentially Model-T designs and if we did not improve the designs, someone else (the USSR) would do so.

11. The efforts of Los Alamos and the other AEC facilities in the late 1940s and 1950s saved Western Europe from occupation by the Soviet Union and prevented WW-III. This is worth repeating! Because the United States possessed nuclear weapons, WW-III was prevented. I was involved in nuclear weapon design improvements in the 1950s and can attest to this effort.
12. Since those early days, the Los Alamos National Laboratory has been involved in all aspects of nuclear weapon design, development, production, safety, safeguards, plutonium element research and more!
13. For these and more reasons, the only logical center for nuclear weapon work in the future is Los Alamos. Any other location would mean a setback of years and years.

215A (cont.)

The center for work with nuclear weapons must be in Los Alamos. All aspects such as theoretical design, engineering design, metallurgy, chemistry, high explosives, testing (as much as we can), and more should be centered at this location. No other choice would be acceptable.

II. Other Aspects of work with fission:

1. The number of nuclear weapons possessed by Russia and the United States is far in excess of any conceivable need. The numbers are a consequence of an arms race that is no longer relevant. The expense of maintaining this stockpile is large for both countries. I believe that this stockpile should be reduced to the low 100's (both countries) and that Los Alamos should have an active role in the inactivating and disassembling these weapons. Los Alamos has more experience with high explosives and plutonium than practically any other facility. Pantex can be supplemented and plutonium and enriched uranium (if any) can be made into fuel for commercial reactors. The LANL has past experience in the manufacture of fuel elements for nuclear

2

215A (cont.)

Stratton, William

Page 3 of 3

- reactors. The decision to reduce stockpile numbers is not NNSA's, but once a decision is made, the fate of surplus weapons and fissile material is the responsibility of NNSA. The progress in these activities is not made public. It should be.
2. The safeguards R and D program was started at Los Alamos. It is essential for the security of the nation and should be continued in the LANL. The interaction between weapon R and D and safeguards can only be fruitful and might lead to a truly useful idea.
 3. Chemistry is an essential component of the weapons program. A most essential part of the commercial nuclear electric program is the separation of fission products from spent fuel and retaining the transuranics to be reconstituted in new fuel. This fuel would be used most advantageously in sodium cooled reactors in which the neutron spectrum can fission all the transuranic elements. This R&D work can and should be done in Los Alamos.
 4. The preferred alternative states that the DAHRT will be moved to the Nevada Test Site and that Hydrodynamic testing will cease in LANL. These would be serious mistakes. The data obtained from Hydro testing and from DARHT should be obtained in the same laboratory in which design work is done. The data and persons creating the data should be in close proximity. Ideas are created by discussions that are easily started; distance creates a barrier to development.
 5. Finally, moving the critical assembly laboratory and the criticality course to Nevada was a very serious mistake. This was not necessary as several studies clearly demonstrated. The dismal performance of the Nuclear Fuel Services company in Erwin, Tenn. in March of 2006 demonstrated the necessity of maintaining a criticality experiment facility and a criticality short course. Should an event similar to or comparable in seriousness to that allowed by NFS and Naval Reactors would have most serious consequences for the NNSA and for LANL. The inability to reproduce and study an incident of that nature would be regarded as evidence of incompetence and lack of responsibility. The criticality laboratory and program should be moved back to Los Alamos. It is essential to both the weapons and commercial programs.

William R Stratton

Stricherz, Andrine

Page 1 of 1

PC_363

Levens, Matthew

From: Andrine Stricherz [andrine@slon.nidno.nel]
Sent: Monday, March 17, 2008 9:08 AM
To: Complex2008
Subject: COMPLEX TRANSFORMATION

Andrine Stricherz
 5321 W Pritchard Dr
 Sioux Falls, SD 57106-0853

March 17, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

I am Andrine Stricherz. I live in Sioux Falls, SD, but lived for almost 30 years in TX and MO. Our foreign policies will determine the future of the world. How we treat other countries will greatly affect how they react to us.

I am strongly opposed to the administration's proposal to build a plant to produce plutonium pits for nuclear weapons.

Building this new plant would send a contradictory message to other countries who may be seeking nuclear weapons. While we are asking others to forego developing nuclear arsenals, we are at the same time trying to increase our own ability to build new nuclear weapons.

I am also opposed to plans to modify nuclear facilities across the country. We should destroy rather than rebuild our nuclear arsenal.

Sincerely,

Andrine Stricherz
 (605) 334-9908

116A:
 215

Stricherz, Lanny

Page 1 of 1

Levens, Matthew

PC_1788

From: Lanny V Stricherz [lanny9@siomidco.net]
Sent: Wednesday, April 02, 2008 8:27 AM
To: Complex2030
Subject: Nuclear Weapons

Lanny V Stricherz
3608 S Gateway Blvd #202
Sioux Falls, SD 57106-1526

April 2, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

19A It is my understanding that the current administration is asking for 150 billion dollars
20A to upgrade the US nuclear weapons program. At a time when we already have enough weapons
to destroy planet earth 30 times over, I oppose spending even one thin dime for new
weapons and only spending our tax dollars to dismantle the nuclear weapons that we already
have and that we promised to dismantle from the former Soviet Union.

316A At a time when we are negotiating with North Korea and pressuring Iran, even to the point
of planning attacks to get them to stop their nuclear proliferation, it is not only
disingenuous but morally and ethically wrong. Please put a stop to this madness, for my
sake and that of my children and grandchildren.

Sincerely,

Lanny V Stricherz
605-977-7669

Strong, D.H.

Page 1 of 1

Levens, Matthew

PC_1685

From: thedehard@icn.com
Sent: Saturday, April 05, 2008 10:32 AM
To: Complex2030
Subject: ONE NUKE IS ENOUGH

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,

1120 Ever actually SEEN the results of a 6.5 psi overpressure blast?

Sincerely,
D. H. Strong
Washtenaw
CHICAGO, IL 60645

cc:
Senator Dick Durbin
Senator Barack Obama

Strong, Darby

Page 1 of 1

Struss-Keyes, Glenda

Page 1 of 1

Levens, Matthew

From: Darby Strong [darby@msdarby.com]
Sent: Wednesday, March 26, 2008 5:53 PM
To: Complex2030
Subject: EIS comment

To: Mr. T. Wyka
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.
Secondly, DOE is putting forth this proposal in the absence of a plan for re-examining the current role or quantity of these weapons.
Thirdly, DOE's main goal should be cleaning up the huge current nuclear waste instead of increasing it.

Darby Strong
<http://www.projectgreenspot.com/>

1/1

2/18

3/7

PC_1733

PC_176

Public Hearing on Complex Transformation
February 26, 2008
Glenda Struss-Keyes, 464 New Harvest Road, Washburn, TN 37888

It seems to me that one of the main driving points of those who support Complex Transformation is for National Security. The draft summary of Complex Transformation says that "National security policies require the U.S. Department of Energy (DOE), through the National Nuclear Security Administration (NNSA), to maintain the U.S. nuclear weapons stockpile, as well as core competencies in nuclear weapons." So National Security is the goal.

I agree that National Security is important. But not at the expense of everyone and everything else. When we put billions into nuclear weapons and ignore social problems, then we will not reach real security. When we put our money, brains and efforts into Nuclear weapons that have the potential to destroy Earth, we neglect to give our attention to Global Warming and other environmental concerns that need urgent attention for the continuance of life on earth.

1/96

The draft also says in its summary of the Scoping meetings that the majority of comments stated that the U.S. is violating the Nuclear Nonproliferation Treaty (NPT). Article VI of the NPT obligates the parties "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." I still feel that this is the crux of the problem. The international community worked for decades to construct the nuclear nonproliferation treaty that has helped prevent the spread of nuclear weapons. The Complex Transformation proposal is a step backwards toward what was intended in the treaty. We cannot expect other nations to not acquire nuclear weapons if we continue to upgrade and increase our own. And the only security we will every have is when all nuclear weapons are off the face of the earth. We need to adhere to the Nonproliferation Treaty which is the law of this land.

2/1F
3/16A

4/1J

5/14N
6/13A

Sometimes you hear the expression, I don't want Nuclear Weapons built in my back yard, Y-12 is in my back yard. But really, these facilities are in everyone's back yard since if there is an accident, or a terrorist attack, or a war, the entire earth is affected.

I came to this hearing first with an attitude of just being tired of repeating the same things but then my attitude changed. I think this is a very positive time and I think if you and our leaders will listen, you will hear that the majority of people want a world free of nuclear weapons. And that this is the only path towards real security for all.

Thank you.



Sturm, Lois

Page 1 of 1

Levens, Matthew

From: loissturm@yahoo.com
Sent: Sunday, April 06, 2008 12:45 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,

It is good that the Department of Energy is working to consolidate and reduce the facilities, workforce, and redundant capabilities of the nation's sprawling nuclear weapons complex.

We do not need new nuclear weapons. We still have far too many.

All nuclear material presents a threat to the health and existence to all the people of the world. Our nuclear habits are a major part of the high cancer rates around the world. We would do far better to focus on reducing and securing what we already have. That would strengthen the security of the U.S. and allow us to focus on the real threats to our security - resource depletion and climate destruction.

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,
Lois Sturm
628 East 14th Street #6
New York, NY 10009

cc:
Senator Charles Schumer
Representative Nydia Velazquez
Senator Hillary Clinton

PC_1794

Sturtz, Katherine

Page 1 of 1

Levens, Matthew

From: Katherine Sturtz (ksturtz@croconnell)
Sent: Tuesday, February 19, 2008 8:47 PM
To: Complex2030
Subject: Nuclear weapons

Katherine Sturtz
701 County Rd. 300
Garden City, TX 79739-2532

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.

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.

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.

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. Double standard!!!

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.

I have one word for this plan, stupidity, stupidity. It makes no sense whatsoever and would be an extremely dangerous undertaking with no good reason for doing it. Congress needs to stop this insanity.

Sincerely,

Katherine Sturtz
432-354-2218

PC_1414

Sullivan, Cathie

Page 1 of 3

Sullivan, Cathie

Page 2 of 3

PC_960

Mr. Theodore Wyka
 Document Manager
 Complex Transformation SPEIS
 National Nuclear Security Administration
 complextransformation@nnsa.doe.gov
 April 8, 2008

Dear Mr. Wyka,

I serve on the Steering Committee of Nuclear Watch New Mexico and ask that the following comments be added to the record of public comment on the Complex Transformation SPEIS. Comments include a 1950 AEC Memo on continuing weapons work at Los Alamos Laboratory after WWII; environmental justice issues that will grow if expanding weapons work occurs; added water consumption with expanded work and impacts from radiological and toxic exposures to workers and the public which would increase with additional work.

1) The files of the Atomic Energy Committee include the following evidence that the Pajarito Plateau was a poor choice for continuing atomic weapons after the Manhattan Project:

On June 29th 1950, Walter Hamilton wrote the following memorandum for the record (Joint Cmte. on Atomic Energy, Classified Document # 1572---Declassified 12/2/92):

The decision to maintain Los Alamos as our permanent principle weapons research center is the result, not of a single decision, but of the accretion of many decisions. Within the past 6 weeks, the Joint Committee has received two Budget overrun reports covering one plant and one laboratory at about \$26 million total cost. These two construction projects -- the new explosives plant and the new chemical-metallurgy laboratory -- constitute the core of the technical and laboratory facilities of Los Alamos. They are part of a permanentizing program now in progress.

This is probably our last economical chance to review the desirability of keeping weapons research work at Los Alamos. All the results of continued use of this remote site are being 'bought' at one stroke. The high operating costs, Government town problems, difficulty of getting top scientists, and the bad military security of the area are all intrinsically accepted as inevitable in this decision. Yet there is nothing about 90% of the work done at Los Alamos which couldn't be done equally well at a more accessible site such as Sandia, Berkeley or some Eastern center.

The profits which might be gained by moving out of Los Alamos now might be more top scientists in the project, faster progress on weapons research projects,

117A7

and financial economies which would free dollars for bombs instead of water wells and golf courses for Los Alamos. It's worth thinking about! W.A.H.
 (end of AEC memo)

I believe W.A.H. got it right in 1945. Sixty years later this forlorn enterprise stumbles on wasting now billions instead of millions. Taxpayers take it in the neck and LANL produces little or nothing that is reality-based to address US national security. The Lab's contribution shrinks to nano dimensions as claims of 'cutting edge science' and 'national crown jewel' swell inversely in glorious chords.

2) Environmental Justice issues: Native Americans continue to suffer as Lab neighbors

When the Army confiscated Native American and Hispanic property on the Pajarito Plateau for the Manhattan Project, the government promised to return the land when the project ended. But most property was never returned, instead the Pueblo and Hispanic owners of Lab property and their sons and daughters for 2 generations have gotten in line for well paid jobs at the Lab. These jobs however come with six decades of a poorly understood involuntarily exposure to radiation and chemical toxins. Health victims of the Lab. Compare their involuntary exposures to the majority of non-native scientific immigrants to Los Alamos who come voluntarily. There is all the ethical difference in the world between those exposed to chemical and radiological toxins without choice or knowledge and those exposed by choice.

There is a second environmental justice issue affecting both those who chose to come to Los Alamos versus locally born whose cultural roots keep them at home next to a nasty new neighbor. Both groups are captive guinea pigs when air emissions, liquid spills, the Cerro Gordo fire, and run-off from the fire releases add chemical and radiological toxins to the environment. We cannot forget to add intentional releases as happened when workers routinely vented tritium gas directly out the back door of their work place to avoid both stack monitors and the paperwork required to report a monitoring alert.

Many families at San Ildefonso have stories of older family members who brought home contaminated tools from Lab jobs and left those radiological sources ticking out radiation for old and young alike for additional years.

Lab environmental health impact May 2007, the New Mexico Environment Department (NMED) reported plutonium and other radionuclides associated with nuclear weapons manufacturing in an old river channel near the proposed Buckman Direct Diversion Project.

In June 2007, the City of Santa Fe reported plutonium in the Buckman wells, which provide about 40% of the drinking water to City and County residents.

214A2

314J1;
 414D8

514D1

614E3

714E24

Sullivan, Cathie

Page 3 of 3

.Buffalo are being raised at Picuris Pueblo: what is the level of contamination, if any, on the grass these animals graze?

7/14E24
(cont.)

3) Water consumption by the lab will go up if the 'preferred option' is chosen.

With water the undisputed factor that limits our State's future prospects it is inconceivable that we would waste it in the production of plutonium pits, approximately 10,000 of which are stored at Pantex. We used one on Nagasaki, we produced thousands during the Cold War, we have 10,000 on our hands--- can't we break the spell? If impartial judges were deciding, increased water use alone would suffice to bury the preferred option put forward by the DOE.

6/14E3
(cont.)

Cathie Sullivan
1336 Bishops Lodge Road
Santa Fe, NM 87506

Sullivan, Mary

Page 1 of 1

PC_646

Levens, Matthew

From: Mary Sullivan [marysull@hargray.com]
Sent: Tuesday, March 25, 2008 10:59 AM
To: Complex2030
Subject: Comment on "Draft Complex Transformation Supplemental Programmatic Environmental Impact Statement"

Attachments: Blank Bkgrd.gif



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BlankAttention Mr. Theodore Wylka:
Comment on "Draft Complex Transformation Supplemental Programmatic Environmental Impact Statement"

1| I strongly oppose this proposal. Your analysis is not complete. Regarding the
140| environmental impact, at a time of critical global climate disruption, the US is engaged
2|16A| in an ultimately wasteful, dangerous, fruitless and incredibly costly and unneeded effort.

3| Our effort should be going in to disarmament and nuclear nonproliferation. Instead you
are gearing up to produce more new weapons which will ultimately decay and then in another
20+ years, you will be back again for another hearing on a new more efficient Bomplex.

1|140| You speak of "prudence." Prudence would call for reducing the threat of nuclear weapons,
(cont.)| you list all the environmental impacts and then simply rationalize them away. There is no
4|14M| sane solution to the production of nuclear waste. This is toxic to the environment for
tens of thousands of years.

2|16A| Your aims sound deceptively "rational," but these are weapons whose only purpose is
(cont.)| ultimately to destroy. This is an expanding industry based on trying to expand our
fears.

I attended the hearing in North Augusta in February and was reminded of all the thousands of people employed in making more "efficient" facilities to "protect" the Nazi regime--the camps and ovens designed to kill more efficiently. Ultimately the plans you present are no different and should be stopped in their tracks. I vote NO, NO, NO More!

Sulock, Dot

Page 1 of 1

Supan, Bob

Page 1 of 1

PC_858

Levens, Matthew

From: Dot Sulock [dsulock@unca.edu]
Sent: Thursday, March 27, 2008 1:03 PM
To: Complex2030
Subject: no new nuclear weapons

Dot Suleek
 18 Beaverdam Knoll
 Asheville, NC 28804-2738

March 27, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A| No nuclear weapons.
 Not needed.
 Not even useful.
 Need to have way fewer nuclear weapons.
 Need to set an example for the world.
 2|1J| Work on nuclear disarmament.
 Sincerely,
 Dot Sulock
 828-232-5196

PC_390

Levens, Matthew

From: Bob Supan [clambakebob@comcast.net]
Sent: Wednesday, March 19, 2008 6:09 PM
To: Complex2030
Subject: Nuclear weapons

Bob Supan
 13104 Midway Avenue
 Rockville, MD 20851-2313

March 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. Period. It's as simple as that. And if the media would make a big a deal as this as they have of other things, the rest of the country would be shouting NO! too.
 Sincerely,
 Bob Supan
 301-468-1645

Surma, Nancy

Page 1 of 1

Sutherland, Alan

Page 1 of 1

Levens, Matthew

From: OSFNancy Surma, OSF, PhD [nsurma@msn.com]
To: Friday, March 28, 2008 10:32 AM
Subject: Complex2030
US Nuclear Weapons Program

PC_1827

OSFNancy Surma, OSF, PhD
525 Depot St.
Monroe, MI 48161-2486

March 28, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

116A I am appalled at this administration's proposal to build a plant to manufacture plutonium pits for nuclear weapons. The CMRR project would turn us from the path of a more peaceful world by allowing the first major nuclear warhead production since the end of the Cold War.

298 I am a Franciscan Sister with a commitment to peacemaking. My ministry in education and now health care make me aware of how tax dollars are spent. We spend too much on war and weapons and not enough on education and health care.

31J How hypocritical for this country to tell other countries they cannot develop nuclear weapons when we are planning to develop our own capacity to build new nuclear weapons.

116A (cont) This is an immoral step to take, one that would use tax-payers money to escalate tensions in this world.

I urge rejection of the CMRR project.
Sincerely,

Nancy Surma, OSF, PhD



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_1066

The great Scientific Pool we have here
MUST NOW be directed towards a BEAUTIFUL
VIABLE Self Sustaining FUTURE. The Absurdity
of building Weapons of Mass Destruction must
STOP - HEALTH, clean air & energy are
the Future for our children. Needs better
also will be created. We can take care of
each other in a loving way - put down
the Weapons of the Pollution - We get
have lots of good positive work to do.

Thank you
Alan Sutherland

116A

298

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

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

Sutton, Patrice

Page 1 of 4

Sutton, Patrice

Page 2 of 4

PC_2078

Levens, Matthew

From: Patrice Sutton [psutton2000@yahoo.com]
Sent: Monday, April 28, 2008 4:31 PM
To: Complex2030
Subject: comments on Complex Transformation

Attachments: 3075641899-4-28-08 Sutton Comments Complex Transformation.pdf



4-28-08
Comments Co

Dear Sir,

Attached please find my comments on DOE's proposed "Complex Transformation."

Sincerely,

Patrice Sutton

Be a better friend, newshound, and know-it-all with Yahoo! Mobile. Try it now. http://mobile.yahoo.com/..._Yit=Ahu06i62sR8HdLDypac8WcJ9tAcJ

PC_2078

April 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
Via email to ComplexTransformation@nrsa.doe.gov

Dear Sir:

I am a public health researcher by profession. I am writing to express my strong opposition to the Department of Energy's (DOE's) proposed "options" for the future of the U.S. nuclear weapons complex as described in the "Complex Transformation" plan. Every one of the alternatives presented by DOE in the "Complex Transformation" document will result in an increase over current nuclear weapons production capabilities. I urge the DOE to abandon its plans for a newly invigorated nuclear weapons complex. Rather, the DOE should embrace the only option with the capacity to preserve the health and well being of our planet --- the option of adhering to the U.S.' legally binding commitment to abolish nuclear weapons.

The DOE's current proposal is fueled by the over half-century-old illusion that nuclear weapons are strategically desirable and, if in "the right hands," can be safely possessed. However, the 27,000 nuclear weapons possessed by eight nations in the current global stockpile demonstrate that national security strategies that rely on possessing nuclear weapons serve as a constant stimulus for other nations to acquire them.

Nuclear abolition is not an illusory goal. In stark contrast to DOE's proposed options, in June 2006, the Weapons of Mass Destruction (WMD) Commission, chaired by former International Atomic Energy Agency Director General Hans Blix and including former U.S. Secretary of Defense William Perry proposed a practical framework to achieve nuclear disarmament. The WMD Commission concluded, "a nuclear disarmament treaty is achievable and can be reached through careful, sensible and practical measures."

The Weapons of Mass Destruction Commission also concluded that "So long as any state has nuclear weapons, others will want them. So long as any such weapons remain, there is a risk that they will one day be used, by design or accident. And any such use would be catastrophic."

The use, research, development, testing and possession of nuclear weapons have been public health catastrophes.

The use of nuclear weapons by the U.S. in Japan caused approximately 210,000 deaths by the end of 1945. The instantaneous release of strong heat and light resulted in primary (flash) burns to directly exposed body parts and secondary burns from exposure to burning clothes or fires. People and objects in the path of the shock waves caused by the blast were crushed and/or blown far distances by high-velocity winds. Exposure to direct radiation from the explosions was intense. All victims within 1 km (0.62 miles) of the hypocenter died within 2 weeks. The survivors had an increased incidence of

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3|1F

4|1J

1|16A (cont)

Sutton, Patrice

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PC_2078

malignancies, including leukemia, multiple myeloma, and cancers of the thyroid, breast, lung, colon, skin, and stomach. Increased radiation dose was also associated with development of cardiovascular and other nonmalignant diseases. Microcephaly with mental retardation was prevalent among children exposed *in utero*. The use of nuclear weapons also had profound and persistent social and mental health impacts. Thousands of children were orphaned, and community life and social systems were devastated.

DOE's current options for nuclear weapons and related capabilities remain inextricably linked to these catastrophic public health consequences. The use of nuclear weapons under present day scenarios such as against the Iranian facilities at Isfahan and the underground uranium enrichment plant at Natanz could cause at least 2.6 million immediate fatalities. A nuclear attack on Iran could expose 10.5 to over 35 million people in the wider region to significant levels of ionizing radiation. This is what a "nuclear weapons option" represents.

The National Cancer Institute estimates that 11,300 to 212,000 additional cases of thyroid cancer will ultimately occur among the U.S. population due to iodine-131 exposure from nuclear weapons testing. It is estimated that the global dissemination of radioactive fallout will have produced 430,000 fatal cancers by the year 2000. As some portions of radioactive fallout are long-lived, human exposure will persist and related adverse health effects will continue to occur for thousands of years among future generations.

According to DOE's own estimates, by the mid-1990s, the radioactive and other hazardous waste products of the U.S. nuclear weapons complex had accumulated at over 91 sites in 28 states and territories with radioactive and/or hazardous weapons waste estimated at 6.3 billion gallons, containing 900 million curies, along with extensive contamination of soil and groundwater.

As I write, contaminated surface and subsurface groundwater throughout the U.S. nuclear weapons complex is leaching, migrating, and moving offsite, posing a threat to major rivers and aquifers, which, in some cases, feed municipal water supplies. In short, the legacy of nuclear weapons has been sick workers, communities, and ecosystems throughout the U.S. nuclear weapons complex. It is extremely cynical for the DOE to suggest a reinvented complex when these existing problems have not been fully addressed.

Moreover, while the proposed Complex Transformation program would further endanger the environment and human life and health, it is striking how the DOE fails to adequately address the true environmental and human health impacts of its proposals. For example, there are several problems in DOE's analysis that gives a false impression that this program will have limited impact. First, risk estimates are calculated for each alternative at each site for each potential exposure separately (waste exposure, water exposure, air emissions). Second, the U.S. government still estimates the health risk of low levels of ionizing radiation using "reference man" characteristics, a practice that underestimates the risk to vulnerable populations from radiation released from various environmental media. Third, it is clear that the DOE's analysis is based on an unacceptable level of exposure for both the workers and the surrounding communities.

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PC_2078

For the sake of generations to come, and the health and security of all people, I join with the opinion of Physicians for Social Responsibility and many other organizations in rejecting the proposed Complex Transformation proposal, and support the concept of implementing a "curatorship" approach towards maintaining the "safety" of the nuclear stockpile in anticipation of its dismantlement as called for by the Non-Proliferation Treaty. The medical and public health community has long realized that nuclear weapons pose a unique threat to human survival. The final conclusion of the 2006 Weapons of Mass Destruction Commission report regarding nuclear weapons was that "All states possessing nuclear weapons should commence planning for security without formulating."

Sincerely,

Patrice Sutton

Patrice Sutton, MPH
311 Douglass Street
San Francisco, CA 94114
psutton2000@yahoo.com

Selected References

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3

Swaine, Anne

Page 1 of 1

Levens, Matthew

From: anne swaine [aswaine1@subghba1.net]
Sent: Thursday, March 27, 2008 6:15 PM
To: complex2030
Subject: no plutonium pls

anne swaine
211 N. Myrtle Avenue
Elmhurst, IL 60126-2626

March 27, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy

I strongly oppose the administration's proposal to have a plant producing ANYTHING that helps to build nuclear weapons. I want my grandson to grow up in a peaceful world, not one dominated by who has the best nuclear weapons.

Sincerely,

anne swaine
6305305865

PC_811

Swan, Doug

Page 1 of 1

Buenaflor, Justin

From: Doug Swan [swan@nomingside.edu]
Sent: Friday, March 21, 2008 1:47 AM
To: Complex2030
Subject: Opposition to new nuclear weapons

Dear Administrator D'Agostino,

The only reasonable way to defend mankind from nuclear destruction is to negotiate treaties on NO NEW NUKES as we have done. I strongly object to the current Bush administration, in its ebbing days, destroying this last chance out by flashing our non-proliferation position. Already we have carved out an exception for India to pursue nuclear arms. Now we want more nuclear weapons for the US. Then we have the nerve to tell Iran it can't have them. I fear an Iran with nuclear weapons. That is why I fear a USA that pursues even more nuclear weapons.

We are the aggressors if we follow this path. It is a path away from peace. Justice requires that we abandon this lunacy. Otherwise your actions of hubris will shape the destiny of the world to ashes.

Let your actions allow 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.

Maintaining stockpiles of weapons is an invitation to terrorists. There is no comfortable future for my grandson with them proliferating. They must be shrunk to be safely contained.

Sincerely,

[Your name and address]

PC_454

Swann Edwin, Marjorie

Page 1 of 2

Swann Edwin, Marjorie

Page 2 of 2

Marjorie and Colleague

PC_58

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

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

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

COMMENTS: *we citizens of the United States should be concerned that the U.S. A. is the only country in the world to have such nuclear weapons - not only the atom bombs on Hiroshima and Nagasaki, but also the depleted uranium weapons on Serbia and Kosovo, and on Iraq and Kuwait in the Gulf War, and on Iraq since 2003. These weapons cause long-lasting illnesses, as well as deaths, not only for the people living in those regions, but for our own and our children and grandchildren. Why aren't we doing up to our obligations under the Nuclear Non-Proliferation Treaty? Why aren't we even thinking about the development of new nuclear weapons? Why are we not specifically about the custom-developing nuclear weapons we refer to as "strategic nuclear weapons"?*

NAME *Marjorie Swann Edwin*

ADDRESS *612 Washington Street, Apt. A, Santa Cruz CA 95060*

PHONE *831-466-9809* *mswan@nuclearballot.net*

SIGNATURE *Marjorie Swann Edwin* DATE *January 19, 2008*

(over)

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21F (cont.)

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near McLaughlin and Colleague at DOE

January 19, 2008

I coordinated the work of the first two groups of hibakusha (atom bomb survivors) - 2 people in 1962 and 25 people (plus 15 anthropologists from Stranctone Christian University in Tokyo) in 1968. The hibakusha met with their counterparts in their country in the fields of medicine, social work, education, law, farming, government, etc. They met with "Never Again" - the use of nuclear weapons. They met with many thousands of U.S. people - from ex-Navyman Truman on down. They also urged that the U.S. not get involved in the war in Vietnam. They were not allowed to meet with the current President (Kennedy in 1962, Johnson in 1964), but they did meet with white House aides, people in government departments, Senators and Congresspeople, mayors and governors, etc.

Before the large group came in 1964, I visited Hiroshima and Nagasaki, and met many survivors, both in and out of hospitals. It was a profound experience for me. I came more fully to understand the long-lasting (over generations) effects of nuclear weapons. Why any country wants to develop, use or threaten to use them, is incomprehensible to me.

While here, the hibakusha kept getting messages of family members or friends dying or becoming ill from the various kinds of "atomic sickness." We know the same thing happened to Iraqi survivors of the Gulf War, especially children affected by the depleted uranium weapons.

I also know veterans of World War II and of the Gulf War who have been affected. It took many, many years for the U.S. government to acknowledge that its own troops - mostly men and some women - had been affected by their being in the Pacific, by the bombings of Hiroshima and Nagasaki (around U.S. soldiers were in the U.S. in Hiroshima on August 6, 1945; many more met in very shortly after the bombings of both cities); and by the depleted uranium weapons used in Kuwait and Iraq.

The U.S. led the world in the development and construction of nuclear weapons. It has never led the world in the disarmament of nuclear weapons. Marjorie Swann Edwin

516A

41J (cont.)

Swift, Thomas

Page 1 of 1

Swinford, David

Page 1 of 2

PC_1244

Levens, Matthew

From: Thomas Swift [swift@csus.edu]
Sent: Thursday, March 27, 2008 4:23 PM
To: Complex2030
Subject: Nuclear weapons

Thomas Swift
 5308 Shepard Ave.
 Sacramento, CA 95819-1732

March 27, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

The U.S. promised in the Non-Proliferation Treaty to reduce its massive arsenal of nuclear weapons, adequate to destroy the world many times over.


We have broken this treaty by not significantly reducing our large arsenal. Now the U.S. government plans to improve our nuclear weapons!

What example does this give to other countries? We come across an outlaw nation, dangerous to ourselves as well as to others.

Sincerely,

Thomas Swift

PC_34


DAVID SWINFORD
 STATE REPRESENTATIVE

DISTRICT 67
 CARBON • MOORE • POTTER • SHERMAN COUNTIES

February 13, 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:

Thanking 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.

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."

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CHAIRMAN, HOUSE COMMITTEE ON STATE AFFAIRS • REGULATED INDUSTRIES

<p>Central Office P.O. Box 25116 Austin, TX 78760-2510 (800) 446-2391</p>	<p>District Office 800 S. Tyler, Suite 1403 Lubbock, TX 79601-12013 (800) 374-9797 • Fax (800) 374-0866</p>
<p>District Office 616 E. First Street Dallas, Texas 75029 (800) 333-4445</p>	<p>Fax (800) 985-9472</p>

Swinford, David

Page 2 of 2

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 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.

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,

David Swinford

David Swinford
State Representative
District 87

115A
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Swinney, Rachel

Page 1 of 1

PC_2087

Levens, Matthew

From: rachel.s.swinney [chawohaw40@juno.com]
Sent: Thursday, April 10, 2008 8:50 AM
To: Complex2030
Subject: weighing in

Dear Mr. Wyka:

I am very disappointed that our country has not complied with the nonproliferation treaty we agreed to many years ago. I would like for us to be leading the world in nonviolent ways of addressing conflict. As a human race, we are way smarter than such barbaric ways of reacting to problems, with bombs. Let's tap into that intelligence among us.

It is a disgrace to be out of compliance to our obligations while expecting others around the world to listen to us tell them to disarm.

No new bombs, no more bomb plants. No life extension plans for our old bombs. Instead set up an office of folks whose job it is to concentrate on peaceful solutions. Include George Shultz, Henry Kissinger, Sam Nunn, and William Perry. I agree with their position that the world needs to be free of nuclear weapons and be serious about it. That is my feedback.

Rachel Swinney
TN citizen

11F

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Swiss, Thomas

Page 1 of 1

Swords, Diane

Page 1 of 8

Levens, Matthew

From: ms@infamous.net
Sent: Thursday, April 10, 2008 1:16 PM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

PC_2133

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 greatly concerned with the DOE's plan to place a nuclear research site on the territory of the Western Shoshone Peoples

While reducing and consolidating nuclear weapons programs is a fine idea, Complex Transformation's capability to research, develop, and manufacture new types of nuclear weapons is unnecessary. The U.S. possesses orders of magnitude more nuclear deterrent capability that could be needed for the foreseeable future.

And as we argue that Iraq should stop its nuclear research program, Complex Transformation undermines our non-proliferation efforts.

Instead of recreating the capacity to produce new, unnecessary nuclear weapons, the DOE should focus on shrinking the still-over-sized 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,
 Thomas Swiss
 2119 Arlomme Drive
 Baltimore, MD 21228

Levens, Matthew

From: Diane R Swords [dswords@maxwell.syr.edu]
Sent: Monday, April 07, 2008 5:46 PM
To: Complex2030
Subject: Public Comment

Attachments: NCL_map.gif; Mary Dickson Testimony.doc

PC_852



C m 12 tmon 0 4 SON

Below is my letter of testimony on Complex Transformation. Some supporting documents are attached.

April 5, 2008

144 Kensington Pl.

Syracuse, NY 13210

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

Dear Sir,

I am writing to strongly oppose any aspects of the DOE Complex Transformation proposal that include producing or preparing to produce new nuclear weapons. While some aspects of the proposal may be laudable (downsizing the nuclear complex and cleaning up radioactive contamination), production of weapons is against international treaty obligations, the will of the American people, and the collective interests of the world community.

Particularly, plans to build a new plutonium pit factory and upgrade the nuclear weapons complex must be stopped. The Chemistry and Metallurgy Research Replacement plant (CMRR), which could produce 80 new plutonium pits annually, would increase the US capacity to produce new weapons, a capacity we have not had since the closing of Rocky Flats and should not seek at a time when we are trying to prevent proliferation of nuclear weapons.

Nuclear weapons are sold to the US public as a means of defending people living in the US against attacks by other nations. But history shows that we are as much at risk from the weapons of our own nation as we are from any enemy or so-called rogue state. And the risk is not hypothetical or based on possible eventualities, but already has affected us for the last 60 year. The health effects of the nuclear complex to date illustrate that

Swords, Diane

Page 2 of 8

concern for the public has never been reflected in nuclear developments. PC_852

The original research and production of the bomb affected people in my state of New York directly. Some Manhattan Project sites that were contaminated with radioactive materials have yet to be adequately remediated. The FUSRAP (Former Use Remedial Action Program) was started in 1974 by the Department of Energy and transferred to the Army Corps of Engineers in 1997. Of the 46 contaminated sites in 14 states around the country, identified by DOE, several are in New York State, concentrated around Buffalo, Niagara Falls and Albany. While some have been remediated to the standards of the Army Corps of Engineers, others have not [i] <https://exchange.syr.edu/exchange/drswords/Drafts/?Cmd=new#_ednref1>, and still contain "levels of radioactive contamination above current guidelines"[ii] <https://exchange.syr.edu/exchange/drswords/Drafts/?Cmd=new#_edn2>, mostly uranium, thorium, and radium, with their associated decay products".[iii] <https://exchange.syr.edu/exchange/drswords/Drafts/?Cmd=new#_edn3>. The time it has taken to clean up these areas indicates the lack of priority placed on the human consequences of radioactive exposure.

Nuclear testing also affected my state - as it did many others far away from Southern Utah, presumed to be the only area contaminated by fallout by above-ground nuclear testing. Data show that radiation from tests in Nevada was picked up by the jet stream and dispersed over far-away parts of the country. Albany area journalist Bill Heller, author of A Good Day Has No Rain, documented the thunderstorm that brought torrents of fallout from a nuclear test in the Nevada Desert in April of 1953. He claims that Queens County, NY twice ranked number one in fallout in the entire nation. Downwinder Mary Dickson notes that "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." She states "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." [iv] <https://exchange.syr.edu/exchange/drswords/Drafts/?Cmd=new#_edn4> And this is why I note now that we cannot trust assurances that this new plant will not cause health problems.

One only need to look at the history of the earlier plutonium pit plant at Rocky Flats to see other examples of the lack of attention to environmental and human health impacts. Rocky Flats "acquired a name for poor environmental and safety oversight leading to two major plutonium fires resulting in significant exposure to local populations (nearly 850 fires total), lost plutonium in the venting ducts, severe groundwater contamination, and a host of other issues" [v] <https://exchange.syr.edu/exchange/drswords/Drafts/?Cmd=new#_edn5>. Although safety reforms began in 1972, there were still accidents connected to both plutonium and beryllium. In 1989 the FBI raided Rocky Flats for breaking environmental laws, and the plant soon was closed in spite of DOE expenditures and publicity to try to re-open it.

My Downwinder friend, Mary Dickson says, "nuclear testing has nothing to do with the war on terror: it is terror itself." Nuclear weapons protect no-one and endanger us all. Nuclear development perpetrates terror on US citizens even when weapons are not exploded. And it encourages other nations to seek them, raising tensions and likelihood that they will be used.

Thank you for including my comments opposing any nuclear weapons development.

Sincerely,

Diane R. Swords, Ph.D

[i] <https://exchange.syr.edu/exchange/drswords/Drafts/?Cmd=new#_ednref1>
http://www.lib.usace.army.mil/fusrap/public.htm

[ii] <https://exchange.syr.edu/exchange/drswords/Drafts/?Cmd=new#_ednref2>
http://www.lib.usace.army.mil/fusrap/docs/fusrap-fs-general-2006-09.pdf

Swords, Diane

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[iii] <https://exchange.syr.edu/exchange/drswords/Drafts/?Cmd=new#_ednref3> PC_852
http://www.mvs.usace.army.mil/OC/fusrap.htm

[iv] <https://exchange.syr.edu/exchange/drswords/Drafts/?Cmd=new#_ednref4> Dickson's complete letter, a map of nuclear fallout, and a description of methods used by author Richard Miller to trace relationships of cancers to nuclear fallout, are enclosed.

[v] <https://exchange.syr.edu/exchange/drswords/Drafts/?Cmd=new#_ednref5>
http://www.psr.org/site/PageServer?pagename=security_nuclear_weapons_development_MPP_rearm

Swords, Diane

Page 4 of 8

Mary Dickson
417 8th Avenue
Salt Lake City, UT 84103
(801) 581-3263
siklala@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 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.

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

PC_852

Swords, Diane

Page 5 of 8

PC_852

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 underground 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.

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.

Mary Dickson is a downwinder and writer in Salt Lake City, Utah.

Swords, Diane

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PC_852

Richard Miller-Methodology Statement

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 glioblastoma 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 able to parse many of the other radioisotopes from the I-131 values. While the process was cumbersome, it was not mathematically difficult. The salt 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.

Swords, Diane

Page 7 of 8

PC_852

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.

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.

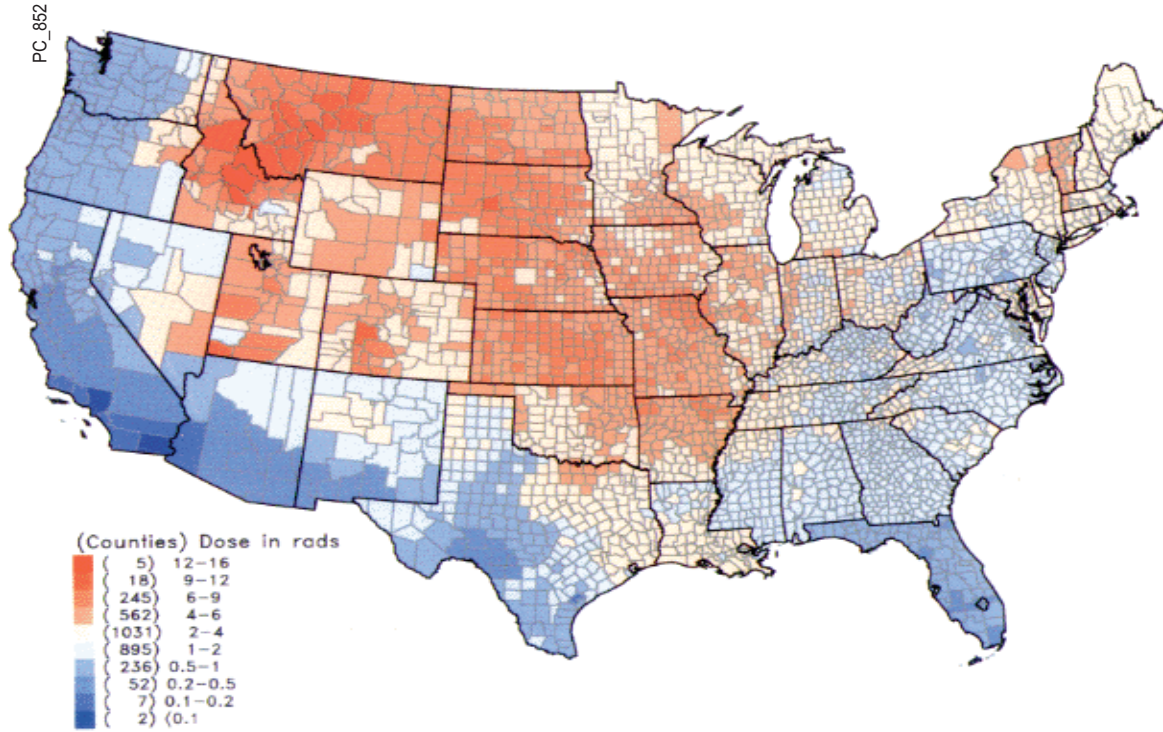
The link between one isotope—Ba139 and male colon cancer for 1990-1998 is so strong that the correlation returns a Z score of 19.

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.

Figure 1: Per capita thyroid doses resulting from all exposure routes from all tests



PC_1008

Public Comments regarding the DOE Complex Transformation

In addition to the public comments I made at the DOE public hearing regarding Complex Transformation held on 3/19/08 in Livermore, CA, I am also submitting these written comments to be entered into the public record. Please be advised that I expect a written response from the DOE and any government officials that deal with nuclear policy in nuclear weapons, nuclear power and safety, and nuclear waste disposal, both in policy and funding.

I am against the Complex Transformation program and all nuclear programs that support it and our current nuclear policy both in defense and energy production for the following reasons:

116A

- 21F • Complex Transformation is a clear violation of United States obligations under article 6 of the Nuclear Non-Proliferation Treaty.
- 33A • The nuclear arsenal is in no need of replacement. This is a complete fallacy. We must decommission our nuclear weapons to reduce the risks posed by theft, terrorism, accident, and credibility in ongoing nuclear disarmament negotiations.
- 47J • There is no current solution to the problem of nuclear waste from weapons manufacturing, nuclear power, and the inevitable disposal of our nuclear arsenal. Solving this problem should be our highest priority, not as a prelude to more nuclear weapons and power development, but as an end to a defense program and energy technology that is outmoded, dangerous, expensive, and a security risk of the highest order.
- 59B • Our lack of energy independence in the United States is driving a wasteful and catastrophic defense and foreign policy which does not provide security or solve our growing energy dependence. DOE money allocated for nuclear weapons and nuclear energy would be better spent on R&D in sustainable renewable energy research, as well as other areas.

The following are projects that could be developed at a "green" Lawrence Livermore Lab:

- 620 • Research into high density battery and capacitor technologies: Increasing efficiency and capacity of electrical storage would transform our energy and transportation infrastructure and provide the foundation for rapid development of wind, solar, kinetic hydro, and other sustainable renewable energy sources that are time varying. The ability to "time shift" energy usage through storage would reduce the cost of energy and capture presently unutilized power capacity.
- Lawrence Livermore Lab is uniquely situated to develop a smart electrical grid infrastructure, based on the model of the Internet, to bring us into the 21st century and beyond. The proximity to Silicon Valley, the Altamont windmills, generous solar access, and kinetic hydro sources make this an ideal location for development and testing of this much needed renovation of our national electrical grid.

Swyers, Matthew

Page 2 of 2

6/20
(cont)

- Water, if not treated as a protected human right and resource, may become the source of the world's next major conflicts. Environmentally sound water reclamation, conservation/management, and desalination are all needed by the United States and the world in the 21st century.
- Biofuels research is in drastic need of reexamination. We have rushed headlong into funding projects of questionable net energy return and devastating effects on the environment and the available arable land for food production. Algae and other sources can be developed which do not compete for these resources, are sustainable, and give the maximum net energy efficiency. Algae research can also be developed symbiotically with water reclamation.

These are some of the projects that I believe are worthy of a world class Lawrence Livermore Lab dedicated to solving the problems we are facing in the 21st century.

Matthew Swyers
Resident of Livermore, CA

Szocik, Linda

Page 1 of 1

PC_604

Levens, Matthew

From: Linda Szocik [lszocik@earthlink.net]
Sent: Sunday, March 16, 2008 5:06 PM
To: Complex2030
Subject: Nuclear Weapon Manufacture

Linda Szocik
3729 S Packard Avenue, Apt 6
Saint Francis, WI 53235-4311

March 16, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

116A I am a Franciscan Sister who is committed to working for peace. I am writing because I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons.

21J I understand that there is another attempt by the administration to restructure and rebuild the Nuclear Weapons Complex, a key element being the construction of a new production plant in Los Alamos, New Mexico. 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.

38A 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 CRRR project is another irresponsible new program that should be rejected.

I urge you to oppose this action.

Sincerely,

Linda Szocik
414-482-0670

Takelal, Grace

Page 1 of 1

Buenafior, Justin

From: Grace Takelal [mailto:jamequa102@yahoo.com]
Sent: Tuesday, February 19, 2008 5:50 PM
To: Complex2030
Subject: We don't need more Weapons !!!!!!!!!!!!!

Grace Takelal
849 1/2 Fifth Avenue
Coracopolis, PA 15108-1552

February 19, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

116A: I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons. Use this
29B money to feed our children, give them better Health care and a safe environment to live and go to school in. Give our
children HOPE!!!!!!!!!!!!!!

Sincerely,

Grace Takelal
412-375-7100

PC_488

Talley, Thurman

Page 1 of 1

Buenafior, Delight

From: Thurman & Gaye Talley [mailto:thurman-gaye@prodigy.net]
Sent: Saturday, March 15, 2008 3:44 PM
To: DIV,Complex,Transformation
Subject: Form posted from Windows Internet Explorer.

Last Name=Talley
First Name=Thurman
Email Address=thurman-gaye@prodigy.net
Street Address=606 Rrm Road
City=Los Alamos
State=NM
ZIP Code=87544

Comments=I am a retired physicist who spent my entire career at Los Alamos mostly in direct contribution to and design of nuclear weapons. I believe the consolidation effort is timely and can best be effected by closure of nuclear weapon activities at either LLNL or LANL. Short of that step, I believe you have not considered some very important considerations.

New and improved technology comes about in often indirect R&D. The materials expertise at Los Alamos is broad and strong and has made many past conceptual improvements in the nuclear weapon arena. It is wise to continue that basic R&D and the capability to transform ideas into prototype hardware here at Los Alamos. This extends beyond fissile materials R&D to at least the areas of engineering structural design, tritium technology and high explosives.

The capability to hydro test at any facility is much safer in total with the ability to fabricate the potential hazardous materials like HE at or near that facility. Similarly potential improvements in tritium transfer systems can only be developed with the ability to handle tritium.

Finally, the design codes used in nuclear weapons design are critically dependent upon the physical data from a broad range of experimental measurements. This includes nuclear physics, equation of state and material opacities in addition to computational methods. All are best motivated and incorporated if they are in close proximity to the developers and users of the design codes. Distance or organizational separation can make close communication difficult.

I would be happy to expand on these topics in a classified discussion at your convenience.

15D1
26D
36B

Talley, Tim
Page 1 of 1

Levens, Matthew

PC_759

From: Talley, Tim W (TWT) [talleytw@y12.doe.gov]
Sent: Thursday, February 28, 2008 2:56 PM
To: Complex2030
Subject: Best Use of Tax Payer's Money

To Whom It May Concern:

The decision to continue work at Y-12 NNSA site should be an easy one. We have already taken steps to modernize the site, reduce the old footprint, and reduce the number of resources on the payroll. We have taken steps to consolidate EU material and safe guard it, we have plans to build a production facility next door. The basic structure is in place for areas of improvement, cost saving, and cost avoidance which saves taxpayers money.

Your mission statement states.....provide safe, secure, and reliable nuclear warheads in support of the nation's deterrent... remember we made part of the original bomb in Oak Ridge. We have a hand in every weapon in the U.S. arsenal. We have the science and technology next door to us with ORNL. We have the waterway, and TVA electricity. We have the educational system with more PhDs in this area than anywhere in the world. Our vision for the future is a smaller leaner less costly Y-12.

There should be no other chose. There should be a law that no one who is not a residence of the county or state should be allowed to come in and tell us what we need to do or what we can and can not do.

I was born and raised in Harriman TN, I am a residents of Powell TN.

Sincerely,

Tim W. Talley
EWX1-F12
Productivity and Process Improvement
Six Sigma Black Belt, EVP
Office: 865-574-5644
Pager: 865-417-5856

3/2C

Tappon, Jim
Page 1 of 1

Buenaflor, Justin

PC_536

From: Jim Tappan [jtappan@rochester.rr.com]
Sent: Tuesday, February 19, 2008 10:32 PM
To: Complex2030
Subject: Building a Nuclear Arsenal

Jim Tappan
197 Deerfield Dr
Rochester, NY 14609-3033

February 19, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

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

How can we rationalize attacking other countries because they might be thinking about gaining weapons of mass destruction and then turn around the CMRR project and increase our own nuclear arsenal. Bad enough that we maintain our arsenal.

2|1J Doesn't this send a contradictory message to the rest of the world? We don't trust anyone else with the power, but we would never be bullies and use this type of force to assure our ideas and ideologies.

Last year congress congress turn down 2 attempts by the administration to expand their arsenal. The CMRR project is another irresponsible program that Congress should reject.

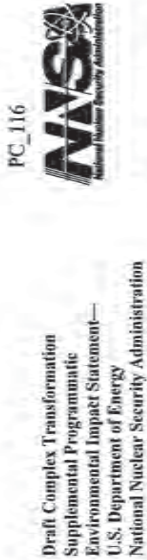
Thank you

Sincerely,

Jim Tappan
255-0362

Tatum, Gloria

Page 1 of 1



PC_116

Written Comment Form

Must be received on or before April 10, 2008

Complex Transformation is a great name. However, name to hide the increased production of more powerful nuclear weapons behind. How come we tell other countries they can't have nuclear energy weapons, while the U.S. has more WMD than any country in the world? Now the government wants to build even more powerful nuclear weapons. Our foreign policy is - Do AS I. Stay, Not AS I Do. Why doesn't the International Atomic Energy Agency inspect the USA for violations? What does the nuclear industry give us? 1. Dead people 2. polluted environment 3. Cancer & birth defects, 4. Targets for terrorists, 5. depends the same war and makes us less safe. 6. We don't have enough water to water our crops, so we don't have enough water to cool nuclear plants & nuclear waste. I want a wall free from nuclear weapons. I see my country spending billions on healthcare, education, housing and alternative forms of energy not trillions on the death industries which give us war & death. I say NO to expensive nuclear suicide and yes to life - Another world is possible!

11J

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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/NNNSA
 1000 Independence Avenue, SW
 Washington, DC 20585

or sent by electronic mail to:
 complextransformation@nnsa.doe.gov

Gloria Tatum

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

Tauxe, Margaret

Page 1 of 1

Levens, Matthew

PC_1443

From: Margaret Tauxe [mailto:mtauxe@aol.com]
 Sent: Thursday, February 21, 2008 6:11 PM
 To: Complex2030
 Subject: NO to "Complex Margaa Transformation"

Dear Mr. Wyka,
 I am saying a resounding NO to "Complex Transformation". (Who dreamed up this name?" We must not add to the nuclear weapon stockpile, nor even look like we would like to. I strongly object to this plan. Please abandon it. Margaret H. Tauxe

Margaret Tauxe
 144 N. Dithridge st
 Pittsburgh, PA 15213

16A

Taylor, F.

Page 1 of 1

Levens, Matthew

From: F. Taylor [fintaylor@hargray.com]
Sent: Sunday, April 27, 2008 9:47 PM
To: Complex2030
Subject: Stop new nukes!

F. Taylor
303 Marsh Pt.
Hilton Head, SC 29926-1588

April 27, 2008

Complex Transformation

Dear Complex Transformation:

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.

It reminds me of rearranging deck chairs on the Titanic.

Sincerely,

Dr. F. Taylor
843-681-4000

PC_1347

Taylor, F.

Page 1 of 1

Buenaflor, Justin

From: F. Taylor [fintaylor@hargray.com]
Sent: Tuesday, March 25, 2008 1:37 PM
To: Complex2030
Subject: No More Nuclear Weapons!

F. Taylor
303 Marsh Pt.
Hilton Head, SC 29926-1588

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|8A Congress rebuked the Energy Department's last attempts to upgrade the arsenal by deluding 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,

F. Taylor
843-681-4000

PC_471

Taylor, James

Page 1 of 1

Levens, Matthew

From: James Edward Taylor [jameset1@verizon.net]
Sent: Tuesday, April 08, 2008 12:59 AM
To: Complex2030
Subject: Reject "Complex Transformation" plan to build nuclear weapons

James Edward Taylor
708 Pico Blvd., #401
Santa Monica, CA 90405-6326

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:

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

I strongly oppose the Administration's so called 'Complex Transformation', the latest proposal yet to build new nuclear weapons. Of which we no longer need, and/or want.

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

Sincerely,

James Edward Taylor
310-399-1168

PC_1375

Taylor, Jennifer

Page 1 of 1

Buenaflor, Justin

From: Jennifer Taylor [jennifertaylor@earthlink.net]
Sent: Friday, February 22, 2008 10:30 AM
To: Complex2030
Subject: The Chemistry and Metallurgy Research Replacement project

Jennifer Taylor
4101 Randolph Avenue #1
Oakland, CA 94602-1313

February 22, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

I am a 43-year-old voter from Oakland, California and care deeply about the issue of nuclear weapons. I believe they are absolutely evil and I cannot believe I am a citizen of the county that invented them, let alone continues to pursue them.

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.

The Chemistry and Metallurgy Research Replacement project is yet another irresponsible new program to line certain people's pockets and should be rejected.

Sincerely,

Jennifer L. Taylor

PC_527

Taylor, Martha

Page 1 of 2

PC_923

Pg. 1.

Theodore Wylka
Complex Transformation SPEI 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. Wylka -
I oppose the Department of Energy Bomb-
plex Transformation because our country
has plenty of nuclear weapons and we don't
possibly annihilate the earth more than ONCE.
Flatly - there is no "no production"
alternative considered. If the current stockpile
is maintained there should be no new research
for new bomber production facilities built
to create new plutonium triggers.

- There is no air quality monitoring for
tritium at the Sandia National Laboratory at
the neutron generator facility. Currently, there
are only just air quality monitors at SNL
compared to many more at nearby facilities,
which have not violated federal standards as
frequently including Los Alamos National
Lab and Pantex, TX which all have more air
quality monitoring.

Monitoring Wells at Sandia National
Labs are technically flawed and are not placed
properly. In the flow of the aquifer, the monitor
contamination of radio-nuclides which will
end up in our river water and ultimately,
into us as a community.

116A
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Taylor, Martha

Page 2 of 2

614M.3

The Mesa del Sol Development is
only one mile away from the unlined
pits of the Sandia National Laboratory.
These pits are currently covered by three
feet of dirt. Dirt doesn't filter but
radioactive isotopes which are affecting
us right now. Children are especially
affected, including the unborn, by radon.
Until Department of Energy cleans
up they can't make any more bombs!

The NNM Environment Department
should enforce Federal Standards
regarding monitoring wells and air
quality monitors. Clean up the mixed
waste landfill and the chemical
waste landfill - STOP MAKING BOMBS!
They make waste.

Sincerely,

Martha Taylor
1635 Vallecito SW
Albuquerque, NM
87105
(505) 452-0453

7174

Taylor, Mary

Page 1 of 1

PC_647

Levens, Matthew

From: Mary Taylor [taylor@esjp.org]
Sent: Friday, March 14, 2008 1:02 PM
To: Complex2030
Subject: Nuclear Weapons

Mary Taylor
6053 33 Ave NE
Seattle, WA 98115-7304

March 14, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

116A I cannot say strongly enough how opposed I am to the development of a new nuclear weapons plant at Los Alamos or anywhere!

214C As a resident of the State of Washington I know the life threatening effects of nuclear weapons production and destructive consequences of toxic waste.

31J For our country to even think of producing new weapons is hypocritical and further erodes the credibility of our demanding that other countries forego developing nuclear arsenals.

410B I urge you to reject all efforts of and funding for the Chemistry and Metallurgy Research Replacement project.

116A I'm counting on your leadership in opposing this plan to modify nuclear facilities across our country.

Sincerely,

Mary Taylor
206-524-2240

Taylor, Jr., Arch

Page 1 of 1

PC_1710

Levens, Matthew

From: Arch Taylor [archtaylor@att.net]
Sent: Wednesday, April 02, 2008 1:26 PM
To: Complex2030
Subject: No more bombs

Hon. Theodore Wyka, Document Manager
Complex Transformation SPEIS

US Department of Energy

1000 Independence Ave SW

Washington DC 20588

Dear Sir:

11J Herewith I wish to express my strong opposition to the "Complex Transformation" proposal. It includes plans to build a new nuclear weapons complex and a permanent nuclear arsenal. This proposal is a violation of the Treaty on the Non-Proliferation of Nuclear Weapons (NPT), which the USA signed in 1968, declaring our "intention to achieve at the earliest possible date the cessation of the nuclear arms race and to undertake effective measures in the direction of nuclear disarmament."

21A Although the U. S. dismantled approximately 13,000 nuclear weapons since the fall of the Berlin wall in 1989, we have kept nuclear weapons on hair-trigger target and maintain their efficiency by means of the current "Life Extension Program."

11J (cont) If the proposed "Complex Transformation" proposal goes through, it will mean the expenditure of additional billions of dollars in nuclear weapons production, a clear violation of the NPT. It will "transform" old warheads into more powerful, longer-lived weapons of mass destruction. We will further undermine the NPT and set a very bad example to other nations of the world that have ambitions to own nuclear weapons.

11J (cont) Instead of being the world leader in making and keeping nuclear weapons, the US should become the honest leader in setting the example for actually reducing nuclear weapons and moving toward total nuclear disarmament.

Very sincerely yours,

Arch B. Taylor, Jr.

Temsamani, Kenza

Page 1 of 1

Levens, Matthew

From: medira422@sbcglobal.net
Sent: Sunday, April 06, 2008 6:10 PM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

PC_1816

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,

Hi, I am a mother of two boys and a teacher of many young children. I worry about the world we are creating for them. Please do anything you can to reduce nuclear weapons safely and do not continue to produce more. What we need is more communication and understanding and a weapon free 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,
Kenza Temsamani
100 Isabel Dr
santa cruz, CA 95060

cc: Senator Dianne Feinstein
Senator Barbara Boxer
Representative Sam Farr

Terpstra, Randy

Page 1 of 1

Levens, Matthew

From: eulyfro@hotmail.com
Sent: Saturday, April 05, 2008 3:42 PM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

PC_1603

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 bismantle the nuclear weapons we have now. Do not build new ones.

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,
randy terpstra
701 warren st
fayetteville, NY 13066

cc: Senator Charles Schumer
Representative James Walsh
Senator Hillary Clinton

Thomas, Dennis

Page 1 of 1

PC_208

Recycled Paper

Mar 3, 2008

Theodore Wyka
Complex Transformation SPEIS Manager
Office of Transformation, NA-10.1
US DOE
1000 Independence Ave SW
Washington, DC 20585

Dear Theodore Wyka,

For the sake of our health, oppose Livermore Lab's application to increase open-air bomb detonations of toxic and radioactive materials at Site 300 near Tracy including 'work for others.'

It is absurd that there is an open-air detonation of any radioactive material anywhere let alone a major population center in California!

The DOE is dumping tons of radioactive elements into our air, land and water and down our throats.

If our 'national security interests' require that we poison ourselves, what value is it?

The DOE does not need this site.

Request that it be closed.

Sincerely,



Dennis Thomas
147 St. Germain
Pleasant Hill, CA 94523

116A

Thomas, Ellen

Page 1 of 1

PC_1977

Levens, Matthew

From: ef@nucnews.net
Sent: Thursday, April 10, 2008 4:59 PM
To: Complex2030
Subject: Forget the Bomb

I testified second-to-last at the Washington DC hearing on the SPEIS, but submitted no written statement at that time. Here it is in written form:

I speak on behalf of the citizens of the District of Columbia. The majority of the voters of Washington D.C. do not want to be targets, nor do we wish to be responsible for the targeting of others with nuclear weapons.

116A This is proven by the voter initiative which was passed in DC in 1993, Initiative 37, the "Nuclear Disarmament and Economic Conversion Act." See <http://propl.org/propl/>

As a result of that success, DC's Congressional Delegate, Eleanor Holmes Norton, has introduced this legislation into the House of Representatives eight times so far.

DC citizens can see the wisdom of abolishing nuclear weapons and using the money saved instead to shut down and clean up the nuclear industries, and to convert other arms industries toward mass-producing clean energy systems (a win-win situation, as workers would be paid while they are retrained and their workplaces retooled).

220 The Department of Energy should live up to its name. Instead of polluting our precious environment and preparing to destroy vast numbers of innocent human beings and other life with nuclear weapons production and maintenance, the Department of Energy should be investing its resources in NON-nuclear, NON-fossil-fuel renewable, truly clean energy systems. It should have nothing to do with

39A nuclear weapons. It certainly should not spend another dime on the complex redesign plan during the last few months of this administration. And it should

42E.1 extend the public comment period until the new administration is installed, and give people a chance to speak all over the country, rather than just concentrating on locations of existing nuclear weapons facilities. This issue is entirely too important to be decided by a few people.

116A Please support Eleanor Holmes Norton's HR-1826, the "Nuclear Disarmament and Economic Conversion Act of 2007." Please DO NOT spend another dime on nuclear weapons, except to dismantle and destroy.

Ellen Thomas
Executive Director
Proposition One Committee
PO Box 27217
Washington, DC 20038
202-682-4282

1

Thomas, Jim

Page 1 of 1

Thomas, Matt

Page 1 of 1

Levens, Matthew

From: Jim Thomas [james_p.thomas@earthlink.net]
Sent: Saturday, March 29, 2006 5:34 PM
To: Complex2030
Subject: Comments on Complex Transformation PEIS

PC_1101

113A The Department of Energy/NNSA has failed to establish sufficient need for any of the proposed alternatives. There is no compelling need for any Reliable Replacement Warheads (RRWs). There is no need for any new nuclear weapon designs. There is no need for any Plutonium (Pu) operations.
31F All of the proposed action alternatives (as well as the no-action alternative) are against international law. The United States should be moving toward local nuclear disarmament. We must lead the world in moving beyond any reliance on nuclear weapons for our security. Total nuclear disarmament is a legal obligation under the Nuclear Non-Proliferation Treaty.
49B: Our country has many, more pressing needs for the billions of dollars we spend on nuclear weapons each year. Instead of building more nuclear weapons, we should be rebuilding our national transportation infrastructure, investing in renewable energy technologies, creating jobs in depressed communities, and reducing poverty throughout the world. Spending our effort and money on these types of projects will assure a sustainable national security for generations. Wasting our money on nuclear weapons will only bring increasing insecurity and suffering.
516A

Sincerely,
James P. Thomas
10703 - 8th Avenue NW
Seattle, WA 98177
james_p.thomas@earthlink.net



PC_162
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, 2006.

To whom it may concern
My name is Matt Thomas, I have recently been employed by BOLD 4-12 it has been a life long dream to be employed here I support the reaction project proposed if it wasn't for the past rise sides "Oak Ridge" would not be here it has made good jobs for thousands of people Thank you for your time
Matt Thomas

1101
215A

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@dmnat.doe.gov

You may also submit comments through the project website which can be found at:
<http://www.complextransformation.org/speis>

Thompson, Erik

Page 1 of 1

Form posted from Windows Internet Explorer.

Page 1 of 1

PC_523

Buenafior, Delight

From: Erik Thompson [EThompson@aegistg.com]
Sent: Thursday, March 06, 2008 12:59 PM
To: DIV Complex Transformation
Subject: Form posted from Windows Internet Explorer.

Last Name=Thompson
First Name=Erik
Email Address=ethompson@aegistg.com
Street Address=37 Madole Road
City=Edgewood
State=NM
Zip Code=87015

Comments-LANL has been an essential part of NM business since it's inception. They have brought a diversity of supplier needs to northern and central NM and must be retained in whole. It is likely some cleanup needs to be done in some areas but this is something that should be budgeted for and carried without compromising the vital national security mission of LANL. Environmental standards have evolved over the last 65 years as more has been learned about the effects of industrial work on the environment. We should do what needs to be done and keep moving ahead. LANL is a vital piece of our security...don't screw this up!

172:
215A

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Thompson, Jenne

Page 1 of 1

PC_983

Mr. Theodore Wyke April 25, 2008
Plans for "Complex Transformation" are simply unconscionable. We have known since the Trinity test that nuclear weapons are radioactive and have blithely continued producing them ever since. High level radiation kills cells outright. Low level radiation causes cells to mutate. I shudder to think that vets returning from Iraq will soon be having offspring with the ghastly deformities of Iraq children since 1991.

1140

But the looming problem, unsolved in 65 years, is what to do with radioactive waste. Even Los Alamos Lab objected to storage at Yucca Mountain because of its geologic instability. Storage at WIPP will cause leakage into a major aquifer. Continuous production defies the intent of the NPT, all existing treaties and any hope for a safe future.

214M

We must stop producing new nuclear weapons and start dismantling them. And then face the problem of how to safely deal with radioactive waste for millennia.

31F

416A

Jenne Thompson
3084 Jacoby Creel Road
Dayville CA 95524

Thompson, Lawrence

Page 1 of 1

Levens, Matthew

From: Lawrence Thompson [thompson14ster@gmail.com]
Sent: Tuesday, February 19, 2008 9:47 PM
To: Complex2030
Subject: Oppose New Nuclear Warhead Plant

Lawrence Thompson
1069 Felicia Court
Livermore, CA 94550-8134

February 19, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

18A Congress rebuked the Energy Department's last attempts to upgrade the arsenal by defunding
216A the Reliable Replacement Warhead and last year's proposed mega-scale bomb plant. The CWR
project is another irresponsible new program that Congress should reject.

Sincerely,

Lawrence Thompson
925 455 9473

PC_1427

Thomson, David

Page 1 of 1

DOE Complex Transformation Hearing
Hilltop House
Los Alamos, NM
Thursday, March 13, 2008

PC_1058

Submission by David B. Thomson

I am a Physicist who joined LANL in 1951. I worked full time in nuclear weapons testing,
neutron and plasma physics, achieved a PhD in 1960, then worked in high explosive driven
systems, atomic physics, the nuclear weapons program office, and magnetic fusion. I retired in
1990 and have subsequently been a lab affiliate and/or guest. Since retirement, I have
concentrated on nuclear arms control issues both for the lab and as a private citizen.

The views I give here are strictly my own.

Firstly I believe it is urgent that the USG seek new multilateral international treaties that will
enhance the NPT, and in balanced and fully verifiable stages, bring nuclear warhead inventories
of all warheads (deployed and stored) for the US and Russia, down from the many thousands
presently on hand to about 300 warheads each. France, UK, and China should be limited to no
more than a few dozen, and all other nations should adhere to zero nuclear weapons as called
for in the NPT.

11F

Secondly, I believe that LANL should be funded to carry on synergistic nuclear research
programs that will enable the laboratory to retain its expertise in the knowledge of nuclear
weapons design and characteristics so that any future needed capability may be reconstituted
as international threats may dictate. Happetully, LANL's weapons capabilities may be retained
without nuclear testing so that the US may ratify the CTBT and work more urgency for its
implementation.

28B

31E

Thirdly, I believe that LANL's long standing and effective programs of research in Nuclear
Safeguards for the IAEA, for space based observations such as Vela, for nuclear warhead
verification, and related verification technologies, should be continued and enhanced.

410B

Fourthly, I believe that LANL's nuclear research programs should include both basic science
as well as goal oriented research in nuclear energy production, including both fission reactor
concepts and fusion energy. LANL's magnetic fusion research program should be restored to
its 1990 level. Nuclear energy research provides the right mix of scientific talents to synergize
with the nuclear weapons knowledge capabilities urged above.

The DOE Complex Transformation program, as I have heard it explained for these hearings,
appears to me to be in conformity with these goals.

513A

LANL may retain a Pit production capability for research and replacement purposes, but
operations budgets for such work should not exceed 20% of the total LANL research budget,
except in extreme emergencies.

410B
(cont)

Thank you for this opportunity to express my views.
I hope to discuss these issues in more detail in appropriate venues.

David B. Thomson,
LANL retiree (PhD, Physics)
1917 Spruce
Los Alamos, NM 87544
(505) 862-5409
David1 sr@newmexico.com

Resumes/ Publications available on request.

Los Alamos, NM (AM)

Thornley, Jaynee

Page 1 of 1

Levens, Matthew

From: carot@ngcable.com
Sent: Saturday, April 05, 2008 3:26 PM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

PC_1585

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 reduce the facilities, workforce, and redundant capabilities within the nation's sprawling nuclear weapons complex.

1|20 However, our government is covering up big time. Have you heard of Stan Myers? Just type his name in at the Google web site. Stan was murdered along with 3 scientists in the mid 2000. Stan was one of the first to create a car to run on hydrogen fuel created with salt water, that was about 30 years ago. Now in the U.K. and California, Meyer's patented discoveries (which expired June 26th) have been successfully replicated? The long held scientific understanding of how water works is now in shambles. It's now possible to burn ordinary water in any internal Combustion Engine, Turbine, Furnace, or Torch, processing it into fuel on-demand. It will replace fossil fuels, changing the way our civilization is powered. Arab oil producing countries 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,
Jaynee Thornley
1162 Tovar Trail 74
Flagstaff, AZ 86001

cc:
Senator John McCain
Senator Jon Kyl
Representative Rick Renzi

Thuot, Michael

Page 1 of 1

Levens, Matthew

From: mthuot2@comcast.net
Sent: Saturday, April 05, 2008 11:47 AM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

PC_1657

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,

Comment from:
Michael Thuot PO Box 608 Sandia Park, NM 87047
As a long term employee at Los Alamos national Lab, 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.

1|5D However, the current Complex Transformation plan puts far too much emphasis on re-creating the unnecessary capability to research, develop, and manufacture new types of nuclear weapons.

2|16A 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.

3|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.

4|11B 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.

2|16A (cont) Instead of recreating the capacity to produce new, unnecessary nuclear weapons, the DOE should focus on shrinking the still-over-sized 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,
Michael Thuot
PO Box 608
Sandia Park, NM 87047

cc:
Senator Pete Domenici
Senator Jeff Bingaman
Representative Heather Wilson

Tibbits, Kathy

Page 1 of 1

Levens, Matthew

From: kathy tibbits [ktibbits@ieec.org]
Sent: Tuesday, January 29, 2008 3:12 PM
To: Complex2030
Subject: No nukes, please

PC_1417

Mr. Wyka:
At some point it becomes evident that there is no middle ground between nuclear power and nuclear weapons. The bright line is at "no nukes" rather than any policy which will take global focus away from a better future.

Kathy Tibbits in Stilwell, Oklahoma

kathy tibbits
Route 1 Box 130
Stilwell, OK 74960

Tichenor, John

Page 1 of 1

Buenaflor, Justin

From: John Tichenor [jt4notes@yahoo.com]
Sent: Wednesday, January 16, 2008 3:08 PM
To: Complex2030
Subject: Citizen Comment regarding SPEIS, Complex Transformation

PC_554

Mr. Wyka:
Save the money.
Stop wasting it on new nuclear weapons.
As a Republican from the frugal and truly conservative tradition of sticking with what works and avoiding losses, I request a renewed focus on our most convincing diplomatic tool: A thriving domestic economy, supporting families.

To impoverish our homeland is stupid.
To depend on armaments is incomplete.
To invest in diplomacy is the answer. JT

John Tichenor
P.O. Box 453
Vallecito, CA 95251

Tierce, Virginia

Page 1 of 1

PC_1561

Levens, Matthew

From: Virginia Tierce [vtierce750@msr.com]
Sent: Wednesday, April 23, 2008 10:01 AM
To: Complex2030
Subject: Reject "Complex Transformation" plan to build nuclear weapons

Virginia Tierce
400 Broadway N apartment 301
Fargo, ND 58102-4462

April 23, 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:

110A The DOE should reject the Complex Transformation proposal to revamp the nuclear weapons arsenal.

If no other country can have nuclear weapons we need to stop making them too.

21U 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,

Virginia Tierce

Tierney, James

Page 1 of 1

PC_1621

Levens, Matthew

From: jtierney4@hawaiiintel.net
Sent: Saturday, April 05, 2008 4:54 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,

116A We do not need a new generation of nuclear weapons. We need to be focusing on the safety and security of our present nuclear arsenal as it is drawn down, along with shrinking our over-sized nuclear weapons manufacturing complex. Designing and producing new nuclear weapons sends exactly the wrong message to the rest of the world -- that obtaining nuclear weapons is a true path to security. No one is safer in a world with increasing nuclear proliferation. There are many other pathways to lasting global security that can be explored and promoted that are far more effective than military -- and especially nuclear -- force.

Please include my comment in the environmental review of the DOE's "Complex Transformation" initiative.

Sincerely,

James T. Tierney
POB 791320
Paia, HI 96779

cc: Senator Daniel Inouye
Senator Daniel Akaka
Representative Mazie Hirono

Toeppen, John

Page 1 of 1

Buenafior, Dwight

From: John Toeppen [toeppen1@gmail.com]
Sent: Monday, April 07, 2008 12:52 PM
To: DIV,Complex,Transformation
Subject: Form posted from Windows Internet Explorer.

Last Name=John
First Name=Toeppen
Email Address=toeppen@comcast.net
Street Address=5271 Irene Way
City=Livermore
State=CA
ZIP Code=94550
Comments=

1100 While the traditional role of LLNL in the nuclear complex has been to provide design and testing services we have done much more than that. The reduction of our broader scope indicates a failure to appreciate our past contributions while preventing us from providing similar contributions in the future. This includes our capability to rise to unforeseen future events outside of the scope of our new narrow responsibilities.

2188 There will be considerable difficulty in the future in recruiting and retaining a competent staff. Narrow task definitions defined by individuals without scientific work experience will limit the attractiveness of future jobs. The elimination of core capabilities reduces our set of scientific tools and will deter future toolmakers from seeking employment. The changes in employment security and benefits will encourage competent individuals to go elsewhere.

1100 Livermore's proximity to Silicon Valley and affiliation with UC Berkeley has been instrumental in previous program successes. It is desirable to have a National Laboratory with a broader scope located in an area that draws from such resources. Overall, it makes no sense to knock the teeth out of our guard dog, but this is exactly where we are going.

John Toeppen

PC_1004

Tofaneli, Norma

Page 1 of 1

Levens, Matthew

From: enj@sonic.net
Sent: Sunday, April 06, 2008 2:36 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,

Control them - don't add to them.
19A; You can already destroy the planet with the nuclear arsenal you currently have. How many
216A times do you need to destroy it to believe it's dead?
enough enough enough ENOUGH!!!!!!

Sincerely,
Norma Tofaneli
P. O. 434
Callistoga, CA 94515

cc:
Senator Dianne Feinstein
Senator Barbara Boxer

PC_1746

Tokunaga, Jane

Page 1 of 2

Levens, Matthew

From: Jane Tokunaga [janetokunaga@cybermesa.com]
Sent: Thursday, April 03, 2008 1:41 PM
To: Complex2030
Subject: comment on NNSA plans to make Los Alamos Lab the center for plutonium production

Ted Wyka, NNSA
Office of Transformation NA-10.1
1000 Independence Ave, S.W.
Washington, D.C. 20585

Dear Mr Wyka,

I attended the public hearing in Santa Fe, New Mexico in March, 2008 concerning the future of the Los Alamos Lab, among others.

Here is my comment:

I do not want my home, my city, my state, my country polluted with nuclear waste.

I am very much opposed to plutonium manufacturing and R&D at Los Alamos.

The city and county of Santa Fe is working on a water project called the Buckman Diversion Project. The Rio Grande River is the source of this water. They have already identified areas where pollution from Los Alamos Lab has and can continue to seep into the river and thereby pollute the drinking water of the City of Santa Fe.

The Los Alamos Lab and DOE have a dismal record of denial and irresponsibility in regards to the production and disposal of nuclear waste.

I would like to see Los Alamos become the leader in research on how to safely dispose of the already existing nuclear waste.

Los Alamos and Sandia scientists should be shifting their focus to meet the needs of the 21st century:

Tokunaga, Jane

Page 2 of 2

- Safe disposal of existing nuclear waste
- Sustainable and renewable energy production

We could become a world leader in these technologies, revive our economy, create new jobs.

Sincerely,

Jane Tokunaga
264 Camino de la Sierra
Santa Fe, NM 87501

PC_1095

Tolidano, Peggy

Page 1 of 2

3165 Suburban Avenue,
Costa Mesa, CA 92626
April 19, 2008

PC_932

Re: Complex Transformation (formerly known as
Complex 203B)

Dear Mr. Niyka:

I am opposed to the development of any kind
of "new" or "updated" nuclear weapons.

Discussions about developing nuclear weaponry
as a "protection" of American security, from attack
by another political entity or by terrorists are
nothing more than a ploy, a sham, a diversion
of attention, an obfuscation of the real issues
which require a competent government
ought to be addressing: the serious economic
and social injustices perpetrated daily on our
population here at home by policies promoting
the poverty, racism, & marginalization of
whole segments of our own citizens and by
the appalling greed and irresponsible policies
of the few corporations and their executives who
actually "run" this nation.

Nuclear weaponry and the strategy of
threat & counterthreat of annihilation of one
or another sector of our planet is outdated,
outfashioned, repetitive of old mistakes, and

116A

213A.1

30B

43A

Tolidano, Peggy

Page 2 of 2

43A
(cont.)


a complete waste of precious resources needed
by all nations to build economic stability.
I require of my leaders an entirely new,
forward-directed strategy to bring economic
and political equity and equality, not a
sophomoric demonstration of increased or
improved capacity to blow the "other guys"
country to smithereens.

I await your response to my letter,
and the opening of a civil dialogue between
this nation and its equals worldwide -
all its equals.

Sincerely,

Peggy Tolidano - American
citizen by birth & choice,
- voter, parent, taxpayer,
churchgoer & individual
willing to speak truth to
power.

Toole, William
Page 1 of 1



February 21, 2008

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

Dear Mr. Wyka:

On behalf of the SRS Community Reuse Organization (SRSCRO), I am pleased to submit this letter of support regarding the Complex Transformation EIS and the proposed role of the Savannah River Site in the reconfigured Nuclear Weapons Complex.

As the U.C Department of Energy's designated Community Reuse Organization (CRO), the SRSCRO is a 501 (C) (3) private non-profit organization. SRSCRO is charged with developing and implementing a comprehensive strategy to diversify the economy of the five-county SRSCRO region in the Central Savannah River Area (CSRA) of Georgia and South Carolina. It is governed by a 22 member Board of Directors composed of business, government, and academic leaders from Georgia and South Carolina.

SPEIS

As proposed in the "Complex Transformation Supplemental Programmatic Environmental Impact Statement, the Savannah River Site would become the "center of excellence for operations involving large quantities of Tritium." We welcome this important mission, so vital to our national security. The Savannah River Site has a long and distinguished history of Tritium production performed by a highly skilled and dedicated workforce. We are committed to advanced hydrogen research and development as evidenced by our investment in the Center for Hydrogen Research located adjacent to the Savannah River Site in Aiken County.

Thank you for allowing our voice to be heard and to participate in this meeting.

Sincerely,
William R. Toole
William R. Toole
Chairman of SRSCRO

P.O. Box 696, Aiken, South Carolina 29802 P: 803.593.9954 ext. 1409 F: 803.593.4296
Serving the Counties of Aiken SC, Allendale SC, Barnwell SC, Columbia GA, and Richmond GA

Topper, Jack
Page 1 of 1

PC_1085

Levens, Matthew

From: Jack Topper (topper@inl.gov)
Monday, April 07, 2008 3:09 PM
To: Complex2030
Subject: NNSA's preferred alternative to Complex Transformation

I have a question for you:

15N: Would you please explain to me how it is in the best strategic interests of this nation to concentrate and store our entire stockpile of SWM in one single geographic location, and to make that location public knowledge?

27E: I sincerely hope we never need to use this material in weapons form again, but I would much rather have it and not need it, than to need it and not have it. Placing all the material in one spot will make it a tempting target to some. It seems to me that a single moderately well-executed strike by a rogue nation, or some other organization dedicated to causing great harm to the U.S., could devastate that area and severely limit our strategic nuclear reserves. For my money (my tax dollars) I think that distributed stockpiles are a more sensible approach.

I'm certain this question has been asked before, I just haven't heard the answer.

Jack D. Topper
Senior Scientific Associate
Team Lead, External Dosimetry
L-787
Lawrence Livermore National Laboratory
(925) 423-8082
(925) 423-0415 (fax)
(925) 423-7705 pager no. 04020

Torney, David

Page 1 of 1

Buenafior, Justin

From: David Torney [dtorney@valornet.com]
Sent: Sunday, March 16, 2008 9:56 PM
To: Complex2030
Subject: Comments on the SPEIS

PC_440

TWIMC:

A prerequisite for building any new weapons-complex facilities should be substantial completion of the cleanup of the DOE cold-war legacies. NNSA should not be allowed a fresh start until it has rehabilitated "itself". We know all too well that our government is sanguinary. Preventing war is advanced by keeping weapons out of its hands (consider, for example, the rogueishness of the DOD, in recently shooting down a satellite). It should be made explicit in the relevant statutes that the RRM is forbidden to be produced using any of the components of the weapons complex, new or old: a second prerequisite for building new weapons-complex facilities. A future act of Congress should be required to gain exemption, i.e. future hare-brained administrations must be effectively thwarted from suborning this rule.

Any new plutonium pit factory and its ilk should be designed to have zero emissions: like the Biosphere (in Tucson) but bombproof. As in the space race, the pertinent technological challenges should be embraced.

The NNSA seems to favor the alternative, "Distributed Centers of Excellence". This is likely to result in significant contamination of surrounding communities, and should be rejected in favor of the "Consolidated Centers of Excellence" alternative. Either do it right or don't do it at all. For once,

DOE should pay the full costs up front, rather than leaving radioactive legacies. In this instance, the government being a Scrooge is likely to hurt a large number of people and to leave Los Alamos and White Rock as ghost towns. Congress should therefore be inclined to loosen its purse strings.

Sincerely,

David Torney

David Torney
5 Sky High Way
Jemez Springs, NM 87025
(575) 829-3433

Torney, David

Page 1 of 1

Levens, Matthew

From: David Torney [dtorney@valornet.com]
Sent: Monday, April 28, 2008 8:45 PM
To: Complex2030
Subject: Comments on the SPEIS

PC_1957

TWIMC:

Thanks to all for the informative road show.

In designing zero-emissions weapons factories, you need to inventory every radioactive atom, e.g. of Pu. None get in the air or water or factory workers. Some go in the fabricated weapons and all the rest go in the ground: not at a temporary storage site but at a permanent site, such as Yucca Mountain.

This is not going to be easy or cheap (invoking the comprehensive plan), but if the DOE tries to do something on a shoestring and fails, it won't get any more chances. Championing the RRM already has the NNSA on tenterhooks.

Sincerely,

David Torney

David Torney
5 Sky High Way
Jemez Springs, NM 87025
(575) 829-3433

Toth, Lisbeth

Page 1 of 1

Levens, Matthew

From: ltoth@sbglobal.net
Sent: Sunday, April 06, 2008 10:17 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 MORE NUKES

Sincerely,
Lisbeth Toth
27 Evening Star Drive
Seymour, CT 06483

cc:
Senator Chris Dodd
Senator Joe Lieberman
Representative Rosa DeLauro

PC_1797

Townsend, Clayton

Page 1 of 1

Levens, Matthew

From: claytontownsend@yahoo.com
Sent: Monday, April 07, 2008 9:40 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,

To whom it my concern:

I support my country whole heartedly, especially the military.

My question is why would the DOE be creating a new series of nuclear weapons. I support the maintenance of our current stockpile ever at current level, but not this. Why is the DOE and the government not creating safer more viable nuclear energy to reduce our dependency on foreign oil. I look forward to any and all replies.

1|3A
2|1B

Sincerely,
Clayton Townsend
7108 Seate Brier Ct.
Fort Worth, TX 76137

cc:
Senator Kay Hutchinson
Representative Ray Granger
Senator John Cornyn

PC_841

Tracy, Karen

Page 1 of 1

Traina, Denise

Page 1 of 1

Levens, Matthew

From: Karen Tracy (ktracy@yahoo.com)
Sent: Tuesday, April 29, 2008 11:44 PM
To: Complex2030
Subject: No More Nuclear Weapons Programs

Karen Tracy
578 Lobnes Dr.
Fairborn, OH 45324-5523

April 29, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

Dear Friends,

I am a mother, a teacher, and a conflict resolution professional in Fairborn, Ohio. I oppose nuclear weapons, and urge you to refuse any proposal which would lead to a rebuild or build-up of the U.S.'s nuclear weapons program and arsenal.

Military professionals understand that nuclear weapons are not an efficient form of either offense or defense.

Nuclear weapons are a waste of money which would be better spent in creating an extensive program to track and monitor fissionable materials everywhere in the world.

I would be proud to see international cooperation inspired by a US commitment to end nuclear weapons and the threat of nuclear war within one generation.

First Strike policy is immoral, and, in light of the new reality of the world we now live in -- with nuclear-armed terrorists willing to self-sacrifice -- the threat of destroying whole countries in retaliation is a ridiculous strategy.

The time of cold war, balance of power, detente, first strike...this time is passed. Please make a choice that will turn the tide, and make the USA a leader in guiding the world to invest in peace and prosperity, not in death and war.

Thank you,

Sincerely,

Karen Jeffers Tracy
937-609-0446

PC_1412



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

PC_115



Written Comment Form

Must be received on or before April 10, 2008.

To Whom It May Concern:

As a citizen, a taxpayer, a health care worker and a mother I am opposed to the Complex Transformation Program being proposed. We know that the use of nuclear material to produce a deterrent is not viable anymore. What we like is the only nation that has def. we could hold that as true. But not anymore now we are faced with a means to protect and defend our people and we must remember that while we need to be protected, fair political and trade policies would assist us, more than holding weapons aimed at other nations. The part of diplomacy, fairness and understanding will yield much more in terms of global peace and prosperity. We need to begin to put our technological energies into inventing the ways we already have already created and to use our technology to create a truly better way and promote energy production in much safer ways.

116A

213A.1

31J

414M

59B; 69H

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

Denise Traina
dtraina@gnul.com

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

Tramer, Sharon

Page 1 of 1

Page 1 of 1

PC_2105

Levens, Matthew

From: Sharon Tramer [s_tramer@yahoo.com]
Sent: Thursday, April 10, 2008 6:36 PM

To: Complex2030

Subject: Plans for increasing the hazards the world faces

Dear Committee Members:

I have been exceedingly troubled for my entire life. Being 65 years old, I never knew a safe period in my lifetime, because we had developed the bomb before I went to school. Now it appears that some people in this country feel they need to rattle those sabers with even greater clout, and I feel that opinion is ill-conceived. How on earth can we expect other countries (i.e., Korea, Iran) not to continue their build-up of their nuclear arsenals when we are sneakily considering increasing ours under the guise of making them more efficient? We still do not know how to handle wastes from nuclear power plants -- let alone knowing how to recover from using nuclear weapons, yet very bright scientists still defend the revamping of our arsenal.

This kind of thinking reminds me of some scientists who truly lived to regret what devastation had been unleashed by their brilliance. Dr. Albert Einstein is a prime example of a person who did not believe a build-up of weapons was the wisest avenue to striking PEACE. Please reconsider and take time to consider learning how to mediate more peaceful means of resolving differences. The planet cannot face more degradation.

Sincerely yours,

Sharon J. Tramer

Do You Yahoo!?
Tired of spam? Yahoo! Mail has the best spam protection around
<http://mail.yahoo.com>

5/19/2008

2-1190

October 2008

Treichel, Judy

Page 1 of 1

PC_2020

Levens, Matthew

From: Judywvl@aol.com
Sent: Wednesday, April 30, 2008 1:23PM
To: Complex2030
Subject: Comments on the Draqit SPEIS

The public worldwide is expressing opposition to nuclear weapons. To pursue the proposed Complex Transformation and the Reliable Replacement Warhead program is the absolute wrong thing to do. To move ahead with either or both of these activities would violate the non-proliferation treaty (NPT). There are currently plans for an International NPT Review Conference and the US should participate in those meetings and wait until the conclusion of those activities before contemplating any new activities on nuclear weapons of the weapons complex.

Modernization of the U.S. nuclear weapons arsenal will lead to more countries gaining nuclear capability and will only thwart efforts to fight terrorism.

Judy Treichel
Executive Director
Nevada Nuclear Waste Task Force
P. O. Box 26177
Las Vegas, NV 89126
Phone: 702-248-1127
Fax: 702-248-1128

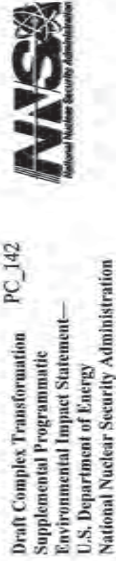
*****Need a new ride? Check out the largest site for U.S. used car listings at AOL Autos.
(<http://autos.aol.com/used?NCID=ac1cmp0030000002851>)

5/19/2008

2-1190

October 2008

Troy, Bill
Page 1 of 1



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

PC_142

Written Comment Form

Must be received on or before April 10, 2008.

Change the inclusion of a No Production alternative in the EIS for Complex Transformation and strongly endorse its adoption.

170

In my view the production of more nuclear bombs makes us more - not less - secure as a nation. It ensures our nuclear proliferation. Just as it would that the U.S. government is guilty of hypocrisy in its approach to world affairs, thereby exacerbating the hostility that causes nuclear proliferation to be such a threat to our security.

213A.1

*Bill Gray
4120 Fulton Dr.
Knoxville TN 37918*

311

Please use other side if more space is needed.

Comment forms may be faxed 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 mailed 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.complextransformation.speis.com>

True, Cynthia
Page 1 of 1

Levens, Matthew

PC_845

From: cynthia true [cindytrue@msn.com]
Sent: Thursday, April 03, 2008 10:08 AM
To: Complex2030
Subject: Don't build up nuclear arsenal

cynthia true
181 12th st.
brooklyn, NY 11215-3990

April 3, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

Please move towards world nuclear disarmament. The toxins from past nuclear bombs are still in our air compromising our health. Please stop using depleted uranium in bombs and stop dropping bombs on Iraq. Please don't make plutonium pits or modify nuclear facilities or arsenals. Please make nuclear weapons anywhere illegal so that the human race is not annihilated. thank you.

Sincerely,

cynthia true

Trujillo, Susan

Page 1 of 1

Levens, Matthew

PC_1834

From: Pete and Susan Trujillo [mailto:psnet@taosnet.com]
Sent: Friday, March 28, 2008 9:48 PM
To: Complex2030
Subject: Los Alamos National Labs

Dear Sirs:
We live about 50 miles downwind from the Labs. We do not want any new materials used in weapons of mass destruction introduced into the environment of northern New Mexico. LANL should concentrate on cleaning up their existing mess and recycling the existing toxic materials.
Instead of engineering weapons, LANL should be working on things like renewable energy, and water treatment. The USA could promote peace and health, instead of war.
Thank you for your consideration.
Susan Trujillo
PO Box 2439
Ranchos de Taos, NM 87557

Trumbo, Jan

Page 1 of 1

Levens, Matthew

PC_1092

From: Jan Trumbo [mailto:jtrumbo@opus1.com]
Sent: Thursday, March 27, 2008 1:25 PM
To: Complex2030
Subject: Reject "Complex Transformation" plan to build nuclear weapons

Jan Trumbo
1404 E Lind Rd
Tucson, AZ 85719-2244
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 How can we expect countries such as Iran to accept limitation on nuclear weapons technology when we actively increase and improve our arsenal? We must instead move in the direction of upholding the Nuclear Non-Proliferation Treaty. I don't want to spend money on weapons that are never used; we have enough already to be a deterrent.

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,

Jan Trumbo

Trumbore, Conrad

Page 1 of 1

Levens, Matthew

From: Conrad Trumbore [conradt@udel.edu]
Sent: Wednesday, April 16, 2008 9:23 AM
To: Complex2030
Subject: New Nuclear Plants

Conrad Trumbore
441 Crosslands Drive
Kennett Square, PA 19348-2051

April 16, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

In my humble opinion, the time is now for reducing nuclear weapons, not producing more plutonium pits. The production of these pits does nothing for national defense and, in fact, merely produces more dangerous material to safeguard, decreasing the nation's security.

We have a treaty obligation to reduce and ultimately ELIMINATE nuclear weapons. Let's get on with it!!

Sincerely,

Conrad Trumbore
610-368-7093

PC_1948

Tsairis, Barbara

Page 1 of 1

Levens, Matthew

From: Barbara Tsairis [btsairis@comcast.net]
Sent: Friday, March 28, 2008 8:51 PM
To: Complex2030
Subject: No to Complex Transformation

Barbara Tsairis
10 Chestnut St., Apt. 2205
Exeter, NH 03833-1878

March 28, 2008

Complex Transformation

Dear Complex Transformation:

I am strongly opposed to the plans of this Administration to modify nuclear facilities across the country, making it easier for the U.S. to rebuild its nuclear arsenal.

We are bound by the Nuclear Non-Proliferation Treaty to take steps to eliminate nuclear weapons. This program violates the spirit and letter of that Treaty and once again viscerates our moral authority to require other nation such as Iran to refrain from building nuclear weapons of their own.

Sincerely,

Barbara Tsairis

PC_1716

Turk, Margaret

Page 1 of 1

PC_292

March 17, 2008
900 E. Oak Hill Avenue
Knoxville, TN 37917

Theodore A. Wyka
Dept. of Energy
National Nuclear Security Administration
Washington, DC 20585

Dear Wyka,

In 1962 I earned my B.A. degree with a chemistry major. The knowledge of the "half life" of nuclear materials registered strongly. I went door to door working for the Non Proliferation treaty. Besides being against nuclear weapons I had a major concern about what we would do with the nuclear waste. It is a bigger worry now. As you know this is a big, expensive and potentially dangerous problem. We are seeing this in our local press with the accidents that have been reported recently at Oak Ridge. Also the discussion about receiving 20,000 tons of nuclear waste from Italy is total non-sense! Look how long it's taken to process what's left at ORNL. We are becoming a nuclear waste dump!

These concerns, along with the other input from OREPA the Sisters of Mercy of the Americas and other groups and reading, prompt me to express myself. I oppose totally the **Stockpile Life Extension Program and the building of a new weapons production facility in Oak Ridge.**

The Nuclear Non Proliferation Treaty is being ignored by our nation. Money that is needed for our people is being cut from programs for needy Americans. It is time for us to attend to our own!

Please consider these remarks with the able presentations from the hearings.

Blessings!
Earnestly,
Sister Margaret Turk, RSM,
Sister Margaret Turk, RSM

19A
214M.3
314N

416A:
516H

69B

Turner, Susan

Page 1 of 1

PC_792

Wyka, Ted
Friday, February 22, 2008 3:51 PM
Complex2030
Fw: support Y-12 as uranium center and new UPF

----- Original Message -----
From: Turner, Susan B (XVT) <turnersb@y12.doe.gov>
To: Wyka, Ted
Sent: Fri, Feb 22 15:45:50 2008
Subject: support Y-12 as uranium center and new UPF

Please record my support for the NNSA Preferred Alternative:
Distributed Centers of Excellence

115A:
210

As a 20 year employee of Y-12, and 8 years at K-25 and ORNL, I have a great understanding of the wide task scope for Oak Ridge. The workforce at Y-12 is unparalleled. To remove the uranium mission and the UPF from them would be a great error on the part of DOE. The workers at Y-12 believe in their mission because they know it is ultimately for the security of the United States. It doesn't matter who is managing Y-12, the attitude is always to support the mission.

Thank you,
Susan

Susan B. Turner
Program Manager, Y-12 NSC
Nuclear Nonproliferation Research and Development
865-574-0661

Twine, Michael

Page 1 of 1

Twist, Mary Ellen

Page 1 of 1



Engineering & Management, Inc.
Success... the only option
101 Donner Drive
Oak Ridge, TN 37830

February 12, 2008

Mr. Ted Wyka
U.S. Department of Energy
Office of Transformation NA-10.1
1000 Independence Avenue, S.W.
Washington, D.C. 20585

SUBJECT: Draft Complex Transformation Supplemental Programmatic
Environmental Impact Statement
RE: Letter of Support of the Plan to Maintain a Uranium Center of Excellence
for the Y-12 Complex in Oak Ridge, Tennessee

Dear Mr. Wyka:

G2 Engineering & Management, Inc. (G2) welcomes the opportunity to share our comments on the National Nuclear Security Administration's Complex 2030 programmatic environmental impact statement. After review of the recommendation issued in early January of this year, G2 supports the NNSA's proposed plan to maintain a uranium center of excellence for the complex in Oak Ridge which was identified as the preferred alternative.

It is our hope that the Y-12 complex remains a key facility of the nuclear weapons complex. Y-12 maintains the reputation of a Distributed Center of Excellence providing the safe and secure storage of special nuclear material and the manufacturer of secondaries and cases for the NNSA.

We were very pleased to find that the Complex 2030 plan supports the ongoing mission of Y-12. G2 supports the following specific points contained in the draft plan:

- the transformation of the nuclear weapons complex to make it smaller, more responsive, safer and more secure.
- 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.

G2, as a contractor currently supporting of the mission and work at the Y-12 National Security Complex, we support the position which allows NNSA and the DOE to finish the clean up needed at the Y-12 site and to continue the important mission specific operations performed in Oak Ridge for the protection and security of the next generation of Americans.

Sincerely,

Michael L. Twine
President and CEO
mike.twine@g2em.com

1/5C

215A:
1/5C
(cont.)

3/9A;

215A
(cont.)

4/7.12

PC_187

Levens, Matthew

From: SMET [mexwistm@verizon.net]
Sent: Tuesday, April 01, 2008 10:13 AM
To: Complex2030
Subject: Nuclear Weapons

PC_1228

1/16A

Please, this is not the time to refurbish a nuclear weapons program.

The volatility of the people of our planet causes us all to be in grave danger of anger and frustration taking a turn for major and unredeemable destruction to our civilization.

Mary Ellen Twist, RSM

Twocrows, Alice
Page 1 of 1

Page 1 of 1
PC_2001

Levens, Matthew
 From: Rebekah Reppert [rebekah11@midblue.net]
 Sent: Sunday, April 20, 2008 10:45 AM
 To: Complex2030
 Subject: sllizen comment on the research and development of nuclear weapons

Mr. Theodore Wyka
 Complex Transformation SPEIS Document Manager
 U.S. Department of Energy/NNSA

Dear Sir,

First, I would like to thank you for the extending the comment period concerning the research and development of nuclear weapons.

If think researching and producing weapons of mass destruction not only contaminates our beautiful Mother Earth, the Water, the Soil and the Air, but also the collective Heart of the American People. In my mind, I can not find justification for taking all our precious resources, including my neighbors who work there (there being, Los Alamos) for the building of weapons of such destructive force. Nor do I believe in using such weapons to threaten other human beings in the name of political idealism. It is outrageous and evil to do such a thing. The time is over, let us, as the Tevah people have suggested: Bury these weapons, all their pieces and parts. Bury them deep and create the legion to make it so sacred that no human will ever consider this path again.

Let the good people of Los Alamos and all nuclear weapons sites, turn their energies and talents toward life giving tasks. Safe renewable energy, how to create peace thru compassionate means. How to educate our young people, how to grow food organically, how to have true freedom, the freedom to know that what we do as Americans is not done with the blood of our young people nor the blood of others anywhere on our precious Mother Earth. Real security for us Americans, is the assurance of health care, education, healthy food, a home, clean water, air, soil.

STOP ALL RESEARCH AND PRODUCTION OF NUCLEAR WEAPONS NOW!!!!!!!!!!!!!!!!!!!!!!!

Sincerely,
 Alice Rebekah Twocrows

116A (cont.)
 220

1120 (cont.)

116A (cont.)

5/19/2008

Twohig, Michelle
Page 1 of 1

PC_1649

Levens, Matthew
 From: mcl@designcentral.com
 Saturday, April 05, 2008 12:19 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,

YES on consolidating and reducing the nation's current nuclear weapons complex.
 NO on efforts to create new types of nuclear weapons.

Please do not violate the spirit and letter of the Comprehensive Test Ban Treaty and send the wrong message to the world--that obtaining nuclear weapons increases security.

Because, in fact, it will do exactly the opposite. We are the role model for "powerful nation" in this world. You are in a position to decide when this nation is going to choose to role model the MUCH GREATER power of peace over the comparatively nominal power of destruction and/or intimidation. Anyone can do that. You could create a Department of Peace with some of the most brilliant and peace-oriented minds in this country and give the job of what to do with our current nuclear weapons to it. Use this opportunity to set a new course for our world--away from faster and greater destruction.

What you personally decide will either speed us faster toward that collision course or begin to turn this Titanic around. Your choice.

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,
 Michelle Twohig
 P.O. Box 2207
 North Bend, WA 98045

cc:
 Senator Patty Murray
 Senator Maria Cantwell
 Representative Dave Reichert

115A
 23A

31E
 41F

51J

1

Tyler, Irene

Page 1 of 1

Levens, Matthew

PC_1993

From: Irene Tyler [irenet@mindspring.com]
Sent: Monday, April 28, 2008 3:19 PM
To: complex2030
Subject: opposition

116A Stop this madness! Our nation is not served by the creation of more weapons of mass destruction such as in the Complex Transformation. It is hazardous to our health. Start teaching the end of waste, we are the worl's leading producers of waste. Money saved, put is to work to fix what ails us.

Sincerely,
Irene Tyler

Tyrrell, Kathie

Page 1 of 1

Levens, Matthew

PC_1415

From: Kathie Tyrrell [khegitedcat@uci.edu]
Sent: Thursday, April 17, 2008 2:10 PM
To: complex2030
Subject: Opposed to this new insanity

Kathie Tyrrell
298 Livingston Way
Grants Pass, OR 97526-8723

April 17, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy,

116A I am a 52-year-old woman who lives in Grants Pass, Oregon. I am appalled and frightened by the latest Bush administration proposal to build a plant to produce plutonium pits for nuclear weapons. I am strongly opposed to plans to modify nuclear facilities across the country, which would make it easier for the U.S. to rebuild its nuclear arsenal. Just another waste of money, time and ultimately lives.

214 If we build this new plant we would be sending 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. Seems like the President is really saying, "Bring it on" once again in an ever increasing high stakes game.

38A 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 CRRR project is yet another irresponsible new program.

Please reject this proposal!

Sincerely,

Kathie Tyrrell
541-476-0891

Umland, Karen

Page 1 of 1

Levens, Matthew

From: Karen Umland [kumland@email.com]
Sent: Monday, March 03, 2008 10:32 AM
To: Complex2030
Subject: nuclear facilities

Karen Umland
2224 Via Granada Pl NW
Albuquerque, NM 87104-5500

March 3, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

116A I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons.

211: 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.

313A: Nuclear facilities make for convenient and dangerous terrorist targets, not only because of the radioactive material abounding there but because building more nukes makes the U.S. prime examples of the worst kind of hypocrisy. Having them makes us less safe, contrary to Bush propaganda to Bush propagandists. Who wins in this equation? War profiteers do well, but the people made vulnerable by nuclear weapon installations lose badly, while making the world as a whole less safe for human beings. You cannot threaten other nations for wanting to build what we already have, and then turn around and build more. Not if you want the support of your own people.

116A 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 OMR project is another irresponsible new program that must be rejected.

Sincerely,

Karen Umland
505-710-4539

PC_574

Ungar, Luci

Page 1 of 1

Levens, Matthew

From: Luci Ungar [lunkpink@aol.com]
Sent: Wednesday, April 16, 2008 11:11 PM
To: Complex2030
Subject: NO NEW NUKES

Luci Ungar
3 Seminole Ave
Corte Madera, CA 94925-1012

April 16, 2008

Complex Transformation Department of Energy

110A Complex Transformation Department of Energy:

NO MORE PLUTONIUM-BASED Bombs or Energy Sources! thanks!
Sincerely,

Luci Ungar

PC_2046

Ungar, Luci

Page 1 of 1

PC_1146

Levens, Matthew

From: Luci Ungar [pinkpink@aol.com]
Sent: Thursday, March 27, 2008 7:31 PM
To: Complex2030
Subject: NO NUCLEAR ANYTHING=bombs or energy!

Luci Ungar
3 Seminole Ave
Corte Madera, CA 94925-1012

March 27, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

116A: I strongly urge you to oppose more nuclear energy in ANY form and oppose any new nuclear weapons!

Sincerely,

Luci Ungar

Ungar, Luci

Page 1 of 1

PC_613

Levens, Matthew

From: Luci Ungar [pinkpink@aol.com]
Sent: Tuesday, March 11, 2008 6:36 PM
To: Complex2030
Subject: No Nukes! No Nuclear Waste! NO PLUTONIUM

Luci Ungar
3 Seminole Ave
Corte Madera, CA 94925-1012

March 11, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

116A: No MONEY for any nuclear proliferation no more bombs, no more nuclear power plants! USE WIND< WATER< GEOTHERMAL< SOLAR POWER!

Sincerely,

Luci Ungar

Unger, Elda

Page 1 of 1

Unknown, George

Page 1 of 1

PC_1742

Levens, Matthew

From: eldsunger@charter.net
Sent: Sunday, April 06, 2008 3:27 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,

Instead of recreating the capacity to produce new, unnecessary nuclear weapons, the DOE should focus on shrinking the still-excessed 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,
ELDA UNGER
P.O. BOX 6128
Malibu, CA 90264

cc: Senator Dianne Feinstein
Senator Barbara Boxer
Representative Henry Waxman

PC_2103

Levens, Matthew

From: Securitas Security [securitas@djix.com]
Sent: Monday, April 14, 2008 6:05 AM
To: Complex2030
Subject: do not end n bomb production.

Good afternoon sir,

DO NOT end N-bomb production. It is the main weapon to stop communism take over of the world. This production is a pro peace item.

1|15A

Who know what the future holds with it but with out it. WAR!. We are out numbered.

Please make better safer but useable modles.

thanks,

George

Unknown, S.C.

Page 1 of 1

PC_38
2-17-08

Untitled

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

Re: Reject "Complex Transformation" plan to build nuclear weapons

Dear Theodore Wyka:

The Department of Energy should reject proposed Complex Transformation project. The DOE should 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.

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. I am also very concerned that revamping the current arsenal could lead to renewed nuclear tests.

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 clean up its mess from past production of nuclear weapons.

The new arsenal would also be bad foreign policy. We need American leadership in convincing countries to forgo nuclear weapons. 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. We need to work on getting rid of nuclear weapons, not build more of them.

Sincerely,
S. C.

Page 1

Unknown, S.C.

Page 1 of 1

PC_49
2-7-08

http://capwiz.com/peaceactionwest/nmlapp/

Theodore A Wyka
Complex 2030 SEIS Document Manager
Office of Transformation, U.S. Department of Energy, MA-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:

The Department of Energy should reject proposed Complex 2030 project.

The DOE should 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.

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.

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 clean up its mess from past production of nuclear weapons.

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. Not building new ones and cutting our old ones would be a start to this.

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,
S. C.

2/7/2008 10:44 AM

Urban, Peter
Page 1 of 1

PC_297

**SISTERS OF LORETTO
4601 TROWBRIDGE
EL PASO, TEXAS 79903**

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

Dear Sir:

I am Father Peter Urban and a Co-Member of Loreto. I am for Nuclear abolition and disarmament. I know there is a proposal to produce LANL'S plutonium "pits" (triggers for cores for nuclear weapons.)

Please do not produce or increase these triggers and cores.

Father Peter Urban
4601 Trowbridge
El Paso, Texas, 79903
915 562 4845
fpeterurban@aol.com

*Father Peter Urban
3-18-08*

11F
216A

Urner, Carol
Page 1 of 2

Page 1 of 2
PC_403

Levens, Matthew

From: Carol Urner [carol.disarm@gmail.com]
Sent: Saturday, April 05, 2008 2:57 PM
To: Complex2030
Subject: Comment on Complex Transformation SPEIS

ComplexTransformation@mnsa.doe.gov

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

Dear Mr. Wyka,

I want to add my comment to the many I hope you are receiving decrying the continued attempt by this present Administration to expand and extend our nuclear weapons industry by promoting Complex Transformation, increasing plutonium pit production and seeking eventual production of the so called Reliable Replacement Warhead.

I have read through your SPEIS document (admittedly skimming many parts) and believe the environmental threats of this project are manifold. To begin with, with this project nuclear waste dumps will continue expanding and threatening soils, groundwater, rivers and the lives of our citizens now and for generations to come: and this at a time when there is no solution in sight for the safe disposal of nuclear waste. With the GNEP involved still more waste will be introduced and transported around the country. Reprocessing will introduce additional hazardous waste to threaten our communities. Native American lands will be further exploited for testing, development and uranium mining, despite the protests and challenges of Navajo, Shoshone and many other Indian nations. Tax revenues that could have gone into waste site clean up and the search for more permanent solutions to disposal and storage will instead be poured into a foolish and unnecessary new nuclear weapons program. < br >

Even worse, this project would further threaten the Nuclear Non-Proliferation Treaty, and open the way to a new nuclear arms race with

2140
314M.3
414H
59H
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71J

4/18/2008

2-1202

October 2008

Urner, Carol

Page 2 of 2

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PC_403

other nations -- including China and Russia -- which had previously been strong supporters of the Comprehensive Test Ban Treaty. These governments have already been joining other nations of the world in taking practical steps toward nuclear weapons abolition, and now our policies -- instead of strengthening and providing sound leadership to this movement -- are causing them, and other nations, to rethink and redesign their own nuclear programs. No one can win a new nuclear arms race: not even the military contractors and investors who hope to profit can win in the end.

Please let Complex Transformation expire during this SPEIS process. There is a sane alternative, and that is to take the lead in moving forward those practical steps toward nuclear weapons abolition which our own nation, and 186 others, agreed to take in 2000. Then only Israel, India and Pakistan will remain in defiance of the NPT process, and it is our leadership that can bring them as well into the effort to end the threat of nuclear annihilation. With progress toward nuclear weapons abolition we can help lay the foundations for human rights and sustainable development in generations to come.

--
in peace, Carol Urner
3745 S.E. Harrison Street
Portland, OR, 97214
cell: 503 320 9108

71J
(cont)

116A
(cont)

Utley, Charles

Page 1 of 4

PC_120

Blue Ridge Environmental Defense League

www.BREDEd.org 3417 Natus Place, Atlanta, Georgia 30306 info@blueenvironment.org (706) 779-5300

February 21, 2008

Secretary Samuel W. Bodman
National Nuclear Security Administration
U.S. Department of Energy
1000 Independence Ave., S.W.
Washington, DC 20585
Fax: 703-911-6222
Complextransformation@nnsa.doe.gov

CC: Theresore Wylka

Re: Draft Complex Transformation Supplemental Programmatic Environmental Impact Statement

Dear Mr. Bodman:

On behalf of the Blue Ridge Environmental Defense League, I write to provide comments on the National Nuclear Security Administration's Draft Complex Transformation Supplemental Programmatic Environmental Impact Statement. In the Federal Register Notice of Intent (71 FR 61731, October 19, 2006), NNSA's proposed action was referred to as "Complex 2030." NNSA has renamed this document the "Complex Transformation SPEIS." Nevertheless, the proposal remains an ill-conceived idea unsuitable for the 21st Century.

116A

The Reduced Operations and Capability-Based Complex Alternative outlined in the aforementioned 2006 federal register notice called for 1) no construction of new facilities, 2) no increased production of plutonium weapons, 3) reductions in the number of sites with Category I/II nuclear materials (SNM), 4) reductions in production capacity at Pantex, Y-12 and the Savannah River Site, and 5) continued dismantling of existing weapons facilities. The DOE-NNSA has not offered any justification for abandoning this alternative. Yet it may represent the most practical course of action for the Central Savannah River Area, the United States of America and the world. Pursuant to the National Environmental Policy Act, 42 U.S.C. 4321 et seq, we hereby formally request that NNSA fully examine this as the no-action alternative to Complex Transformation as required in the development of an Environmental Impact Statement and make it available to the public for review and comment.

25A:
34A

Pollution Prohibits New Missions

The NNSA's Consolidated Plutonium Center (CPC) would provide the facilities and equipment to perform plutonium wastelike manufacturing and plutonium research and development. A CPC could manufacture 200 new warheads per year by 2022. NNSA is

€see quam vobis

considering five sites for this facility: Los Alamos National Laboratory in New Mexico; Nevada Test Site in Nevada; Pantex in Texas; the Savannah River Site in South Carolina; and the Y-12 Site in Tennessee.

Past atomic weapons production has had a negative effect on human health in the Central Savannah River area. For example, the infant death rate in Aiken County, South Carolina was 11.6 in 2004, a 20% increase over the previous year and 25% higher than the statewide average during the same period. The number one cause of infant death identified was congenital malformation. (a) Aiken is a prosperous town; one must ask why are increased birth defects happening here? The Department of Energy must determine the source of these deaths before considering SRS for further radiologically-permitting facilities.

The 2006 Savannah River Site Ten-Year Comprehensive Site Plan, an NNSA planning document, states:

The revised NPDES permit from South Carolina Department of Health and Environmental Control (SCDHEC) became effective on December 1, 2003. SRS is required to be in compliance with these limits by November 1, 2008. (b)

However, SRS is out of compliance with its National Pollutant Discharge Elimination System permit for liquid effluents and excess mercury discharges are ongoing from the Savannah River Site. An NPDES permitted outfall was found to be releasing levels of the toxic metal apparently in violation of the SC Pollution Control Act. In a consent order, the DOE and the Westinghouse Savannah River Company admitted their proper testing using the most current method at the offending outfall would result in continued violations of the limit for mercury. Consent order 03-238-W (below), effective on December 15, 2003, (c) directed DOE and WSRC to submit a detailed plan for compliance within three years and to comply with mercury limits within five years.

Order Type and No.: Consent Order 03-238-W
Order Date: December 15, 2003
Responsible Party: United States Department of Energy and Westinghouse Savannah River Company
Facility: Savannah River Site
Location/Mailing Address: Savannah River Company, LLC
Building 719-A-A
Aiken, SC 29808
County: Aiken, Auldridge & Burnswell
Previous Order(s): 99-153-W (80), 99-041-4FW(\$35,900), 01-163-A (\$3,000), 02-225-W (80), CWA-04-2002-451(B) (\$50,000) (USEPA)
Permit/ID Number: SC0000175
Violation(s) Cited: N/A
Summary: The United States Department of Energy and Westinghouse Savannah River Company (Respondents) own and are responsible for the proper operation and maintenance of the manufacturing, administrative and production areas at the Savannah River Site. Mercury concentrations in the effluent at outfall E-18 will violate the conditions of the NPDES Permit.
Action: The Respondents have agreed to submit a mercury minimization plan

Case quam videre

414K21

514E28

with an implementation schedule within 60 days; within 3 years, submit a PER for construction of facilities necessary to achieve compliance with the permitted limit for mercury; and within 5 years, comply with permitted discharge limits for mercury at outfall E-08.

SRS continues to discharge excess levels of mercury. We hereby request that DOE-NNSA include the above consent order and all other outstanding orders in its Environmental Impact Statement. The DOE and NNSA must ensure that its operations comply with all environmental laws before considering any new facilities.

Complex Transformation Would Violate US and International Law

International treaty obligations and U.S. law prohibit further development of atomic weapons. The Nuclear Non-proliferation Treaty (NPT) compels the United States to end nuclear weapons development. The preamble to the treaty is unequivocal in its purpose:

Declaring their intention to achieve at the earliest possible date the cessation of the nuclear arms race and to undertake effective measures in the direction of nuclear disarmament...to seek to achieve the discontinuance of all test explosions of nuclear weapons...the establishment and maintenance of international peace and security are to be promoted with the least diversion for armaments of the world's human and economic resources.

The NPT specifically requires that:

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. (d)

There have been no such negotiations during the current administration. Further, the maintenance of Tritium facilities for thermonuclear warheads envisioned under Complex Transformation would take us in the opposite direction, making good faith negotiations impossible. A little over a year ago the Defense Science Board issued a report on an expanded nuclear weapons production complex. It recommended the annual production of "a predetermined number of RRW-class warheads." The board, a federal advisory committee of the US Department of Defense, could not have been more wrong when they stated:

Any discussion of options for improving the U.S. nuclear deterrent must be grounded in an understanding of the role of nuclear weapons in the 21st century. Nuclear capabilities remain an essential element of U.S. national security strategy and defense posture. The knowledge needed to create the power and destructive potential of nuclear weapons is widespread and is a continuing fact of life. Global abolition of these capabilities is a naive hope. Consequently, the effective implementation of U.S. national security strategy in the 21st century requires nuclear capabilities adequate to the task of continuing deterrence in a dynamic

Case quam videre

81F

Utley, Charles

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Utsumi, Gyoshu


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Page 4 - Re: Draft Complex Transformation SPEIS February 21, 2008

world where the emergence of new and diverse threats makes the deterrence task more complex and less certain. (S) (emphasis added)

The NPT does not seek to abolish "knowledge needed to create the power and destructive potential of nuclear weapons," and world leaders are no more naive today than they were in 1969. Moreover, an advisory opinion by a defense committee does not alter the facts or supersede the law. The 180 nations who have signed this treaty understand it and are watching what we do. Perilous and uncertain times call for leadership, not escapism. The United States of America cannot hold the high moral standard in one hand while keeping the other hand behind its back with fingers crossed.

Respectfully submitted,



Charles Utley
Blue Ridge Environmental Defense League

References

- US National Center for Health Statistics 2004, Death rate per 1000 live births, reported by SC Dept. of Health and Environmental Control
- Fiscal Year 2006 Savannah River Site (SRS) Ten-Year Comprehensive Site Plan, p. 3-2
- EQC Enforcement Report Board of Health and Environmental Control, No. 21, February 12, 2004
- Article VI, Treaty on the Non-Proliferation of Nuclear Weapons
- Report of the Defense Science Board Task Force on Nuclear Capabilities Report Summary, Office of the Under Secretary of Defense For Acquisition, Technology and Logistics, Washington, DC, December 2006

Èse quam viève

PC_88

NIPPONZAN
日本山妙法寺
MYOHOJI
The Most Venerable Nichidatsu Fujii, Founder and Preceptor

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

February 27, 2008

Re: Draft Complex Transformation SPEIS Comments

Dear Mr. Wyka,

Yesterday we attended the Complex Transformation hearings at Oak Ridge, TN, and heard many workers favor the complex solely because it could provide jobs. We sympathize with these workers and wish to see them all fully and happily employed. However, the issue facing us now is not a jobs issue but a question of national and global policy.

With the proposed bomb-making complex, the Dept. of Energy is promoting the ongoing manufacture of nuclear weapons in direct violation of the Non-Proliferation Treaty, of which the U.S. is a signer. Furthermore, it sends a signal to the world that rather than working towards disarmament, as the treaty calls for, the U.S. is proceeding with the manufacture of new weapons, setting a dangerous example that others most likely will follow. We see only chaos and risk of total annihilation and no hope for the greater national security that the draft statement assumes. In fact, after yesterday's hearing, we were inclined to call Y-12's latest building the "No Hope Center" rather than the misnamed "New Hope Center."

The workers at Y-12 need and deserve security, true security. They deserve jobs that pay well, support the well-being of the community and do not threaten their health or the environment in which we all live. They could realize all this and more if the DOE would, at long last, assume responsibility for a comprehensive clean-up at Oak Ridge and at all of its nuclear weapons facilities. If the Complex Transformation is approved, the workers might get their jobs, but at what price? What profits if a man (or woman) to gain employment but to lose, literally, the world?

We call on the DOE to respect the needs of the U.S. citizens and the global community for a future that is not clouded by a new nuclear arms race. Already so many needs—education, health care, energy research, public transportation, to name a few—go under-funded while everything military receives more and more money with each passing year. The future is being run down for the profits of the bomb-making industry. Future generations, if they survive this madness, will shake their heads in wonder at the greed and short-sightedness of the current nuclear weapons policies.

11B

21F

31J

4140:
513A.1

614:

71J

816A
31J
(cont.)

99B

NIPPONZAN MYOHOJI — Atlanta Dojo: **Buradmir Religious Order**
Atlanta, GA 30316, USA (404) 627-8948

Utsumi, Gyoshu

Page 2 of 2

8/16A (cont)
1/1F (cont.)

We unequivocally oppose any plan that calls for continued manufacture of nuclear weapons. It is long past time for the U.S. to honor its signature on the Non-proliferation treaty and work towards total nuclear disarmament.

Sincerely,

G. Utsumi

Brother Gyoshu Utsumi
Sister Denise Luffin
Nipponzan Myohoji - Atlanta Dojo
1127 Glenwood Ave., SE
Atlanta, GA 30316

cc: U.S. Senator Saxby Chambliss
U.S. Senator Johnny Isakson
U.S. Representative John Lewis
Knoxville News-Sentinel
The Oak Ridger
Oak Ridge Environmental Peace Alliance

Denise Luffin

Vaccaro, Mary

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PC_648

Levens, Matthew

From: Mary Vaccaro [Mvaccaro@catholicinformationcenter.org]
Sent: Monday, April 07, 2008 10:12 AM
To: Complex2030
Subject: A Voice against Complex Transformation

To Whom it May Concern:

It is my writing to encourage the federal government to drop all plans for Complex Transformation of the Nuclear Weapons Complex. Proliferating weapons of war do nothing to build peace. Rather they endanger all people and the entire planet.

1/16A
2/13A1

Please work toward total disarmament. Please drop new plans to advance the Nuclear Weapons Complex and invest in exploring peaceful means of conflict resolution.

Sincerely,

Mary Vaccaro
16 Plymouth Ave NE
Grand Rapids, MI 49503

Vaile, Barbara

Page 1 of 1

Levens, Matthew

From: Barbara Vaile [barbara@organicconsumers.org]
Sent: Thursday, March 27, 2008 12:52 PM
To: Complex2030
Subject: no new nukes

Barbara Vaile
70 Reservoir Rd.
Walpole, NH 03608-4634

March 27, 2008
Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A [Until we get caught up on spending more on peace than on war we should not even talk about
2|9B new war weapons..

Change the dialogue to what we WANT TO HAPPEN - PEACE INITIATIVES. Have a moratorium on war talk.

3|20 [See that children have water, that people on the land grow food for their family and neighborhood, NOT cash crops to be squandered in the west.

Teach literacy, NOT war!
Sincerely,

Barbara Vaile
603 756 3711

PC_816

Valentin, Diann

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PC_1333

Levens, Matthew

From: Dianne Valentin [diannevalentin@gmail.com]
Sent: Friday, February 22, 2008 6:10 PM
To: Complex2030
Cc: Dianne Valentin
Subject: Public Comment on Complex Transformation Supplemental Programmatic Environmental Impact Statement

Greetings Mr. Wyka,
I hope this message reaches you well and enjoying your day.

My name is Dianne Valentin and I am saying *graz* to the NNSA's Complex Transformation project at any location in this country or its sovereigns.

Nuclear weapons adversely affect each of the categories listed on you SPEIS Impact Assessments list. The creation and development of new nuclear weapons cannot be separated from the process by which they are made. Land, Air Quality, Water Resources, Waste Management, Environmental Justice, Human Health, Transportation, and Cumulative Impacts are all specifically what I wish to speak on.

I am requesting that the Environmental Impact Statement provide details on

- how uranium mining and milling needed to produce the new nuclear weapons that are being proposed will not adversely affect communities, which are primarily minority and poor, their water supplies, and their land.
• how uranium mining and milling needed to produce the new nuclear weapons that are being proposed will not adversely affect the climate with its release of toxins, including but not limited to CO2 into the atmosphere, in any way, (including all emissions that take place with the use of coal fired plants).
• how any health study that the National Nuclear Security Administration (NNSA), any related organizations, their contracted, or commissioned entities have done, not only use what is known as reference man or standard man to develop its health effects data, but has researched and compiled data and statistics on how nuclear weapons waste, or any other nuclear materials affect the most vulnerable of us, including children, pregnant women, the elderly, and those with compromised health. Does it not matter to you that by not using the most vulnerable when developing this data that these toxins and contaminants may be causing the rise that we see in our country in birth defects, developmental defects such as autism, and chronic childhood asthma? You know that tritium passes through the placenta and can cause defects that affect that family through more than one generation if the fetus is female because the eggs are within that female fetus already so they are also adversely affected. Why is this project worth that?
• how the NNSA intends to deal with the radioactive waste materials generated by the creation and production of these new nuclear weapons.
• how the NNSA intends to deal with the radioactive waste materials already generated by the creation and production of the existing nuclear weapons
• how, with a shrinking water supply in the regions targeted, the communities affected will not be compromised in any way by the amount of water used by these facilities.
• how tritium releases will be monitored and by whom.
• how tritium releases will be halted.
• how transport of any of the materials needed in this process will be safely executed whether by

1|11D

2|11A

3|14M.3

3|14M.3 (cont)

4|14E.2

2|11A (cont); 5|14K.18

5/15/2008

Valentin, Diann

Page 2 of 3

211A (cont)	road, rail, waterway, or air. • why the nuclear weapons that we already have are not sufficient for our nation's self defense.	Page 2 of 3 PC_ 1333
314M.3 (cont)	As I said in my testimony yesterday, February 21, 2008, in South Carolina, what the Department of Energy is doing with nuclear weapons creation and development is wrong from a moral perspective, a fiscal perspective, and an environmental perspective.	
616A	Morally wrong because we don't need new and efficient ways to indiscriminately kill millions of people at once to be secure as a nation. Morally wrong because you know that mining and mill tailings have ruined Native American lands and waters. Morally wrong because these toxins and contaminants may very well be the cause of the increases that we see in chronic childhood asthma, autism, and other physical & developmental disorders in children. Morally wrong because you know that nuclear industry workers who are not executives and engineers are <i>still</i> riddled with work related illnesses. Morally wrong because you know that these programs are being kept alive, (even though the people of this country have spoken out in huge numbers against them whatever name you tag on it), because some government insider wants these contracts, and the lions share of the money related to these nuclear projects to go to affiliated entities. (My heart sank over and over again when I read who the contractors were for a previous EIS that was done; after each name, Haliburton was listed as who he or she was affiliated with.) Will any of you there, being paid with tax payer dollars, be willing to stand up for the American people? We are who you ultimately work for. You know that we cannot afford this and you know that we do not need this. Remember what the eighteen year old who spoke said? You guys are smart.	
719A	Fiscally wrong because this country does not have the money for, nor do we need anymore nuclear weapons. The money that is being spent on this process as well and the project that it proposes could be used for unmet human needs that we currently face in this country. Our health care systems, our education systems, our diplomatic corp, our rapid (and thorough) responses to our natural disasters, our enlisted military pay and family care, our research and development into a number of areas including alternative energy sources, and our advancements in non-war related science and engineering. Again, with the debt that we are carrying, you know that we cannot afford this.	
819B		
919A	It is environmentally wrong because the nuclear fuel cycle is dirty, extremely and irreversibly polluting. The long-term radioactive waste that is produced on both ends of the fuel cycle are so harmful to this environment we may never recover if you continue on this path. Every aspect of our environment is adversely affected.	
314M.3 (cont)	<ul style="list-style-type: none"> • The air, with toxic mining and milling emissions which include but are not limited to CO₂. • Our water when only one third of it is returned to our waterways and what is returned is thermally affected, and water that has been affected by tritium's radioactive contamination (once that is done you cannot undo it), the fish that ingest the radioactive water and subsequently the local people who consume the fish as one of their food sources. • The earth with the radioactive materials being buried and seeping into the soil affecting vegetation, the animals that eat the vegetation and subsequently, the people who eat the vegetation and the animals. 	
211A (cont)	It is no longer acceptable for our government entities to use what is commonly know as Reference Man or Standard Man when gathering, compiling, and putting out data and statistics related to this area (nuclear weapons development), when our most vulnerable are the ones who are so terribly affected. Until you can prove that these radioactive nuclear, and nuclear related materials do not have adverse affects on children, pregnant women, the elderly, and those with compromised health, the project needs to be stopped in its tracks. Regardless of how much you think that it will cost to do this, that cost pales	

Valentin, Diann

Page 3 of 3

Page 3 of 3 PC_ 1333	in comparison to the damage that it does and will do to our health and environment.
1011B	You heard the young students aged 12 through 18 years of age speak on this yesterday. Their voices and their words were compelling, they moved me. They made me know that there are millions of reasons why I fight this nuclear madness. They are not just our future, they are our present. They are here now breathing this air, drinking this water, eating food produced on this earth.
117J	The NNSA and the Department of Energy will be looked upon as committing crimes against humanity and as having perpetuated the encroaching environmental holocaust without ever dropping one bomb. These entities and the people working for them and running them are committing these acts by engaging in the activities required to build these nuclear weapons. Use the money that would be saved by closing the facilities that you plan to close, to clean up the radioactive mess that has already been made by nuclear weapons production. As you know, we have not successfully dealt with even the very first bit of waste generated by the nuclear industry well over fifty years ago. As I stated yesterday, the NNSA and the Department of Energy should be ashamed and embarrassed to use terms like "Centers of Excellence", "special nuclear materials", and "Complex Transformation" relative to nuclear weapons. It shows such disrespect for the people of this great country.
Peace Dianne	

Valentine, Bruce

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PC_143

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.

15C: 215A: 37N: 7101

I am in full support of the Disturbed Centers of Excellence Alternative to keep our work here at Y-12 Bruce Valentine

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

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

Valerio, Julia

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PC_249

ADMINISTRATIVE OFFICE of the

TAOS COUNTY COMMISSION

COUNTY COMMISSIONERS Duane P. Bannone James E. Gaudin Orenia J. Roman Nicholas E. Jaramillo Joe H. Doherty

105 Albricht Street - Suite A Taos, New Mexico 87571

Telephone: (505) 737-6300 Telefax: (505) 737-6314

March 14, 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: Los Alamos National Laboratory National Plutonium Manufacturing Center Proposal

Dear Mr. Wyka:

The Taos County Board of Commissioners voted unanimously on March 11, 2008 to request that you hold hearings in Taos County regarding the proposal that Los Alamos National Laboratory serve as the nation's center for plutonium manufacturing for the United States' nuclear arsenal. The proposal is of vital interest to the citizens of Taos County. Taos is roughly 55 miles in a direct line from Los Alamos. Residents of Taos County work in Los Alamos and commute there daily.

12E

We understand that hearings have been held in Albuquerque, Santa Fe, and Los Alamos and will be held in Espanola in late March. Perhaps a hearing could be scheduled in Taos in late March when you are already scheduled to be in Espanola, which is approximately a 45 minute drive from Taos. Although we are not familiar with the format that has been utilized for hearings elsewhere, we would ask that you allocate equal amounts of time for proponents and opponents of the proposal to make presentations and in addition set aside substantial time for citizen questions.

We would like to work with you to insure that the citizens of Taos County have an opportunity to learn about this proposal directly from the Department of Energy and to communicate their thoughts about the proposal directly to the Department of Energy.

Please call at your earliest convenience.

Very truly yours,

Julia Valerio Taos County Manager

"Open County Government Protecting the Health, Safety, Welfare and Environment of it's Citizens"

Valerio, Julia

Page 2 of 2

Van Dellen, Marian

Page 1 of 1

cc: U.S. Rep. Tom Udall, 211 Saint Michaels Drive, Suite 104, Santa Fe, NM 87501
 U.S. Sen. Jeff Bingaman, 119 E. Marcy, Suite 101, Santa Fe, NM 87501
 NM Rep. Roberto Gonzales, 6193 NDCBU, Taos, NM 87571
 NM Sen. Carlos Cisneros, P.O. Box 1129, Questa, NM 87556
 Mayor Bobby Duran, Town of Taos, 400 Camino de la Placita, Taos, NM 87571
 Taos County Board of Commissioners



PC_2053

Levens, Matthew

From: Marian Van Dellen [vandellem@charter.net]
Sent: Wednesday, April 30, 2008 8:52 PM
To: Complex2030
Subject: U.S. Nuclear Weapons Production

Marian Van Dellen
 600 4th St SW #306
 Rochester, MN 55902-3245

April 30, 2008
 Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A I am a grandmother concerned about my grandchildren's future. I strongly oppose the
 2|1J administration's proposal to build a plant to produce plutonium pits for nuclear weapons.
 Building this new plant would send a contradictory message to other countries. We cannot
 expect other countries to stay nuclear free if we upgrade and increase our arsenal. I
 urge you to NOT fund this project.

Sincerely,

Marian Van Dellen
 507-282-4565

Van Ooteghem, Rose

Page 1 of 1

PC_244

March 4, 2008

Theodore Wyka
SPIES Document Mgr.
U.S. Department of Energy
1000 Independence Ave. SW
Washington D. C. 20585

Dear Mr. Wyka,

This is to express my opposition to the intent to draft a proposal, namely, "Complex Transformation" from the department of Energy (DOE)

This document lays out the agency's vision for the future of U.S. nuclear weapons production and the future rebuilding of the entire nuclear weapons complex with new facilities.

Though research and planning is necessary the imbalance between the military build up and peacemaking is far too dangerous and unproductive.

I am pleading that these efforts be transformed to peacemaking and building better relationship rather than use of power and fear. Please consider the long range consequences of decisions that are being made.

Sincerely,
Rose Bernadette Van Ooteghem
610 W. Elm
Monroe, Michigan

116A

213A

Vandivere, Stephen

Page 1 of 1

Levens, Matthew

From: Stephen Vandivere [stephen@vandivere.net]
Sent: Thursday, February 21, 2008 8:08 PM
To: Complex2030
Subject: No new nuclear weapons

Stephen Vandivere
13825 Baywood Ct
Centreville, VA 20120-1747

February 21, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

11F After living through the cold war years and the Cuba missile crisis, I cannot feel more strongly that any action our nation takes must not weaken or interfere with the Nuclear Non-Proliferation Treaty.

21A Congress wisely rejected the Reliable Replacement Warhead (which was actually much more than just a replacement) and also rejected a large-scale manufacturing facility.

35C.1 We will have a reliable and effective nuclear deterrent for at least the next 50 years.

416A So I strongly oppose the administration's proposal to develop now the infrastructure for future new nuclear weapon development. It should be rejected for the same reasons the RW was rejected - we should not be sending the message that it is permissible for the U.S. to develop, or build more, nuclear weapons, but not for other countries. It is not reasonable to expect those countries to accept such a double standard.

Sincerely,

Stephen Vandivere
703-222-4173

PC_1913

Varboncoeur, Evelyn

Page 1 of 1

Buenafior, Justin

From: Evelyn Varboncoeur [evelynbv@sbcglobal.net]
Sent: Wednesday, March 19, 2008 3:07 PM
To: Complex Transformation proposal
Subject:

Evelyn Varboncoeur
717 N. Batavia Avenue
Batavia, IL 60510-1228

March 19, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

Dear Senator Obama, Senator Durbin, decision-makers in the Department of Energy,

It has come to my attention through the LCWR (Leadership Conference of Women Religious) that President Bush is again attempting to restructure and rebuild the Nuclear Weapons Complex, including a new nuclear weapon production plant at Los Alamos, New Mexico.

I am strongly opposed to this proposal by our president. With the multiple efforts that have been made in recent years to reduce the number of nuclear weapons throughout our world and our strong stance against Iran, this action by our United States government would be untenable.

Please do all in your power to defeat this effort.

Sincerely,

Sister Evelyn Varboncoeur, sscm

PC_469

Varley, Daniel

Page 1 of 2

Levens, Matthew

From: Daniel Varley [varleydnator@gmail.com]
Sent: Tuesday, March 18, 2008 3:05 PM
To: Complex2030
Subject: SPEIS Public Comment Input
Attachments: Supplemental Programmatic Environmental Impact Statement.doc

The following is public comment input concerning the Draft Supplemental Programmatic Environmental Impact Statement (SPEIS) from Daniel T. Varley, 944 Estates Drive, Los Alamos, NM 87544. Phone: 505-66207074 E-mail: varleydnator@gmail.com

I appreciate the opportunity to provide the following input concerning the stated NNSA preferred alternative for Complex Transformation. My input is based on 30 years of past employment in the Nuclear Weapons Complex, knowledge of the referenced NWC sites and facilities as well as the programmatic activities supported, and extensive familiarity with the historical baseline (no action) and transformation alternatives as presented. While I still have an active Q-clearance, I am retired and not currently employed within the nuclear weapons complex or by the US Government.

119A The proposed alternative for Tritium Research and Development does not provide the lowest overall cost and risk alternative for the future of the complex as respectively described in the next two paragraphs below. In addition, the preferred alternatives for Plutonium and Uranium processing and 299E major nuclear facilities appear very solid, but the High Explosives R&D operations could have been 315H reduced further rather than the choosing the "Minor Consolidation Alternative" but any savings probably 416B would not have been worth the pain and effort.

In the long run, the more cost effective option is to consolidate all GTS surveillance operations and production related reservoir filling with Tritium R&D at the existing Los Alamos National Laboratory facilities. Overall, considerably fewer Gas Transfer Systems are required given planned reductions in numbers and types of stockpiled weapons combined with longer-lived GTS designs. Even more significant cost reductions should be achievable through footprint reduction at the larger Savannah River Site space, plus this would allow that site to be removed completely from the overall Nuclear Weapons Complex. Another indication that expected savings won't be achieved is the most recent effort to shift tritium related operations, which while smaller in scope, ran considerably over-budget percentage-wise.

The proposed alternative for Tritium R&D does not address the technical and programmatic risks associated with transferring existing Tritium R&D capability from Los Alamos to the Savannah River Site, and I have not seen evidence that leads me to believe the risks have been adequately addressed. However, I have not seen the classified appendix but can guess its content based on reading similar proposals in the past. I believe the most significant risk stems from dismantling the existing cadre of Los Alamos technical personnel most familiar with the design of existing Gas Transfer Systems

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PC_431

4/18/2008

Varley, Daniel

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19A (cont) including Tritium-specific foundational fundamental materials research, parametric functional requirements, and design weaknesses or pitfalls to be avoided or managed. The integrated supporting R&D of Gas Transfer Systems is a key weapon technology directly affecting performance while the simpler production-fill and surveillance activities that the SRS personnel are most familiar with are much less complex (and thus also easier to relocate). Los Alamos' GTS supporting Tritium R&D capability and track record is much stronger than Sandia's (GTS Designers for LLNL) which has declined over the past 15 years. Historically and on a number of occasions, Savannah River Site personnel have requested Los Alamos support to solve technical problems they were unable to solve.

39H (cont)

46B (cont) A Consolidate Tritium R&D at Los Alamos alternative is best given all the SPEIS goals, but the "Reduce Tritium R&D in Place Alternative" is less risky and maintains agility that will be lost in the preferred Consolidate Tritium R&D at SRS alternative. The NNSA chosen preferred alternative unacceptably increases risk to national security.

PC_431

Varra, Pamela

Page 1 of 1

PC_499 325

March 26, 2008

U.S. DOE

Ted Wyka, NA-101

Complex Transformation Comment

Dear Mr. Wyka,

I oppose the DOE "Complex Transformation" plan. Do not build more nuclear bombs at all. Abide by the Nuclear weapons Non-proliferation treaty.

Thank-you,

Pamela C. Varra

Pamela C. Varra

457 C ST.

Askland, OR 97520

116A:

21F

Vasconcellos, Carl

Page 1 of 1

PC_1890

Levens, Matthew

From: Carl Vasconcellos [vasco@hawaii.rr.com]
Sent: Wednesday, February 20, 2008 1:42 AM
To: Complex2030
Subject: No more Nuclear Weapons

Carl Vasconcellos
3148 Kalihi St.
Honolulu, HI 96819-3059

February 20, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

116A Why do we need more nuclear bombs? Why can't we just hold on to a dozen or so although I
29B know we have thousands. We don't need more. That money can be spent on universal health
33A care instead. I am strongly against nuclear weapons and feel even stronger about MORE of
them.Thank you

Sincerely,

Carl Vasconcellos

Vee, Ordell

Page 1 of 1

PC_1176

Levens, Matthew

From: ordell.vee [tvee@hotmail.com]
Sent: Thursday, March 27, 2008 11:10 PM
To: Complex2030
Subject: nuclear weapons

ordell.vee
427 2nd st. n.e.
madelia, MN 56062-1901

March 27, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

116A 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.

21U 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.

38A 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.

we need to spend money on people and our infrastructure, not weapons.

Sincerely,

ordell.vee
507-382-0893

Venable, Minnie
Page 1 of 1

1/98

PC_199

being of our country, already overburdened with defense spending, a huge national debt, and an economic recession. That amount of money could provide health care and college educations for hundreds of thousands of our citizens, strengthening our economy, our citizenry, and our country.

Minnie Venable
Minnie Venable
7323 Parkway Drive
Amarillo, TX 79119

I do have some pleasant news to share with you. I submit

Ventura, Jon
Page 1 of 3

11/5A

PC_1028

~~XXXXXXXXXX~~
~~XXXXXXXXXX~~
~~XXXXXXXXXX~~
EVENING
GOOD ~~XXXXXXXXXX~~ MY NAME IS JON VENTURA. MY WIFE AND I HAVE BEEN STAFF MEMBERS OF THE WEAPONS PROGRAM AT LOS ALAMOS NATIONAL LABORATORY FOR ALMOST 4 YEARS. WE ARE RESIDENTS OF LOS ALAMOS COUNTY. ~~XXXXXXXXXX~~

I HAVE CAREFULLY READ THE DOCUMENTATION ASSOCIATED WITH THE PREFERRED ALTERNATIVE AND BELIEVE IT TO BE THE BEST PLAN TO ENSURE THE TECHNICAL EXCELLENCE OF LOS ALAMOS FOR DECADES TO COME. THEREFORE, I ENDORSE THE PREFERRED ALTERNATIVE AND HOPE TO SEE IT INCORPORATED INTO THE RECORD OF DECISION.

PART OF
MY REMARKS TODAY WILL FOCUS ON THE DISCUSSION THAT HAS TAKEN PLACE OVER THE LAST SEVERAL DAYS ACROSS NEW MEXICO.

WHILE LABORATORY STAFF HAVE ~~PROVIDED~~ *PROVIDED* THE FACTS ABOUT THE LABORATORY'S WORK AND HOW IT CONTRIBUTES TO U.S. NATIONAL SECURITY IN THE BROADEST SENSE, WE HAVE BEEN AT TIMES PILLORIED BY OUR OPONENTS IN THE MOST DISPARAGING TERMS. ~~THAT~~ *THAT* ~~THIS INFORMATION WILL NOT REPEAT. THIS INFORMATION~~

THE MEN AND WOMEN AT LOS ALAMOS ARE THE MOST DEDICATED AND TALENTED PEOPLE WORKING TO PRESERVE, PROTECT, AND DEFEND THE BLESSINGS OF LIBERTY THAT ~~WE ALL ENJOY AS EVIDENCED~~ *WE ALL ENJOY AS EVIDENCED* BY TONIGHT'S DISCUSSION.

HEALTHY

Ventura, Jon

Page 2 of 3

115A
(cont)

OWR
CONTRIBUTIONS HAVE HELPED TO PRESERVE WORLD PEACE AND PROSPERITY FOR MORE THAN 65 YEARS, WITH BOTH NUCLEAR AND NON-NUCLEAR CONTRIBUTIONS. LET ME PROVIDE A FEW EXAMPLES OF THE NON-NUCLEAR INITIATIVES WE ARE INVOLVED IN:

LANL SCIENTISTS ARE DEVELOPING DETAILED COMPUTER MODELS TO TRACK AND PREDICT ~~SPREAD OF INFLUENZA AND CHOLERA~~ DISEASE PANDEMICS INCLUDING AVIAN FLU AND SMALLPOX.

LAB STAFF, WORKING WITH OUR COLLEAGUES AT LA WRENCE, LIVERMORE, DEVELOPED AND DEPLOYED ^{*A KNOWN AS*} THE SYSTEM (BASIS) USED TO DETECT PATHOGENS SUCH AS ANTHRAX AT THE SALT LAKE CITY OLYMPICS, SUPERBOWLS AND ~~THE~~ WORLD SERIES.

LAB ENGINEERS ARE WORKING WITH THE DEPARTMENT OF HOMELAND SECURITY ON A NUCLEAR DETECTION SYSTEM FOR THE PORT AUTHORITY OF NEW YORK AND NEW JERSEY ~~AND THE~~

LAB FOR THE PAST 40 YEARS HAS TRAINED NEARLY ALL OF THE INTERNATIONAL ATOMIC ENERGY AGENCY SAFEGUARDS INSPECTORS.

Ventura, Jon

Page 3 of 3

115A
(cont)

LANL TECHNOLOGIES INCLUDING ADVANCED BODY ARMOR AND THE ANGEL FIRE COMBAT SURVEILLANCE SYSTEM ARE AT WORK TODAY PROTECTING U.S. TROOPS, WHO, THROUGH THEIR HEROISM ARE HELPING TO SECURE THE FREEDOMS GUARANTEED BY THE CONSTITUTION.

THIS IS THE KIND OF WORK WE DO AT LOS ALAMOS ~~IN THE~~ ^{*U.S.*} ~~LABORATORY~~, AND WE ARE ABLE TO DO IT BECAUSE OF OUR CORE NATIONAL SECURITY RESPONSIBILITIES.

THANK YOU FOR LISTENING.

Verhoff, Wilfred

Page 1 of 1

Levens, Matthew

PC_1882

From: Wilfred Verhoff [wilfredverhoff@yahoo.com]
Sent: Friday, April 04, 2008 12:33 AM
To: Complex2030
Subject: No New Nuclear Bombs

Wilfred Verhoff
3081 Columbus Pike
Delaware, OH 43015-3211

April 4, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

116A Please do not reconstitute the arms race with new generations of nuclear bombs.

211J The world has too many bombs as it is. When I lived in New Mexico, I was shocked how "nuclear" the west is, and New Mexico in particular.

320 Please do not recreate the arms race in Los Alamos, New Mexico or anywhere else.

(cont)
Sincerely,

Wilfred Verhoff

Vice, Daniel

Page 1 of 1

Levens, Matthew

PC_433

From: danvice@yahoo.com
Sent: Wednesday, March 19, 2008 4:45 PM
To: Complex2030
Subject: Comments - Complex Transformation SPEIS

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

Dear Mr. Wyka,

115A I am writing to thank 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.

219A But, I feel that 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.

311B 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.

5170 Instead of recreating the capacity to produce new, unnecessary nuclear weapons, the DOE should focus on shrinking the still-over-sized 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,
Daniel Vice
2141 P St. NW #203
Washington, DC 20037

Victor, Arisa

Page 1 of 1

Levens, Matthew

PC_1887

From: Arisa Victor [grannyrainbow@msn.com]
Sent: Friday, February 08, 2006 2:46 AM
To: Complex2030
Subject: No more nuclear weapons!

Arisa Victor
PO Box 150111
San Rafael, CA 94915-0111

February 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:

The Department of Energy should reject proposed Complex Transformation project.

Nuclear weapons are the product of insane minds. What our planet needs is peace, not warfare. Peace cannot be created by violence, but onlb by peace.

If we act peacefully toward our neighbor nations in the world community, they will respond in peaceful ways.

It is time to lay down weapons that were created by paranoid thinking. We can replace weapons with our hands extended to help and bless the world.

The way of peace is not a pipe dream: it is the only way humanity will survive. Peace is the expression of a sane mind. Please wake up to this truth and forget about nuclear weapons entirely.

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.

Thank you,

Arisa Victor

Villaire, Kate

Page 1 of 1

Levens, Matthew

PC_1903

From: Katevilleire@aol.com
Sent: Tuesday, March 25, 2008 4:18 PM
To: Complex2030
Subject: no nuclear expansion ...

116A Dear Mr. Wyka, Please stop designing and producing any nuclear weapons now!
Kate villaire

*****Create a Home Theater Like the Pros. Watch the video on AOL Home.
(http://home.aol.com/diy/home-improvement-eric-stromer?video=157ncid=aolhom00300000000001)

Villarreal, Robert

Page 1 of 2

PC_299

COMMENTS ON DOE TRANSFORMATION PLAN

Ted Wyka, NNSA

Office of Transformation, NA-10.1
1000 Independence Avenue, SW
Washington D.C. 20585

March 17, 2008

Dear Mr. Wyka,

Thank you for allowing me to comment on the plan for the transformation of the nuclear weapons complex. I considered presenting this at one of the local hearings but prefer to do this by mail because my comments might provide activists with anti-nuclear biases to obtain this information and use it to great advantage against your plan.

Because of my experience (46 years within DOE) and my expertise (Nuclear Chemistry, radiochemistry, and analytical chemistry in nuclear reactors, nuclear weapons, and nuclear waste cleanup), I am a strong advocate of DOE nuclear technologies and programs. However, I have two major concerns that I believe are critical to furtherance of new NNSA plans for nuclear weapons.

No. 1—There are certain areas of weapons technologies that are currently being re-positioned to new geographical areas. I find little problem with most of the re-positioning except one. I have a great deal of experience and expertise in tritium-bearing components. LANL was where these components were initially made, installed, and tested in weapons. The historical several generations of scientists conducting R&D, implementation and testing to arrive at the state-of-the-science we now possess. I was the project leader of a recent effort to document the history advancements of tritium science that was completed in 2007. I believe that it would not be prudent and economical to lose tritium science and expertise and experience in a re-positioning of tritium activities because this unique capability will require several new generations to recapture.

No. 2—A technical area that I am well informed about is environmental cleanup of high activity waste sites. I have been active in pursuing retrieval and disposition of Remote-Handled waste from TA-54 and ultra-high levels of Pu and U and multiple Kg quantities of hazardous materials from TA-49. We currently have the technologies and hot cell facilities to cleanup this two sites

115A

Villarreal, Robert

Page 2 of 2

but NNSA or EM does not have sufficient funding to clean up these two sites in the near future (or perhaps, ever). When I approached LANL management with a proposal to cleanup TA-49, they were most surprised, indeed unbelieving, about the identity and quantities of NM and other hazardous materials that are located at the site. They asked me for a rough estimate of what it would cost to cleanup the site and my estimate was \$300 to 500M depending on how clean they needed it. Their response was that NNSA could not afford it, then or in the near future. And so I do not foresee that TA-49 will ever be cleaned up!! Imagine, 50 to 100 Kgs of Pu and U that is uncontained in the tufa matrix above the Rio Grande River because we cannot afford to clean it up. Santa Fe activists could have a field day with this.

298: 374.41

14M.2: 516A

As I mentioned before, we currently have the technology, expertise, and facilities to cleanup both the TA-54 RH-waste (33 shafts) site for \$40 to 50M and the multiple Kgs of Pu and U at TA-49 as long as the LANL CMR hot cells are available and the very few remaining gray-haired scientists that have the know-how to accomplish this task are still associated with the Lab.

In conclusion, if we cannot clean up the LANL legacy waste from WW-II and the cold war, and are seriously considering leaving it buried unprotected in the ground, it is no time to be pressing ahead with new transformation plans that increase the quantity of newly-generated nuclear waste without a definitive path forward, including funding, for cleanup of the legacy waste sites. Leaving it in the ground is not acceptable, especially for a scientific Laboratory.

The credibility of NNSA and DOE is at stake here!

Sincerely yours,

Robert Villarreal

3-17-08

Robert Villarreal, LANL Senior Scientist (Currently, Guest Scientist)
560 Navajo Rd, Los Alamos, New Mexico 87544
Phone 1-505-665-7400 work 1-505-662-4176 home
e-mail BobV@lanl.gov

American Friends Service Committee *PC_1040*
Washington Public Policy Office
1822 R Street Washington DC 20009

Statement Urging No Action for Complex Transformation

March 25, 2008

The American Friends Service Committee (AFSC) is a Quaker-based organization that works for peace, justice and reconciliation and is a recipient of the Nobel Peace Prize. Our Peace and Economic Security Program has worked on U.S. nuclear weapons policies since the late 1970s, including its Director Joseph Gerson's role in launching the Nuclear Weapons Freeze movement that moved our government to negotiate the Intermediate Nuclear Forces Treaty and which played a powerful role in ending the Cold War. A leading nuclear thinker, Gerson has since published three books on U.S. nuclear weapons and war policies and has been involved in Track II nuclear disarmament and abolition efforts with NGOs and diplomats from Asia, Europe, the Middle East, and Latin America.

I come before you today to urge that the Department of Energy and the National Nuclear Security Administration take no action to actualize the Complex Transformation proposal. It is a misconceived and dangerous proposal that will increase -- not reduce -- the dangers of nuclear war.

In his valedictory speech, former Republican President Eisenhower warned his compatriots of the ever growing demands of the military-industrial complex which subverts both our democracy and our security. This certainly applies to Complex Transformation, and I want to focus my remarks on its negative impacts on our national and human security.

116A
213A1

washington, DC

The Nobel Laureate and former Manhattan Project senior scientist Dr. Joseph Roblat taught that because no nation will long tolerate what it experiences as a threatening and unjust imbalance of terror, humanity faces a stark choice of either negotiating the elimination of the world's nuclear arsenals as provided by the NPT and countless U.N. General Assembly resolutions, or facing global proliferation of nuclear weapons and the nuclear wars that will inevitably follow. In part due to the refusal of our government and the other declared nuclear powers to fulfill their NPT Article VI obligations, India, Pakistan and more recently North Korea have become declared nuclear powers, and we have reason to fear that Iran and other nations will follow suit in years to come.

31F

IAEA Director General Mohammed El Baradei has repeatedly reminded us, that the "hypocrisy," i.e. the double standards, of the nuclear powers is the most subversive force undermining the Nuclear Nonproliferation Treaty order. By proceeding with Complex Transformation, our government will be sending the message that we have no respect for the NPT Article VI Treaty obligations, that preparations and threats to initiate genocidal or omnicidal nuclear war remain "the cornerstone of our policies," (see the appended list of U.S. first strike threats,) and that if nations seek to rectify the terrorizing imbalance of terror they should seriously consider unconventional warfare or becoming nuclear weapons states themselves.

31F
(cont)

Proceeding with Complex Transformation is analogous to President Bush's unfortunate call for Iraqi insurgents to "bring it on." It will serve as a very public call for nations who are targeted by our Nuclear Posture Review, who at the receiving end of our "Full Spectrum Dominance" policies, and who have been recipients of U.S. nuclear

51J

Virji, Amsa

Page 3 of 6

threats to move full speed ahead to rectify the nuclear imbalance. It will encourage non-nuclear states to become nuclear powers, and it will encourage several existing nuclear weapons states to expand their nuclear arsenals and to deepen their reliance on weapons and threats to use them.

4/1J
(cont)

For the sake of the security of the U.S. and other peoples, we urge that you not go forward with the Complex Transformation. Doing so is essential to the pursuit of nuclear nonproliferation and to the ultimate achievement of nuclear weapons abolition.

1/16A
(cont)

Thank you for your consideration.

Virji, Amsa

Page 4 of 6

Partial Listing of Incidents of Nuclear Blackmail

- 1946 Truman threatens Soviets regarding Northern Iran.
- 1946 Truman sends SAC bombers to intimidate Yugoslavia following the downing of U.S. aircraft over Yugoslavia.
- 1948 Truman threatens Soviets in response to Berlin blockade.
- 1950 Truman threatens Chinese when U.S. Marines were surrounded at Chosin Reservoir in Korea.
- 1951 Truman approves military request to attack Manchuria with nuclear weapons if significant numbers of new Chinese Forces join the war.
- 1953 Eisenhower threatens China to force an end to Korean War on terms acceptable to U.S.
- 1954 Eisenhower's Secretary of State Dulles offers French three tactical nuclear weapons to break the siege at Dienbienphu, Vietnam. Supported by Nixon's public trial balloons.
- 1954 Eisenhower used nuclear armed SAC bombers to reinforce CIA-backed coup in Guatemala.
- 1956 Bulganin threatens London and Paris with nuclear attacks, demanding withdrawal following their invasion of Egypt.
- 1956 Eisenhower counter by threatening the U.S.S.R. while also demanding British and French retreat from Egypt.
- 1958 Eisenhower orders Joint Chiefs of Staff to prepare to use nuclear weapons against Iraq, if necessary to prevent extension of revolution into Kuwait.
- 1958 Eisenhower orders Joint Chiefs of Staff to prepare to use nuclear weapons against China if they invade the island of Quemoy.

1961 Kennedy threatens Soviets during Berlin Crisis.

1962 Cuban Missile Crisis

1967 Johnson threatens Soviets during Middle East War.

1967 Johnson's public threats against Vietnam are linked to possible use of nuclear weapons to break siege at Khe Sanh.

1969 Brezhnev threatens China during border war.

1969 Nixon's "November Ultimatum" against Vietnam.

1970 Nixon signals U.S. preparations to fight nuclear war during Black September War in Jordan.

1973 Israeli Government threatens use of nuclear weapons during the "October War".

1973 Kissinger threatens Soviet Union during the last hours of the "October War" in the Middle East.

1973 Nixon pledges to South Vietnamese President Thieu that he will respond with nuclear attacks or the bombing of North Vietnam's dikes if it violated the provisions of the Paris Peace Accords

1975 Sec. of Defense Schlesinger threatens North Korea with nuclear retaliation should it attack south Korea in the wake of the U.S. defeat in Vietnam.

1980 Carter Doctrine announced.

1981 Reagan reaffirms the Carter Doctrine.

1982 British Prime Minister Margaret Thatcher threatens to eliminate Buenos Aires during the Falklands' War.

1990 Pakistan threatens India during confrontation over Kashmir.

1990-91 Bush threatens Iraq during the "Gulf War."

1993 Clinton threatens North Korea.

1994 Clinton's confrontation with North Korea

1996 China threatens "Los Angeles" during confrontation over Taiwan

1996 Clinton threatens Libya with nuclear attack to prevent completion of underground chemical weapons production complex.

1998 Clinton threatens Iraq with nuclear attack

1999 India & Pakistan threaten and prepare nuclear threats during the Kargil War.

2001 U.S. forces placed on a DEFCON alert in the immediate aftermath of the September 11 terrorist attacks.

2001 Secretary of Defense Rumsfeld refuses to rule out using tactical nuclear weapons against Afghan caves possibly sheltering Osama Bin Laden.

2002 Bush communicates an implied threat to counter any Iraqi use of chemical or biological weapons with a nuclear attack.

2003 U.S. mobilization and implicit nuclear threats against North Korea

2006 French Prime Minister Chirac threatens first strike nuclear attacks against nations that practice terrorism against France.

2006 Implicit U.S. threats to bomb Iran's nuclear infrastructure with "bunker"

Documentation is drawn from the Brookings Institution, presidential memoirs, press accounts and other studies and can be found in [Empire and the Bomb: How the United States Uses Nuclear Weapons to Dominate the World](#), by Joseph Gerson

Vlahovich, Sharon

Page 1 of 1

PC_307

16 March 2008

Dear Theodore Wyles,

I am writing to you about the Dept. of Energy's proposal to modernize and expand our nation's nuclear weapons. I am writing to express my opposition to this proposal. To expand our nation's nuclear stockpile will violate the Nuclear Non-proliferation Treaty and risks beginning a new arms race. An arms race would divert too many resources away from the ordinary needs of regular people all across the globe. creating instability and misery. And this works against our country's long-term goals of peace throughout the world.

Thank you for your attention.

Sharon M Vlahovich
17343 Warrington Dr.
Detroit MI 48221

Voelcker, Elsa

Page 1 of 1

Buenafior, Justin PC_460

From: Elsa Voelcker [elsav@mctelecom.com]
Sent: Wednesday, January 16, 2008 11:06 AM
To:
Subject: Hearings on New Nuclear weapons

112E | Why are there no hearings up in New England?
 Sincerely,
 Elsa Voelcker

Volckhausen, Jane

Page 1 of 1

PC_286

970 North Street #303
Boulder, CO 80304
March 24, 2008

Mr. Ted Wyka
NA-101 Complex Transformation Comment
U.S. Department of Energy
1000 Independence Avenue SW
Washington, D. C. 20585

Dear Mr. Wyka:

I am writing to oppose the proposed construction of new facilities for nuclear weapons research, as well as the testing and production of nuclear weapons.

116A

I am opposed to the pollution of land and groundwater in the production of nuclear weapons. This deadly pollution is killing our citizens, not protecting them.

I am opposed to violation of the Nuclear Weapons Non-Proliferation Treaty, which our country has negotiated and signed. Our foreign policy should be devoted rather to building alliances for the elimination of nuclear weapons.

21F
31J

Nuclear weapons kill innocent civilians, not just armed soldiers, and render vast stretches of land uninhabitable. If we wish to preserve our fragile planet, we need to avoid the production or use of nuclear weapons.

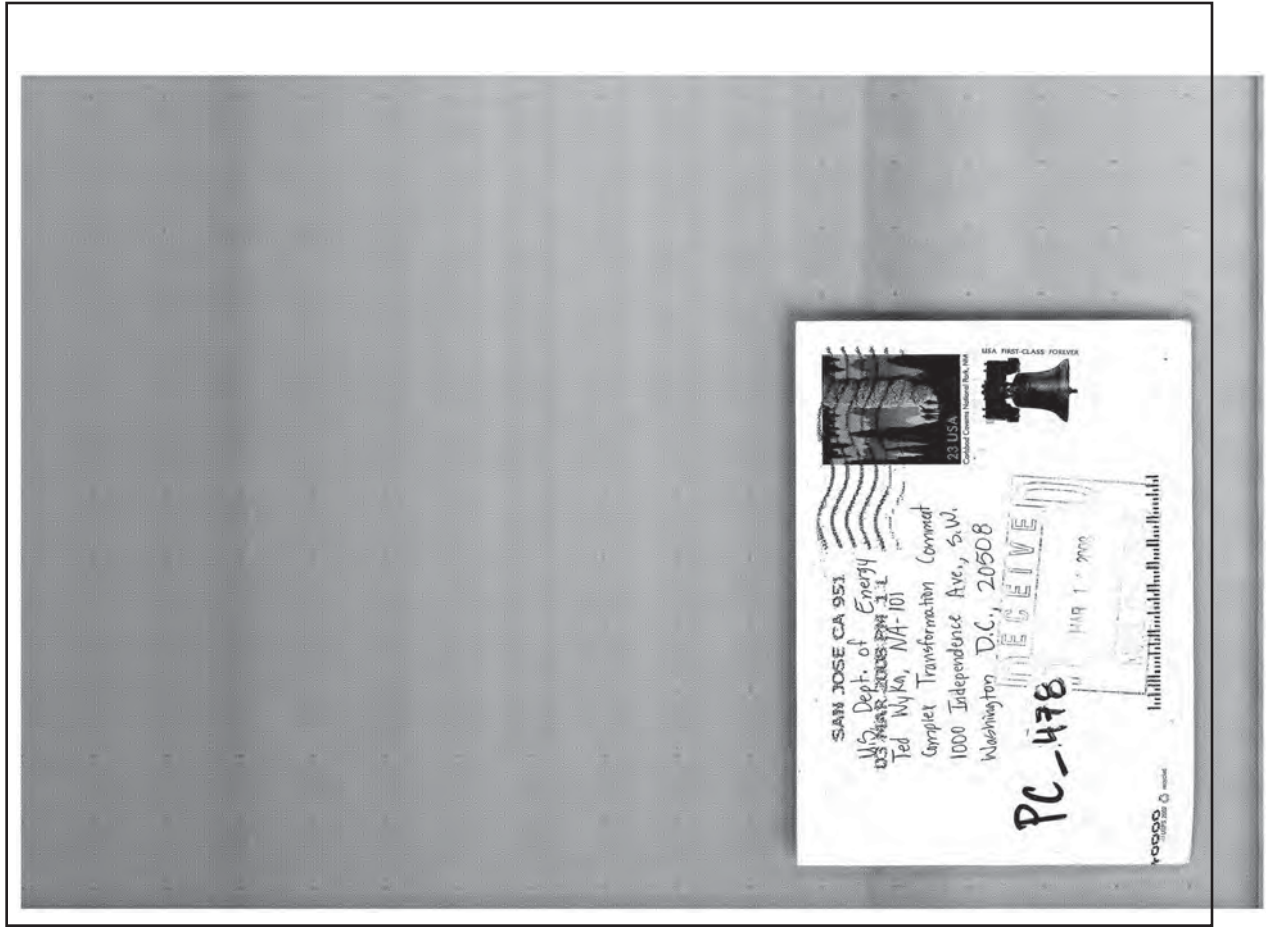
4140

Sincerely yours,

Jane B. Volckhausen
Jane B. Volckhausen

Volz, Braden

Page 1 of 2

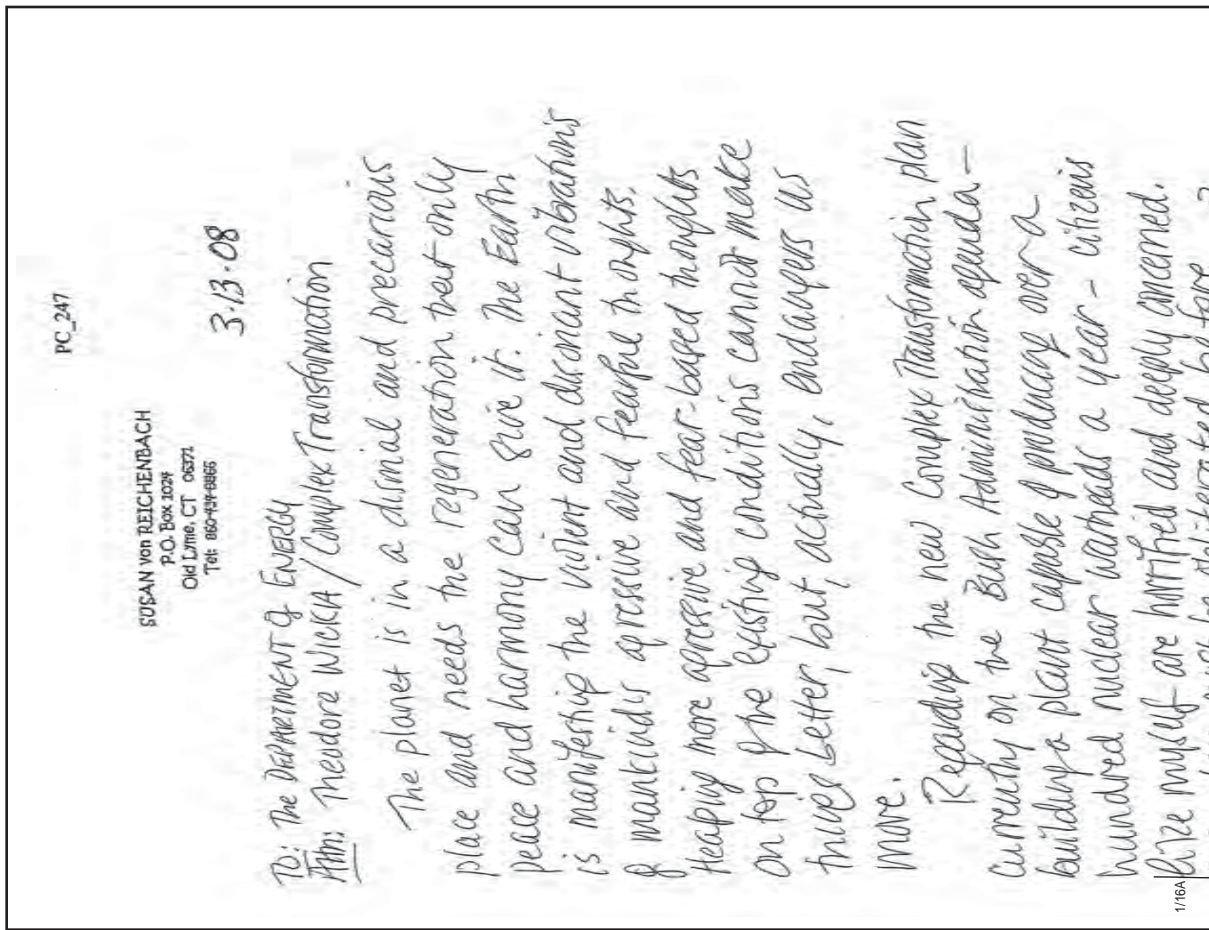
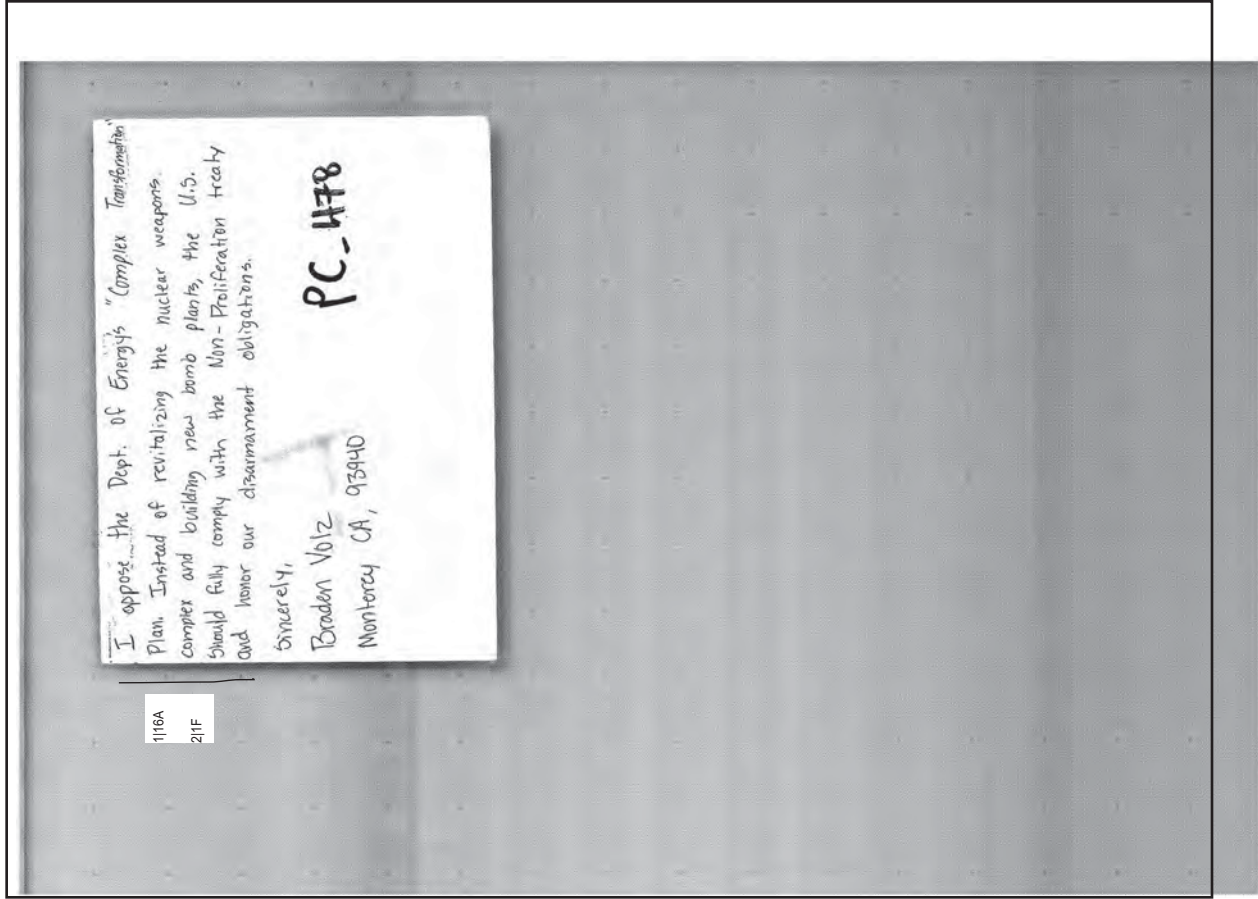


Volz, Braden

Page 2 of 2

Vonreichenbach, Susan

Page 1 of 2



Vonreichenbach, Susan

Page 2 of 2

Wadas, Micheal

Page 1 of 1

2
 it obliterates us.
 We do not want more war or more fear
 spreading across the Earth - we want
 peace, harmony, order and creative life.
 To repeat the off-gated wisdom:
 "War does not make peace - war makes pieces."
 Hear the citizens of this country who are
 not lobbyists or politicians or angry, vindictive,
 self-righteous activists. Hear the prophecy of
 Isaiah which offers us a vision through which
 we can be redeemed and the Earth can be
 saved: "[When]" we shall beat our swords into
 plowshares and our spears into pruning hooks,
 nation shall not lift up sword [nuclear threats]
 against nation, neither shall they learn
 I keep alive the idea of] war anymore" (Is 2:4).
 Let us begin this "Complex Transformation" that
 can shift the Energy to Good. Sincerely,
 Susan Vonreichenbach

116A (cont)

Levens, Matthew PC_1161

From: Micheal Wadas [mwadas93@yahoo.com]
 Sent: Monday, March 31, 2008 4:51 PM
 To: Complex2030
 Subject: Against Nuclear. Pass it on.

Micheal Wadas
 1519 Yost School road
 Ottsville, PA 18942-9542

March 31, 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. I think that nuclear is not a clean resource, and it is a very dangerous practice. We have the technology, but we do not need to use it. Let's try to focus our efforts on clean, and renewable resources like solar, wind, hydro-power, and geothermal. This is the only way we can stabilize our economy, and stop our need to produce weapons to protect our country from countries we support.

Sincerely,

Micheal Wadas
 2157950438

Wade, Kim

Page 1 of 3

Levens, Matthew

From: Kim Wade [KWade@cityofalcoa-tn.gov]
Sent: Friday, March 14, 2008 9:43 AM
To: Complex2008
Subject: Y-12 NATIONAL NUCLEAR SECURITY COMPLEX
Attachments: RES R08-113.PDF



RES
113.PDF (103

Please confirm receipt of the attached resolution.

Kim Wade
CITY OF ALCOA
Finance & Administration
PH: 865-380-4773
kwade@cityofalcoa-tn.org

PC_585

Wade, Kim

Page 2 of 3

PC_585

RESOLUTION NO. R08-113

A RESOLUTION SUPPORTING THE FUTURE OF THE Y-12 NATIONAL NUCLEAR SECURITY COMPLEX

115A WHEREAS, the Y-12 National Nuclear Security Complex in Oak Ridge, Tennessee has played a critical role in the nation's defense since its origins during World War II; and

2101 WHEREAS, in the six decades since its inception, the knowledge and expertise amassed at the Y-12 complex has made it the world's leader in uranium and other nuclear materials technologies; and

WHEREAS, since the end of the Cold War, the Y-12 complex has been an integral component in the nation's security and the war on terrorism by reducing the proliferation of nuclear weapons through component dismantlement, storage, and disposition of their nuclear materials; and

WHEREAS, the Y-12 complex has contributed immensely to the economy of East Tennessee by providing 4,500 jobs and an annual budget of \$800,000,000; and

WHEREAS, the National Nuclear Security Administration is considering alternatives regarding the future of the Y-12 complex through a process entitled Programmatic Environmental Impact Statement on Complex Transformation.

317N NOW, THEREFORE, BE IT RESOLVED by the Board of Commissioners of the City of Alcoa, Tennessee, that it hereby supports, endorses and recommends that the Congress of the United States, the Department of Energy, and specifically the National Nuclear Security Administration proceed with the transformation and modernization of the Y-12 nuclear complex in an expeditious manner in order to provide for the nation's defense, enhance the nation's security and maintain the economic health and well-being of East Tennessee.

Wade, Kim

Page 3 of 3

Wakeland, Wayne

Page 1 of 1



PC_1264

Levens, Matthew

From: wwakeland@gmail.com
Sent: Monday, April 07, 2008 5:59 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,

11U 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.

21C 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.

33A Instead of recreating the capacity to produce new, unnecessary nuclear weapons, the DOE should focus on shrinking the still-over-sized nuclear weapons complex and on maintaining the safety and security of our existing weapons arsenal as the size of our nuclear stockpile is reduced.

4200 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,
 Wayne Wakeland
 12416 SW 34th Ave.
 Portland, OR 97219

cc:
 Senator Ron Wyden
 Senator Gordon Smith
 Representative Darlene Hooley

Walker, Joseph

Page 1 of 1

Buenafior, Justin

From: Joseph Walker [joewalker318@gmail.com]
Sent: Monday, March 24, 2008 8:43 AM
To: Complex2030
Subject: Draft Complex Transformation SPEIS Comments

Importance: High

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 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 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 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. is a signatory, making it U.S. law.

It is immoral to contemplate, plan for, or create the means of mass destruction of all 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 family of sustenance and survival.

I am a Catholic activist who has travelled many times from Michigan to Oak Ridge TN to support OREPA's demonstrations against the Y-12 plant. I believe strongly that the USA should lead the world in total nuclear disarmament.

Very truly yours,

Joseph J. Walker
2706 Hall St. se
East Grand Rapids, MI
49506-3510
(616) 286-7995

PC_562

Wallace, Donald

Page 1 of 2

Levens, Matthew

From: mraywallace1@mac.com
Sent: Saturday, April 05, 2008 5:29 PM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

PC_1647

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, as a citizen forced to pay for a military budget greater than the combined military budgets of THE REST OF THE WORLD, do strenuously object to the proposed smoke and mirrors project known as "Complex Transformation," which has been expertly designed by the Department of Energy to further degrade our economy, putting education, healthcare, decent job benefits and retirement beyond the reach of ordinary Americans, let alone those already homeless, jobless and hopeless.

Someone in the Department of Energy is dangerously out of touch with reality to even suggest that we need more than the FIVE THOUSAND COUNTRYBUSTERS WE ALREADY HAVE without even so much as an analysis of whether we need them. This is no complex transformation, just "More of the Same," from an Energy Department fixated on promoting wasteful, dangerous, dirty, non-renewable nuclear solutions to everything, from electricity generation to national security, instead of concentrating on energy needs that can be secured by an increasing reliance on renewable sources and conservation.

It is beyond my imagination how the Department of Energy has been allowed to take charge of providing yet more nuclear doomsday machinery to an administration that has proved itself incapable of doing anything right. The right thing to do is put the many billions they plan to waste on more useless bombs to work, cooperating with the United Nations, and entering into negotiations with all nations interested in controlling and reducing the worldwide stockpiles of nuclear waste and weapons.

We simply do not need the capability to make more or newer nuclear weapons, which in itself is a serious violation of the Comprehensive Test Ban Treaty-- but then this administration is openly contemptuous of treaties in general.

The incoming President and the Department of Defense (not the DOE) are already obligated to such an analysis, which is required before any decision can be made, so why are you even contemplating this radical action with the lamest of lame-duck administrations?

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. One further request: I would like an email confirmation that this comment has been placed in the official record, not in your circular file.

Sincerely,
donald wallace
470 West Highland Drive
camarillo, CA 93010

Wallace, Donald

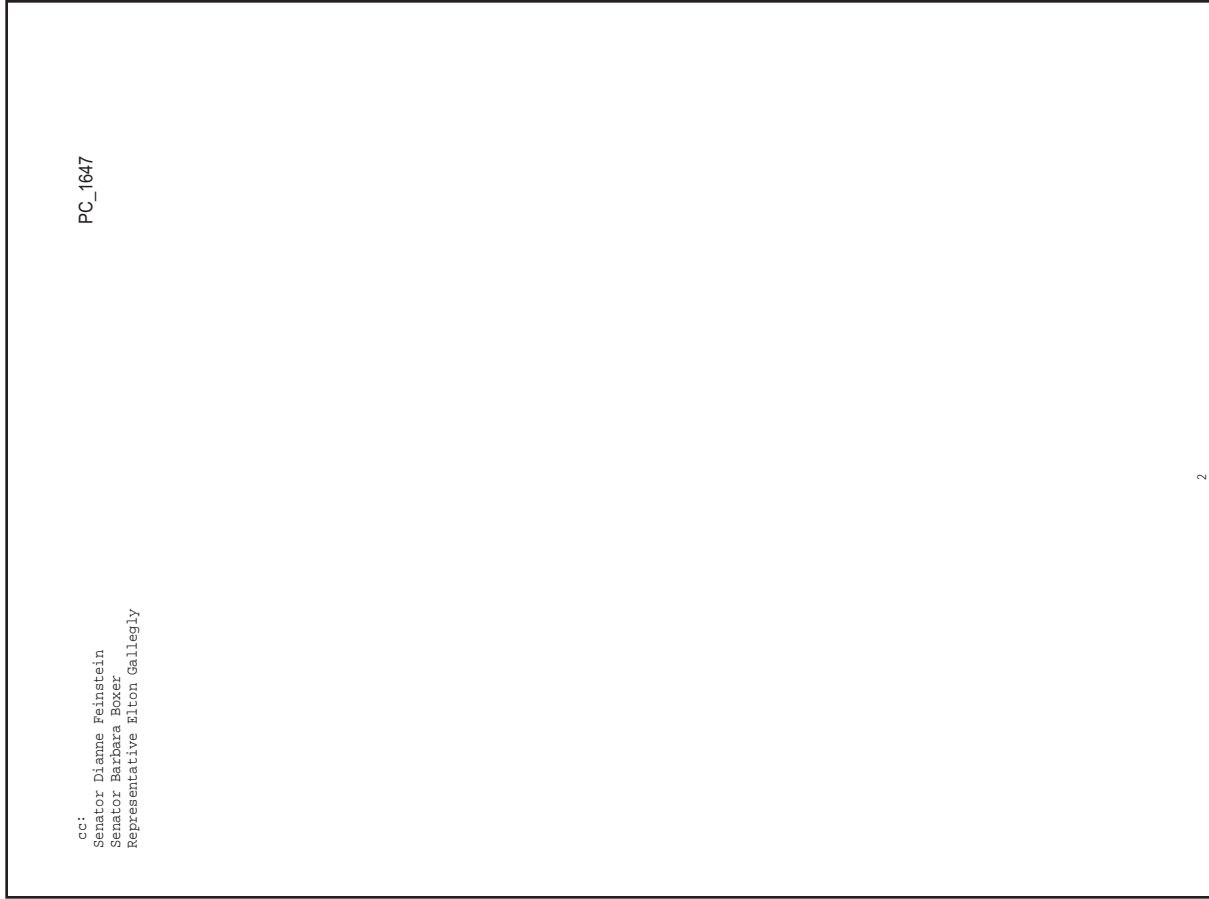
Page 2 of 2


cc: Senator Dianne Feinstein
Senator Barbara Boxer
Representative Elton Gallegly

PC_1647

Wallace, Jeannette

Page 1 of 2





JEANNETTE O. WALLACE
18 Los Alamos, Sandoval & Santa Fe Counties
District 43

1913 Spruce
Los Alamos, NM 87544
Home Phone: (505) 661-2875
E-Mail: jeannette@ballistics.com

COMMITTEES:
Appropriations & Finance
Government & Urban Affairs

INTERIM COMMITTEES:
Information Technology Oversight
Legislative Council
Legislative Finance

Los Alamos National Laboratory Oversight
Radioactive & Hazardous Materials

State of New Mexico
House of Representatives
Santa Fe

PC_1034

Thank you for holding the public forums in our state, and thank you to the audience for being interested enough to attend.

My name is Jeannette Wallace, I am a State Representative in New Mexico, My district includes Los Alamos, Santa Fe And Sandoval Counties. I have served for 18 years and I also served 6 years on the Los Alamos County Council.

Los Alamos National Laboratory and Sandia National Laboratory are both important to our state as well as our nation. The economics to our state are easily seen. We provide well paying jobs to many in northern New Mexico, we work with the schools of northern New Mexico to educate all of our children, so they can all lead a successful life, here or elsewhere.

Los Alamos National Lab has great technological capabilities, we can reduce the nuclear

115A

Wallace, Jeannette

Page 2 of 2

115A
(cont)

operations footprint by nearly 50 percent, we can reduce the stockpile while enhancing security and readiness. We also can use our technology and computer modeling to verify without underground testing. We can be more cost effective and downsize. However, many of do feel that we need to have the infrastructure in place. We have great scientists here with a great many disciplines. The issues they work on include a broad range of projects. Those projects include many spinoffs that take place as a result of something that excites a scientist during a research project. Those items include valuable Healthcare research, energy security, environment issues, including key climate change issues, technology to solve solutions to complex math, science and physics problems. Those advances have been possible with LANL technologies and scientific work derived from the national defense and security work.

We urge you to listen to those of us that support the lab. Many of us support the lab. We urge you to support the lab also
Thank you very much, Jeannette Wallace

to accomplish all of these things

Wallerstein, Robert

Page 1 of 2

PC_70

ROBERT B. WALLERSTEIN, M. D.
210 BEACH ROAD
BELVEDERE, CALIFORNIA 94920
TELEPHONE (415) 455-8417
FAX (415) 700-0890

February 12, 2008

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

Dear Mr. Wyke:

The proposed New Nuclear Weapons and Complex Transformation plan (Draft Complex Transformation SPEIS) should be completely abandoned. It is an attempt by a lame-duck administration to commit this country to a disastrously counterproductive and dangerous program in its final months, despite the rejection of the Bush administration and of its nuclear program in particular by large majorities of the American public. Actually, in a recent poll, 79% of a national sample said they want the U.S. to do more to eliminate nuclear weapons. Even four of our most conservative and hawkish senior retired statesmen, Henry Kissinger, George Schultz, William Perry, and Sam Nunn, made a public statement a year ago on the necessity of abolishing nuclear weapons, not increasing their number.

The basic reason to abandon this latest wrong-headed decision of the most incompetent administration in US history is, therefore, the overriding necessity to begin the process of world-wide abandonment of the production of nuclear weapons and the steady, systematic destruction of those that already exist. To do so is our solemn treaty obligation, though many administrations of both parties have pretended that it does not exist. Long ago, enlightened military planners realized that there is no rational role for nuclear weapons in any defense policy. Even that icon of conservative Republicans, Ronald Reagan, was able to recognize that the only way to solve the complex problems of nuclear arms control was to start serious work on multilateral abolition of the only true weapons of mass destruction that exist.

Even if you refuse to recognize the validity of the above argument, you must see that the proposal to create 120-125 new warheads every year flies in the face of Congress's recent rejection of the Reliable Replacement Warhead program. These new warheads are not only unwanted, they are also unnecessary to a policy of stubbornly clinging to the delusion that nuclear weapons 'make us strong'. Last year, the JASON scientific defense advisory group reported that the current U.S. nuclear stockpile will remain reliable for at least another 70 years.

116A

211K

31F

48A

58F


65C.1

Wallerstein, Robert

Page 2 of 2

1|16A (cont)
 7|9B
 2|1K (cont)

Under these circumstances, it would be absolutely irresponsible to continue with this morally bankrupt, strategically senseless, and fiscally ruinous policy at a time of crushing debt and threatening recession. The only honorable course of action for the Secretary of Energy and other leaders of the Department, if they cannot convince the Bush administration to abandon the proposed "complex transformation" policy, is to resign in protest.

Sincerely yours,

 Robert S. Wallerstein, M.D.

Wallman, Joshua

Page 1 of 1

PC_564

Buenafior, Justin

From: Joshua Wallman [scrappyproc@aol.com]
Sent: Tuesday, February 19, 2008 10:03 PM
To: Complex2030
Subject: The CMRR Project

Joshua Wallman
 410 East 6th St
 NYC, NY 10009-6403

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.
 Sincerely,

Joshua Wallman

Walsh, Concepta

Page 1 of 1

PC_253

To: Theodore Wyka
U.S. Dept. Of Energy
Washington, D.C. 20585

From: Sister Concepta Walsh
1437 Blossom Road
Rochester, New York 14610

Date: March 27, 2008

Re: Complex Transformation program. Please deny environmental clearances for this program.

1/16A

Memo: I understand that the U.S. Dept. of Energy National Nuclear Security Administration is planning to refurbish nuclear weaponry - enabling us to build new nuclear weapons.

2/1F

This program violates the Nuclear Nonproliferation Treaty.

3/1J

This program hinders nuclear disarmament efforts and hinders international

Non-proliferation initiatives.

4/14O

This program produces toxic waste that endangers generations to come.

1/16A
(cont.)

I urge you to deny environmental clearances for this program.

Signed

Walton, Barbara

Page 1 of 1

PC_1293

Levens, Matthew

From: bwalton9@juno.com
Sent: Tuesday, April 08, 2008 6:14 PM
To: Complex2030
Cc: Gawarecki, Susan; Mulvenon, Norman
Subject: Draft Complex Transformation SPEIS

Dear Mr. Wyka,

I am encouraged by the Department of Energy's most recent plans to consolidate and reduce the facilities, workforce, and redundant capabilities within the nation's nuclear weapons complex. It is an improvement from the SEAB recommendations in 2005. I am very pleased with the Programmatic Preferred Alternatives (PPA), Distributed Centers of Excellence. I appreciate the responsiveness to the scoping comments in the selection of the 50/50 option for the production of pits in the PPA; this recognition of the smaller US stockpile and its potential future reduction is of great importance globally.

The Alternatives to Restructure R&D and Testing Facilities (also sometimes referred to as "Project-specific") were less clear to me. I have little background in this area and found both the alternatives and the preferred alternatives somewhat confusing. In addition, reading was difficult due to many acronyms, some similar to the SNM Facilities acronyms, for example HE, very similar to HEU, was not in the acronym list for the Summary document (p 8-1v).

A matrix of alternatives and sub-options would be especially helpful in commenting 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.

- 1. Page 3-162 The LANL Pu Phaseout 'box' belongs under waste management not transportation
- 2. Page 4-349 This appears to have 2 titles: I suggest combining.
- 3. Pages 4-367, 370, and 372 show Oak Ridge Reservation outline properly but 4-373 shows it in same color as radius. In addition an outline of 1-12 as shown on page 4-349 would be more relevant.
- 4. Vol. II TOC P 111. Incorrect page numbers are given for sections 5.9.15, 5.10, and 5.10.1.
- 5. Page 5-389, Table 5.10-3 -- why use WDP values?
- 6. Page 5-387 Table 5.10-1 Assumptions refer to WDP Waste Management EIS (DOE/EIS- 0337) which could not be found in Chapter 12 References.
- 7. Page 12-12 DOE 2007 appears to be in error. The Final Y12 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 Y12, it should have a new document number. I attended the early public hearing on 2/26/08 and signed up to speak, but time ran out due to the large number of speakers. Thank you for this opportunity to comment.

Barbara A. Walton, 85 N. Claymore Lane, Oak Ridge, TN 37830

1/15A

2/2J

1

Walton, Ty
Page 1 of 1

Levens, Matthew

From: Ty Walton [mailto:tinaijan@gmail.com]
To: Thursday, March 27, 2008 1:34 PM
Subject: Complex2030
Enough Nuclear Weapons!

Ty Walton
1033 S. Duncaster Ct.
Bloomington, IN 47401-8175

March 27, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy

111K Nuclear weapons are intended to 'demonstrate superiority', but in actuality they demonstrate aggressive inferiority. Superior persons excel in negotiation powers. By increasing the number of weapons of mass destruction we only prove how idiotic we are! Have persons forgotten how to find a line between 2 oppositions by which they can come to terms? Just because leading men feel inferior lacking of their own standing shouldn't mean that every other being on this planet should pay! The President (Bush) is mentally challenged!

Sincerely,

Ty
312-320-8645

PC_1248

Wamp, Zach
Page 1 of 1

APPROPRIATIONS COMMITTEE

SUBCOMMITTEE

LEGISLATIVE BRANCH
Division Number
ENERGY AND WATER

REPUBLICAN
POLICY COMMITTEE



PC_165

ZACH WAMP
UNITED STATES CONGRESS
THIRD DISTRICT OF TENNESSEE

February 26, 2008

The Honorable Thomas P. D'Agostino
Administrator, National Nuclear Security Administration
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

RE: Comments for Record - NNSA Public Hearing Oak Ridge, Tennessee
Draft Complex Transformation Supplemental Programmatic EIS

Dear Administrator D'Agostino:

115A Thank you for the opportunity to provide comments on the National Nuclear Security Administration (NNSA) study on transforming the nuclear weapons complex. This process is a very important step that I strongly support to make our nuclear weapons complex more responsive, secure and cost effective.

2f0f It's crucial to engage communities like Oak Ridge, made up of Cold War heroes who carry the burden of the Manhattan project legacy proudly. As the NNSA is evaluating all of the options to transform the Nuclear Weapons Complex, the primary focus should be on producing the most efficient complex to meet our national security needs for the next century.

3f5c4 4f7N Since it was first proposed, I have actively supported the Y-12 National Security Complex's modernization efforts, including the construction of the Highly Enriched Uranium Manufacturing Facility, (HEUMF) the Uranium Processing Facility (UPF) and accelerated cleanup. These efforts for a smaller, safer site preceded the overarching goals of complex transformation well before it became a national policy focus.

115A (cont) As we examine the future of the nation's nuclear weapons complex, it's important to maintain vital missions at Y-12 and support its designation as the Center of Excellence for Uranium and Canned Subassemblies. My position in Congress allows me to take a leadership role in overseeing NNSA's reconfiguration of the nuclear weapons complex. It is an honor to work with the men and women of Y-12, the NNSA, and the Oak Ridge community.

Warmest regards,

Zach Wamp
Member of Congress

<http://www.house.gov/wamp/>
wamp@house.gov

Waters, Patricia

Page 1 of 1

Watt, John

Page 1 of 1

PC_1179

Levens, Matthew

From: Patricia Waters [waters_patricia@hotmail.com]
Sent: Thursday, March 27, 2008 4:42 PM
To: Complex2030
Subject: No new nuclear weapons

Patricia Waters
409 Lynn Avenue
Athens, TN 37303-3719

March 27, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

198 I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons. As an educator, I see that we need to spend our resources on our people, not on weapons.

211 Building this new plant would send a contradictory message to other countries, such as Iran, India, and Pakistan. 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.

198 Lastly, with our collapsing economy, the crumbling infrastructure, the increasing needs of our veterans, whether disabled mentally or physically, and the disaster that is become Iraq, we cannot afford it

Sincerely,

Dr. Patricia Waters
423-745-0423

PC_1411

Levens, Matthew

From: jwatt45@aol.com
Sent: Thursday, April 17, 2008 1:43 PM
To: Complex2030
Subject: Complex Transformation SPEISComments

Complex 2030 Document Manager Theodore A. Nyka

Dear Complex 2030 Document Manager Nyka,

The Cold War is over and the United States still has thousands of nuclear weapons. I do not believe that this country needs a vast nuclear weapons complex and the capability to develop and build new types of nuclear bombs. Instead, the United States should be showing leadership in pursuing a world free of nuclear weapons. Your plan, known as "Complex Transformation," takes us down the wrong path.

I support efforts to reduce the nuclear weapons complex and ensure the safety and security of our remaining nuclear weapons and nuclear materials.

Complex Transformation undermines global efforts to prevent other countries and terrorists from developing or acquiring nuclear weapons. It undermines our credibility as a nation committed to nuclear non-proliferation and nuclear disarmament.

The message to others is "do as I say, not as I do."

Nuclear weapons are a grave and growing threat to human civilization. As our nuclear arsenal is reduced, the Department of Energy should focus on downsizing the nuclear weapons complex and on the safe storage, dismantlement, and disposal of nuclear weapons and nuclear materials. We do not need the capacity to build new nuclear weapons.

You already know that we don't need more weapons of mass destruction. But we both know that the corporatocracy demands to be fed. However, sooner or later, perhaps in our lifetime, the people of this nation will have to rise as one to enforce their will upon our elected officials. Until that day, it seems we are doomed to a government that can't hear the voices of its citizens, because its head is too far up the Corporate anus.

Who would have believed as we sat in our high school U. S. history class that we would witness the shame which has become America. We loose the Jackals to overturn legitimate, popular elected democratic governments, use economic nit men to corrupt others, and should they fail this nations corporations, we loose our military. How proud we should be, the bully of the world.

Sincerely,
John Watt
8813 Shoemaker Ln
Hudson, FL 34667

Wayland, April

Page 1 of 1

Levens, Matthew

PC_373

From: April Wayland [rabbit101@aol.com]
Sent: Monday, January 28, 2008 11:28 PM
To: Complex2030
Subject: Citizen Comment regarding SPEIS, Complex Transformation

Mr. Wyka:
No.
No, no no.
No new nuclear weapons.
Instead, the Department of Energy should be putting their resources into nuclear cleanup and "green" energy research, not expanding their weapons program.
These new warheads are unnecessary. The Jason's reported that the current U.S. nuclear stockpile will be remain reliable for at least another 70 years.
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.

No, no, NO!
April Wayland
1642 Voorhees Avenue
Manhattan Beach, CA 90266

116A
29B
33A
45C1
514M3
69H

Wayland, April

Page 1 of 1

Levens, Matthew

PC_372

From: April Wayland [rabbit101@aol.com]
Sent: Friday, February 08, 2008 2:45 AM
To: Complex2030
Subject: Don't build more nuclear weapons

April Wayland
1642 Voorhees Avenue
Manhattan Beach, CA 90266-7044
February 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:
The Department of Energy should reject proposed Complex Transformation project.
I am a parent and a University lecturer and I am very concerned that revamping the current arsenal will lead to renewed nuclear tests.
In addition, the new arsenal is bad foreign policy.
Americans need to be role models to convince countries like Iran and North Korea to forgo nuclear weapons.
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,
April Wayland

116A
29B
31L
41J

Weaver, Edward

Page 1 of 1

Page 1 of 1

PC_1970

Levens, Matthew

From: Edward Weaver [the_dietz_inside@yahoo.com]

Sent: Thursday, April 10, 2008 2:25 AM

To: Complex2030

this is another affidavit of an American citizen against building nuclear weapons, or future or earth relies on not being destroyed by fear or weapons of fear no more nuke bombs. grow up

116A

Do You Yahoo!? Tired of spam? Yahoo! Mail has the best spam protection around http://mail.yahoo.com

Webb, Xaq

Page 1 of 1

PC_1695

Levens, Matthew

From: xaqwebb@gmail.com

Saturday, April 05, 2008 12:31 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,

11J I do not want to die in a nuclear exchange. Building our already-brimming nuclear arsenal will only encourage other, more volatile countries, to build nuclear weapons. What, is our plan to "strike first" as we did with the terrorists after 9/11? It doesn't work that way with nuclear weapons and retaliation is not a threat for jihadists or whoever our enemy de-
jur will be.

29B It gives America an even worse world image to build more nuclear weapons. Department of Energy--please work on designing new sources of industrial and consumer energy that are more affordable and less wasteful rather than building weapons which can only destroy. Who are our enemies? Civilians? You cannot have a term such as "collateral damage" in a nuclear attack:

11J Innocent lives will be lost. Take the first step, become a leader in the eyes of the world, and start dismantling our nuclear arsenal NOW.

315A That being said, 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. But the rest of the plan, to build new and better nuclear death machines, is a grievous error.

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,
Xaq Webb
11303 Prairie Dog Trail
Austin, TX 78750

cc:
Senator Kay Hutchison
Representative John Carter
Senator John Cornyn

Weber, Diane

Page 1 of 1

Buenafior, Justin

From: Diane Weber [dweber@bis.midco.net]
Sent: Tuesday, March 18, 2008 7:43 PM
To: Complex2030
Subject: nuclear spending and development

Diane Weber
633 Bidgeport Drive #3
Bismarck, ND 58504-7429

March 18, 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.

116A 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.

23A Why does the administration feel a need for more money for and development of nuclear weapons when we dont plan to use them??? Or is there just such an intent?

30B Such money can be better spent for peaceful purposes beginning with education and health care.

49A Here in North Dakota we spent millions on the warhead silos in the '60s and '70s only to now turn them into a museum. Were we any safer? It was money down the drain.

Sincerely,

Diane J Weber
701 250-6006

PC_446

Weeks, Stephen

Page 1 of 1

Levens, Matthew

From: scw@uakron.edu
Sent: Saturday, April 05, 2008 12:36 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,

I grew up in Southern California near a huge navy base during the height of the cold war. We had one "duck and cover" drill about once a month. It scared me to death to think about vaporizing in a nuclear war. That early set of childhood experiences has affected me to this day, in a negative way. I would LOVE to keep my two lovely daughters from having the same experiences during their lives!

11J Why risk sparking a whole new arms race by developing a whole suite of new nuclear weapons? Don't we already have enough to vaporize all of humanity many times over? Isn't that enough?

23A Let's keep the nuclear arms race a thing of the past and just maintain those nuclear weapons we need to maintain a credible threat to possible enemies. At the moment, we DO have such a threat, and we don't need any new weapons to strike fear into the hearts of our enemies!

Thank you for listening.

Sincerely,
Stephen Weeks
4461 Ridge Crest Dr.
Copley, OH 44321

cc:
Senator Sherrod Brown
Senator George Voinovich
Representative Betty Sutton

PC_1675

Wehr, Paul

Page 1 of 1

Weick, Maria

Page 1 of 2

PC_1563

Levens, Matthew

From: wehr [Paul.Wehr@colorado.edu]
Sent: Monday, April 21, 2008 12:14 PM
To: Complex2030
Subject: Draft Complex Transformation SPEIS Comments

To: SPEIS team
From: Paul Wehr, Professor Emeritus, University of Colorado

116A Having read the arguments for and against, I am convinced the US should not pursue a new level of nuclear weapons technology and an expensive, dangerous complex to develop it. What is needed is a more vigorous US program of diplomacy and negotiation with other nuclear weapons states to reverse the nuclear proliferation now occurring. Our government's pursuit of a new generation of nuclear weapons, however disguised, will only encourage Russia, China, India, Pakistan et al into yet other nuclear arms races and render our nation less secure. We should take the lead, the high road here.

21J

PC_254



LEPOCO
Lehigh-Pocono Committee of Concern

lepoco@fast.net www.lepoco.org

313 West Fourth Street
Bethlehem, PA 18015
(610) 691-8730

April 2, 2008

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

Dear Mr. Wyka,

The National Nuclear Security Administration must cancel Complex Transformation and any program that would perpetuate or expand our nuclear arsenal. We demand that all branches and agencies of our government honor the 1970 Nuclear Non-Proliferation Treaty by working towards complete nuclear disarmament as that treaty requires. The well being of this planet, and indeed its future, depends on the United States providing leadership in the disarmament of nuclear stockpiles.

11F

21J

Should the US insist on going forward with plans to maintain a nuclear stockpile and build new bombs it will spur nuclear weapons proliferation worldwide. Nuclear proliferation, especially as it is framed by the realities of terrorism, would recklessly and immorally expose all life on this planet to the possibility of nuclear annihilation. The US cannot in good faith call on other nations to stop the production of new nuclear weapons while we are spending billions to develop a new generation of deadly bombs. Voices of experience such as Henry Kissinger and George Schultz have called for universal nuclear disarmament.

21J
(cont)

Albert Einstein himself gave us a dire warning:

"Through the release of atomic energy, our generation has brought into the world the most revolutionary force since prehistoric man's discovery of fire. This basic force of the universe cannot be fitted into the outmoded concept of narrow nationalisms. For there is no secret and

31N:
41M

Weick, Maria

Page 2 of 2

31N (cont.); 41M (cont.) there is no defense, there is no possibility of control except through the aroused understanding and insistence of the peoples of the world. We scientists recognize our inescapable responsibility to carry to our fellow citizens an understanding of atomic energy and its implication for society. In this lies our only security and our only hope -- we believe that an informed citizenry will act for life and not for death." (January 22, 1947)

516A In writing this letter we act for sanity and life. Nuclear weapons are madness and death. (Complex Transformation must be cancelled.

In peace,

Maria Weick

Maria Weick for the Nuclear Abolition Sisters of LEPOCO (Lehigh-Pocono Committee of Concern) Mimi Lang, Ursula Wuerth, Monica McLaughon, Nancy Tate, Susie Ravitz, Amy Frey, Robert Daniels II, Maria Weick, Joyce Ravitz

cc: Senator Bob Casey Senator Arlen Specter Representative Charles Dent Representative Patrick Murphy

Weidemann, Elaine

Page 1 of 1

PC_30

1459 E. Main St. Madison, Wisconsin February 14, 2008

Theodore A. Wyka Complex Transformation SPEIS Document Manager Office of Transformation, NA-1C.1 U.S. Department of Energy/NSA 1000 Independence Avenue, SW Washington, D.C., 20585

Dear Mr. Wyka,

I have just finished looking at the document summaries on the Computer Disk your office sent to me. My deep concerns about the continuing transformation of our nuclear weapons programs remains unabated! The document does nothing to allay my fears about:

- 116A (1) the effect on our economy of all the money being drained from government coffers to pursue this program; (2) the arrogant message this program sends to the rest of the world about our development of more and more potent nuclear weapons; (3) the contradiction between our rhetoric and our actions regarding nuclear weapons, destroying our image as a wise, dependable leader in world affairs; (4) the inevitable poisoning of the environment for many miles around construction, research and testing sites; (5) the 'nuclear cleanup problem,' which has never been solved; (6) the abrogation of every Christian principle I have ever known, as well as treaties made in the past; (7) the image of the United States, as a people obsessed with FEAR!

We are spending billions of dollars because people in government are so-o-o-o afraid. Man are wealthy - and protecting their fortunes. But most Americans are not wealthy, nor are they afraid.

It is interesting that all of your public hearings were scheduled in states that already are benefiting from jobs in the nuclear industry! These are places where you can present this program as one that creates jobs. These are jobs most of us do not want in our neighborhoods. Please abandon this program. . .

61ZE

Sincerely,

Elaine M. S. Weidemann

Elaine M.S. Weidemann, M.A., M.S., M.Div..

EMSW/ii

Weir, Joyce

Page 1 of 1

Buenafior, Justin

From: Joyce Weir [jweir@povm.com]
Sent: Thursday, February 14, 2008 10:35 AM
To: Complex2030
Subject: Citizen Comment

PC_565

174: Mr. Wyka:
 298: Simply put, the Department of Energy should be putting their resources into nuclear cleanup and "green" energy research, not expanding their weapons program.

314: 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.

Joyce Weir
 Box 749
 Newport, WA 99156

Weiskopf, Richard

Page 1 of 2

Levens, Matthew

From: Richard W.Weiskopf [RichardW6@tcwty.r.com]
Sent: Tuesday, April 01, 2008 10:06 AM
To: Complex2030
Subject: Complex Transformation

PC_1203

Mr. Theodore Wyka
 Office of Transformation, NA-10.1
 U.S. Department of Energy/NNSA

Dear Mr. Wyka:

The following are my comments on Complex Transformation.
 The Complex Transformation program includes a new nuclear bomb plant, officially called the Chemistry and Metallurgy Research Replacement nuclear Facility (CMRR). It would have the annual capacity to build 80 plutonium pits, the "triggers" of new nuclear warheads. I am strongly opposed to the CMRR.

In 1980, 26 years ago, I became a member of Physicians for Social Responsibility (PSR). That was during the cold war, and there was fear of nuclear war between USSR and the US. The founders of PSR felt it was our duty as physicians to educate the public and point out to our government and politicians that there is no medical defense or response to nuclear war; that the only "defense" against nuclear war is prevention. The prospect of nuclear war and the immediate massive destruction, deaths and severe injury of millions of people make this an urgent public health issue for physicians to educate about.

PSR was instrumental in educating the public about the dangers of radiation from nuclear test explosions. Its public campaign pointing to Sr-90 in children's teeth led to the stopping of above ground testing and the 1963 limited test ban treaty.

Today in spite of the Nonproliferation treaty (NPT), a number of nations have nuclear arsenals, and because of our present world situation, nuclear war is again a serious threat.

After the collapse of the Soviet Union in 1991, the public's fear of nuclear war was greatly lessened. I think that currently there is great public apathy on this issue. The threat of nuclear war has almost disappeared from the media and public awareness. Yet the danger has actually increased. The US and Russia each have thousands of nuclear warheads, many on active alert. Several other countries have nuclear arsenals. Today we need reminding that in connection with the Bush administration's preemptive war policy, the administration has stated that it would consider the possibility of a nuclear first strike.

The horrible effects of nuclear weapons is a topic that people dont want to hear or think about. Once again it is the job of PSR to speak out.

Very briefly, consider the effects of a one megaton nuclear bomb detonated 8000 feet above the center of the city of Syracuse, NY, where I live. A study from the Office of Technology assessment in 1979 indicated that 150,000 people in Onondaga County would be killed within days of the explosion. Immediate effects would be from blast, burns and radiation injuries. Within a radius of 2 1/2 miles 98% of the people would be blown apart and incinerated. All buildings leveled except a few concrete structures. Three hospitals would be destroyed, including the medical personnel. The firestorm area would include a radius of 4 miles in which 50% of the people would be killed, many others wounded and with third degree burns. Our fourth hospital would be severely damaged. Within a radius of 11 3/4 miles one quarter of the people would be severely injured, one half with 1st and 2nd degree burns.

With three hospitals destroyed and the fourth damaged, there would be essentially no medical care available. Thousands would be left to die a painful death of their burns and wounds. Many more would die of radiation sickness. There would also be severe long term effects such as leukemia, cancer, birth defects, etc. A full scale nuclear war with

Weiskopf, Richard

Page 2 of 2

multiple warhead detonations, would produce similar damage in many of our megapopolis areas, including the death of millions of people and severe environmental effects.

The present policies of the US with its continued modernizing of nuclear weapons and proposed increase in its nuclear arsenal, while threatening countries such as Iran, who may aspire to nuclear weapons, can only carry us further to the brink of nuclear war and devastation of unimaginable magnitude. Building a new bomb plant can only increase that risk. By telling our adversaries, "We can have nuclear weapons, but you can't," and then adding to our own nuclear arsenal, we prevent meaningful negotiations with our adversaries for nuclear disarmament. We need to use diplomacy, negotiate and set an example of cooperation, which can eventually lead to mutual nuclear disarmament, the only realistic way to prevent nuclear war.

Building the new nuclear pit facility (CMRR) would cost over \$2 billion, estimated by the Energy Department. The money should be used for other purposes such as education, healthcare, environment, the problem of global warming, programs for our inner cities, etc.

I strongly oppose plans for a new nuclear bomb plant and other plans for "modernization" of nuclear weapons.

Please acknowledge your receipt of these comments.

Thank you,

Richard Weiskopf MD
5031 Onondaga Road
Syracuse, NY 13215

21J

39A
49H
59B

Weiss, Martin

Page 1 of 1

Levens, Matthew

From: martin weiss [mailto:mattweiss@gmail.com]

Sent: Monday, January 21, 2008 1:00 PM

To: Complex2030

Subject: our present and future

To Whom it Should concern:

I oppose further contamination of our environment. Our government has already dumped hundreds of thousands of tons of nuclear wastes into our environment. Consequently, the health of those who pay your salary are jeopardized. The health-care costs of the entire nation are increased. You are risking your livelihood, as well as the ability of your grandchildren to procreate. Sterilizing one's own children is rather short-sighted, don't you agree? Increasing the rate of mutation among all populations, not merely the poor, is fundamentally pure stupidity.

If you can't see this, or need reminding, you don't deserve to be holding any job in government.

The ancient tradition of dumping the production costs of the rich into the environment has come full circle to bite everyone in the posterior.

Remember, HUNDREDS OF THOUSANDS OF TONS OF NUCLEAR WASTES already dumped into the world's biosphere.

Please act as if your very sanity were in question, because it is.

M. S. Weiss
Mexico, MO

1|140

2|14W3

1|140
(cont.)

Weissenberger, Stein

Page 1 of 1

Wekall, Elizabeth

Page 1 of 1

PC_2112

Levens, Matthew

From: Stein Weissenberger [sweissenberger@comcast.net]
Sent: Thursday, April 10, 2008 5:58 PM
To: Complex2030
Subject: Concerns re transformation of the DOE nuclear complex

I am a citizen concerned about the risk of terrorists acquiring nuclear weapon material, or nuclear weapons themselves, from outsider attacks on transport vehicles or on DOE sites, or through insider plots aimed at either of these kinds of targets. I therefore recommend strongly that in your planning for the DOE complex transformation you take a broadly structured, analytic look at considering terrorism risk in evaluating alternative end states of the complex.

While there is no unique way to systematically approach such challenging decision problems, in my opinion (and that of many others who have seriously confronted such problems), the most organized, defensible, and transparent approach is by making use of a multi-attribute utility function (MAUF). Using this method, the evaluation of the new complex would be based on a MAUF where the attributes would include the risk of transporting fissile material, weapon components and the weapons themselves, as well as the risks associated with storage of these three asset types, and the pros and cons of consolidated vs distributed storage. Such an effort would, through its execution, also suggest other significant attributes for consideration. Such additional concerns might include the number and distribution of people who hold particular information and expertise, and the number, distribution and protection of certain critical equipment.

Note that I am not suggesting that the evaluation be dominated by the terrorism concerns I have raised here, but simply that these concerns be incorporated explicitly as attributes in a MAUF used in that evaluation. If the rational answer is that these concerns should have little impact on the decisions to transform the complex, then that would fall out naturally as a result of the analysis, with the happy further consequence that this result would have been obtained in an explicit, defensible manner, with an "audit trail" of distinct, logical steps.

This email is not intended to imply that these concerns are not being addressed, but simply to express the hope that they will be addressed in an explicit and careful manner, and to suggest an analysis framework for best doing so.

I would appreciate it if you would inform me, when you are able, as to how the concerns I have listed here will be considered in your work.

Regards,

Stein Weissenberger
Mountain View CA
sweissenberger@comcast.net

PC_330

March 20, 2008

Theodore Styka
Complex Transformation: SPEIS (or Map)
US Department of Energy

Dear Mr. Wepka:

Samir is concerned to learn that the Department of Energy plans to refurbish the U.S. nuclear weapons - pushing capacity through the Complex Transformation program. The production of these weapons will produce toxic substances that render dangerous for thousands of years and claim that will be damaged more. Don't our planet deserve the program that we are the billions the program will cost, coming from?

This program also involves the Nuclear Nonproliferation Treaty to which the United States is a signatory. It also says that the U.S. intends to continue to develop its nuclear arsenal while other countries are told to abandon their nuclear weapons. Some states of New York and very concerned about the nuclear weapons being built.

Sincerely,
Theodore Styka

116A

2140

398H

411F

116A(cont)

Wells, Barbara

Page 1 of 1

Levens, Matthew

PC_828

From: bwells@cdsopcc.edu
Sent: Monday, April 07, 2008 12:33 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 If it is true that the DOE is planning on spending money on new nuclear weapons, please
pass it along that I think that is a very backward idea.

2|1J We talk a lot about other nations not having a nuclear weapons plan and yet we continue to
develop ours. We are getting the reputation of the big bully on the block.

2|1J I don't think our administration is any better at controlling what will happen in a
(cont.) nuclear world than Iran or North Korea. If we want them to stop working on their own
3|1K nuclear bombs, we need to do the same.

4|9B Let's keep working on reducing our arsenal not increasing it. We have too many projects
5|9H that need money that will help our citizens. Let's spend wisely.

Sincerely,
Barbara Wells
40969 Grand View Lane
Astoria, OR 97103

cc:
Senator Ron Wyden
Senator Gordon Smith
Representative David Wu

Wells, Christine

Page 1 of 1

Levens, Matthew

PC_1308

From: Christine Wells [wells@newmex.com]
Sent: Monday, April 21, 2008 10:23 AM
To: Complex2030
Subject: Nuclear Bomplex at Los Alamos

1|16A #1) I am AGAINST any new nuclear bomb development or production at Los Alamos or anywhere
else.

2|2E.1 #2) The comment period should be extended because so few people know of the opportunity to
express themselves (either for or against)

#2) The comment period should be extended for another 90 days.

Christine L. Wells, Ph.D.
PO Box 730
Arroyo Seco, NM 87514

Wendt, Jack

Page 1 of 1

Wentland, Mary

Page 1 of 1

PC_914

March 28, 2008

US Dept. of Energy
 Ted Wyka, MA 0181
 Complex Transformation Comment

Dear Sir,

Please comply with the Non-Proliferation Treaty and honor our disarmament obligations. I strongly oppose the DOE's Complex Transformation plan!!

Sincerely,
 Jack Wendt
 321 Clay #3
 Ashland OR
 97520

116A:
21F

PC_649

Levens, Matthew

From: Mary Wentland [wentmar@juno.com]
 Sent: Monday, March 17, 2008 12:49 PM
 To: Complex2030
 Subject: Complex Transformation program

Mary Wentland
 727 Margaret St.
 St. Paul, MN 55106-4425

March 17, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

I oppose the program, Complex Transformation, and urge that it not be passed by Congress.

116A Consolidating weapon's-grade nuclear material into fewer locations is acceptable. But
 25N building a new bomb plant is not. If older weapons can last for a century, why would the
 39C1 US want to build more? Many countries are disarming nuclear weapons. Why does the US want
 to build new ones?

41U Countries such as Iran that want nuclear capabilities have only to point at the US to
 prove that they need them, too, for protection from us!

Nuclear weapons are not acceptable in any form. Yes, there are crazy people in our world.
 but building more bombs is not an answer. If we put half of our resources into diplomacy
 and peace making, this world would be safer. If Peacemaker Teams and individuals can make
 a difference in parts of our world, it seems that our political leaders and diplomats
 should be able to do it also.

Thank you.
 Sincerely,

Mary Wentland
 651-772-1740

West, Elisabeth

Page 1 of 1

Levens, Matthew

From: Elisabeth West [west.design@verizon.net]
Sent: Tuesday, April 29, 2008 4:57 PM
To: Complex2030
Subject: No New Nuclear Weapons

Elisabeth West
114 Windsor Avenue
Elkins Park, PA 19027-2920

April 29, 2008
Complex Transformation Department of Energy

Complex Transformation Department of Energy:

I am a voting constituent of yours from Elkins Park, PA.

116A I am opposed to the development of new nuclear weapons. I am also opposed to building plants or modifying existing facilities as places where the process of creating weapons would take place.

211J America has loudly criticized other nations who pursue nuclear weapons; now we need to walk the walk, instead of just talking the talk.

I ask our lawmakers to be leaders in opposing all attempts to continue the nuclear arms race.

Thank you.

Sincerely,

Elisabeth West

PC_1341

West, Elisabeth

Page 1 of 1

Levens, Matthew

From: Elisabeth West [ewest@cybermesa.com]
Sent: Tuesday, April 08, 2008 11:03 PM
To: Complex2030
Subject: Complex rush

Hello Mr. Wyka-

12A; having a deadline in Spring when folks want to rush seems too hasty to me when the rush concerns something such as the National Nuclear Safety Administration's proposed plan which I understand is called "Complex Transformation".

23A I say the rush is too hasty since the USA has not really had meaningful and ethical and creative debate about this issue which is partly confusing because I also understand that we do not need the increase in plutonium triggers/cores for nuclear weapons. It is part of such a complex issue, isn't it?

I have wondered recently about the rush and I wonder if it is connected to agreements some in our government have made with allies/ non-allies such as Kosovo? I feel uneasy about the information in the proposal; I wonder what has been left out? Perhaps you don't know either.

I say this because I am concerned about rushing into a situation that will most likely have to be changed later. Who is asking for this rush?

Thank you.

Elisabeth West.

<ewest@cybermesa.com>

(PS - I live in New Mexico but when I visit Washington, DC, I like to eat at Nora, the fabulous restaurant up near Dupont Circle, on Florida; if you haven't eaten there, do try it: it's yummy!)

PC_1343

West, Esther

Page 1 of 1

Levens, Matthew

From: Esther West [hermanazulesa@yahoo.com]
Sent: Thursday, March 27, 2008 12:17 PM
To: Complex2030
Subject: No nuclear development= healthier world

Esther West
2008 Queen City Ave.
Cincinnati, OH 45214-1013

March 27, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

116A Please do not support the current administration's proposal to build a plant to produce plutonium pits for nuclear weapons, or the idea to modify nuclear facilities in the U.S.

29A I am strongly opposed to the development of nuclear weapons. We do not want to regress into another Cold War, or give other countries incentive to develop weapons, either. This is particularly true as Iran and the U.S. work to avoid war, although I am not entirely certain the Bush administration cares to avoid war. I personally don't want to see destruction of human life anywhere, whether U.S. military or people from other countries.

31K I have personally seen a former nuclear warhead. Just seeing it's huge size and the once-impossibly huge damage it could do is horrifying.

41J Using nuclear weapons not only kills innocents, but also damages the credibility and integrity of the U.S. I do not want my country to re-embark on this disgusting path.

Sincerely,

Esther West

PC_873

Weston, Jason

Page 1 of 1

Levens, Matthew

From: Jason Weston [jason@jasonweston.com]
Sent: Friday, March 28, 2008 9:20 PM
To: Complex2030
Subject: jason@jasonweston.com

Jason Weston
1730A Day Valley Rd
Aptos, CA 95003-9719

March 28, 2008

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

Dear Theodore Wyka:

116A The DOE should reject the Complex Transformation proposal to revamp the nuclear weapons arsenal.

29A Warfare is an outdated means of resolving conflict. It's only defensible use is to stop genocide by other aggressors, and nuclear weapons are the wrong approach to that end.

31B As a US citizen, and a world citizen, I call upon you to reject adolescent approaches to conflict that include violence, and focus all energies on saving civilization from the foreseeable catastrophic events global warming is likely to produce.

41J By building up its nuclear arsenal right now, the US is essentially telling the world, "Do as I say, not as I do."

Sincerely,

Jason Weston
831-685-8888

PC_1767

Whalen, John

Page 1 of 3

PC_164

Good Afternoon,

My name is John Whalen; I live in Harriman, Tennessee and I have been part of the DOE Contractor workforce for the past 30 years.

I'd first like to take this opportunity to thank our hosts from NNSA for allowing us this opportunity to show our support for making the Y-12 Plant the NNSA Center for Uranium Excellence.

15C4
2101



The Oak Ridge area and East Tennessee share both a rich history and long term employer/employee relationship with the DOE and its predecessors. In fact, you cannot mention the words "Manhattan Project" without mentioning Oak Ridge, Tennessee. The City of Oak Ridge's very birth was made possible by the governments' acquisition of the Wheat Community and surrounding area. East Tennesseans are proud that we were the builders and operators of the 3 facilities that created the very first atomic weapons that ended the bloodiest war in history. Regretfully, many people lost their lives at both Hiroshima and Nagasaki; but the United States did not start the Second World War. We did however; build the weapons that ended the war abruptly and saved what some estimated would have been millions of American Servicemen lives that would have been sacrificed to conquer Japan with a land invasion of their island.

315A
2101
(cont)

Mr. BALE

East Tennesseans proudly built the facilities and a new city here that where then referred to as the Secret City. In cooperation with the design engineers out west, we developed the first technologies to safely refine Uranium to weapons grade purity. We also developed the processes to safely assemble the first and all other secondary's and have proudly supplied the government with the necessary Craftsmen to both operate all of the complicated processes and maintain all of the specialized equipment that the DOE has ever required.

For 65 Years Y-12 has been one of East Tennessee's largest and most auspicious employers. Thanks to NNSA and their predecessors, this region has grown from a sleepy little East Tennessee community to one of the southeast's premier manufacturing facilities. Thousands of

315A
(cont)
2101
(cont)

Whalen, John

Page 2 of 3

families from this area have enjoyed a better lifestyle and higher standard of living thanks to these good jobs. The workforce here at Y-12 is recognized as the areas best, brightest and most highly skilled craftsmen in the industry and has gratefully accepted the opportunity to demonstrate their talents by maintaining the most highly skilled, best trained and safest workforce in the DOE Complex.

315A
(cont)

The Y-12 hourly workforce consists of over 1400 highly trained employees belonging to 17 different unions that are all represented by the Atomic Trades and Labor Council. (ATLC) For over 60 years, the ATLC and various DOE Contractors have shared a symbiotic relationship that is equal to none other in the complex. In exchange for quality jobs and benefits, the ATLC has amassed the most highly skilled, best trained, safest workforce in all of the DOE. Both the employees and the areas local citizens are proud to have these facilities in our neighborhood and would gladly welcome new, modern facilities to replace the aging factory that we have used since the end of the Second World War. After seeing the description and conceptual design of the proposed UPF Facility; I feel it would be the safest, most economical and most efficient factory ever designed. We the members of the existing Y-12 Workforce would proudly welcome an opportunity to show our "Volunteer Spirit" by operating the new complex with the same pride and efficiency as we have for the entire history of the Nuclear Weapons Complex.

4141

315A
(cont)
15C4(cont)





As the day progresses, please observe how many of today's speakers are from this local area and how many are from elsewhere and weigh each of their comments accordingly. I would expect plenty of comments from many non-East Tennesseans touting their consternation for any form of nuclear weapons and the evilness of their very existence. While I respect their rights to voice their opinions on the pros and cons of nuclear weapons; I do not feel that this venue was designed for their protests, but instead is designed to help shape the future configuration of the nuclear weapons complex.


512A
612C

Whalen, John

Page 3 of 3

78A  I personally feel that today's nuclear arsenal is both needed and wanted by the majority of American Citizens; what with the likes of Pakistan and North Korea having the technology. Now that we have "Released the genie from the Bottle", we need to harness its resources to further reduce our energy demands, cure our illnesses and for our own protection.

315A (cont.)  I'd also like for the NNSA to know that no matter what the decision, the local workforce here will continue to give our contractors the most highly trained employees available and we will endeavor to maintain the quality Labor/Management relationship that all of the Y-12 contractors have enjoyed since the days of the Clinton Laboratories and The Atomic Energy Commission. The existing workforce is well aware of the importance of providing quality, highly skilled, safety oriented employees for the tasks involved in keeping Y-12 the Flagship facility of the NNSA Weapons Complex. I personally feel that the NNSA preferred option for "Distributed Centers of Excellence" would provide the necessary footprint reduction needed for today's weapon needs and would also provide the safest, most efficient, streamlined production matrix possible.

87N
95C  Once again, I'd like to thank Mr. Wyka and all of the other NNSA personnel that have made this forum possible and would remind you that decisions pertaining to the DOE Facilities of East Tennessee should be a reflection of the views of the citizens of East Tennessee and not the invalidated perceptions of those who haven't any idea what goes on behind the security fences at Y-12.

Sincerely,
John R Whalen Sr.
1496 Oakdale Highway
Harriman, Tennessee 37748
teachcool@bellsouth.net

62C

Wheeler, Lynn

Page 1 of 1

Levens, Matthew

PC_1147

From: Physicians for Social Responsibility [webmaster@psr.org] on behalf of LYNN WHEELER [lwheeler@the-beach.net]
Sent: Tuesday, April 01, 2008 7:00 PM
To: Complex2030
Subject: The U.S. doesn't need new nuclear weapons

Apr 1, 2008

Mr. Theodore Wyka
1000 Independence Avenue, SW
Washington, DC 20585

Dear Mr. Wyka,

I would like to submit the following comment on the Draft Complex Transformation PEIS (DOE/EIS-0236-S4).

1140 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

214K radiation. In 2000, the U.S. Government admitted that workers had been

hamed by activities at Department of Energy and other facilities, and those deemed injured were to be offered financial and other compensation.

I would like to put aside any recommendations made by the Bush Administration until he is out of office. Why would we want to waste time studying a proposal put forth by a president who has made so many bad decisions?

Sincerely,

Ms. LYNN WHEELER
7435 SW 54th Ave
Miami, FL 33143-5813

Wheelsel, Janice

Page 1 of 1

Wheelsel, Emily

Page 1 of 2

Buenafior, Justin

From: jwpw@juno.com
Sent: Friday, February 22, 2008 8:38 AM
To: Complex2030
Subject: Complex Transformation

PC_519

11F: Regarding Complex Transformation--where does the US get off demanding other countries to quit their nuclear ambitions
216A: when we are thinking about "Complex Transformation"? Building any nuclear weapon is immoral. It's as simple as that.

Sincerely,

Janice Wheelock



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



PC_225

Written Comment Form

Must be received on or before April 10, 2008.

See back for additional information and comments, Tues, Nov. 4, 08

LETTERS

are some stats for the Y-12 Plant from materials available at the Feb. 26 meeting:

- Transformational changes ... reduce its high security area by 90 percent, reduce its nuclear operations footprint by 60 percent, reduce its total building footprint by 50 percent.
- Around 20 to 30 percent of staff will be reduced, but most of the reduction will be from natural attrition (I'm assuming work-related deaths and disabilities are included in "attrition" statistics) and transfers.

Well, that doesn't sound so bad. Maybe not good, but it's necessary.

Nuclear materials need to be monitored, tested, maintained and dismantled – and that takes facilities and employees. You can't just throw the warhead stockpile in a landfill and be done with it.

But the unexpected, unsettling part was that the preferred plan would increase weapons until we eliminate them. We must not swallow the increased pit production capability along with the acceptable parts of the plan.

We need to tear down, clean up and eliminate our nuclear weapons program – not continue it in a slightly altered form.

Emily Wheelsel
Oak Ridge

Nuke alternative rider must be addressed

To the Editor
I went to the hearing presented by the National Nuclear Security Administration on proposed changes to nuclear plants in the United States. The Complex Transformation Supplemental Programmatic Environmental Impact Statement or SPEIS. Many things sounded good in their preferred plan. Here

Also see my letter in the Feb 28 2008 edition of The Knoxville News Sentinel - <http://www.knews.com>

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 submitted by electronic mail to: complextransformation@e.doe.gov

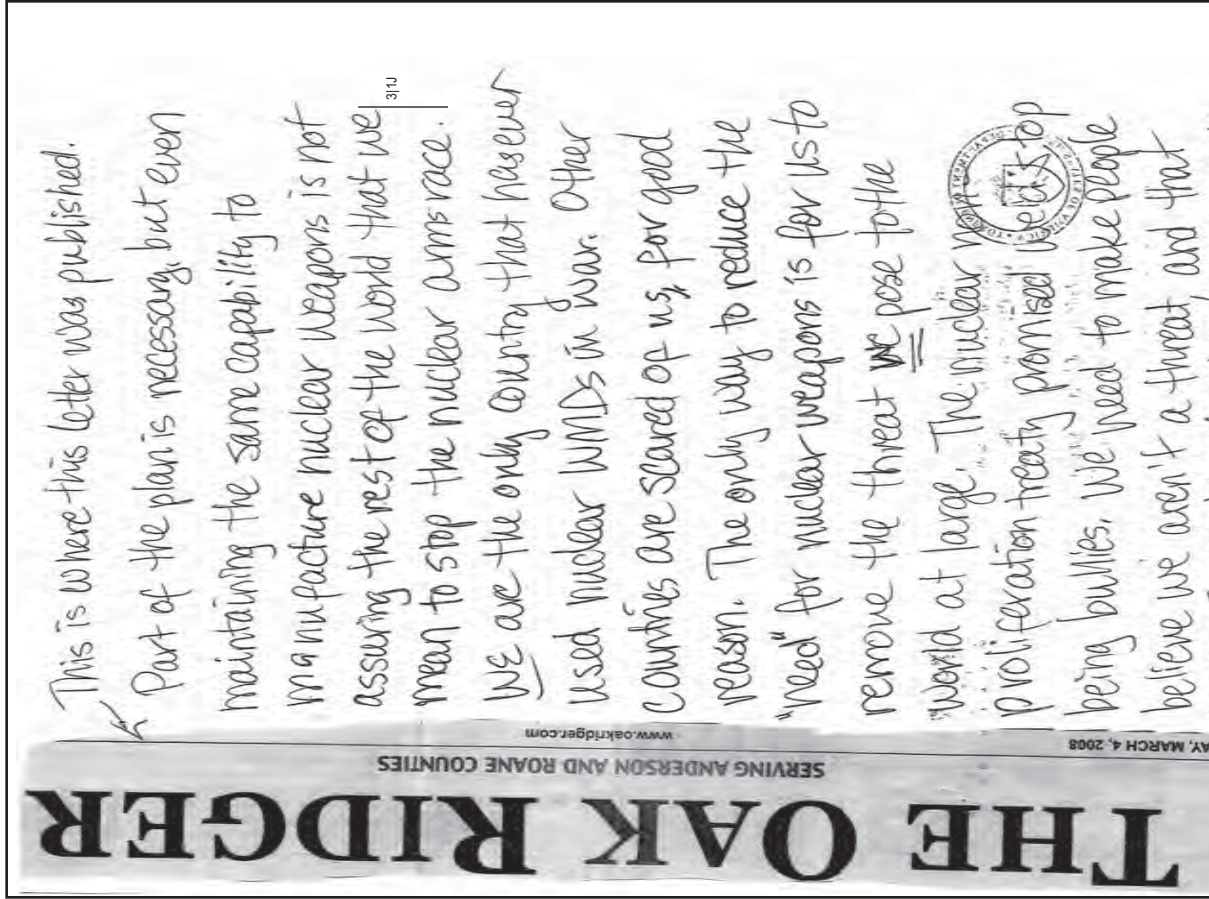
You may also submit comments through the project website which can be found at: <http://www.complextransformation.speis.com>

(865) 483-1618

Emily Wheelsel
118 wheelsel@e.doe.gov
Oak Ridge, TN

Whetsel, Emily

Page 2 of 2




Whetstone, Joe

Page 1 of 2

Buenaflor, Justin PC_547

From: Joe Whetstone [jpw@whetstone@hargray.com]
Sent: Thursday, February 21, 2008 3:38 PM
To: Complex2030
Cc: John Ramsburg
Subject: Comments of the South Carolina Chapter of the Sierra Club

Attachments: SC Sierra Position on Complex Transformation.doc

 SC Sierra Position on Complex ...
 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

Dear Mr. Wyka,

I enjoyed meeting you at the N. Augusta Complex Transformation SPEIS morning session. I registered at the front table but did not sign up to verbally present the attached comments. I prefer to send them to you electronically instead. These comments were also presented to members of the press who were in attendance today.

Thank you in advance for reviewing the attached comments.

Joe Whetstone
 10 Hamilton Drive
 Bluffton, SC 29909-4437
 (843) 705-9128

South Carolina Sierra Club Executive Director John Ramsburg has been copied on this e-mail.

Whetstone, Joe

Page 2 of 2

PC_547

Sierra Club of South Carolina

My name is Joe Whetstone; I live downriver from the Savannah River site in Bluffton, SC. I am here to make a statement on behalf of the Sierra Club of South Carolina. Our statewide organization of over 5,000 members is dedicated to promoting a clean energy future, protecting our state's treasured places, and creating healthy, sustainable communities. We are pleased to join the other groups present today voicing concern about the National Nuclear Security Administration (NNSA) Complex Transformation Supplemental Programmatic Environmental Impact Statement (SPEIS).

Members of the South Carolina Sierra Club are well aware of the environmental dangers posed by the production of nuclear weapons. The Savannah River Site (SRS) currently contains more curies of radioactive waste than any other site in the Department of Energy complex. The 36 million gallons of dangerous high-level radioactive waste sitting in the tank farms of SRS are the result of years of nuclear weapons materials production. Nuclear weapons materials production at SRS has endangered not only the health and safety of SRS workers but the health of those who live downriver as well.

11/40;
2/14M,3

Instead of limiting the options in the NNSA SPEIS to various methods for the continued production of nuclear weapons, we ask the NNSA to include a "No Action Alternative" and to adopt the following Sierra Club policies concerning nuclear weapons:

Because the use of nuclear weapons in modern warfare would result in unprecedented destruction to the global environment on which human and all life depends for survival, the Sierra Club expresses grave concern over the lack of progress in completing nuclear arms reduction agreements and urges all nations by bilateral and multilateral agreements to halt any further development, testing, and further deployment of nuclear weapons.

Recognizing the dangers of nuclear proliferation and the immediate threats to public health and environmental safety from the continuous production of fissile materials, the Sierra Club urges the United States government to negotiate a global, verifiable moratorium on the production of plutonium and highly enriched uranium.

The Sierra Club of South Carolina believes that limiting the available options in the current NNSA SPEIS to various strategies for continued nuclear weapons development and production is costly and short sighted. Other options that avoid the production of nuclear weapons must be on the table in order to reduce harmful environmental outcomes and save our tax-payers billions of dollars.

For additional information contact **S.C. Sierra Club Director – John Ramsburgh**
Phone: 803-256-8487

5/9H

3/HF;
4/1J

White, Azlan

Page 1 of 1

PC_1923

Levens, Matthew

From: Azlan White [azlan11@mac.com]
Sent: Thursday, April 10, 2008 2:14 AM
To: Complex2030
Subject: No.

No. No. No.

The trigger facility, the new uranium and toxic production process WILL and DOES affect land, water and lives and I say NO! and so does anyone else who is aware of the truth.

1/16A

Thank you
Please Be just in your roll.
Thank you again,

Azlan Tiffany White

Azlan White
Executive Director
Global Relief Resources
PO Box 9012, Santa Fe, NM 87504
505-920-0199
azlan11@mac.com

"We need a new global culture that finds the existence of millions of thirsty people thoroughly and immediately unacceptable."
--Jean-Michel Cousteau

White, Kenneth

Page 1 of 1

PC_1525

Levens, Matthew

From: sehms@yahoo.com
Sent: Friday, February 22, 2008 8:03 PM
To: Complex2030
Subject: Nuclear complex transformation SPEIS review 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,

11J The preservation or upgrade in the capacity to store and test nuclear weapons increases
213A the potential for their use. As there is no means of mitigating the devastating
34A environmental impact of such use, the "no project" option is clearly preferable. This
project should not proceed.

4BA 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.
34A The focus should be on shrinking the still-over-sized nuclear weapons complex and on
(com) maintaining the safety and security of existing weapons as the size of our nuclear
stockpile is reduced.

Sincerely,
Kenneth White
507 California Av
Santa Cruz, CA 95060-5910

White, Rosemarie

Page 1 of 2

PC_1672

Levens, Matthew

From: rwhite@charter.net
Sent: Saturday, April 05, 2008 5:28 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,

It makes no sense to pour more money into Nuclear warfare which could ultimately destroy
this entire planet, anymore than it makes sense for a bird to dirty its own nest. We
shouldn't be spending money and effort creating more Nuclear weapons, especially when our
very soil, our Mother Earth, has become so impoverished because of the way we have
mistreated our land that the food we eat can no longer produce health and vitality.

116A
220

We are a nation of generous, but tired, obese, sickly people who as a nation ranks the
lowest (37th among the 37 industrialized, so called "civilized" nations) when it comes to
our health. If we as a people are to survive, we need to return to basic common sense,
cooperating with nature, not trying to destroy it further.

The best way to persuade others is to set a good example, and stockpiling nuclear warfare
does not do that. It encourages others to build and stockpile more. I'd rather see us set
a much better example of appreciation and reverence for the planet we live on by improving
the quality of the soil so that our food becomes nutrient dense and healthful again, and
let others follow that example, which is a safe one to follow! An example that would lead
to healthier people and more beautiful planet for everyone.

31J

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.

4BA

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. More nuclear weapons increase the chance of destroying this very planet and
everyone on it!

116A
(com)
31J
(com)
43A
(com)

DOE should focus on shrinking the still-over-sized 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 would like my comments to be included as part of the official record for the
Supplemental Programmatic Environmental Impact Statement for the "Complex Transformation"
Project. Thank you.

Sincerely,
Rosemarie S. White
87764 Saltaire St.
Florence, OR 97439

cc:

1

White, Rosemarie

Page 2 of 2

Senator Ron Wyden
Representative Peter DeFazio
Senator Gordon Smith

PC_1672

Whitmer, John

Page 1 of 1

Buenaflor, Justin

From: JOHN WHITMER [john.whitmer@cablespeed.com]
Sent: Friday, February 22, 2008 12:35 AM
To: Complex2030
Subject: OPPOSE NEW NUCLEAR WEAPONS

JOHN WHITMER
22533 SE 42ND COURT
ISSAQUAH, WA 98029-7241

February 22, 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.

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.

11:16A-
211J

I have been a resident of Washington for 59 of my 84 years. I have seen the effects of the Manhattan Project on this region since 1944, though the nature of the project was not known until the Hiroshima bomb was dropped. The threat to the environment, including the water supply downstream is enormous & intractable. However, the most alarming aspect of U.S. weapons policy has been to stoke a nuclear arms race which no one can win, & which ushers increasingly unstable governments into the group of nations armed with nuclear weapons.

I have voted in Washington since 1965. My precinct has not changed since 1991.

Sincerely,

John H. Whitmer
425.557.9271

PC_555

Whitson, Charles

Page 1 of 1

Levens, Matthew

From: Charles Whitson [whitsonjb@comcast.net]
Sent: Thursday, February 28, 2008 1:46 PM
To: Complex2030
Subject: Y-12/Nuclear/Weapons Site

PC_410

115A To retain the Y-12 Nuclear weapons site, and keep a stock pile of nuclear weapons ought to
213A be a no brainer. With Iran and North Korea producing these weapons, and others not so
313A friendly with the US already having weapons makes it an absolute necessity for us to be
333A able to deter another Peral Harbor and another 9/11. The Iranian's have plainly said they
will strike, and have proven it. How senseless to not be able to protect our country. As
has seen often said, 'Walk softly, but carry a big stick.'

Wichar, Denis

Page 1 of 1

Levens, Matthew

From: Denis Markian Wichar [deedub@webtv.net]
Sent: Friday, April 18, 2008 11:30 AM
To: Complex2030
Subject: NO!

PC_1960

116A |NO!
Den Mark Wichar
Vancouver WA

Wieder, Mark

Page 1 of 1

PC_86

TREDDORE A. WYKA
DOCUMENTS MANAGER
DEPT. OF ENERGY
1000 INDEPENDENCE AVE, SW
WASHINGTON, DC 20585

I AM WRITING TO GIVE PUBLIC COMMENT FOR
THE DEPT. OF ENERGY'S PUBLIC HEARINGS
REGARDING NEW NUCLEAR WEAPONS. I AM
COMPLETELY OPPOSED TO "COMPLEX TRANSFORMATION"
AND THE ADMINISTRATION'S PROPOSAL TO REVAMP
AND REBUILD OUR ENTIRE STOCKPILE OF NUCLEAR
WEAPONS.

MARK WIEDER

1116A

Wieland, Leona

Page 1 of 1

Levens, Matthew

PC_598

From: Leona Wieland [gl_wieland@yahoo.com]
Sent: Monday, March 17, 2008 12:11 AM
To: Complex2030
Subject: No to Nuclear Complex Transformation

Leona Wieland
6212 W Coughran Ct.
Sioux Falls, SD 57106-0442

March 17, 2008
Complex Transformation Department of Energy

Complex Transformation Department of Energy:

I am Leona Wieland, Sioux Falls, SD, and I deeply care about our foreign and domestic policies. We each have only one life to live, and if we can't make life better for ourselves and others, we have lived and died in vain.

111F: I cannot endure with national policies focused on more destruction of Mother Earth or an
214: economy that continues to spend on nuclear might. It is in direct opposition to our
313A: country's commitment, the promise we made in 1970 for complete nuclear disarmament. Our
attempts to solidify nuclear weapons not only breaks our promise, but compels similar
actions by other countries, thus leading not to more security, but less.

Sincerely,

Leona Wieland
605-362-8182

Wilcox, William

Page 1 of 2

PC 158
Remarks at Hearing for Complex Transformation Supplemental Programmatic Environmental Impact Statement (SPEIS) February 26th, 2008 Y-12.

William J. Wilcox, Jr.,
412 New York Ave.,
Oak Ridge, TN, 37830

First, I wish to speak in favor of the Distributed Centers of Excellence Alternative, then second, in favor of each of the Consolidation at One Site alternatives of the Restructuring of R&D and Testing Facilities, addressed on pages 88 to 128 of Chapter 3 of the NNSA's December 2007 Draft Report.

I came to work at Y-12 in 1943, 65 years ago next fall, when the Nuclear Weapons Complex was comprised of three sites. I watched it grow through the Arms Race to 12 by 1948, and then as the Cold War heated up in the 1950s saw it increase from 17 at the beginning to 21 sites in 1959. Of course, the question then was what more can we do, not transformation. But that was not long in coming with the decisions in the mid 1960s that we had sufficient HEU and Pu for future needs. The NWC dropped to 14 in the 1970s, and then to 12 in 1989. I facilitated one such DOE wide study of trimming the NWC in the late 1980s, and later saw the Complex drop to the present 8 sites in 1994.

The new directions that Y-12's top management under NNSA's leadership has for the past half dozen years challenged their managers to strive for seem to me to be exactly the directions that this SPEIS is urging on the entire Nuclear Weapons Complex (NWC). Y-12's strategic goals are major reductions in the PIDAS footprint, major reductions in the mortgage costs of their myriad old WW1 buildings, major operating cost reductions right along with increases in the safety and security of personnel and HEU storage and HEU chemical purification. Y-12 is well started toward implementing the new strategies, especially in the always difficult task of changing the work force culture that is such an essential for reaching new challenging objectives.

Y-12 is already delivering on the SPEIS goals for transformation of the Complex's enriched uranium facilities with its 75% finished, entirely new HEUMP and its planned entirely new UPF. Y-12 is already committed to a transformed Uranium Center of Excellence that will in a timely manner meet their four goals:

- "Smaller" (they will have a 90% smaller PIDAS footprint than it has been for 50+ years; plus a 50% reduction in the footprint of all buildings),
- "Safer" (because of brand new, up to date facilities and because of redesigned, modernized processing facilities),
- "Less expensive and more cost effective" (because of the demolition of hundreds of WW1 and other old buildings, and 20% or more fewer employees), and
- "More Secure" (the new major process and storage buildings will be more secure.)

A testimony to this Y-12 leadership is that NNSA's Deputy Administrator Tom D'Agostino has used Y-12 as a model for transformation according to Y-12's Tom Smith.

As a person who worked with the Design Labs and other of the Complex throughout the 1970s and over half of the 1980s as Technical Director responsible for Y-12's Process Development, Product Certification, and Quality organizations, I urge the selection of the Alternative - Distributed Centers of Excellence for continuing enriched uranium facilities at Y-12. In my opinion, it is the only one that will prove both cost effective over a period of years, that can also be fully responsive to changes mandated by future Nuclear Posture Reviews - up or down. The enthusiastic community support for this large nuclear defense plant so close to our City should be

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25D
36D

410

515A

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(cont)
71C

Wilcox, William

Page 2 of 2

Remarks at Hearing for Complex Transformation Supplemental Programmatic Environmental Impact Statement (SPEIS) February 26th, 2008 Y-12.

given much weight - it is a valuable asset to NNSA, not to be automatically assumed as transferable to other locations.

I also wish to commend NNSA for lacking the previously "unavoidable" matter of all the programmatic redundancies between the National Security Labs. In the previous periodic studies of how to "transform" the Complex, 1989 and 1996, discussions of such overlaps have never been "on the table." The NNSA Draft Report of Dec. 2007 shows in the very first figure, page 1-2, a listing of the major responsibilities of each of their eight sites. It's a revealing graphic - the 3 production plants Y-12, Pantex, and Savannah River are sole sources; have no programs duplicated at other sites. One program is worked on by four sites; three programs are worked on by three sites, three more by two sites. Surely with the Nuclear Posture review of 2001 and the Moscow Treaty of 2003 that cuts the stockpile to no more than 2200 deployable warheads, NNSA ought to be able to assign most of these programs to one or the other of the two Nuclear Physics Labs, rather than continuing the decades of duplications that we felt were justifiable in the days of the Cold War.

Thank you.

515A
(cont)

71C
(cont)
81G

Wilcoxon, Sean

Page 1 of 1

PC_243

Sean Wilcoxon
30 camp st
San Francisco, CA 94110-1119
March 4, 2008

Theodore A Wyla
Complex 2030 SEIS Document Manager
Office of Transformation, U.S. Department of Energy, N.A.-10.1
1090 Independence Avenue, SW,
Washington, DC 20585

Re: Reject "Complex Transformation" plan to build nuclear weapons

Dear Theodore Wyla:

The Department of Energy should reject proposed Complex Transformation project.

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.

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 also very concerned that revamping the current arsenal could lead to renewed nuclear tests.

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.

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,
Sean Wilcoxon

Wilhelm, Luanne

Page 1 of 1

PC_612

Luanne Wilhelm [luanneslw@comcast.net]
Monday, March 17, 2008 5:44 PM
Complex2030
nuclear weapons

Luanne Wilhelm
5501 N. Manso #2
Chicago, IL 60630-1205
March 17, 2008
Complex Transformation Department of Energy

Complex Transformation Department of Energy:

I strongly oppose any plans to build a nuclear weapons plant and to do anything to promote nuclear weapons/war.

Sincerely,

Luanne Wilhelm

Wilke, Malcolm

Page 1 of 1

Levens, Matthew

PC_2050

From: malcolm Wilke [malcolmw2002@yahoo.com]
Sent: Thursday, April 10, 2008 12:34 PM
To: Complex2030
Subject: Citizen Comment regarding SPEIS, Complex Transformation

Mr. Wyka:
Seventy-nine percent of Americans wish that our government would work to eliminate nuclear weapons, not develop more of them, as proposed by the Department of Energy.
Congress has voted against the Reliable Replacement Warhead program, yet the administration still wants to produce 120 to 125 new warheads annually from now on year. These new warheads are not only unwanted, they are also unnecessary. In 2007, Jason's Report found that the U.S. nuclear stockpile will be dependable for another 70 years.
Furthermore, any move to expand or upgrade our nuclear weapons will lead to further destabilization of the world's nuclear weapons stand-offs, and encourage other countries to expand their nuclear weapons programs, which is just what our diplomacy should be working to prevent, if not reduce.

In any case, why have an expensive program to create these unnecessary nuclear weapons without congressional and administration nuclear policy reviews are finished? There are all sorts of issues, especially with regard to how to handle nuclear waste storage and employee safety.

I urge everyone in Washington to carefully consider and reject this completely unnecessary boondoggle.

malcolm Wilke
2101 Burgundy St.
New Orleans, LA 70116

Complex 2030 Document Manager: Theodore A. Wyka

Dear Complex 2030 Document Manager Wyka,

The Cold War is over and the United States still has thousands of nuclear weapons. I do not believe that this country needs a vast nuclear weapons complex and the capability to develop and build new types of nuclear bombs. Instead, the United States should be showing leadership in pursuing a world free of nuclear weapons. Your plan, known as "Complex Transformation," takes us down the wrong path.

I support efforts to reduce the nuclear weapons complex and ensure the safety and security of our remaining nuclear weapons and nuclear materials.

Complex Transformation undermines global efforts to prevent other countries and terrorists from developing or acquiring nuclear weapons. It undermines our credibility as a nation committed to nuclear non-proliferation and nuclear disarmament.

The message to others is "do as I say, not as I do."

Nuclear weapons are a grave and growing threat to human civilization. As our nuclear arsenal is reduced, the Department of Energy should focus on downsizing the nuclear weapons complex and on the safe storage, dismantlement, and disposal of nuclear weapons and nuclear materials. We do not need the capacity to build new nuclear weapons.

The whole idea is ridiculous. Children are starving and people are losing their homes because of this crazy economy and gas prices, food prices, all prices are so high and you are going to spend more money on nuclear bombs! Is our country being run by barbarians now? Where are your values and what is America standing for now? Taking God out of everything and putting nuclear bombs everywhere is and has been the biggest mistake our country has made. PUT GOD BACK in everything and get rid of all these bombs. How about more Prayer days and less war days? If we all put GOD back in this country as He use to be, use our faith and prayer instead of fighting and killing people maybe we would truly be the Home of the Brave and Free. Why do you people keep making more bombs and threatening more wars when that is what starts all this terrorism to begin with. Remember back in the good old days when God was first and prayer was said at meetings and signings of petitions and bills? This was when even during a depression, somehow Americans came through for each and everyone. Are you people so blinded by power that you cannot see anymore? Check it out! Since Nuclear power began, more people have died than ever and if it continues to be used to make bombs, more and more people are going to die. I think its time for a GOD BOMB, fight for GOD to be put back where HE BELONGS!
AT THAT HEAD OF THIS COUNTRY!

Sincerely,
Marilyn Wilke
3925 MacGregor Drive
Jacksonville, FL 32210

Wilke, Marilyn

Page 1 of 1

Levens, Matthew

PC_1366

From: haleyangelbrat@aol.com
Sent: Thursday, April 17, 2008 8:53 PM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

Complex 2030 Document Manager: Theodore A. Wyka

Dear Complex 2030 Document Manager Wyka,

The Cold War is over and the United States still has thousands of nuclear weapons. I do not believe that this country needs a vast nuclear weapons complex and the capability to develop and build new types of nuclear bombs. Instead, the United States should be showing leadership in pursuing a world free of nuclear weapons. Your plan, known as "Complex Transformation," takes us down the wrong path.

I support efforts to reduce the nuclear weapons complex and ensure the safety and security of our remaining nuclear weapons and nuclear materials.

Complex Transformation undermines global efforts to prevent other countries and terrorists from developing or acquiring nuclear weapons. It undermines our credibility as a nation committed to nuclear non-proliferation and nuclear disarmament.

The message to others is "do as I say, not as I do."

Nuclear weapons are a grave and growing threat to human civilization. As our nuclear arsenal is reduced, the Department of Energy should focus on downsizing the nuclear weapons complex and on the safe storage, dismantlement, and disposal of nuclear weapons and nuclear materials. We do not need the capacity to build new nuclear weapons.

The whole idea is ridiculous. Children are starving and people are losing their homes because of this crazy economy and gas prices, food prices, all prices are so high and you are going to spend more money on nuclear bombs! Is our country being run by barbarians now? Where are your values and what is America standing for now? Taking God out of everything and putting nuclear bombs everywhere is and has been the biggest mistake our country has made. PUT GOD BACK in everything and get rid of all these bombs. How about more Prayer days and less war days? If we all put GOD back in this country as He use to be, use our faith and prayer instead of fighting and killing people maybe we would truly be the Home of the Brave and Free. Why do you people keep making more bombs and threatening more wars when that is what starts all this terrorism to begin with. Remember back in the good old days when God was first and prayer was said at meetings and signings of petitions and bills? This was when even during a depression, somehow Americans came through for each and everyone. Are you people so blinded by power that you cannot see anymore? Check it out! Since Nuclear power began, more people have died than ever and if it continues to be used to make bombs, more and more people are going to die. I think its time for a GOD BOMB, fight for GOD to be put back where HE BELONGS!
AT THAT HEAD OF THIS COUNTRY!

Sincerely,
Marilyn Wilke
3925 MacGregor Drive
Jacksonville, FL 32210

Wilkin, Donovan

Page 1 of 1

Levens, Matthew

PC_857

From: Donovan C. Wilkin [wilkin@olympus.net]
Sent: Thursday, March 27, 2008 4:20 PM
To: Complex2030
Subject: Uncontrollable Nuclear Arsenal

Donovan C. Wilkin
92 Todd Road
Sequim, WA 98382-8965

March 27, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

If you are not terrified about our plans to produce plutonium pits, you should be. The world has begun a serious economic deconstruction due to a melt-down of credit. This devolution into a potentially permanent global depression will be hastened by sky-rocketing resource costs, particularly energy, food, and water.

Our preoccupation with feeding ourselves and protecting our food supplies will make controlling existing nuclear arsenals virtually impossible.

The world will reap the devastating whirlwind it has already sown.

Adding to that whirlwind by adding to the world's nuclear arsenal is insane.

A responsible government will be destroying the world's nuclear arsenal,

not adding to it, and turning its resources to feeding all of us.

Sincerely,

Prof. Donovan C. Wilkin
360-582-1790

216A
33A
4TK
59B

Will, Karen

Page 1 of 1

Levens, Matthew

PC_1123

From: Karen Will [kellypw@aol.com]
Sent: Thursday, March 27, 2008 4:34 PM
To: Complex2030
Subject: New nuclear weapons production

Karen Will
227 Girard Ave.
Hartford, CT 06105-2234

March 27, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

If we spend huge amounts of money on weapons instead of domestic and diplomatic goals we weaken our own society as Russia did during the cold war. It led to the downfall of communism, as it could lead to the diminishment of US authority and prestige in the world. We are better than that and should send a different message to other countries such as Iran, who may be seeking nuclear weapons.

Sincerely,

Karen Will

1

Williams, Carmen

Page 1 of 1

Levens, Matthew

From: chambrayca@msn.com
Sent: Saturday, April 05, 2008 12:29 PM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

PC_1588

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,

116A It is my belief that we have no need to develop and manufacture more nuclear weapons, as
this would only spur other countries to do the same, and we would be in effect
backsliding. Nuclear weapons do not keep the world safe, they endanger the world.
21J They are too dangerous to use. Should we ever attack with them we would certainly be fired
upon in return, and not only would the targeted cities be devastated, but our atmosphere
37M1 would be contaminated. I don't have to tell you the risks.

We should be focusing on the security of the nuclear weapons we already have, and finding
ways to rid the world of them if at all possible. It has been decided by Congress that the
next president will study our need for further nuclear weapons.

Sincerely,
Carmen Williams
309 E. Maple St.
Red Oak, IA 51566

cc: Senator Chuck Grassley
Senator Tom Harkin
Representative Steve King

Williams, Janet

Page 1 of 1

Levens, Matthew

From: Janet Williams [williams1682@sbcglobal.net]
Sent: Tuesday, February 19, 2008 5:39 PM
To: Complex2030
Subject: Nuclear weapons

PC_1377

Janet Williams
8630 Lynx Road
San Diego, CA 92126-1829

February 19, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

11J 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.

29B I don't want money spent on nuclear weapons but on projects that help people in other
countries.

Sincerely,

Janet Williams

Williams, Joanne

Page 1 of 1

Williams, John

Page 1 of 1

PC_1389

Levens, Matthew

From: Joanne Williams [joanne2906@yahoo.com]
Sent: Wednesday, February 20, 2008 1:22 PM
To: Complex2030
Subject: Nuclear triggers for warheads

Joanne Williams
6436 Sylvan Drive
Columbia, SC 29206-1144

February 20, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy

116A I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons.

217J The age of nuclear deterrence is past and the disposal option to deal with the deadly waste from such production has not been found. There is no good reason for this proposal.

318B SC is looking to the future with its investment in fuel cell research - put the money towards clean energy that could benefit the world and lower tensions.

Sincerely,

Joanne Williams
803-782-4238

Levens, Matthew

From: Williams, John (37V) [williamsj1@y12.doe.gov]
Sent: Friday, February 08, 2008 8:42 AM
To: Complex2030
Cc: Campbell, Henry nmm (C17); Williams, Jackie (W3J)
Subject: upf

115A Please keep the New Uranium Processing Facility Project at Y-12. This area has lost enough work over the last decades. The younger employees need a stable future to be able to raise their families.

sincerely

John E Williams

PC_787

Williams, Mariah

Page 1 of 1

PC_557

Buenafior, Justin

From: Jon Williams [jon@tablerockers.com]
 Sent: Thursday, February 07, 2008 11:31 AM
 To: Complex2030
 Subject: jon@tablerockers.com

Jon Williams
 1144 N. Fairview Ave.
 Goleta, CA 93117-1819

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 2030 project.

There are much better and more humane things on which we could be spending our money!

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,

Jon K. Williams
 (805) 451-7608


Williams, Mariah

Page 1 of 1

PC_1026



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

Dear Mr. Wyka:

I oppose the expansion of plutonium production at Los Alamos National Laboratories. According to the Moscow Treaty, we need to reduce, not expand, our stockpile of nuclear weapons by 2012. Increased plutonium production is a waste of taxpayer money which would be better spent invested in social services, education, health care, and renewable energy. To expand the facility would be hazardous, and would be an irresponsible legacy to our children and the whole planet.

Thank you for your time and consideration.

Sincerely,
 Mariah Williams
 PO Box 22748
 Santa Fe, NM 87502

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.doc.gov

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

Williams, Mary

Page 1 of 1

Levens, Matthew

PC_1155

From: mary williams [bishwake@yahoo.com]
Sent: Saturday, March 29, 2006 4:53 PM
To: Complex2030
Subject: Stop the Bomplex!

mary williams
841 S. 500 E., #8
Salt Lake City, UT 84102-3343

March 29, 2008

DOE Complex Transformation

Dear DOE Complex Transformation:

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,

mary williams

Williams, Richard

Page 1 of 1

Levens, Matthew

PC_1595

From: dickwilliams@imcdai.com
Sent: Saturday, April 05, 2008 12:57 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,

120 Instead of creating unnecessary nuclear weapons, the DOE should focus on creating alternatives to fossil fuels.

29H Stop wasting taxpayer dollars on weapons and use those dollars to create energy, 1,000 times more necessary than new weapons.

Sincerely,
Richard Williams
815 Calle Del Norte
Sierra Vista, AZ 85635

cc:
Senator John McCain
Senator Jon Kyl
Representative Gabrielle Giffords

Williams, Susan

Page 1 of 1

PC_1690

Levens, Matthew

From: usersz@hotmail.com
Sent: Saturday, April 05, 2008 4:05 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,

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. This belligerence is one of the many reasons 80% or more Americans believe our country is heading in the wrong direction.

The unnecessary and expensive research, development, and manufacture of new types of nuclear weapons does not comport at all with the public's opinion on where to spend their tax dollars. 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 more or newer or bigger or prettier 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. 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. Is the DOE trying to get its foot in before the door slams shut on George Bush's administration?

Whatever efforts the DOE undertakes will likely be overruled by our new president and his advisers, and they may not be gracious about this out-of-bounds effort by the DOE. Americans think of national security as safe borders, airports, seaports and municipal buildings now, not running headlong into another cold war complete with arms race. It's a new world with different priorities and strategies.

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 Williams
1620 Yukon St.
Lakewood, CO 80214

CC:
Senator Wayne Allard
Representative Ed Perlmutter
Senator Ken Salazar

Williamson, Abby

Page 1 of 1

Levens, Matthew

From: Abby Williamson [myfrenab@yahoo.com]
Sent: Wednesday, April 16, 2008 11:43 AM
To: Complex2030
Subject: New Nukes?

Abby Williamson
216 St. Luke Court
Wilmington, NC 28409-2640

April 16, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

Please do not in ANY way support the development of more nuclear weapons.

We already are burdened with nuclear waste and we ALL live downwind of a nuclear explosion. Someone will eventually figure out how to use our present stockpiles against us.

AND it is apparent that the globe is shrinking every day thanks to information, communication, and transportation technologies. We MUST grow up and learn how to solve our disagreements, even our dangers, diplomatically instead of continuing the problem-solving techniques of adolescent males.

Please don't further endanger the lives and well-being of our children and grandchildren.

Sincerely,

Abby Williamson
(910)793-5516

Willis, Suzanne

Page 1 of 1

PC_1238

Levens, Matthew

From: Suzanne Willis [suzanne@yahoo.com]
Sent: Saturday, March 29, 2008 1:54 PM
To: Complex2030
Subject: No new nuclear weapons!

Suzanne Willie
703 S 2nd St.
De Kalb, IL 60115-4168

March 29, 2008

Complex Transformation

Dear Complex Transformation:

120 I am a physicist living in northern Illinois; I did my dissertation research at Los Alamos and am familiar with the unclassified aspects of the weapons programs there.

210B While it is true that not all of the tens of thousands of nuclear weapons in our arsenal remain functional, many of them do; we still have enough firepower to destroy the entire planet several times over.

410A I am opposed to plans to modify nuclear facilities across the country, which would make it easier for the U.S. to add new weapons to its nuclear arsenal.

59B We should spend the billions proposed for this plan on programs to eliminate nuclear weapons and for other social necessities.

Sincerely,

Suzanne Willis

Wilson, Olive

Page 1 of 1

PC_1826

Levens, Matthew

From: olive@tceexpress.com
Sent: Friday, April 04, 2008 9:07 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 Department of Energy is to be commended for moving forward with plans to consolidate and reduce the facilities, workforce, and redundant capabilities within the nation's sprawling nuclear weapons complex.

Complex Transformation undermines U.S. efforts to stop the spread of nuclear weapons around the world.

Instead of recreating the capacity to produce new, unnecessary nuclear weapons, the DOE should focus on shrinking the still-over-sized 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,
Olive Wilson
280 2nd St NE
Pringhar, IA 51245

cc:
Senator Chuck Grassley
Senator Tom Harkin
Representative Steve King

Wilson, Randy

Page 1 of 1

Buenafor, Delight

From: Randy Wilson [randy.b.wilson@imco.com]
Sent: Tuesday, April 01, 2008 3:37 PM
To: DIV.Complex.Transformation
Subject: Form Post from Firefox

PC_885

Last Name=Wilson
First Name=Randy
Email Address=randy.b.wilson@imco.com
Street Address=1155 University Blvd., SE City=Albuquerque State=NM ZIP Code=87106 Comments=On behalf of Technology Ventures Corporation, I add my voice in strong support of the Los Alamos National Laboratory Mission. The Laboratory is vital to our national interests in so many ways. The research conducted there is contributing to our nation's security, advancing our understanding of life sciences, fostering innovation in alternative and renewable energies, and generating breakthroughs in the fields of nanotechnology, just to name a few. Further, technologies developed within LANL are being commercialized by the private sector, which creates jobs and improves our country's ability to compete in the global marketplace.

Randy
Wilson
Director Business Operations
Technology Ventures Corp.

1116A
210B

Wilson, Rickey

Page 1 of 1

NAME of LOCAL RESIDENT NOT A TRAVELER
Rickey W. Wilson
401 SANDY CREEK Hollow Rd
Oliver Springs TN 37840
PC_169

BASED upon Agreements Signed in 2001, 2004, 2007
we are going to reduce the weapons stockpile
we wish to maintain these Agreements here
@ Y-12 while working safely & efficiently
184 Building a new complex we can modernize the
process & be more cost effective, saving Taxpayers
dollars for other projects such as Fighting
Terrorism.

Terrorist know nothing About Peace, they wish
to destroy Bridges, Buildings, and Lives; Beat
men, women, & children, They understand nothing
About Peace.

Projects such as Y-12 substantially remove
threats from those wishing to do us harm.
With Y-12 Modernization, we can move forward and
reducing our Stockpile level, reducing cost.
Moving Savings to other Projects

1115A
2101

39A
49B

313A

1115A
(cont.)

Wilson, Teresa

Page 1 of 1

Levens, Matthew

From: Teresa Wilson [teresawilson@msn.com]
Sent: Friday, March 28, 2008 6:57 PM
To: Complex2030
Subject: Oppose new nuclear weapons

Teresa Wilson
544 Bradford Ct
Claremont, CA 91711-4234

March 28, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

116A I am almost 80 years old and ask your attention to this for my grandchildren and the future of all children. I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons.

210 Peace Links was organized in 1984 to educate the public about nuclear dangers.

30H We know how much money has been spent on nuclear facilities.

116A [Stop now. (on)] Sincerely,

Teresa Wilson
909 624 3721

PC_1872

Winter, Herbert

Page 1 of 1

Levens, Matthew

From: HandlWinter@verizon.net
Sent: Saturday, April 05, 2008 10:50 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,

116A I cannot see the necessity of planning an upgrade of our nuclear weapons complex. We should focus on shrinking it. In any case, these are decisions for the president and congress, with the advice of the Department of Defense, not the DOE.

Sincerely,
Herbert Winter
241 Hungry Hollow Rd
Spring Valley, NY 10977

cc: Senator Charles Schumer
Representative Eliot Engel
Senator Hillary Clinton

PC_1609

Winter, M.L.

Page 1 of 1

Winters, Jane

Page 1 of 1

PC_116A

Levens, Matthew

From: ML Winter [mlwinter@pvnetworks.net]
Sent: Thursday, March 27, 2008 4:00 PM
To: Complex2030
Subject: Once again--Oppose Any New Nuclear Weapons

ML Winter
PO Box 215
Lincoln, NM 88338-0215

March 27, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

It seems as though I have to send yet another email regarding this administration's continued attempts to break our previous treaties on nuclear weapons. There is no honor in this administration. I would like to see the very knowledgeable people working in Los Alamos change their views to peaceful ways of protecting ourselves and the people of the world.

116A 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.

21J 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.

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.

38A 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,

ML Winter
575-653-4774

PC_334

P.O. Box 96
2630 Church Rd.
Reading Center, NY 14876
March 26, 2008

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

Dear Mr. Wyka,

I have recently learned about the Complex Transformation program and write to voice my opposition. While the material I received contained information refuted by the Los Alamos National Laboratory website, I am still opposed.

While I can certainly understand the desire to update facilities, and the thought of a smaller footprint is appealing, the fact that we are even planning to build replacement parts for existing nuclear weapons is troubling. I do not think this is necessary. It is my hope and prayer that nuclear weapons will go the way of the dinosaur. We learned in the past the devastation wrought by nuclear weapons. There cannot be any scenario in which we would seriously think about using them, so why have them.

I am the grandmother of four beautiful children ages three and under. I want them to grow up in a world that is beautiful, not one destroyed by a nuclear winter. I want them to be proud of their country that is committed to working toward peace, a country that will lead the way in showing good faith in not stockpiling useless weapons; a country that repents of its past mistakes in dropping nuclear bombs on Hiroshima and Nagasaki. Please consider future generations. While war may be a reality, the need for nuclear weapons in war is not. We have no need to repeat the mistakes of the past.

Sincerely,

Jane S. Winters
Jane S. Winters

116A

1

Wise, Linda

Page 1 of 1

Woglie, Blanche

Page 1 of 1

PC_606

Levens, Matthew

From: Linda Wise [rich.lj@texas-skies.com]
Sent: Wednesday, February 20, 2008 9:36 PM
To: Complex2030
Subject: The Bush Administration's New Nuclear Attack Proposed Program

Linda Wise
1301 Stagecoach Ranch Rd
Dripping Springs, TX 78620-2325

February 20, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

Good Gravy. How dumb is this idea? And just who are we planning to nuke, at the behest of this disastrous lame duck administration.

Now that it is in the final throes of its catastrophic, inept and desperately poorly managed days, let's not start a new travesty please.

Or in polite, government-letter talk, I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons.

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.

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 OMER project is another irresponsible new program that should be rejected.

Sincerely,

Linda Wise
512-264-7192

PC_263

March 30, 2008

Mr. Thaddeus A. Wyka,
I am writing to urge to
protest and ask you not to
increase Nuclear danger / the
Complex Transformation proposal,
Let's have anyone out there
that is against destroying
this planet Earth we live on?
And the cost - Have we gone
totally mad, - this once great
Country, and its leaders?
Please consider future generation
and what we will be leaving
for them.

Blanche Woglie
Bobby Co 93515

No New Nukes, So God's Sakes

Wohlauer, Gabriele

Page 1 of 1

Wohlauer, Gabriele

Page 1 of 1

Levens, Matthew PC_1751

From: Gabriele Wohlauer [wohlauer@rochester.rr.com]
Sent: Wednesday, April 02, 2008 6:09 PM
To: Complex2030
Subject: Do we need additional, improved, new nuclear weapons for these United States?

Gabriele Wohlauer
58 Reitz Parkway
Pittsford, NY 14534-2206

April 2, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

116A I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons.

2BA The United States of America currently possesses 10,000+ nuclear weapons -- more than most other countries on the globe. The United States is the only country that has dropped nuclear bombs on major population centers and killed and maimed thousands of civilians.

313A The United States does not require additional nuclear weapons or updated nuclear weaponry (or newly developed, "improved" nuclear weapons. Americans are scared stiff that nuclear weapons may get into the hands of so-called "terrorists".

116A Please do everything in Congress to reduce the nuclear weapons arsenal we now have -- to get it down to a reasonable level. Let America serve as an example of restraint and civility, not as a war-hungry aggressor threatening other countries with nuclear war!

Sincerely,

Gabriele Wohlauer

Levens, Matthew

From: Gabriele Wohlauer [wohlauer@rochester.rr.com]
Sent: Tuesday, April 01, 2008 10:16 AM
To: wohlauer@rochester.rr.com
Cc: Complex2030
Subject: BUSH'S NUCLEAR WEAPONS PLANS

PC_882

116A I am 100% against the development of new and/or improved nuclear weaponry for the following reasons:

211K 1) this Government does not hesitate to invade (and pretty much destroy) other countries, when we suspect they might have "weapons of mass destruction";

33A 2) this country has 1000's more nuclear weapons than any other nation on this earth;

41J 3) this country has already dropped nuclear bombs on two major population centers;

4) this country should set an example to the world of reducing/eliminating/destroying nuclear arms --NOT of increasing/developing additional such weapons!

Gabriele Wohlauer

Mar. 4, 2008 9:34AM No. 1975 P. 1
PC_20

3005 Wilbur Blvd Auburn Hills, MI 48306 248-373-6107/mc373-6470

**St. John Fisher Chapel
University Parish**

Fax

To: *Therese Wylha* From: *Dot Woiff*

Fax: *1-708-931-9322* Pages: *1*

Phone: _____ Date: *3-4-08*

Fax: _____ CC: _____

Urgent For Review Please Comment Please Reply Please Recycle

* Comments:

*We need to immediately join the rest of the world's countries in eliminating nuclear weapons. We must set the example that we are a country that respects human life and the earth - two things nuclear weapons will destroy.
Please no new plants, no re-working of nuclear weapons.
Thank you.*

11J 21L 316A

Levens, Matthew PC_370

From: Anne Wolf [wolfmdst@sonic.net]
Sent: Wednesday, March 12, 2008 4:38 PM
To: Complex2030
Subject: No funding for nuclear weapons

Anne Wolf
1452 Townview Ave
Santa Rosa, CA 95405-7561

March 12, 2008
Complex Transformation Department of Energy

Complex Transformation Department of Energy:

We are bombarded daily about Iran and their alleged move to nuclear weapons. Yet, this nation is considering building a plant to produce plutonium for nuclear weapons and modifying nuclear facilities to rebuild our nuclear arsenal.

We are sending a contradictory message to other countries. Our plea for them not to develop such weapons will certainly be seen as insincere.

Congress rejected the last attempt to upgrade the arsenal by de-funding the Reliable Replacement Warhead and last year's proposed mega scale bomb plant. Please reject any attempt to begin again the production and building of nuclear weapons. Let's attempt to minimize the threat to nuclear war not increase it.

Sincerely,
Anne Wolf


11J 28A 316A

Wolfe, Clint
Page 1 of 1

Feb 18 08 07:10 a

PC 16

P. 1



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Executive Director
Clint Wolfe

Director Emeritus
Mick McElroy
CNTA
1204 Whiskey Road
Suite 11
Aiken, SC 29803
803/666-5456
Fax: 803/666-9860
CNTA@ballouthair.com
www.cnta.com

February 21, 2008

Subject: "Complex Transformation SPEIS Comments"

Testimony for February 21, 2008 public meeting on NNSA Consolidation.

Good evening. I am Clint Wolfe, Executive Director of Citizens for Nuclear Technology Awareness (CNTA). CNTA is the nation's largest citizen-based, pro-nuclear, education and advocacy group, with about 2000 members and 40 corporate and business sponsors. We are pleased to have the opportunity to comment on NNSA's consolidation plans.

We fully support NNSA's plans to consolidate and modernize the nation's weapon facilities. This will make the complex more efficient, safer, and environmentally responsible. It should also give NNSA the flexibility it needs to respond to changing defense needs.

We applaud NNSA's decision, already made, to consolidate non-weapon plutonium at SRS, in which surplus plutonium will be processed and then disposed of off-site. The MOX and PDCP missions are already targeted for SRS.

We also believe, however, that SRS would be the best location to meet the need to manufacture new replacement pits, supported by research from the Savannah River National Laboratory and Los Alamos National Laboratory. SRS has a 55-year history of production excellence. It has met every shipment date and every product specification. Los Alamos' history of excellence is in research, not production.

We are concerned that there will be little "uplift" capacity at Los Alamos. One does not go from 1 shift to 3 shifts without months of training of appropriately skilled people. Production facilities designed for their intended purpose are inherently more efficient than piece work performed in aging facilities designed for other purposes. We do not believe it is in the best interests of Los Alamos or the nation for LANL to assume this meretricious production role. This is one experiment we cannot afford to have Los Alamos conduct.

Our organization, our elected officials, and the citizens of this area are very supportive of national defense missions at SRS. I think you will find our record of support is unmatched anywhere in the country. This is one more reason why SRS should be the site of choice for pit production.

Dr. Clint Wolfe
Executive Director
Citizens for Nuclear Technology Awareness (CNTA)
Phone: 803-649-5456

THE CITIZENS' NUCLEAR VOICE

Wong, Amy
Page 1 of 1

PC_1499

Benamfor, Delight

From: Amy Wong [wong@lanl.gov]
Sent: Thursday, April 10, 2008 2:05 AM
To: DIV,Complex,Transformation
Subject: Public Comments

Last Name=Wong
First Name=Amy
Email Address=wongsuwu@earthlink.net, wong@lanl.gov Street Address=310 Donna Ave City=Los Alamos State=NM ZIP Code=87544 Comments=It is extremely important that for NNSA and US Government to choose the right path for Complex Transformation. LANL is chosen as the preferred alternative, which is a good and a must decision for this nation. Around the world, increase use of nuclear energy and emerging treats for nuclear weapons development and nuclear terrorism. LANL is the only working and operational facility that have a complete nuclear material processing and manufacturing capabilities especially in the area of analytical chemistry analysis capabilities. None of the DOE complex lab has complete analytical capabilities that can support DOE and national security missions. If we lose any of these key facilities and their replacements, i.e., CMR Replacement, the United States will be the only nuclear power in the world could not support emerging issues (e.g., global nuclear threats and nuclear renaissance) and will lose all the expertise that know how to tackle potential national security emergency related to special nuclear materials. LANL has the right expertise and nuclear facilities to provide long-term DOE missions. Preferred alternative
- Plutonium Center for Excellence is the right choice.

115A
210B

Wood, Anne Marie

Page 1 of 1

Wood, Rachel

Page 1 of 1

Levens, Matthew

PC_369

From: Anne Marie Wood [awood@ssiphila.org]
Sent: Wednesday, February 20, 2008 11:07 AM
To: Complex2030
Subject: New Bomb Plant

Anne Marie Wood
9701 Germantown Avenue
Philadelphia, PA 19118-2633

February 20, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

116A Has the Bush Administration gone completely berserk??!
21K Please do all in the rightful power of your mind and conscience to oppose the building of this plant.

Thank you.

Sincerely yours,
Anne Marie Wood

Sincerely,

Anne Marie Wood
215/747729

Levens, Matthew

PC_1509

From: Rachel Wood [rachelwood@cybermesa.com]
Sent: Tuesday, April 29, 2008 3:13 PM
To: Complex2030
Subject: No to Los Alamos Complex Transformation Plan

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 am opposed to the development of further nuclear buildup of any sort at Los Alamos Lab. As a US citizen living downstream and as someone who has worked with and has concerns for the Native American Nations living upwind, I urge you to select the "No Action Alternative". Developing nuclear weapon is an extreme danger to human and planet health. We have to learn to settle our disagreements more civilly-through negotiations or other measures.

The people of the world want peace and to be happy. This is not done through control and domination. It is done through recognizing the sanctity and rights of all people and life forms. Nuclear energy and weapons are far too dangerous and have extremely long lasting effects to be considered an option anymore.

24A The "No Action Alternative" is the only respectful option to follow.

Sincerely,

Rachel Wood
1000 Marquez Place, C-1
Santa Fe, New Mexico 87505

Wood, Thomas

Page 1 of 3

Wood, Thomas

Page 2 of 3

PC_1917

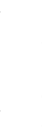
Levens, Matthew

From: Wood, Thomas [Thomas.Wood@parsons.com]
Sent: Monday, April 07, 2008 7:25 PM
To: Complex2030
Subject: Comments

Attachments: Picture (Enhanced Metafile); Picture (Enhanced Metafile)



31e0.bmp (883)e1.bmp (49 KB)



31e0.bmp (883)e1.bmp (49 KB)

Comment on the Draft Complex Transformation PEIS:

Mr. Theodore Wyka
Complex Transformation SPEIS Document Manager, Office of Transformation, NA-10.1 U.S. Department of Energy/MSA 1000 Independence Avenue, SW Washington, D.C. 20585 Dear Sir:
In Section 6.3.1 the cumulative impacts to LANL are discussed. In particular, the proposed siting of the AFFF within area TA-36 is summarized and it's location is outlined as being a new fenced property of about 144 acres within a remote area actively used to test high explosives. The following is taken from the text:

<<Picture (Enhanced Metafile)>>
Also as shown in the excerpt below, the current activities in this area are described:
<<Picture (Enhanced Metafile)>>
Why would it make sense to place a sensitive spent fuel "reprocessing" facility in the midst of an explosives testing and projectile "firing range" that might result in the unexpected consequence of blowing things up that unpredictably could damage or impact a new facility that contains hazardous and radioactive elements? I see these two operations as incompatible neighbors? The potential for the release of hazardous or radioactive elements is too high a risk.
In my opinion, this is not the right location for a glove box operation.
It doesn't make sense from a security or hazardous operations standpoint. Another location, such as the existing secure facilities area at Y-12, that is planned for shrinkage, would make more sense. At least that location has no explosives or propellant testing or projectiles flying around. It's much more likely that hazardous materials would be better handled there.
In addition, the available work force needed for building such a facility in this remote area in New Mexico is not likely to be available for as reasonable a cost as some the other alternative locations listed.
These costs are also a major issue.
Thanks for the opportunity to comment. (Please copy me on future notices about this program at the address shown below.)

Thomas R. Wood
1700 Broadway, Suite 900
Denver, CO 80290
303 764 8850
thomas.wood@parsons.com

1108

2358

339E

PC_1917

TA-36 is one of the sites that conducts high explosives (HE) testing. TA-36 is in a remotely located area in the eastern portion of LANL that is fenced and patrolled. It has four active firing sites that support explosives testing. The sites are used for a wide variety of non-nuclear ordnance tests pertaining to warhead designs, armor and armor-defeating mechanisms, explosives vulnerability to projectile and shaped-charge attack, warhead lethality, and determining the effects of shock waves on explosives and propellants.

Wood, Thomas

Page 3 of 3

Woody, Elizabeth

Page 1 of 1

PC_1917

The GNEP PEIS is considering LANL (TA-35) as a site location for the AFCF. The AFCF would provide the venue for development and advancement of several of these technologies, including those needed for: (a) separation and recovery of usable materials from SNF; and (b) fabrication of proliferation-resistant, recycled fuels. The AFCF would be a large (approximately 550,000 square feet) shielded facility with remotely maintained areas, known as hot cells to validate, demonstrate, and improve fuel cycle technologies such as fully integrated spent fuel processing and fuel fabrication. The majority of the process facilities of the AFCF would be located within a Perimeter Intrusion, Detection and Assessment System (PIDAS) to protect the nuclear material from diversion or sabotage. The site area within the PIDAS would be approximately 62 acres. The total site area required, within a property protection fence, would be approximately 144 acres.

PC_868

Levens, Matthew

From: Elizabeth Woody [sizzlewoody@yahoo.com]
 Sent: Thursday, March 27, 2008 3:21 PM
 To: Complex2030
 Subject: Stop Nuclear weapons and energy departments plan to build facility

Elizabeth Woody
 2036 SE 11th AV
 Portland, OR 97214-5316

March 27, 2008
 Complex Transformation Department of Energy

Complex Transformation Department of Energy:

116A I oppose the present administration's proposal to build a plutonium plant for nuclear weapons. I will oppose any future plans as they arise.

116A I vehemently oppose plans to modify nuclear facilities across the US as I see this as step one to start up the nuclear arsenal madness. These plants have a tremendously poisonous footprint upon the land and life around them.

214K I have seen and read about the poisonous nature of these plutonium pits, and to produce 50-80 of them will be the first major nuclear warhead production since the Cold War.

3140 I have family who were "downwinders" of the Hanford Nuclear Plant, and friends who have opposed the waste leakages from the site. Through all of it, there are NO safe, long term disposal of wastes from nuclear activities. It is life threatening not only to humans, but to all life.

414M

51U If we refuse others in the world to arm themselves with such destructive and heinous methods then we should not be hypocrites by going against our word, and taking the "offensive" by plans and proposals to build nuclear weapons, anyway.

116A (cont) I know citizens of our great country have consistently opposed nuclear weapons, energy, and waste facilities for generations. It is irresponsible to continue to push for projects that only benefit the huge military machine and profits only a few. Reject this CMRR Project.

Sincerely,
 Elizabeth Woody
 503-231-7662

Worthington, William

Page 1 of 1

PC_55

January 28, 2008

BILL WORTHINGTON
 8 Bridge Road
 P. O. Box 91
 Truro MA 02666-0091

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.

Dear Mr. Wyka:

The proposed New Nuclear Weapons and Complex Transformation plan would move the United States in a direction which is counter to the desires of the majority of its citizens.

111F In addition to impeding the destruction of our nuclear weapons, as called for by treaty, this pro-
 298 gram would use up federal funds which are desperately needed to correct the economic problems which our country has developed.

316A If the Secretary of Energy and his staff are unable to persuade the President to drop the Complex Transformation (SPEIS) program, they should resign their positions in public protest.

William C. Worthington
 William C. Worthington

billwvck@comcast.net

Wright, Warren

Page 1 of 1

PC_52

February 7, 2008

Warren Wright
 1011 Staudford Ave
 Oakland, CA 94608-2317

Theodore A Wyka
 Complex 2030 SPEIS 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:

The Department of Energy should reject proposed Complex 2030 project.

The DOE should 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.

I am also very concerned that revamping the current arsenal could lead to renewed nuclear tests.

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.

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.

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,
Warren W. Wright
 Warren W. Wright
 310-655-5749

116A
 215C.1
 37M.1
 411Q
 514C:
 67J
 71J

Wyse, Frank
Page 1 of 1

Yarger, Lisa
Page 1 of 1

Levens, Matthew

PC_1354

From: Frank Wyse [wysef@post.harvard.edu]
Sent: Thursday, February 07, 2008 11:53 AM
To: Complex2030
Subject: Please Reject the proposed Complex Transformation

Frank Wyse
8865 E. Baseline Road, #1501
Mesa, AZ 85209-5300

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 2030 project.

We and the whole world are less secure if anyone has nuclear weapons. We should eliminate them, not improve them.

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,

Frank Wyse
(480) 357-6103

Levens, Matthew

PC_1141

From: Lisa Yarger [lisa@stormingheaven.com]
Sent: Thursday, March 27, 2008 6:30 PM
To: Complex2030
Subject: no new nukes

Lisa Yarger
1025 Alabama Avenue
Durham, NC 27705-4074

March 27, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy

Please register my strong opposition to the administration's proposal to build a plant to produce plutonium pits for nuclear weapons.

If the United States wishes to stop countries such as Iran from developing nuclear weapons programs, it has to show leadership in reducing its own capacity to build new nuclear weapons.

Sincerely,

Lisa Yarger
919-286-3170

**Yates, Gus
Page 1 of 1**

PC_491

Buenafior, Justin

From: Gus Yates [gusyates@earthlink.net]
Sent: Thursday, February 07, 2008 8:04 PM
To: Complex2030
Subject: Don't overhaul the bomb complex

Gus Yates
 1809 California Street
 Berkeley, CA 94703-1207

February 7, 2008

Theodore A Wyka
 Complex 2030 SEIS Document Manager
 Office of Transformation, U.S. Department of Energy, NA-10.1000 Independence Avenue, SW,
 Washington, DC 20565

Dear Theodore Wyka:

116A The Department of Energy should reject proposed Complex Transformation project.
 29H Like most of America's defense and foreign policy efforts in recent years, revamping the nuclear weapons complex will make us and the rest of the world less safe and squander a vast amount of taxpayer dollars.

If we spent \$150 billion dollars making friends instead of enemies, our weapons of mass destruction would be entirely unnecessary.

Sincerely,
 Gus Yates

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,
 Gus Yates

**Yoshimura, Mary
Page 1 of 1**

PC_1156

Levens, Matthew

From: Mary Yoshimura [myoshimura544@charter.net]
Sent: Thursday, March 27, 2008 1:05 PM
To: Complex2030
Subject: Oppose U.S. Nuclear Weapons program

Mary Yoshimura
 337 N. Tassajara
 San Luis Obispo, CA 93405-1215

March 27, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

116A I am absolutely opposed to any proposal involving the production of plutonium for nuclear weapons.

2140 I live in San Luis Obispo, CA, just north of the Diablo Canyon Nuclear Power plant. The citizens of this area have grave concerns over this energy producing plant, its safe operation and the unresolved problem of disposal of the radioactive waste it produces.

It is incredible that the administration should suggest such a dangerous and expensive technology for the purpose of nuclear weapons.

31J 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,
 Mary Yoshimura

PC_957

**Union of Concerned Scientists
Working Paper**

**The Cart before the Horse:
DOE's Plan for the Future of the
U.S. Nuclear Weapons Complex**

Stephen Young
Lisbeth Gronlund

29 April 2008

Stephen Young is Senior Analyst and Washington Representative in the Global Security program at the Union of Concerned Scientists in Washington DC. Lisbeth Gronlund is Senior Staff Scientist and Co-Director of the Global Security program at the Union of Concerned Scientists in Cambridge, MA and Research Fellow at the Massachusetts Institute of Technology Science, Technology and Society Program.

The authors would like to thank Robert Nelson, Ivan Oelrich, Bob Peurifoy, and Shervin Boloorian for reading and commenting on drafts of this paper, and Sean Meyer, Edwin Lyman, Robert S. Norris and Hans Kristensen for their assistance on important details. They would also like to thank Sandra Hachman for a superb editing job.

"This announcement puts the cart before the horse. Although a lot of time and energy went into determining the winning design for a new nuclear warhead, there appears to have been little thought given to the question of why the United States needs to build new nuclear warheads at this time. My preference is that the Department of Energy would have spent their resources reconfiguring the old Cold War complex and dismantling obsolete warheads."

- Rep. Pete Visclosky (D-IN), Chairman, House Energy and Water Development Appropriations Subcommittee, March 2, 2007, on the announcement of the selection of the first Reliable Replacement Warhead design.

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Executive Summary

Over the next several years, the U.S. government must make critical decisions about the future of the nation's nuclear weapons complex—the industrial infrastructure, largely built during the cold war, to design, develop, build, and maintain the thousands of nuclear weapons in the U.S. arsenal. These decisions include the future purpose of the arsenal, the need for new warheads or replacement warheads, and how best to consolidate the complex.

Specifically, the U.S. government must decide:

- whether to increase the nation's capacity to produce plutonium pits—the essential core of nuclear warheads;
- whether to design, develop, and build a new generation of nuclear warheads, starting with the Reliable Replacement Warhead;
- how best to consolidate the fissile material essential to nuclear weapons, to increase security and reduce costs; and
- how to maintain the existing nuclear arsenal without resuming nuclear explosive testing.

These questions are critical because the Department of Energy (DOE) and its National Nuclear Security Agency (NNSA) have proposed a plan, called Complex Transformation, to revitalize the nuclear weapons complex. Complex Transformation—and a recently released environmental impact statement (EIS) on the plan—lay out the agencies' vision for the future. That vision includes restoring the nation's ability to produce significant quantities of nuclear weapons, including the new Reliable Replacement Warhead.

These issues are coming to the fore in part because Congress has required the next president to undertake a Nuclear Posture Review to examine to the purpose of U.S. nuclear weapons, and established the Commission on the Strategic Posture to consider the future of the nation's nuclear arsenal. Finally, these decisions will occur amid growing calls for the United States to spearhead a global effort to attain a world free of nuclear weapons.

Our assessment of the Complex Transformation proposal finds that:

The United States needs a new nuclear policy and a plan for the future of its nuclear weapons arsenal before it makes major decisions on the future of the complex.

111C

Until the size and characteristics of the future arsenal are determined, it is premature to build new facilities related to the production of weapons components—including the Chemical and Research Replacement (CMRR) Nuclear Facility and the Uranium Processing Facility (UPF). The CMRR Nuclear Facility proposed as part of Complex Transformation would allow the United States to expand its current capacity to produce plutonium pits—which are at the core of all U.S. nuclear weapons. Similarly, the UPF would replicate the current U.S. capacity to manufacture new "secondaries"—the components that produce most of the weapons' explosive yield. Any decision on construction of these facilities must await a comprehensive review of U.S. nuclear weapons policy and a plan for the future arsenal.

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Young, Stephen

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Under its current nuclear weapons policy, the United States does not need to produce new pits until at least 2015, and perhaps not until 2022.
 Currently, the only identified need for new pits is to allow the United States to continue to deploy its roughly 400 W88 submarine-based warheads while destroying one W88 each year as part of the testing process used to determine that the arsenal remains reliable, safe, and secure. By the end of 2008, the United States will have produced a reserve of 6 to 12 certified new W88 pits—enough for 6 to 12 years of continued testing.

The United States should resize the complex from the bottom up. After the nation decides on a long-term nuclear weapons policy, and the stockpile required to implement that policy, the NNSA should perform a comprehensive, bottom-up review of the nuclear weapons complex and maintain only those programs and facilities needed to support the future arsenal. The United States should then determine how best to utilize the substantial resources within the complex for other important scientific missions.

Consolidating weapons-usable fissile material should be a higher priority for the NNSA. NNSA recognizes that consolidating weapons-usable fissile material reduces security costs, and reduces the danger of theft, accident, and radiological exposure. However, while its proposed plans are a step in the right direction, these efforts should be sped up and their scope expanded.

The DOE should examine other alternatives for the future of the complex. The alternatives DOE considered in its draft EIS for Complex Transformation were too limited in scope. In particular, it should consider options for no pit production and for a future in which the United States spearheads a global effort to move toward the prohibition of nuclear weapons.

1. Introduction

As the Bush administration nears its end, it has proposed a plan—called Complex Transformation—to revitalize the nation’s nuclear weapons complex. This plan—only the latest in a long line of such proposals (see Box 1, p. 3)—would restore the nation’s ability to produce significant quantities of new nuclear weapons. The plan would also consolidate some nuclear materials at fewer sites, and reduce some excess capacity in the complex.

The National Nuclear Security Agency (NNSA)—the semi-autonomous unit within the Department of Energy (DOE) that manages the nation’s nuclear weapons facilities—sees the plan as transforming them into “a modernized, cost-effective nuclear weapons complex.”¹ However, the nation needs to answer critical policy questions before making key decisions on the future of its nuclear weapons infrastructure.

This report outlines the evolution of the nuclear weapons complex, summarizes the Complex Transformation initiative, and makes recommendations for a path toward a sensible future.

2. The Evolution of the Nation’s Nuclear Weapons Complex

The U.S. nuclear weapons complex is a sprawling collection of eight facilities at nine sites, many with buildings that are old and increasingly expensive to maintain.² Scientists at three national laboratories research, design, and develop nuclear weapons. When the Department of Defense (DOD) issues a formal military requirement for a new nuclear warhead, scientists at Livermore National Laboratory (in California) and Los Alamos National Laboratory (in New Mexico) create competing designs for the nuclear “physics package,” which produces the nuclear explosion. The Nuclear Weapons Council, composed of representatives from both the Defense and Energy departments, selects the winning design. Each lab has designed about half the warhead types in the U.S. stockpile.

Los Alamos produces some weapons components—primarily detonators, which trigger the nuclear explosion, and also houses the only facility that now produces plutonium “pits.” A pit is

¹This plan was initially called Complex 2030 because it was to be completed by that year. See U.S. Department of Energy (DOE), 2006. *Complex 2030: An infrastructure planning scenario for a nuclear weapons complex able to meet the threats of the 21st century*, p. 2.

²The United States built the first facilities in what became the nuclear weapons complex under the Manhattan Project. Over time the complex grew to 15 major research and production sites across the country. These sites produced more than 10 new nuclear warheads per day for lengthy periods, as the U.S. arsenal expanded from roughly 6,000 weapons in 1957 to its peak of 32,000 in 1966. See Natural Resources Defense Council, “Nuclear Notebook: Global nuclear stockpiles, 1945-2006,” *The Bulletin of Atomic Scientists*, July/August 2006, p. 66. Available at: <http://thebulletin.metapress.com/content/4120650923474701text.pdf>

After the end of the cold war, the mission of the complex became increasingly uncertain. In 1991 President George H. W. Bush unilaterally removed thousands of short-range tactical nuclear weapons from bases in Europe and all navy surface ships. After more than a decade of negotiations and delays, the 1994 Strategic Arms Reduction Treaty (START) limited U.S. and Russian deployed long-range nuclear forces to 6,000 warheads and 1,700 delivery vehicles—a cut of roughly 50 percent.

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the core of the primary, or first stage, of a modern nuclear weapon. It is surrounded by high explosives, which compress the pit and initiate a runaway fission chain reaction; this fission explosion ignites the secondary, or second-stage fusion explosion.

Working at sites close to both Livermore and Los Alamos, scientists and engineers at Sandia National Laboratory collaborate with both those labs in developing the non-nuclear components of warheads. Sandia also ensures that all components of the warheads work together, and has facilities that produce some components.

The Pantex Plant (in Amarillo, TX) is the site for final assembly as well as dismantlement of nuclear weapons. It also stores more than 10,000 plutonium pits from dismantled weapons. The Y-12 National Security Complex (in Oak Ridge, TN) houses facilities that work with and store uranium, and that manufacture the secondaries—the components of thermonuclear weapons that undergo nuclear fusion reactions.

The Kansas City Plant manufactures most of the non-nuclear components of nuclear weapons. Using control rods extracted from the Watts Bar nuclear reactor, the Savannah River Site (in South Carolina) extracts radioactive tritium gas, a key material used to boost the yield and efficiency of the fission primary. Tritium has a half-life of only 12.3 years, so it must be replenished frequently.

Finally, the NNSA conducts non-nuclear experiments at the Nevada Test Site (NTS)—the location for nuclear explosive testing until 1992. These experiments include “subcritical” explosions involving amounts of nuclear material too small to allow a nuclear chain reaction. NNSA also maintains the ability to resume full-scale underground nuclear testing if needed.

The Stockpile Stewardship Program

In 1992 the Bush administration signed into law a temporary moratorium on nuclear explosive testing. After extending the moratorium, the Clinton administration joined multilateral negotiations on a Comprehensive Test Ban Treaty (CTBT), and President Clinton signed the CTBT in 1996. Although the Senate has not ratified the treaty, the United States continues to abide by it.³

In response to the moratorium, in 1993 the DOE launched a major program to maintain the U.S. nuclear arsenal without nuclear explosive testing. Under what is now called the Stockpile Stewardship Program (SSP), the DOE subjects each type of warhead to rigorous annual inspections, and conducts extensive testing on its components. This enhanced monitoring and assessment has allowed the NNSA to better understand the effects of aging on warhead safety, security, and reliability.

With this knowledge, the NNSA is able to refurbish, replace, or fix warhead components before aging-related changes might reduce their safety and reliability. Each tailored “life extension program” is expected to extend the lifetime of the warheads by 20 to 30 years.

³ The United States is obligated not to undermine the terms of the treaty unless and until the U.S. president informs the UN secretary general that the United States withdraws its signature.

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Box 1: The Best-Laid Schemes—Proposals to Modify the Nuclear Weapons Complex

Numerous commissions have considered how to modify the U.S. nuclear weapons complex, but the DOE has not implemented most of their recommendations. Proposals, beginning with the most recent, include:

1. *Recommendations for the Nuclear Weapons Complex of the Future: Report of the Nuclear Weapons Complex Infrastructure Task Force*, Secretary of Energy’s Advisory Board (SEAB), U.S. Department of Energy, July 13, 2005 (also known as the Oversket report).¹ Established by Secretary of Energy Samuel Bodman, the task force developed a plan to consolidate all nuclear materials and activities at one site, including production, dismantlement, stewardship, research and development, and nuclear weapons.
2. *Report of the Commission on Maintaining United States Nuclear Weapons Expertise: Report to the Congress and Secretary of Energy Pursuant to the National Defense Authorization Acts of 1997 and 1998*, March 1, 1999 (also known as the Chiles report).² This Congressional commission reviewed the DOE’s efforts to attract scientific and technical personnel, and to produce a plan for recruiting and retaining such employees. Recommendations included complex-wide “tightening,” reorganization to eliminate excessive DOE oversight and overlapping, unclear roles, and enhanced congressional oversight of the weapons program. (Henry Kendall, then chair of the board of directors of the Union of Concerned Scientists, served on the panel.)
3. *Record of Decision Programmatic Environmental Impact Statement for Stockpile Stewardship and Management*, Department of Energy, December 19, 1996.³ The Clinton administration proposed downsizing all existing nuclear sites rather than closing any, resuming limited pit production at Los Alamos, and building the National Ignition Facility.
4. *Alternative Futures for the Department of Energy National Laboratories*, by the Task Force on Alternative Futures for the Department of Energy National Laboratories, February 1995 (known as the Galvin report).⁴ This panel recommended phasing out nuclear weapons work at Livermore, and basing future weapons production on residual capabilities at Pantex, Los Alamos, and Sandia. (Henry Kendall also served on this panel.)
5. *Nuclear Weapons Complex Reconfiguration Study*, Department of Energy, January 1991 (known as the Watkins report).⁵ Similar to Complex Transformation, this report called for a “reconfigured complex, called Complex-21” that “would be smaller, less diverse, and less expensive to operate than the Complex of today. Complex-21 would be able to safely and reliably support nuclear deterrent stockpile objectives set forth by the President and funded by the Congress.”

¹ Available at: <http://www.seab.energy.gov/publications/NAWCITERen7-11-05.pdf>.

² Available at: <http://www.doeai.gov/L/NI/Commission/Reports/andComments/chilesrpt.pdf>.

³ Available at: <http://www.epa.gov/EPA/IMP/ACTI/1996/December/day-26/pr-17280.html>.

⁴ Available at: <http://www.fbi.gov/IL/PID/Galvin-Report/Galvin-Report.html>.

⁵ Available at: http://www.osti.gov/bridge/product biblio.jsp?osti_id=6077838.

The shift from production to stockpile stewardship led to major investments in large-scale projects designed, according to the NNSA, to improve its ability to maintain the existing arsenal.

For example, the National Ignition Facility (NIF) at Livermore is intended to ignite a fusion reaction that would mimic the first microseconds of a thermonuclear explosion. The Dual-Axis Radiographic Hydrodynamic Test (DARHT) Facility at Los Alamos will use two linear accelerators—essentially large x-ray machines—to record three-dimensional images of materials undergoing a simulated nuclear explosion. The NNSA has also made enormous investments in high-speed supercomputer projects intended to allow detailed modeling of nuclear explosions.⁴

Despite significant problems plaguing NIF and DARHT, the Stockpile Stewardship Program has been a tremendous success.⁵ The program has significantly advanced knowledge of the properties of aging fissile materials, dramatically improved the modeling of nuclear explosions, and verified that the U.S. arsenal remains safe and reliable. As a result, the laboratories have a better first-principles understanding of U.S. nuclear warheads than when the weapons first entered the stockpile. Indeed, based on this extensive program, the secretaries of energy and defense have certified to the president each year since 1997 that all types of warheads in the U.S. nuclear stockpile are safe, secure, and reliable.

Along with its changing role, the complex saw significant cuts in its size and budget. Between 1990 and 1997, the complex shrank by 50 percent, as the DOE shut down numerous production facilities and several sites.⁶ In 1988, near the end of the cold war, the complex operated on a budget of about \$9.9 billion per year and employed some 60,000 people.⁷ By 2000, the annual budget had fallen to about \$5.6 billion, and employment to about 24,500.

However, the second Bush administration has reversed these trends. The fiscal year 2008 budget for the complex is \$6.3 billion, and employment at the complex has risen to more than 47,000.⁸ The administration's budget request for fiscal year 2009 is more than \$6.6 billion—well above the cold war average.

⁴ For a recent summary of the status of the major stewardship programs, see Fitzpatrick, A., and I. Oehrlich, *The Stockpile Stewardship Program: Fifteen years on*, Washington, DC: Federation of American Scientists, April 2007. The DOE has significantly scaled back the NIF, and it may never achieve fusion. After years of delays, DARHT will achieve the ability to work on a dual axis this year.

⁵ In 1994 the DOE shut down all nuclear weapons-related work at the Pinellas Plant near Clearwater, FL, which produced the neutron generators used in nuclear warheads. In 1998 the DOE also shut down the Mound Plant near Dayton, OH, which manufactured the high-energy chemical explosives used to initiate the nuclear explosion and other non-nuclear components, and produced tritium gas for use in warheads. Other sites in the complex took on these functions.

⁶ General Accounting Office (GAO), 2000, *Nuclear weapons: Improved management needed to implement stockpile stewardship program effectively*, GAO-01-48, p. 18.

⁸ These figures are from the president's fiscal year 2009 budget request, released in February 2008. On April 16, 2008, the directors of Los Alamos and Livermore testified before Congress that employment at each lab had dropped by about 2,000 people in the previous 18 months.

3. The NNSA's Complex Plans

The NNSA's Complex Transformation plan draws much of its impetus from the Bush administration's 2001 Nuclear Posture Review (NPR), which called for a "revitalized defensive infrastructure" that would provide the capability to "design, develop, manufacture, and certify new warheads."⁹ According to the NPR, this production capability will allow the United States to maintain its ability "to respond to large strategic changes" and "dissuade adversaries from starting a competition in nuclear armaments." The DOE has argued that this capability would also permit reductions in the "responsive force" of warheads that the nation keeps in reserve.¹⁰

In 2002, the NNSA proposed the Robust Nuclear Earth Penetrator (RNEP), a new warhead designed to destroy deeply buried underground bunkers. It also proposed building a Modern Pit Facility (MPF) to produce new plutonium pits. After providing modest initial support for both, Congress ultimately rejected both those programs.

The NNSA has since searched for a nuclear weapons program that could garner congressional support. When it stopped the earth penetrator, Congress created the Reliable Replacement Warhead (RRW) program in 2004 to enable the agency to take modest steps to maintain confidence in the existing nuclear stockpile. However, the NNSA saw this new program as the engine that would transform the complex. It turned the RRW into a program to design and build entirely new warheads, and thereby justify a revitalized infrastructure. Congress turned against the NNSA's plans for a new warhead, calling instead for a new nuclear policy to drive decisions on the arsenal and the complex. For fiscal year 2008, Congress cut off all funding for work on the RRW warhead.¹¹ Thus the NNSA has realized that the Complex Transformation plan must survive on its own merits.

The Plan's Environmental Impact Statement

By law, the NNSA must review the environmental impact of Complex Transformation and reasonable alternatives that would achieve the agency's goal of making the complex "smaller, and more responsive, efficient, and secure."¹² A draft Supplemental Programmatic Environmental Impact Statement (EIS) with some 1,600 pages—released by the agency in January 2008—provides details about the alternatives but minimal explanation of the NNSA's "preferred alternative."¹³ (See Appendix 1 for the text of the preferred alternative.)

⁹ Although the Nuclear Posture Review is classified, significant extracts were leaked and widely distributed. These are online at <http://www.globalsecurity.org/wmd/library/policy/doe/npr.htm>

¹⁰ The responsive force includes nuclear weapons that the nation could add to its deployed forces over a period of days to years in response to an "evolving crisis." For example, deploying additional bombs could take days or weeks, while restoring 50 warheads to a squadron of Minuteman III intercontinental ballistic missiles (ICBMs) could take a year.

¹¹ Although Congress eliminated all RRW funding from the NNSA's budget, it did approve \$15 million in the Pentagon's budget to investigate modifying Trident missiles to carry the first RRW warheads.

¹² DOE 2008, Chapter 1, p. 1-1.

¹³ National Nuclear Security Agency, 2008. Draft complex transformation supplemental programmatic environmental impact statement (SPEIS), DOE/EIS-0236-S4, January 11. Available at: <http://www.complextransformationspeis.com/>

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The final version of the EIS is expected in the summer of 2008.¹⁴ A “record of decision” describing the NNSA’s final plans will follow. Key elements of the plan will require funding from Congress—something that is by no means assured.

The draft EIS includes several alternative plans:

- A “no-action” alternative would continue the status quo.
- A “distributed centers of excellence” alternative would essentially keep most activities where they are now, with some consolidation and major new facilities at several sites, including one that would produce 125 to 200 new plutonium pits per year. The NNSA’s “preferred alternative” is very similar, except that it would not include a new pit facility.
- A “consolidated centers of excellence” alternative would consolidate all activities at one or two sites—a variation on the option proposed by the Secretary of Energy’s Advisory Board in 2005 (see Box 1, p. 4).
- A “capabilities-based” alternative would maintain existing capacity except, notably, allowing the NNSA to upgrade production capacity to 50 pits per year.

However, the draft EIS does not consider in detail several reasonable alternatives. For example, the NNSA dismisses the notion of closing one of the two weapons design labs at Livermore and Los Alamos. It briefly cites a 1995 decision by President Clinton to maintain both sites, and asserts that there is no need to reconsider this question.¹⁵

This list also overlooks two options that are by every measure reasonable alternatives. One option is no production of new pits. As the next section explains, the United States does not need to produce plutonium pits for a decade or longer. Under this alternative, the NNSA could maintain its present capacity to produce about 10 pits per year, but would not actually produce any until it specifically needed them.

More broadly, the EIS does not consider the possibility that the United States would commit to making deep reductions in its arsenal in the near term, and to pursuing a prohibition on nuclear weapons over the longer term. This option has gained prominence largely because of a call by prominent former defense officials—George Shultz, secretary of state under Ronald Reagan, Henry Kissinger, secretary of state under Gerald Ford, Bill Perry, secretary of defense under Bill Clinton, and Sam Nunn, former chair of the Senate Armed Services Committee—for the United States to pursue a “world free of nuclear weapons.” These proponents maintain that “reassertion of the vision of a world free of nuclear weapons and practical measures toward achieving that goal would be, and would be perceived as, a bold initiative consistent with America’s moral heritage.”¹⁶

¹⁴ A public comment period on the EIS will end on April 30, 2008. The NNSA has already received more than 85,000 comments as of April 10, 2008. The vast majority of those comments have opposed the Complex Transformation plans.

¹⁵ DOE 2008, pp. 3–15.

¹⁶ Shultz, George P., William J. Perry, Henry A. Kissinger, and Sam Nunn. 2007. “A World Free of Nuclear Weapons.” *Wall Street Journal*, January 4, p. A15.

3/701
(cont)

Conclusion:

The alternatives the NNSA considered in its draft EIS for Complex Transformation were too limited in scope, and it should examine other alternatives. In particular, it should consider a “no pit production” alternative, as well as one under which the United States spearheads a global effort to move toward the prohibition of nuclear weapons.

4. Producing Plutonium Pits

From 1952 to 1989, the Rocky Flats Plant in Golden, CO, produced almost all the plutonium pits for U.S. warheads. At its peak, the plant manufactured thousands per year. But the DOE was forced to shut down the plant in December 1989, after the FBI raided it in response to serious environmental and safety concerns.¹⁷

Since then, the NNSA has repeatedly sought to resume some level of pit production, and to build a dedicated facility to produce pits. The efforts to restore modest production have faced serious technical and legal challenges, while Congress has refused to fund a dedicated new facility.

Specifically, in 1996 DOE Secretary Hazel O’Leary announced a plan to resume production of new pits at Los Alamos. This decision was driven by the need to meet stockpile stewardship requirements.

To assess the reliability of the stockpile, each year the DOE removes 11 warheads of each type at random from the stockpile for disassembly and extensive testing. One of the 11 is destroyed during the tests, and the other 10 are reassembled and returned to the stockpile. As of 2004, only one pit for a W88 nuclear warhead was available to replace the one destroyed during testing.¹⁸ Thus, testing the next year would have reduced the arsenal of deployed nuclear weapons by one.

¹⁷ In 1991, Secretary of Energy James Watkins announced a plan to resume pit production at Rocky Flats, and Congress approved a \$283 million supplemental appropriation for emergency repairs. (This was the Watkins report—see Box 1.) However, in 1992 President George H.W. Bush ended production of W88 pits as part of cuts in the U.S. nuclear arsenal, and in 1993 DOE Secretary Hazel O’Leary announced the permanent end of nuclear production at Rocky Flats.

¹⁸ Medalia, Jonathan. 2004. *Nuclear warhead “pit” production: Background and issues for Congress*. Congressional Research Service, RL31993. This is an excellent summary of recent pit production. Online at <http://www.fas.org/sgp/starwars/crs/RL31993.pdf>.

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To avoid such forced reductions, the 1996 DOE plan had tasked Los Alamos with producing 50 to 80 new pits per year by 2005. But in 1997, after local opposition and problems updating facilities, DOE cut the required production level to 20 pits per year. The lab produced the first new certifiable pit—manufactured to stockpile standards—in 2003, but then encountered more delays. In September 2007 the agency announced that the first new W88 warhead with a new pit was certified for entry into the stockpile since 1989.¹⁹ Los Alamos produced 11 pits for the W88 in 2007, of which 10 had been certified by late January 2008.²⁰ NNSA officials say they will produce six W88 pits in 2008.

The Plutonium Facility-4 (PF-4) building at Los Alamos makes the new W88 pits. According to the NNSA, PF-4 is nominally able to produce 20 pits per year, and it will be able to produce 30 to 50 pits per year by 2012.²¹ Outside sources, however, say that staff members had to work around the clock for weeks to produce the 11 pits in 2007.²²

Despite this progress, the NNSA has also sought to produce dramatically higher numbers of pits by building a dedicated production plant—even as both the deployed and total U.S. arsenal (the latter includes nuclear weapons stored after removal from active deployment) moved toward dramatic reductions.

For example, after the release of the 2001 Nuclear Posture Review, the NNSA sought funding for a Modern Pit Facility capable of producing 125 to 450 new plutonium pits a year.²³ Yet the United States is on course to significantly reduce the number of active warheads. In May 2002, President Bush and Russian President Vladimir Putin signed the Moscow Treaty, which requires both countries to reduce their deployed warheads to 1,700 to 2,200 by the end of 2012.

Then, in 2004, President Bush announced that the United States was unilaterally cutting its total nuclear stockpile by almost half. Outside analysts estimated that this would bring the arsenal to around 5,000 warheads. Yet in 2005 the NNSA was still seeking funding for the MPF. At the 450-pit level, the facility would produce enough pits to replace the entire arsenal every 11 years.²⁴

More recently, the NNSA sought the ability to produce fewer pits—but still through a dedicated facility. A 2006 proposal—*Complex 2030: An Infrastructure Planning Scenario for a Nuclear Weapons Complex Able to Meet the Threats of the 21st Century*—called for “a baseline capacity of 125 units per year net to the stockpile by 2022.”²⁵ (“Net to the stockpile” means certified

¹⁹ U.S. Department of Energy (DOE), 2007. Rebut W88 warhead formally accepted for use in U.S. nuclear weapon stockpile. Press release, September 27. Online at <http://nnsa.energy.gov/news/896.htm>.

²⁰ Hebert, H. Josef, 2008. Quality of nuclear devices questioned. Associated Press, January 20. Online at <http://www.wtopnews.com/?nid=116&id=1329887>.

²¹ DOE 2008, Chapter 3, p. 3-7.

²² Conversation with Greg Mello, Los Alamos Study Group, January 24, 2008.

²³ U.S. Department of Energy (DOE), 2003. Draft supplemental programmatic environmental impact statement on stockpile stewardship and management for a Modern Pit Facility. DOE/EIS-0236-S2. May. Online at <http://www.eh.doe.gov/epa/ia/docs/eis/eis02362/02362s0236.htm>.

²⁴ For a revealing and somewhat comical story about the Modern Pit Facility and relations between Congress and the NNSA, see Sterngold, James, 2008. Failure to launch. *Mother Jones* (January/February). Online at <http://www.motherjones.com/news/feature/2008/01/failure-to-launch.html>.

²⁵ DOE 2006, p. 11.

warheads introduced into the arsenal, so actual production ability could be significantly higher.) A “consolidated plutonium center” at an existing NNSA site would provide “long-term R&D, surveillance, and manufacturing operations.”²⁶

Only with the release of the draft EIS for the Complex Transformation plan did the NNSA abandon, at least for now, the idea of a dedicated facility for producing plutonium pits. In the January 2008 EIS, the NNSA’s “preferred alternative”—the option it intends to pursue—is 50 to 80 pits per year, which it plans to achieve by expanding pit production at Los Alamos.

When questioned, NNSA Administrator Tom D. Agostino said that two developments made this change possible.²⁷ First, new DOE data show that plutonium pits will last significantly longer than previously thought, a finding confirmed by the Jansons, an independent scientific body that advises the government.²⁸ Second, the planned cuts in the total U.S. arsenal reduced the requirements for new pits. In December 2007, the administration announced that it would achieve the reductions announced in 2004 by the end of 2007—five years ahead of schedule—and that the nation would cut its total arsenal by another 15 percent by 2012.²⁹

To achieve the 50-to-80-pits-per-year capacity, the proposal calls for reorganizing operations at the PF-4 facility at Los Alamos and building a new one, the Chemical and Research Replacement (CMRR) Nuclear Facility, also at Los Alamos.³⁰ The new facility would primarily test the purity of the plutonium used in the pits, but it would allow pit production to expand at PF-4 by taking on some of its work, and by storing some fissile materials that would otherwise be stored at PF-4.

In shelving its proposal for a new facility dedicated to producing pits, the NNSA is acknowledging that it does not have congressional support. Since Rocky Flats closed in 1989, Congress has not been willing to provide significant funding for any DOE proposal to create such a capacity.³¹ In fact, in the fiscal year 2008 appropriations bill, Congress specifically limited the NNSA to producing the number of pits called for in its new preferred alternative:

²⁶ *Ibid.*

²⁷ Author Stephen Young asked this question during the public presentation of the Department of Energy’s budget, February 4, 2008.

²⁸ Hemley, R. J., and D. Meiron, 2007. Pit lifetime. JSR-06-335. Bedford, MA: Mitre Corp, January 11. Online at <http://www.fas.org/irp/agency/dod/jasr/pit.pdf>

²⁹ D’Agostino, Thomas, 2007. Press conference: Announcement on Complex Transformation. Washington, DC: National Nuclear Security Administration, December 18.

³⁰ The CMRR Nuclear Facility is part of a larger project at Los Alamos. Construction of phase one—a radiological lab—is already under way. The NNSA’s FY2009 budget request for the full CMRR project is \$100.2 million. However, the request estimates that the full cost of the Nuclear Facility alone, still in its planning phase, will top \$2 billion.

³¹ Although the DOE says the CMRR Nuclear Facility is still in its planning phase, a report from the House Energy and Water Appropriations Committee tells a different story:

The CMRR facility has no coherent mission to justify it unless the decision is made to begin an aggressive new nuclear warhead design and pit production mission at Los Alamos National Laboratory. The NNSA is directed to develop a long-term plan to maintain the nation’s nuclear stockpile requirements that does not assume an *a priori* case for the current program. Production capabilities proposed in the CMRR should be located at the future production sites identified in a detailed complex transformation plan that supports the long-term stockpile requirements. The Committee is concerned the NNSA is proceeding with large expenditures for this project while there are significant unresolved issues, and recommends the fiscal year

Until a modern nuclear weapons strategy, including required pit production capacity defined by nuclear stockpile requirements, is developed, the NNSA is directed to constrain the out-year planning for plutonium operations to a pit production capacity no greater than 80 pits per year. The NNSA Administrator is directed to provide quarterly reports to the Committees on Appropriations on pit production, with the first report due on April 1, 2008.³²

Potential Reasons to Build New Pits

Beyond the near-term cuts in nuclear weapons already noted, the United States has no strategy in place to determine how much pit production capacity it may actually need. The nation might need new pits for several reasons. These include: (1) to replace those at the end of their lifetime; (2) to replace pits destroyed in testing; (3) to increase the size of the arsenal, or to replace a class of defective warheads; (4) to build more of one warhead type to replace another type; and (5) to produce new types of warheads, such as those envisioned under the Reliable Replacement Warhead program.

Replacing Pits at the End of Their Lifetime

The pits in today's nuclear arsenal were produced largely between 1980 and 1990. (The exception, the W62, will be retired in 2009.) Before 2006, the DOE estimated that these pits would last 45 to 60 years.

Concern about how long the pits would remain reliable was one of the primary reasons for seeking the ability to produce new ones, and a key initial justification for the RRW program. However, the 2006 study by the Jansons on pit lifetimes found that "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."³³

This means the United States has *at least* until 2080—more than 70 years—to replace all the pits in its arsenal. Thus, there is no urgent need to expand pit production for this purpose—and it would be a costly mistake to do so before creating a long-term strategic plan for the nation's nuclear arsenal.

³² 2007 funding be held in reserve. Although the NNSA claims the Nuclear Facility Phase 3 of the project is under review, the Committee notes the Laboratory excavated 90,000 cubic yards of soil at the construction site where the CMRR Phase 3 Nuclear Facility is proposed to be built. The Committee also notes the Department's CMRR acquisition strategy combines Critical Decision 2 (approval of performance baseline) and Critical Decision 3 (approval to start construction) under DOE Order 413.3A on project management. The Committee does not support construction projects that fail to strictly adhere to DOE Order 413.3 requirements by abbreviating the process.

See: Committee on Appropriations, 2007, "House Report 110-185, Energy and water development appropriations bill, 2008, to accompany H.R. 2641," June 11.

³³ U.S. Congress, Consolidated Appropriations Act, 2008, Division C, Energy and Water Development and Related Agencies Appropriations Act 2008, explanatory statement. It is unclear if the NNSA decided to reduce production requirements to 50 to 80 pits before or after Congress passed its limitation.

³⁴ Hemley and Meiron 2007.

Moreover, each year accelerated aging experiments provide data on 17 years of natural aging, so the DOE is quickly accruing more knowledge of pit lifetimes. For example, the DOE will learn whether its pits remain reliable for at least 150 years by 2010, and for at least 200 years by 2014. Even if the DOE finds that pits will last only 100 years, the nation could easily wait two decades before beginning to replace them. To reduce the size of any new facility, the department could spread this work over many decades. If the NNSA began pit replacement in 2030 and completed it by 2080, the size of the arsenal would determine the needed average annual capacity (see Table 1).

Table 1: Required Annual Pit Production Capacity, under Various Arsenal Sizes

Size of the U.S. nuclear arsenal in 2080	Required average annual pit production, starting in 2030
1,000	20
2,000	40
3,000	60
5,000	100

Replacing Pits Destroyed under the Stockpile Stewardship Program

As noted, the tests under the Stockpile Stewardship Program destroy one pit from each type of warhead every year. Large numbers of reserve warheads are available for all but one of the nine types now in the arsenal. However, this is not the case for W88 warheads, which are deployed on submarines. The DOE intended to build several thousand W88 warheads to replace some W76s, but produced only some 400 before shutting down the Rocky Flats plant.³⁴

As noted above, as of 2004, only one W88 pit was available to replace the one destroyed during testing. Los Alamos produced 11 new pits in 2007, of which 10 had been certified by late January 2008, and plans to produce an additional six in 2008.

Assuming that testing in 2005 and 2006 reduced the deployed arsenal by two W88 warheads, as of late January 2008, enough W88 pits had been certified to replace those two deployed warheads and to allow destructive testing through 2014. If the remaining 7 pits produced through 2008 are certified, there will be enough to allow testing through 2021. Thus, under current U.S. nuclear weapons policy, new pits would need to be produced as soon as 2015 and as late as 2022.

There is no immediate need to produce new pits. And a new nuclear weapons policy could reduce or eliminate the number of W88 warheads in the U.S. arsenal, further extending the time until new W88 pits are needed, or eliminating the need entirely.

³⁴ See Norris, Robert S., 1985, "Counterforce at sea: The Trident II missile," *Arms Control Today*, September; and Norris, Robert S., and Hans M. Kristensen, 2008, "Nuclear notebook: U.S. nuclear forces, 2008," *Bulletin of the Atomic Scientists*, March/April, p. 52.

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Increasing the Arsenal or Replacing a Class of Defective Warheads

The United States maintains a stockpile of thousands of reserve nuclear warheads that the nation removed from deployment at the end of the cold war. Rather than destroy these warheads, the Clinton administration decided that the nation needed this large nuclear “hedge” to respond to any potential threat from a resurgent Russia, or to replace a class of warheads found to be defective.

Many experts believe so large a hedge is unnecessary.³⁵ Nevertheless, the NNSA argues that the nation could reduce it only if the agency builds up the weapons complex to be “responsive.” That is, the agency must establish and maintain a capability to quickly produce large numbers of new warheads. The NNSA further argues that the effort to design, develop, produce, and deploy new Reliable Replacement Warheads would create such a responsive infrastructure.

As noted, however, the existing nuclear stockpile is highly reliable, and the likelihood of a defective class of warheads is extremely low. The secretaries of energy and defense continue to certify annually that all warhead types in the U.S. nuclear stockpile are safe, secure, and reliable.

As part of planning for the RRR, the DOE has estimated that acquiring the ability to produce significant numbers (more than tens) of new warheads would take 15 years. That estimate should be tempered by the DOE’s poor track record in building large-scale facilities on schedule.³⁶

On the other hand, if a new threat did emerge, the nation might be able to produce a significant number of nuclear weapons in fewer than 15 years. After all, in the 1940s, the United States went from mere belief that a nuclear weapon could work to an arsenal of more than 200 weapons in seven years. Moreover, the United States still stores over 10,000 pits in Texas, which could also be a source of new warheads if the need emerged. This approach would presumably take considerably less time than building new pits.

Given these considerations, the nation does not need to enhance its capacity to produce pits to expand the nuclear arsenal or replace defective warheads.

Building More of One Type of Warhead to Replace Another

Each long-range delivery vehicle in the U.S. arsenal—land-based missiles, sea-based missiles, and bombers—has two warhead designs. This provides even greater redundancy, in case a defect emerges in one type of warhead. However, the United States might want more of one type of warhead than another because of their capabilities. In particular, submarine-based ballistic missiles carry either W76s or W88s. The latter have a much higher yield, or explosive force, than

³⁵ See, for example, Blair, Bruce G., Cochran, Thomas B., et al. 2008. *Toward true security: Ten steps the next president should take to transform U.S. nuclear weapons policy*. Federation of American Scientists, National Resources Defense Council, Union of Concerned Scientists, February. Online at: <http://www.ucsusa.org/truesecurity>

³⁶ See, for example, U.S. Government Accountability Office (GAO). 2007. Department of Energy: Major construction projects need a consistent approach for assessing technology readiness to help avoid cost increases and delays. Report to the House Subcommittee on Energy and Water Development, and Related Agencies, Committee on Appropriations. GAO-07-33. Online at <http://www.gao.gov/new.items/d07336.pdf>.

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the former. An administration might decide it wants to deploy more than the current number of roughly 400 W88s, requiring the production of additional W88 pits.

However, the United States has not made a decision to do so, again because it has not developed a plan for the future of the arsenal.

Building New Types of Warheads

The NNSA is seeking funding for work on the first Reliable Replacement Warhead—a new design built from scratch. If the program goes ahead, the agency could need several thousand new pits. However, as noted, Congress eliminated all funding for the RRR in 2008. Moreover, the fiscal year 2008 defense authorization bill requires the NNSA to study whether the RRR program could reuse existing pits, and how doing so “would affect the schedule and scope for new pit production.”³⁷

The 2001 Nuclear Posture Review also indicates the Bush administration’s desire to develop new nuclear weapons. These include a “bunker buster” (the Robust Nuclear Earth Penetrator), which could destroy hardened, deeply buried targets, a warhead that could destroy stockpiled chemical or biological agents, or a lower-yield “mini-nuke” with a goal of limiting collateral damage.³⁸

However, beyond the abandoned RNEP program, the administration has not established any specific requirements for new warheads. The 2001 Nuclear Posture Review does not create an official requirement that the NNSA must fulfill. Given congressional opposition to both the RNEP and the RRR, there is no justification for establishing significant ability to produce pits for new types of warheads.

Conclusion:

Under its current nuclear weapons policy, the United States does not need to produce new pits until at least 2015, and perhaps not until 2022. Currently, the only identified need for new pits is to allow the United States to continue to deploy its roughly 400 W88 submarine-based warheads while destroying one W88 each year as part of the testing process used to determine that the arsenal remains reliable, safe, and secure. By the end of 2008, the United States will have produced a reserve of from 6 to 12 certified new W88 pits—enough for 6 to 12 years of continued testing. Any decision on future pit production and construction of the CMRR Nuclear Facility must await a comprehensive review of U.S. nuclear weapons policy and a plan for the future arsenal.

³⁷ U.S. Congress. 2007. National defense authorization act for fiscal year 2008: Conference report to accompany H.R. 1585. Report 110-477. Section 3121.

³⁸ According to the 2001 Nuclear Posture Review, “New capabilities must be developed to defeat emerging threats such as hard and deeply buried targets (HDBT), to find and attack mobile and relocatable targets, to defeat chemical or biological agents, and to improve accuracy and limit collateral damage. Development of these capabilities, to include extensive research and timely fielding of new systems to address these challenges, are imperative.” See <http://www.globalsecurity.org/armadlibrary/policy/dodnpr.htm>.

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<p>97N</p> <p>105C2</p>	<p>5. Producing Secondaries for Nuclear Weapons</p> <p>As part of downsizing under its preferred alternative, the NNSA would consolidate almost all uranium operations of the nuclear weapons complex, as well as storage of highly enriched uranium, at the Y-12 site in Oak Ridge.³⁹</p> <p>The Uranium Processing Facility (UPF), likely located at the Y-12 site, would process enriched uranium and manufacture warhead “secondaries,” cases, and other weapons components. (The first, or primary, stage of a nuclear weapon—which includes the pit—ignites the secondary, which produces most of the explosive yield.) The secondary and the case it comes in compose a “canned subassembly”—the final product Y-12 ships to Pantex, which assembles the warhead.</p> <p>However, the Y-12 plant already makes canned subassemblies for B61 warheads, and components for W76 warheads, as part of life extension programs for both. According to an official at Y-12, the capacity at that plant is “roughly the same” as that of the planned UPF, although the actual facilities are much larger than needed.⁴⁰</p> <p>The UPF would also take on activities now performed at other buildings at Y-12, including the testing and dismantling of components of nuclear weapons, and R&D on enriched uranium. The NNSA is slating site preparation to begin around 2010, work completion to occur around 2016, and operations to begin in 2018.</p> <p>The UPF could produce 125 to 200 canned subassemblies per year, even though the NNSA’s preferred alternative for the future of the complex now calls for producing only 50 to 80 pits annually.⁴¹ The draft EIS states that the DOE needs the ability to manufacture more secondaries than pits because the former may have shorter lifetimes. The NNSA claims that it could use any excess production capacity to dismantle its large backlog of excess canned subassemblies.</p> <p>If the UPF is built at Y-12, it would be adjacent to the Highly-Enriched Uranium Materials Facility (HEUMF), now being built to consolidate storage of highly enriched uranium, and scheduled for completion in 2008. The NNSA estimates that the UPF would occupy 33 percent less space than the buildings now spread across the Y-12 site, and that together that facility and the HEMPF would reduce Y-12’s high-security footprint by up to 90 percent.</p> <p>In 2005, the DOE estimated that the UPF would cost \$600 million to \$1.1 billion. However, the actual cost could be substantially higher, given that the HEUMF is now expected to cost \$549 million—four times the DOE’s estimate when it first proposed the facility in 1999.</p>
<p>11C (cont)</p>	<p>Conclusion:</p> <p><i>Until the nation establishes a new nuclear weapons policy, it cannot determine the right size for a new Uranium Processing Facility, so a decision to build such a facility would be premature.</i></p> <p>³⁹ Stored uranium would include all highly enriched uranium now at other sites in the weapons complex, but not those dedicated to providing fuel for U.S. naval reactors on submarines and aircraft carriers.</p> <p>⁴⁰ Mungler, Frank. 2008. Weapons Planning in Oak Ridge. Atomic City Underground, knoxnews.com blog. Online at http://blogs.knoxnews.com/knox/munger200802/y12_secondaries_and_the_upf.html.</p> <p>⁴¹ DOE 2008, pp. 2-13-2-14.</p>

<p>6A (cont)</p>	<p>6. Downsizing the Complex</p> <p>According to the NNSA website, the agency plans to eliminate old buildings and reduce redundancy and excess capacity as part of Complex Transformation. The agency says the plan would:</p> <ul style="list-style-type: none"> • “Consolidate special nuclear materials at five sites by the end of 2012, with reduced square footage within those sites by 2017;” • “Close or transfer from weapons activities about 600 buildings or structures, many by 2010;” • “Cease NNSA operations of two major testing sites supporting our laboratories by 2015;” • “Reduce the square footage of buildings and structures supporting weapons missions by as much as one-third, going from greater than 35 million to less than 26 million square feet;” • “Employ 20-30% fewer workers directly supporting weapons missions consistent with a smaller, more efficient complex;” • “Dismantle weapons at a significantly faster pace.”⁴²
<p>114A</p> <p>97N (cont)</p>	<p>However, these highlights do not mention the NNSA’s plan to increase its pit production capacity. What’s more, although the NNSA would consolidate some activities under its preferred scenario, every site would remain open, and the DOE would build several major new facilities. These include the Uranium Processing Facility, the Chemical and Research Replacement, as well as an entirely new facility for producing non-nuclear components at the Kansas City plant—a proposal the draft EIS does not address.</p> <p>The Complex Transformation proposal also fails to consider the supercomputers at the nation’s weapons labs, Sandia’s Red Storm, Los Alamos’ Q, and Livermore’s BlueGene/L and ASC Purple have each vied for the title of fastest computer in the world. To achieve even higher speeds, Los Alamos is now working on Roadrunner, and Livermore on Sequoia. The nation has spent billions of dollars on these computers, yet the labs often seem to be competing with each other rather than trying to build the tools needed to sustain the U.S. nuclear weapons stockpile.</p> <p>The EIS also makes little mention of the new facilities that are finally coming online or approaching initial operating capability. The National Ignition Facility is scheduled to finish construction in the next year, while the Dual-Axis Radiographic Hydrodynamic Test Facility will soon achieve its intended, two-axis design capability. Both of these facilities have long-been described as critical to stockpile stewardship.</p>
<p>11C (cont)</p>	<p>The entire nuclear weapons complex needs a fundamental, bottom-up review. That review should take place <i>after</i> the next president completes a new Nuclear Posture Review, and Congress and the next administration make decisions about the future of the U.S. stockpile.</p> <p>At that point, the NNSA should conduct a clear-headed analysis of the facilities the nation needs to meet the goals of the new policies. The agency should use an approach similar to zero-based</p> <p>⁴² National Nuclear Security Agency, 2008, Complex Transformation. Online at http://nnsa.energy.gov/defense_programs/complex_transformation.htm</p>

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budgeting; rather than looking for areas where the complex can be trimmed, the NNSA should show that every program and expenditure helps meet the needs of the stockpile plan, regardless of how much the agency has spent on any given program in the past.

If the substantial scientific and technical resources currently present in the complex are not all needed under a new nuclear weapons policy, the United States should determine how best to utilize those resources for other important scientific missions.

Conclusion:

After the nation decides on a long-term nuclear weapons policy and the stockpile required to implement that policy, the NNSA should perform a comprehensive, bottom-up review of the nuclear weapons complex and maintain only those programs and facilities needed to support the future arsenal. The United States should then determine how best to utilize the substantial resources within the complex for other important scientific missions.

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7. Consolidating Weapons-Usable Fissile Materials

After pit production, perhaps the most significant element of the NNSA's plans is to decrease the number of sites that store or use weapons-usable fissile materials. In 2005, the Secretary of Energy's Advisory Board developed a plan to consolidate all nuclear materials and activities at one site, including production, dismantlement, stewardship, R&D, and storage of excess nuclear weapons and nuclear materials (see Box 1). The NNSA rejected this proposal, it said, because the costs of such consolidation were too high. It is also worth noting, however, that having facilities spread across many states helps generate support for the complex, as local jobs play a role in building congressional support.

Under its preferred alternative, the NNSA would reduce the number of facilities with weapons-usable materials from seven to five by 2012. By that date, it plans to remove all Category I/II special nuclear materials⁴⁵ from Livermore and Sandia. In fact, the agency announced on February 28, 2008, that it had already reached that goal for Sandia, seven months ahead of schedule. However, the draft EIS notes that some weapons-usable materials may return to Sandia for specific experiments, and small quantities of weapons-usable materials are likely to remain at these sites.

Consolidation is a priority for the NNSA regardless of the outcome of the Complex Transformation process, because the greater protection mandated by the DOE following the September 11 attacks has led to higher security costs. The DOE has raised the standard for protection that its facilities must meet twice since 9/11, and reports that its facilities have met the first standard but are still working to achieve the second.

⁴⁵ "Special nuclear materials" are fissile materials that can be used to make nuclear weapons, including plutonium and highly enriched uranium. Category I includes material in sufficient quantities to make at least one nuclear weapon, while Category II includes smaller amounts of the same material, or uranium that is not enriched enough to make nuclear weapons.

The NNSA's proposed efforts to consolidate highly enriched uranium and plutonium would move in the right direction, but they are relatively modest. Removing such materials from Sandia ahead of schedule is a significant achievement. The NNSA should also advance the timeline for removing special nuclear materials from Livermore.

Conclusion:

NNSA recognizes that consolidating weapons-usable fissile material reduces security costs, and reduces the danger of theft, accident, and radiological exposure. However, while its proposed plans are a step in the right direction, these efforts should be sped up and their scope expanded.

8. Visions for the Future

To make sound decisions about the future of its nuclear weapons complex, the United States must have a blueprint for the size and composition of its nuclear arsenal over the next several decades. This is particularly true of decisions on whether to build new facilities that could operate for the next half-century. However, no such blueprint for the arsenal exists, and until one does, the NNSA will be unable to produce an appropriate plan for the future of the complex. Thus it is premature for the agency to seek funding for several of the facilities it proposes.

The U.S. Government Accountability Office (GAO) offers similar guidance. The first step in the GAO recommendations for transforming the complex requires the Department of Defense to "establish clear, long-term requirements for the nuclear stockpile by determining the types and quantities of nuclear weapons needed to provide for our nation's nuclear deterrent."⁴⁴ The NNSA should develop options only after the U.S. military defines requirements.

That view is also shared by the House Energy and Water Appropriations Subcommittee, which has jurisdiction over nuclear weapons research, development, and production. In its report on the fiscal year 2008 Energy and Water Development Appropriations bill, the subcommittee maintained that it would not support any funding for Complex Transformation until the United States had (1) developed a nuclear weapons strategy for the future, (2) used this strategy to derive military requirements for the size and composition of the nuclear arsenal, and (3) used these requirements to define the current and future needs of the nuclear weapons complex.⁴⁵

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(cont)

⁴⁴ Abiose, Gene. 2006. "Testimony Before the Subcommittee on Energy and Water Development, Committee on Appropriations, House of Representatives: Nuclear Weapons: Views on Proposals to Transform the Nuclear Weapons Complex," GAO-06-606T, April 6.
⁴⁵ From the subcommittee's report: "The Committee believes it is premature to proceed with further development of the PRW or a significant nuclear complex modernization plan, until a three-part planning sequence is completed including: (1) a comprehensive nuclear defense strategy, based upon current and projected global threats; (2) clearly defined military requirements for the size and composition of the nuclear stockpile derived from the comprehensive nuclear defense strategy; and (3) alignment of these military requirements to the existing and estimated future needs and capabilities of NNSA's weapons complex. The Committee views completion of this three-part planning sequence as a necessary condition before considering additional funding for Complex 2030 and RRW activities." U.S. Congress. 2007. Report 110-185.

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(cont)
While the final omnibus fiscal year 2008 appropriations bill reversed some of the funding cuts made by the subcommittee, those principles have widespread congressional support.

In fact, Congress has taken a direct role in calling for a new nuclear weapons policy. The fiscal year 2008 Defense Authorization Act created a congressional Commission on the Strategic Posture of the United States. Recently appointed and chaired by former secretary of defense Bill Perry, the commission will conduct "a strategic threat assessment and a detailed review of nuclear weapons policy, strategy, and force structure" for the next administration.⁴⁶ The same bill requires that the next administration undertake its own Nuclear Posture Review, which should assess the "nuclear weapons complex that will be required for implementing the United States national and military strategy, including any plans to modernize or modify the complex."⁴⁷

Conclusion:

The United States needs a new nuclear policy and a plan for the nation's stockpile of nuclear weapons before it makes decisions on the future of the complex.

⁴⁶ U.S. Congress, 2007, National Defense Authorization Act for fiscal year 2008: Conference report to accompany H.R. 1585, Report 110-477, Section 1062.
⁴⁷ *Ibid.*, Section 1070.

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Appendix I

Preferred Alternative from Draft Complex Transformation Supplemental Programmatic Environmental Impact Statement (EIS)

Preferred Alternatives

CEQ regulations require an agency to identify its preferred alternative to meet its purpose and need, if one exists, in a Draft EIS (40 CFR 1502.14(e)). At this time, NNSA has identified the preferred alternatives as described below. This is based on the consideration of environmental impacts described in this Draft SPEIS, as well as consideration of other factors such as mission and infrastructure compatibility, economic analyses, safety, safeguards and security, and workforce training and retention.

Restructuring SNM Facilities Preferred Alternatives

Pursue Distributed Centers of Excellence as follows:

- Plutonium Manufacturing and R&D: Los Alamos (50/80 Alternative) would provide up to 80 pits per year enabled by construction and operation of the Chemistry and Metallurgy Research Replacement - Nuclear Facility (CMRR-NF). Other national security actinide needs and missions would be supported at TA-55 on a priority basis (e.g., emergency response, material disposition, nuclear energy).
- Uranium Manufacturing and R&D: 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 and consolidating HEU storage in that facility; and can proceed with the preliminary design of a UPF that could be located at any of the sites under consideration in this SPEIS.
- Assembly/Disassembly/High Explosives Production and Manufacturing: Pantex would remain the Assembly/Disassembly/High Explosives production and manufacturing center. Consolidate non-destructive surveillance operations at Pantex.
- Consolidation of Category III SNM: Phase-out Category I/II operations at LLNL Superblock by the end of 2012. Consolidate Category III SNM at Pantex within Zone 12, and close Zone 4.

Restructuring R&D and Testing Facilities Preferred Alternatives

HE R&D. Reduce footprint of NNSA weapons activity HE production and R&D; reduce number of firing sites as well. Use of energetic materials for environmental testing (e.g., acceleration or sled tracks, shock loading, or in explosive tubes) is not included in HE R&D.

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Consolidate weapons HE R&D and testing at the following locations by 2010.

- Pantex would remain the HE production (formulation, processing, and testing) and machining center. All HE production and machining to support nuclear explosive package (NEP) development is performed at Pantex. HE experiments up to 22 kg HE could remain at Pantex.
- NTS would remain the R&D testing center for large quantities of HE (greater than 10 kg);
- LLNL would be the HE R&D center for formulation, processing, and testing (less than 10 kg) HE at the High Explosives Applications Facility (HEAF);
- SNL/NM would remain the energetic devices R&D center (less than 1 kg of HE) at the existing Explosives Test Facility (ETF); and
- LANL would produce HE detonators and conduct contained HE R&D.

Maintain one open-burn/open detonation area at each site for safety and disposal purposes.

Tritium R&D. Consolidate Tritium R&D at SRS. SRS would remain the site for tritium supply management and provide R&D support to production operations and gas transfer system development. Neutron generator loading at SNL/NM and production of National Ignition Facility targets at LLNL, which involve small quantities of tritium, would continue and would not be included in this consolidation. Move bulk quantities of tritium from LANL to SRS by 2009. Remove tritium materials above the 30 gram level from the Weapons Engineering Tritium Facility (WETF) at LANL by 2012.

NNSA Flight Test Operations. Cease NNSA operation of TTR in approximately 2009 and conduct flight testing at a DoD facility. No Category I/II SNM will be used in future flight tests.

Hydrodynamic Testing. Cease open-air hydrotesting at LANL and LLNL in 2009, and conduct future open-air hydrotesting at NTS. Consolidate in-place LANL and LLNL hydrotesting facilities. Close CFF at LLNL in approximately 2015 which could enable transfer or closure of Site 300. As the LANL Dual Axis Radiographic Hydrodynamic Test (DARHT) facility approaches end of life in approximately 2025, plan for a next generation facility at the NTS.

Major Environmental Test Facilities. Consolidate major environmental testing at SNL/NM and conduct infrequent operations requiring Category I/II SNM in security campaign mode. Close LANL and LLNL major environmental testing facilities by 2010 (except those in LLNL Building 334). Move environmental testing of nuclear explosive packages currently performed in LLNL Building 334 to Pantex by 2012. As SNL/NM facilities used for infrequent Category I/II SNM testing (Annular Core Research Reactor and Aerial Cable Facility) reach the end of their life, NNSA would evaluate building replacement facilities at NTS.

National Nuclear Security Agency, 2008, DOE/EIS-0236-S4, January 11, p. 3-17, available at: <http://www.complexttransformationspeis.com/>

Comments of the

Western Shoshone National Council

On Review of

The National Nuclear Security Administration Department of Energy
Complex Transformation

Supplemental Programmatic Environmental Impact Statement

April 30, 2008

Western Shoshone National Council
Box 107
Las Vegas, NV 89119

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INTRODUCTION

These comments are provided by the Western Shoshone National Council (WSNC), government of Newe Sogobia¹, as a supplement to oral comments provided on March 6, 2008 in Las Vegas, Nevada. These comments review the Complex Transformation Supplemental Programmatic Environmental Impact Statement (CTSPEIS) and is to be included in the official record.

The approach used herein will provide a land ownership perspective of the WSNC challenging the ownership assumptions to both the Tonopah Test Range (TTR) and the Nevada Test Site (NTS) for use to conduct, subcritical testing, hydrodynamic testing, flight/delivery testing, ordnance disposal or plutonium pit assembly, disassemble and or abandonment of waste and contamination as contemplated in the CTSPEIS.

The US does not own the NTS lands or the TTR lands and is in willful trespass upon Newe Sogobia. This point has been made repeatedly to US representative at home and abroad and should be the subject of concern owing to the larger foreign policy interests of both the Western Shoshone Nation and the US. The Western Shoshone Nation cannot continue to bear the burden of US nuclear development and the abuse that results there from. Proceeding with a tribally appropriate cultural perspective that includes land ownership by the citizens of Newe Sogobia provides a clearer understanding of the high sense of responsibility for the land by Western Shoshone nationals and the responsibility of the WSNC to protect the property rights of it's citizens. By identifying the extant land rights of the Western Shoshone people a clearer understanding of risks to Native Americans can be assessed.

BACKGROUND

The WSNC is the government de jure exercising territorial sovereignty, full powers of self-government for the protection of the collective and individual rights and titles of Western Shoshone nationals. The government of Newe Sogobia has ruled in an unbroken line of succession from time immemorial. Continuity is the dominant concept of tribal property rights and other fundamental rights and liberties. The custom of Newe Sogobia derives its force and authority from the universal consent and immemorial practice of the people. The source of law is the inherent sovereign right of each tribal individual endowed by the Creator, then delegated to the Chief and Principle Men in council to exercise collectively on behalf of the people. There is no separation of religion from the government established by the Newe people.

For thousands of years, the Western Shoshone have been a land-centered people living a culture of land ownership. Land ownership rights and responsibilities have always been a stabilizing factor of community in sense of place, memories and of bonds uniting the Western Shoshone people to the soil. Land use over millennia provided social and economic benefit developing a culture of land ownership.

¹ Newe refers to the Western Shoshone people. Sogobia refers to the motherlands where the Newe exercise their customs and culture (ATTACHMENT I). Together they represent the embodiment of the people and land as a nation.

Newe Sogobia's entry and commitment to International Law began by laying down arms and guaranteeing "peace and friendship" in 1863 by peace treaty with the US. The firm configuration of the boundaries of Newe Sogobia are identified in Article V of the 1863 Treaty of Ruby Valley² and furnishes the WSNC with a formally recognized setting for the exercise of its power and at least relative recognition of the coexistence beyond these boundaries of the US exercising similar powers. Specific rights were granted to the US for rights-of-way and access for specific purposes. The US agreed to pay for the rights sought and damage done to the property interests disturbed in Article VII. WSNC exercise of sovereign authority in Newe Sogobia was acknowledged and guaranteed for the safety of foreign nationals under Article II. Newe Sogobia continues to uphold its obligations under International Law by restraining acts that violate the peace treaty with the US.

Since the signing of the treaty a long simmering warm dispute between the government of Newe Sogobia and the US has existed over competition for land. A subtle violence of economic interests and even well intentioned initiatives coming from the US undermine Western Shoshone tribal life-ways and self-government stability. Gradual encroachment and the application of federal land laws extrajudicially by the US condone racism rather than justice and marginalize Western Shoshone nationals. The US has abandoned what rights it sought through the peace treaty by not fulfilling payment obligations specified in Article VII of the 1863 peace treaty. |114.45 (cont.)

An effort by the US to end the dispute in 1946 resulted in the creation the Indian Claims Commission to identify tribal groups, determine lands "taken" and provide payment for lands "taken". In the Case of the Western Shoshone no "taking" had occurred. A report prepared by the WSNC in 2003 highlights the failure of the ICC to achieve its statutory mandate (ATTACHMENT II). The report finds that:

The 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.

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.

² 18 US Statute 689-693.

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Because the Indian Claims Commission no longer exists, the reporting requirement of the ICC Act will forever remain unfulfilled by the Indian Claims Commission.

Extant Western Shoshone property rights antedated and survive the US occupation and forced claim to Newe Sogobia following the legal tradition of continuity. For example, property rights are presumed to continue until there is something that takes them away. All rights and liberties are of that fundamental nature.

The NNSADOE has not addressed impacts to property interests of the Western Shoshone people in the CTSPEIS. There is no prohibition against considering potential impacts to Newe Sogobia, only lack of will on the part of the NNSADOE to consider the possibility of extant property ownership rights of the Western Shoshone people and the social, economic and political impact in the loss of those rights to Newe tribal society.

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(cont)

SPECIFIC CONCERNS

Additional potential adverse impacts and concerns of the WSNC not addressed from a culturally appropriate tribal perspective in the CTSPEIS include:

1. Violation of Western Shoshone territorial sovereignty from trespass by the US in development of NTS for nuclear testing, hydrodynamic testing, high-explosive testing, flight testing and other major environmental testing;
2. Violation of Western Shoshone territorial sovereignty and peace treaty through trespass by the USNNSADOE and the US Air Force at the NTS and TTR;
3. Disruption of foreign relations between Newe Sogobia results when peace treaty is violated by US;
4. Violation of the WSNC Nuclear Free Zone Resolution 01-WSNC-95;
5. Failure to identify hazardous waste and toxic contamination or appropriate remediation approaches acceptable to Newe Sogobia;
6. Environmental racism results by the effort of the US to bring commercial nuclear reactor waste to Newe Sogobia, targeting the Western Shoshone people's land;
7. Impact of diminished capacity in self-government results from the deployment of limited human and technical resources from normal day-to-day affairs to unfunded monitoring and response to NNSADOE CTSPEIS activity;
8. Cumulative impacts result from additional burdens created when Western Shoshone land use is further reduced, plant resources are diminished, non-Native American presence increases and additional Western Shoshone cultural resources are disturbed or removed;
9. Ethnic identity of the Western Shoshone people in land is diminished;
10. Additional impact results when culturally appropriate mitigation is not taken or positive benefit not made to Western Shoshone victims to offset adverse impacts;
11. Adverse psychological impacts related to stigma or "special effects" in fallout accidents Newe nationals live in a heightened state of anxiety from fear of nuclear hazard;
12. Awareness to nuclear testing causes psychological fear by Newe people of nuclear war similar to deterrence effect;
13. Cumulative psychological impacts from venting, resuspension of radiation, individual psychological fear and anxiety that combine in tribal community to become greater than they were individually – synergistic effects;

1114J8
(cont)

214M17

314I7

4I2C3

514I8

614H

7I2O.0

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14. Racially disproportionate burden of risk – no positive benefit for tribal community and all the risk;
15. Cumulative and synergistic adverse impact on Native American health and tribal environment;
16. Failure to conduct tribal and ecological health risk assessment, short and long term monitoring;
17. Impacts to lands held in trust for the tribe that may be damaged radiation dispersal;
18. Impacts to land outside the reservation boundaries arising from a congressionally ratified treaty may be damaged by testing at NTS;
19. Impact to extant cultural relationship to land outside of the reservation boundaries that may be removed from use and access by NNSADOE occupancy;
20. Impacts to tribal fiscal balances from the need to review and respond to NNSADOE documents without additional funding;
21. Impacts to sustainable tribal economic development may result from stigma related impacts;
22. Impacts to quality of life factors that make the community vulnerable to accidents;
23. Impacts to services such as law enforcement from the lack of training or emergency preparedness;
24. Impacts to self-governance and tribal administration of the tribe from failure of institutional capacity to deal with accident or disaster related demands;
25. Impacts to the government-to-government relationship between the tribe and the federal government being further strained over conflict in ownership of the NTS and TTR;
26. Impacts to lands held in trust for tribe that may be damaged or made uninhabitable by groundwater contamination;
27. Impacts to access of land outside of reservation boundaries which are secured to under the 1863 Treaty of Ruby Valley that may be damaged or otherwise removed from use of tribal members by radioactive contamination;
28. Impacts to tribal fiscal balances by the need to respond to DOE documents, reports and NEPA review participation without additional funding support;
29. Impacts to water resources from potential radioactive releases;
30. Impacts to potentially returning tribal members from fears of nuclear weapons fallout;
31. Impacts to sustainable tribal economic development, future economic development opportunities, reservation expansion contemplated by Article VII of the Treaty of Ruby Valley, grazing rights from accidental radioactive release;
32. Damage to resources used by tribal members such as wood, grasses, piñon nuts, plant for food and medicinal uses by radiation exposure;
33. Damage to the health of tribal members from possible exposure to radiation through exposure pathways unique to tribal lifestyle from an accidental or planned venting or other release of radiation or toxic materials;
34. Damage to grazing range utilized by the tribe's cattle operation resulting in damage to the ranching economy of the tribe as contemplated in Article VI of the Treaty of Ruby Valley;
35. Impacts to self-governance from migration of population away from potential radioactive release resulting in lower population base to justify required services;
36. Impact related to stigma of off-reservation population unwilling to relocate to tribal lands;
37. Involuntary tribal community risk from radiological accident;
38. Stigma affecting community confidence in environment resulting in migration out of community;

1114J8
(cont)

814H1

914K3

1014A3

4I2C3
(cont)

7I2O.0
(cont)

1114N10

12I2C4

1314F4

1414E15

4I2C3
(cont)

1414E15 (c)

7I2O (cont)

1014A3
(cont)

1514A5

1614K21

1014A3
(cont)

7I2O (c)

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7I2O.0
(cont.)

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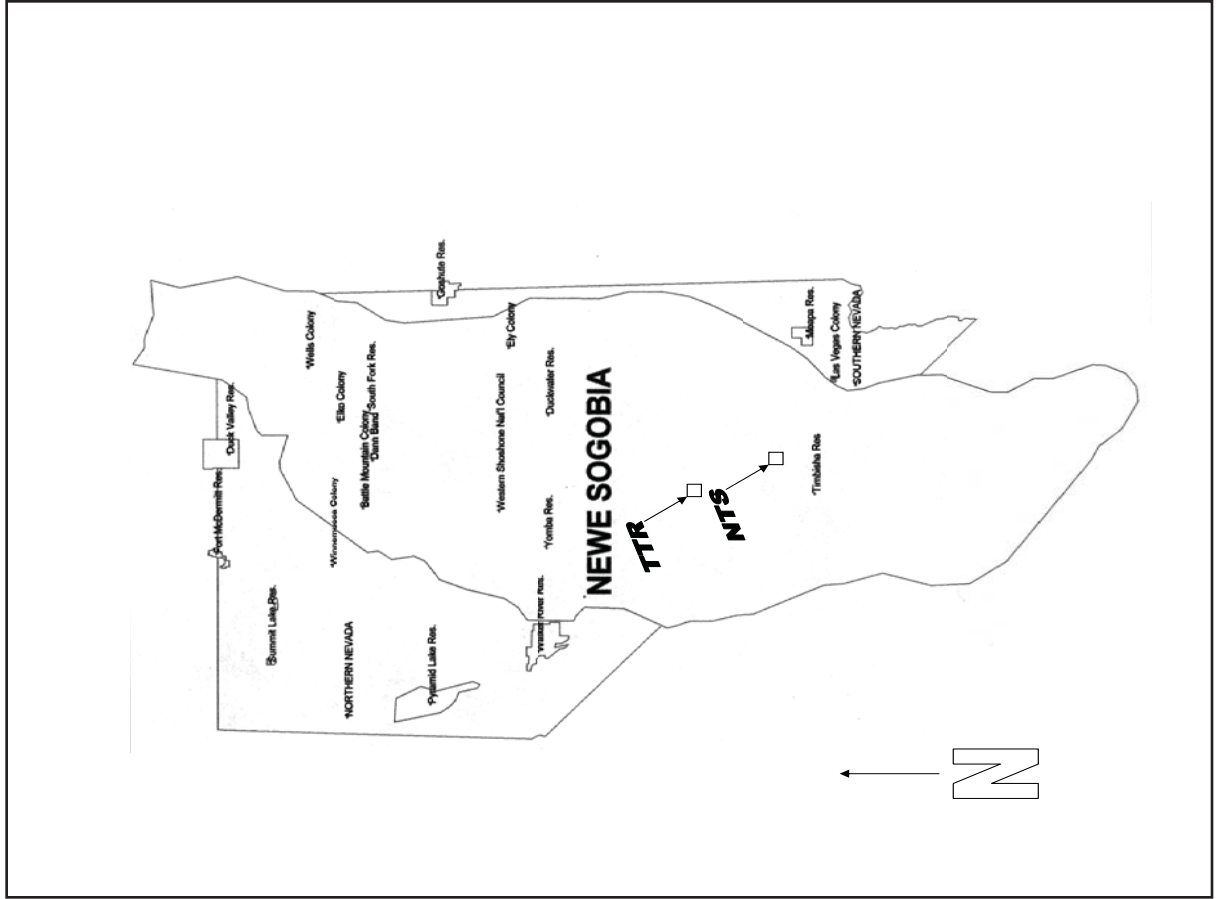
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- 39. Loss in confidence by community members in the environment's ability to sustain the needs of the people; 7/20.0 (c)
- 40. Adverse health effects from exposure to radiation through exposure pathways unique to Native Americans lifestyle; 16/K21

ATTACHMENT I

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Failure of the United States Indian Claims Commission
to File a Report with Congress
in the Western Shoshone Case (Docket 326-K),
Pursuant to Sections 21 and 22(a) of the Indian Claims Commission Act

A Report

Prepared on Behalf of the Western Shoshone National Council

by

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January 2003

7/20.0
(cont)

Summary

Information has recently come to light that raises a fundamental question with regard to the Indian Claims Commission Western Shoshone Docket 326-K.

Section 21 of the Indian Claims Commission Act (ICCA) required the Indian Claims Commission to promptly file a report with Congress when it completed a given case. However, the Commission never carried out this legislative requirement in the Western Shoshone case.

Thus, the statutory basis for a Western Shoshone monetary distribution of Docket 326-K now stands challenged by the failure of the Indian Claims Commission to fulfill its obligations in the Western Shoshone case, as required by the very statute that brought the Commission into existence.

This new finding calls into question the basis of Senate bill 958 (sponsored by Senators Reid and Ensign), and H.R. 2851 (sponsored by Congressman Gibbons) that would distribute nearly \$140 million to the Western Shoshone Indians, as compensation for Western Shoshone lands supposedly taken by the United States without the consent of the Western Shoshone people.

Background

On August 13, 1946, President Truman signed into law the United States Indian Claims Commission Act. The stated purpose of the legislation was to provide American Indians with an opportunity to sue the federal government of the United States for monetary compensation for Indian lands wrongfully taken by the United States at some time in the past. At the time, the U.S. government estimated that there were some \$3 billion dollars in potential Indian claims against the United States. (Officials in the Justice Department bragged that they had been able to throw out some 98% of the claims brought by Indians against the United States).

Because American Indians were not citizens of the United States prior to the Indian Citizenship Act of 1924, Indians were not allowed to sue the U.S. government in the U.S. Court of Claims. Before the Indian Claims Commission Act was signed into law in 1946, any Indian people that wanted to sue the United States had to go to Congress and petition for passage of a special jurisdictional act that would give them permission to sue the United States on a one time limited basis. This process was a problem for Indians as well as for the United States government.

Eventually, officials in the United States government (members of the House and Senate of the Congress, and officials of the Department of the Interior and the Department of Justice) agreed that a more systematic approach would be needed in order to put an end to Indian claims against the United States. It was decided that a Commission was needed that would take the burden off Congress by sifting through and investigating any Indian claims against the U.S., and deciding which claims had merit and which did not. It was decided that a specific deadline would be set up, and Indians would have to come forward and make a claim against the United States government by that deadline.

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The Traditional Western Shoshone

On October 1, 1863, U.S. treaty commissioners signed a treaty of peace and friendship with eleven "Chiefs, Principal Men, and Warriors of the Western Bands of the Shoshone Nation." The Treaty of Ruby Valley was later ratified by the Senate of the United States in 1869, thereby making it "the supreme Law of the land," pursuant to Article VI of the U.S. Constitution.

The Ruby Valley treaty specified that whites could cross through Western Shoshone territory, build railroads, establish telegraph lines, set up ranches, and form mines within the Western Shoshone country.

The Treaty of Ruby Valley, however, was not a treaty of cession. That is, the Western Shoshone did not cede their lands to the United States by the terms of the Ruby Valley Treaty.

As the generations passed, the Western Shoshone elders continued to invoke the Ruby Valley Treaty's recognition of the boundaries of their ancestral lands. These traditional elders, particularly Muchach Temoak—the grandson of treaty signer, Chief Temoak—were willing to acknowledge that the Western Shoshone had conceded certain rights-of-way and easements to the United States and to white settlers. But these same traditional Western Shoshone leaders were also protective of Western Shoshone land rights and their traditional way of life. As authors Lieder and Page state in the book *Wild Justice: The People of Geronimo vs. the United States* (1997), "Few tribes in the continental United States have been as little disrupted by Anglo-Americans as the Western Shoshones" (p. 189).

In 1934, the United States established the Indian Reorganization Act (IRA), which allowed Indian communities to establish a corporate style tribal council government. A relatively small group of Western Shoshone people decided to establish an IRA-style government system known as the Te-Moak Bands Tribe. The Indian Claims Commission notified the Western Shoshone IRA system of the opportunity to file a claim against the United States. The traditional Western Shoshone, however, were never formally notified of the Indian Claims Commission process.

Wilkinson, Cragun, and Barker

After the Indian Claims Commission Act was passed, the law firm Wilkinson, Cragun, and Barker approached the IRA Western Shoshone Temoak Bands Tribe and encouraged the Tribe to file a claim with the ICC as "the Western Shoshone identifiable group." In 1951 Wilkinson, Cragun, and Barker filed a claim on behalf of the Western Shoshone identifiable group, and the process began.

On October 16, 1962, the Indian Claims Commission issued a 30 page "Findings of Fact" having to do with Shoshone Indians generally. Only some 36 sentences of this "Findings" document had to do specifically with the Western Shoshone Indians.

Section 26 of this report reads:

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The Commission further finds that the Goshute Tribe and the Western Shoshone identifiable group exclusively used and occupied their respective territories as described in Findings 22 and 23 (except the Western Shoshone lands in the present State of California) until by gradual encroachment by whites, settlers and others, and the acquisition, disposition, or taking of their lands by the United States for its own use and benefit, or the use and benefit of its citizens, the way of life of these Indians was disrupted and they were deprived of their lands. For these reasons the Commission may not now definitely set the date of acquisition of these lands by the United States. The Commission, however, finds that the United States, without payment of compensation, acquired, controlled, or treated these lands of the Goshute Tribe and the Western Shoshone group as public lands from date or dates long ago prior to this action to be hereinafter determined upon further proof unless the parties may agree upon a date. (11 Ind. Cl. Comm. 416)

Importantly, in the 30 pages of the ICC's "Findings of Fact" that served as the basis of the above statement, there is not one piece of historical information to support the Commission's claim of the "acquisition, disposition, or taking" of Western Shoshone lands by the United States. This is why the Commission also said: "For these reasons the Commission may not now definitely set the date of acquisition of these lands by the United States."

As Lieder and Page explain:

...Robert Barker, the attorney at Wilkinson, Cragun, and Barker in charge of the case, argued that all the Western Shoshones' lands had been taken. He didn't attempt to identify the dates of taking, an issue that, he believed, should be reserved for future proceedings. The government contented itself with arguing that the Shoshones had not met the requirements for proving aboriginal ownership and 'the United States could not take from them [the Western Shoshone] what they did not have.' Neither party introduced any evidence on the taking issue or analyzed the possibility that much of the land had never been taken. Apparently, Associate Commissioner Holt, who in 1962 delivered the Commission's opinion in the liability stage of the case, did not consider that possibility either. Rather, the Commission determined the extent of the Western Shoshones' aboriginal territory and concluded they were deprived of that land by the gradual encroachment of non-Indians and the gradual disposition of the land by the [federal] government. Identifying the crucial date when all these lands were magically transformed into a taking was left for future proceedings, which proved unnecessary. (*Wild Justice: The People of Geronimo vs. the United States*, p. 191)

The ICC was unable to "set the date of acquisition" because the Commissioners were going on the basis of their own personal conjecture and their historically unfounded assumption that the Western Shoshone lands had been taken from the Western Shoshone Indians.

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It was as if the Commission were saying in its "Findings of Fact," "We know that the Western Shoshone lands were acquired, disposed of, or taken by the United States, we just don't know precisely when this occurred." Thus, the ICC "Findings" document said that "further proof" would be necessary "unless the parties" (the U.S. attorneys and the attorneys for the Indians) "may agree upon a date" when the alleged taking occurred. In other words, the Commission would need no historical documentation to support its "Findings" if the attorneys could come up with a gentleman's agreement or stipulation as to a date of "taking."

Had the Commissioners used historical documentation to come up with their "Findings" regarding the supposed taking of Western Shoshone lands by the United States, they would have made that historical documentation part of the record. They did not do so.

Indeed, in *Temoak Band of Western Shoshone Indians, Nevada v. U.S.* (593 F.2d 994 (1979)), the Court of Claims admitted that the Western Shoshone case

is one of many where the Commission was unable to discover any formal extinguishment of Indians' legal title, only gradual encroachment by settlers and others, and takings, the exact date of which could not be definitely set. (p. 996)

In an "Interlocutory Order" dated October 16, 1962, the Indian Claims Commission stated in part:

That the Western Shoshone identifiable group exclusively used and occupied the lands described in Finding of Fact 23; that the Indian title to such of the lands of the Western Shoshone group as are located in the present State of California was extinguished on March 3, 1853; and that as to the remainder of the lands of the Western Shoshone, Indian title was extinguished by the gradual encroachment by whites, settlers and others, and the acquisition, disposition or taking of said lands by the United States for its own use and benefit, or the use and benefit of its citizens.

The "Interlocutory Order" concluded:

IT IS THEREFORE ORDERED that the case proceed for the purpose of determining the acreage in each of the four areas involved; the consideration paid, if any; the dates of acquisition where necessary; and the market values thereof on the dates of acquisition.

Thus, instead of looking at the historical record and pinpointing specific actions on the part of the United States (or, say, white settlers) when the Western Shoshone lands were purportedly acquired, disposed of, or taken, the ICC decided to allow the attorneys of record to agree by stipulation upon a date acceptable to both parties. However, it is always important to keep in mind that the non-Indian attorneys of the firm Wilkinson, Cragun, and Barker, were the one's

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who made this stipulation with the U.S. attorneys. The Western Shoshone Indians themselves were not directly involved in the process leading up to the stipulation.

In an ICC document "Opinion of the Commission, dated October 11, 1972, the Commission described the stipulation as follows:

By order of February 11, 1966, the Commission approved a joint stipulation of the plaintiffs and the defendant (U.S.) in Docket Nos. 326 and 367 as to the date of valuation of Western Shoshone lands. The stipulation provides:

Counsel for both parties, having reviewed pertinent information relating to the time as of which the Western Shoshone lands in Nevada (Indian Claims Commission Finding No. 23) should be valued, hereby stipulate that the Nevada portion of the Western Shoshone lands in dockets 326 and 367 shall be valued as of July 1, 1872. (29 Ind. Cl. Comm. 7)

The abovementioned "order" of the Commission approving a joint stipulation is not available in the microfiche records of the Indian Claims Commission proceedings. Additionally, there is nothing in the record that indicates any specific "pertinent information" that had been reviewed by the non-Indian attorneys who came up with the stipulation.

Attempted Western Shoshone Intervention to Stop the Proceedings

In the 1960's, a group of traditional Western Shoshone formed the Western Shoshone Legal Defense and Education Association. In 1974, this organization attempted to intervene in the Indian Claims Commission proceedings pertaining to the Western Shoshone. The Western Shoshone interveners appealed to the ICC to exclude any unsettled Western Shoshone lands from the claim filed by Wilkinson, Cragun, and Barker in 1951. The Western Shoshone Legal Defense and Educational Association argued that all such unsettled Western Shoshone lands had never been taken by the United States, and, therefore, still rightfully belonged to the Western Shoshone.

For its part, the IRA Te-Moak Bands Tribe—led by attorney Robert Barker—opposed the legal action by the Western Shoshone Legal Defense and Education Association.

In 1975, the Indian Claims Commission ruled that the Western Shoshone opponents of the ICC proceedings had waited too long to file their petition. The ICC said that the Western Shoshone opponents could not stop or change the course of the proceedings unless they could prove that the process had been tainted by fraud, collusion, or laches. The Commission said that it found no such evidence and denied the Western Shoshone intervention.

Soon after the ICC's ruling against them, the Western Shoshone opponents of the ICC proceedings won political control of the Te-Moak Bands Tribe through a new election. In November 1976, the new leadership of the Te-Moak Bands Tribe fired Robert Barker as the

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attorney of record in the ICC proceedings. (Notably, the Bureau of Indian Affairs ruled that the Te-Moak Bands Tribe was not permitted to fire Barker).

With new legal representation, the Te-Moak Bands Tribal Council asked the Indian Claims Commission to suspend further proceedings in the case until the traditional Western Shoshone could attempt to enter negotiations with the United States government. The Commission refused to temporarily suspend its proceedings in the Western Shoshone case.

On August 15, 1977, the ICC handed down its “Opinion of the Commission” and “Final Award” in the Western Shoshone case. (40 Ind. Cl. Comm. 318, 453.) And in December 1979, the Court of Claims reported the final award of \$26 million for the “taking” of Western Shoshone lands.

On July 26, 1980, the Bureau of Indian Affairs, as part of its effort to develop a monetary distribution plan, held a hearing of record in Western Shoshone country. Over 80% of the Western Shoshones who testified (many of whom spoke in Shoshone) opposed the monetary distribution, denounced the Indian Claims Commission claim, and called for the Western Shoshone Nation to refuse the monetary award.

During this hearing of record, a Western Shoshone elder asked the specific question of the federal hearing officer, “By what law did the United States acquire Western Shoshone territory?” The hearing officer, Interior Solicitor Bruce McConkie, had no answer to this question, and remained mute. The elder then said, “Keep your money until you can answer the question of how the U.S. acquired Western Shoshone territory. I reject the award.” Thereafter each Western Shoshone person who testified asked the same question of the hearing officer, and when he couldn’t answer the question, also rejected the claim.

Because of such massive Western Shoshone opposition to the monetary award (also based in large part on the argument that “Mother Earth is not for sale”), it became readily apparent to the BIA that it would not be able to complete a distribution plan within the six months required by the Indian Tribal Judgment Funds Use or Distribution Act (Pub.L. 93-134, section 1, October 19, 1973). The BIA asked the Senate Select Committee on Indian Affairs for an extension, but the Committee turned down the request.

Failure of the Indian Claims Commission to File a Report with Congress

On September 30, 1978, Congress dissolved the Indian Claims Commission. In 1979 the ICC’s “Final Report” to Congress was published. This report includes a chart on page 125: “Fiscal Year Totals of Dockets Completed and Awards.” In a footnote that accompanies the chart, we find the Commission’s acknowledgment that out of the 324 dockets shown as completed by awards, 20 of these dockets were “not reported to Congress as completed.” (emphasis added). This same information is also found H.D. Rosenthal’s *Their Day in Court: A History of The Indian Claims Commission* (1990), on pages 266-67).

Western Shoshone docket 326-K is listed in the ICC’s “Final Report” as one of the dockets “not reported to Congress” because the case was still on appeals (by both the U.S. government and the

Zabarte, Ian Page 17 of 21

traditional Western Shoshone) before the Court of Claims when the Indian Claims Commission went out of existence.

Although the ICC issued a Final Award judgment in the Western Shoshone case, this did not end its statutory responsibility in the case. The Commission was still required to file its report with Congress. This requirement is spelled out in Section 21 of the Indian Claims Commission Act, “Report of Commission to Congress,” which reads as follows:

Sec. 21. In each claim, after the proceedings have been finally concluded, the Commission shall promptly submit its report to Congress. The report to Congress shall contain 1) the final determination of the Commission; 2) a transcript of the proceedings or judgment Upon review, if any, with the instructions of the Court of Claims; and 3) a statement of how each Commissioner voted upon the final determination of the claim.

Based on Section 21 of the ICC Act, the Indian Claims Commission had a clear and explicit statutory obligation to file a final report with Congress in the Western Shoshone case. Because the Commission failed to do so, finality was never achieved in the Western Shoshone case pursuant to the terms of the ICC Act.

Section 22 of the ICC Act explains the “Effect of Final Determination of Commission.”

Sec. 22. (a) *When the report of the Commission determining any Claimant to be entitled to recover has been filed with Congress, such report shall have the effect of a final judgment of the Court of Claims, and there is hereby authorized to be appropriated such sums as are necessary to pay the final determination of the Commission.* (emphasis added).

Section 21 is wrapped up inside Section 22(a) of the Indian Claims Commission Act. In other words, Section 22(a) rests on the statutory requirement that the Commission file its report with Congress when it completed any given case.

This point was noted by the Court of Claims in a 1979 decision (Temoak Band of Western Shoshone Indians, 219 Ct. Cl. 346). The Court of Claims said quite clearly:

[in a previous ruling] we pointed out that by Section 22 of Act, 25 U.S.C. Section 70u, *the United States would not be discharged of any claim, including one that the Western Shoshones owned the land, until the judgment was reported to Congress, money to pay it appropriated, and payment made.* (352) (emphasis added).

Thus, according to the Court of Claims, the report of the Commission’s judgment to Congress was an essential requirement, based on the ICC Act, for the United States to be “discharged of any claim” including the claim that the Western Shoshones still own the unsettled land within the boundaries described in the 1865 Treaty of Ruby Valley. However, the Court of Claims did not

Zabarte, Ian

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address, as a factual matter, whether the Indian Claims Commission had filed, as required by statute, its report with Congress in the Western Shoshone case.

In *U.S. v. Dann* (572 F.2d 222 (1978)), the Ninth Circuit Court of Appeals pointed out that, "Claims before the ICC proceeded in three steps: decision whether the claimant Indians had ever had title to the land for which they are seeking compensation; establishment of the value of the lands claimed to have been taken as of the time of taking; and a determination of any offsets against the Indians by the Government."

The Ninth Circuit Court of Appeals further said that the 1962 order of the ICC in the Western Shoshone case "is not deemed a final judgment within the meaning of the ICC Act. '*Finality*' for this purpose does not attach until the Commission has filed its report with Congress and the Indians have actually been paid the compensation owed them;" (p. 226) (emphasis added). Importantly, the Ninth Circuit did not address, as a factual matter, whether the Indian Claims Commission had ever filed "its report with Congress" in the Western Shoshone case.

The U.S. government's brief, filed with the Supreme Court in *U.S. v. Dann* (470 U.S., 1984), reads in part as follows:

"STATUTE INVOLVED

Section 22 of the Indian Claims Commission Act, ch. 959, 60 Stat. 1055, 25 U.S.C. (1976 ed.) 70a n1 provides:

(a) When the report of the commission determining any claimant to be entitled to recover has been filed with Congress, such report shall have the effect of a final judgment of the Court of Claims, and there is authorized to be appropriated such sums as are necessary to pay the final determination of the Commission."

The above reference to "final determination" in the U.S. government's brief is defined in Section 19 of the ICC Act, which reads as follows:

The final determination of the Commission shall be in writing, shall be filed with its clerk, and shall include 1) its findings of the facts upon which its conclusions are based; 2) a statement (a) whether there are any just grounds for relief of the claimant and, if so, the amount thereof; b) whether there are any allowable offsets, counterclaims, or other deductions, and, if so, the amount thereof; and (3) a statement for its reasons for its findings and conclusions.

And, as noted above, the Commission's final determination was to be included in its report to Congress.

In the 1985 the Supreme Court noted in *U.S. v. Dann*:

The Indian Claims Commission Act had two purposes. The "chief purpose

Zabarte, Ian

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of the [Act was] to dispose of the Indian claims problem with finality." H.R. Rep. No. 1466, 79th Cong., 1st Sess., 10 (1945). This purpose [of finality] was effected the language of Section 22(a): "*When the report of the Commission determining any claimant to be entitled to recover has been filed with Congress, such report shall have the effect of a final judgment of the Court of Claims....*" Section 22(a) also states that the "payment of any claim...shall be a full discharge of the United States of all claims and demands touching any of the matters involved in the controversy;" (p. 45) (emphasis added).

According to the Supreme Court's reading of Section 22(a), the Commission's filing of a report with Congress is one of two ingredients necessary to "effect" [achieve or accomplish] finality in a given Indian Claims Commission case, payment being the second ingredient.

Notably, although it mentioned the reporting requirement of the ICC Act, the Court never did address, as a factual matter, the specific question of whether the Commission had actually filed its report with Congress in the Western Shoshone case.

Instead, the Court limited itself in *U.S. v. Dann* to only the second ingredient of "finality" in an Indian Claims Commission case, namely, the legal issue of whether payment had been made to the Western Shoshone Indians pursuant to Section 22(a) of the ICC Act.

The Court was clearly aware that the Commission's report with Congress was an essential and statutorily required aspect of "finality" in any given Indian Claims Commission case. Thus, the Court's failure to address, as a factual matter, the question of whether the Commission had indeed filed such a report with Congress in the Western Shoshone case, is presumptive that the Court had not discovered at the time of its ruling in *U.S. v. Dann* that the Commission never filed its report with Congress.

Conclusion

The 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. As already mentioned above, 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.

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

Zabarte, Ian

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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.

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.

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

Zabarte, Ian

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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.

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.

Zahner, Jill

Page 1 of 1

Buenafior, Justin

From: jill.zahner@dnax.org
Sent: Wednesday, March 19, 2008 4:11 PM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

PC_533

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

Dear Mr. Wyka,

Frankly, I'm appalled we still have a nuclear weapons program, given that we've sadly appointed ourselves the gestapo of other countries' programs. I.e. North Korea, Iraq, Iran. What can this Administration possibly be thinking that we should restore ANY portion of our program? I'm at a loss to understand how our current Administration can justify any kind of nuclear weapons program without being hypocritical. We lose our credibility as a global partner in a sustainable and equitable future on this globe.

It is obvious that the 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. As a matter of pointed fact, nuclear weapons are a Jurassic form of diplomatic strategy. Nuclear weapons should be OFF THE TABLE of any country, and let me just say that the United States of America has no business employing pre-emptive aggression to ensure that other countries abide. All of humankind's history proves that war and weapons do NOT solve the problem, for here we are, after Hitler, Mussolini, Pol Pot, bin Laden, obviously dealing with the heads of the hydra, that keep growing back, to prove that such tactics do not work in the long run. In the words of Albert Einstein, "Violence sometimes may have cleared away obstructions quickly, but it never has proved itself creative." This business of nuclear armament cannot be surmounted by the United States of America adjusting or augmenting its own nuclear program. We must shut it down, if we are ever to hope for respect from other nations. It is up to us to show the way by demonstration, not by oppression and aggressive action against other countries who have nuclear programs.

The 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.

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,
Jill A. Zahner
1252 Ridgeley Drive
Campbell, CA 95008

Zamora, Gloria

Page 1 of 1

Levens, Matthew

From: Zamora, Gloria (Bingaman) [Gloria_Zamora@bingaman.senate.gov]
Sent: Friday, February 22, 2008 12:13PM
To: Complex2030
Cc: Epstein, Jonathan <Alert>; sent@cybermesa.com
Subject: Request for Espanola hearing

PC_798

Dear Mr. Wyka,

Senator Bingaman's office has been contacted by several constituents regarding the public hearings on the Draft Complex Transformation Supplemental Programmatic Environmental Impact Statement currently scheduled for March 12, 2008 in Los Alamos. The concern has been expressed that there is a need for one of these two hearings to be scheduled in Espanola, New Mexico rather than both being held in Los Alamos. Many of our constituents that have concerns with the complex transformation plan live in the Espanola area so for the sake of broader participation we agree that a meeting in Espanola would make it much easier for these citizens to be heard.

I appreciate the fact that there are other opportunities to provide comments, including written comments via mail or e-mail. If you are concerned with having a fair process that is inclusive and actively seeks comment a scheduled hearing in Espanola is one way to accomplish that goal. It appears to be a reasonable request to re-locate one of the Los Alamos meetings to accommodate the Espanola residents.

If you are unable to change this venue would you please provide me with the reason for the inability to change the location?

Thank you for your attention to this request.

Gloria J. Zamora
Fellow and Field Representative
Office of Senator Jeff Bingaman
119 E. Marcy St
Suite, 101
Santa Fe, NM 87501
505 988-6647
gloria_zamora@bingaman.senate.gov

Zappone, Mark

Page 1 of 1

Zeiger, John

Page 1 of 1

Levens, Matthew

From: mark.zappone [mailto:markzappone@hotmail.com]
Sent: Wednesday, April 02, 2008 2:12 PM
To: Complex2030

PC_1806

Mr. Wyka,

Please, the Complex Transformation not only violates the Non-Proliferation Treaty, but it also sends the wrong message to the world. At a time when international sentiment towards America is at an all-time low, largely because many people across the globe view America as putting themselves above international law, this simply is a very bad endeavor. In addition, there are serious environmental concerns with producing further plutonium pits-- also not so good timing with the current state of the environment. Lastly, violence just begets more violence, and if we are gearing up for such things, well, it very possibly could lead to the annihilation of mankind. Moreover, how can we legitimately ask other countries (like Iran) to not produce further nukes, when we ourselves are doing just that. It is truly hypocrisy at its finest.

Thank you for your time,

Mark A. Zappone
306 Jefferson Avenue
Linwood, NJ 08221
USA Citizen

Get in touch in an instant. Get Windows Live Messenger now.
http://www.windowslive.com/messenger/overview.html?ocid=TXT_TAGLML_Refresh_getintouch_042008

PC_332

3/20/08

WHD

John Zeiger
63 Beacon Hill Rd,
Ardsley, NY 10502

Administrator Thomas P. D'Agostino
National Nuclear Security Administration
Dept. of Energy
Washington, DC 20585

Dear Administrator D'Agostino,

I am appressed to the current draft Complex Transformation Supplemental Programmatic Environmental Impact Statement. I believe that the US should reduce or eliminate altogether through international treaties, our nuclear weapons. There is no reason why we should ~~the~~ consolidate our nukes for the Cold War has been over for 20 years.

The current draft plan excludes review of consolidation options that would eliminate unnecessary missile sights, besides saving billions of dollars. This would prevent the chance of devastating accidents/ explosions.

I think that nuclear weapons are currently the second worst threat to society today after global warming. Instead of developing even more devastating nuclear weapons the US should take the lead, by reducing our stockpiles to make the world a safer place for every one,

Sincerely,

John Zeiger

13A:

21F

39H:

414N

51J

Zeller, Laura

Page 1 of 1

Levens, Matthew

From: Laura Zeller [ocnebtra@aol.com]
Sent: Friday, February 22, 2008 11:37 AM
To: Complex2030
Subject: nuclear weapons

Laura Zeller
415 Westside Blvd.
Catonsville, MD 21228-4062

February 22, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

11J I can't believe that in this day and age anyone would even consider the idea of creating any more nuclear weapons. After living through the fifties and sixties as a young person when we were all convinced that a nuclear holocaust was imminent. We made it through those times of the cold war. so now we need to focus on non-proliferation for the entire world so we have a habitable world to live in for our grandchildren.

23A I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons.

316A

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.

410B 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.

11J 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.

58A 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,

Laura Zeller

PC_583

Zengel, Elizabeth

Page 1 of 1

Buenaflor, Justin

From: Elizabeth Zengel [bzengel@ohsted.org]
Sent: Wednesday, March 19, 2008 11:53 AM
To: Complex2030
Subject: Oppose New Nuclear Weapons

Elizabeth Zengel
701 E. Columbia Ave
Cincinnati, OH 45215-3947

March 19, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

116A 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.

2140 We are creating more dangerous environments than adding to the protection of our citizens.

31J We ask other countries to dismantle their nuclear arsenals and yet choose to add more to our country. What kind of message is that giving to other countries?

Can they trust our words, if our example shows otherwise?

As a constituent of Ohio, I appreciate all your efforts in following through on these important issues.

Sincerely,

Elizabeth A Zengel

PC_458

Zimmermann, Adele

Page 1 of 1

Levens, Matthew

From: ADELE E. ZIMMERMANN [loccadele@cybermesa.com]
Sent: Sunday, March 30, 2008 11:17 AM
To: Complex2030
Subject: Draft Complex Transformation SPEIS Comments

PC_1636

116A I am opposed to the National Security Administration's proposed Complex Transformation of our nuclear program. We seem to be mired in cold-war thinking about our arsenal. Using nuclear weapons against small, widely dispersed bands of terrorists is definitely overkill. The political fallout from such acts could tip the teetering balance of world opinion firmly against our country. The physical fallout could threaten the survival of our species.

3140 I am particularly against the plans for my state. Under the Complex Transformation, three new or expanded operations are proposed for New Mexico: pit production increased at Los Alamos National Laboratory; performance testing of nuclear weapons consolidated at Sandia National Laboratories; flight-testing of nuclear gravity bombs moved from Nevada to White Sands. There has been no effort to evaluate the cumulative impact on the people and environment of New Mexico of these activities in such close proximity to large population centers and to each other. It appears that New Mexico is being asked to bear an inordinate share of the risk involved, possibly because we rank 36th in population among the states.

43A The military-industrial cabal would have us believe we must increase our supply of nuclear weapons, in violation of yet another international treaty. This must be done to protect us from provincial fanatics whose chief capabilities are ranting dogma and the manufacture of crude localized explosives, and from rogue nations that have no capability of delivering their rudimentary atoms to our shores. We already have enough weapons to destroy the whole world many times over.

511K The Transformation is being rushed in order to implement the President's 2001 Nuclear Posture Review before he leaves office. It is just one more effort to plant the seeds of our self-destruction before the poisonous weed called the Bush Administration withers and dies in January of 2009.

Where is there an enemy terrible enough to deserve nuclear annihilation? Who will protect our country from the dangers of production and storage of nuclear weapons and the waste generated in the process? Who will protect our Earth if these weapons are ever used? To quote that late, great American, Pogo: "We have met the enemy, and he is us."

Adele E. Zimmermann
Rinconada Box 4B
Embudo, NM 87531
505-579-4661/870-1322
loccadele@cybermesa.com

Zitzwitz, Helmut

Page 1 of 1

Levens, Matthew

From: Helmut Zitzwitz [zitzwitz@meac.com]
Sent: Tuesday, February 19, 2008 5:01 PM
To: Complex2030
Subject: Nuclear disarmament

PC_1367

Helmut Zitzwitz
2728 Henry Hudson Pkwy
Bronx, NY 10463-4703

February 19, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

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 preached disarmament for 50 years to the rest of the world.

This hypocrisy has to stop. If we want to be seen as a peaceful nation, it is out of the question to start this "war effort" all over again. I, for one, will oppose this re-start with all my strength and resources and will NOT vote for NY legislators who do not oppose this effort.

The whole question of nuclear power is ridiculous in light of the fact that some future generation will be confronted with the reversal of our action today. Sincerely Helmut E Zitzwitz

Sincerely,

Helmut Zitzwitz

Zullo, Edward

Page 1 of 1

Levens, Matthew

From: Edward Zullo [edzullo@aol.com]
Sent: Thursday, March 27, 2008 2:55 PM
To: Complex2030
Subject: OPPOSE NEW NUCLEAR WEAPONS

PC_862

Edward Zullo
1978 Taylorsville Rd.
Washington Crossing, PA 18977-1316

March 27, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

116A Please oppose any action that will produce new nuclear weapons or modify nuclear
facilities across the country. If the US puts that money into producing and installing
298B technology to save the environment, the entire world will again look toward us as a
leader. The Bush administration has been a disaster and now that it is being ushered out
it is trying to do as much damage as it can in service to it's buddies in big oil and big
31K business. Democrats and Republicans as well can agree on this. Let the true leaders come
forward.

Sincerely,

Dr. Edward Zullo

Multiple Signatory Letter 1

Page 1 of 1

PC_36

Richard and Amelia Kroeger
65 Stubbs Bay Road
Maple Plain MN 55359-9071
952-476-6126

19 February 2008

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

Dear Theodore:

We remember debates between George W. Bush and John Kerry prior to the Presidential election in 2004. A question was posed – what is the most urgent issue facing the United States and the world? Both Mr. Bush and Mr. Kerry responded, nuclear proliferation and both candidates stressed stemming the spread of nuclear weapons.

Public comment – SPEIS – a proposed plan for New Nuclear Weapons and Complex Transformation

This plan for New Nuclear Weapons and Complex Transformation to resume the development, testing and production of new nuclear weapons will only provoke other nations to either build up their nuclear arsenals or proceed rapidly with plans to establish nuclear weapons

The only possible benefit we can see would be to weapons manufacturers Lockheed Martin, Boeing, Raytheon, and TRW.

This plan for New Nuclear Weapons and Complex Transformation is reckless. It would shed two decades of international arms control agreements, add to environmental hazards, and cost billions of dollars that, in our view, would be much better spent addressing nuclear non-proliferation or urgent matters such as global climate change.

If not for addressing climate change, any investment in nuclear weapons should be limited to decommissioning those already built and ensuring their radioactive wastes find safe storage.

We are totally opposed to proceeding further toward new nuclear weapons.

Very truly yours,


Richard Kroeger


Amelia Kroeger

- printed on high post-consumer content recycled paper -

111

218A

318B
11J
(cont.)
414C

218B
(cont.)

516A

Multiple Signatory Letter 2

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PC_64

Vic and Gail Macks
20318 Edmunton
St. Clair Shores, MI 48080-3748
586-779-1782

February 6, 2008

Theodore Wyka
Complex Transformation SPEIS Document
Mgr.
U.S. Department of Energy
1000 Independence Ave. SW
Washington, DC 20585



The plan to build new nuclear weapons is at once frivolous, profoundly dangerous, illegal, and 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 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. is a signatory, making it U.S. law.

- 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 and maintain nuclear weapons robs the human family of sustenance and survival.

We consider it of paramount importance that we do what we can to promote a viable world—which requires elimination of all nuclear weapons as envisioned in the Nuclear Non-Proliferation Treaty—for all of the world's children and grand children. It can be done by people of goodwill. To all of those promoting new nuclear weapons, consider that it is your grand children's survival that is at stake. Nuclear weapons are not just a bigger bomb. They are the end of life for all children and grand children.

"...nuclear weapons are the scourge of the earth; to mine for them, manufacture them, deploy them, use them, is a curse against God, the human family and the earth itself."

Philip Berrigan

Sincerely yours,

Vic Macks

Gail Macks




116A

215C.1

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717A

Multiple Signatory Letter 3

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PC_72 8/17/08

Dear Mr. Wypa

The proposal to build new nuclear weapons is not needed. Indeed, it is immoral.

• It is not needed - we have weapons enough to destroy the world several times over. Their life span is over 100 years.

• Such a plan is dangerous, only increasing the pressure on others to 'step up'.

They are a temptation to our nation to see them in pre-emptive attack or presumed enmity.

• Such new weapons - of mass destruction - would be immoral. We have no right to

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13A (cont.)

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216A (cont.)

Multiple Signatory Letter 3

Page 2 of 2

-5140

develop weapons which would destroy humans without destruction.

Our government signed the Nuclear Non-Proliferation Treaty. We should be pushing for the universal elimination of existing nuclear weapons - not planning new one.

We need to build a future for our grandchildren - not the means of destruction.

Sincerely

William J. Bodley
John W. Bodley

61F

Multiple Signatory Letter 4

Page 1 of 1

PC_73

Mary and John Bickerstaff
P.O. Box 1051
Sylva, NC 28779

February 14, 2008

Mr. Theodore Wyka
Complex Transformation SPEIS Document Mgr.
U.S. Department of Energy
1000 Independence Ave. SW
Washington, DC 20585

Dear Mr. Wyka:

Thank you for your service to our country, especially at this critical moment. As disciples of Jesus Christ and members of the Network of Spiritual Progressives, we are committed to transforming the culture of America. The future for which we advocate will be characterized by compassion, generosity, kindness, respect for the sacred nature of all life, corporate accountability, intelligent interaction with the environment, a sense of wonder and gratitude for the freedom to choose the values by which we will live.

In this decade focused on choosing nonviolent strategies and methods for resolving conflicts, at a time when all peoples are being motivated by fear of weapons of mass destruction, we call for continuing the commitment and effort to disarm all nuclear weapons. We believe that one of the reasons that other nations seek such weapons of mass destruction is because they fear those of us who already have stockpiles of these weapons. The peoples of the world know that the United States of America is the only nation ever to use these weapons of mass destruction on civilian populations and they have become fearful of our current policy of pre-emptive strikes against others whom our leaders perceive to be a threat or who possess resources that some citizens consider necessary for maintaining our present economic dominance. We believe that creative and imaginative leaders can help to create a world-wide climate of understanding and trust through dialogue, cultural exchanges, diplomacy and application of tested conflict resolution knowledge and skills.

This is the common sense and wise direction for the government we will support to take. Building more nuclear weapons and investing more of the national treasure in the emerging military-industrial-disaster complex is a failure of statesmanship and poor stewardship of the public trust.

We are grateful that we still live in a country where citizens can express their convictions to those who exercise power and responsibility on our behalf. We thank you for considering our opposition to the Stockpile Life Extension Program proposal and we trust you to include our voices with others who feel the same way.

Sincerely

Mary & John Bickerstaff
Mary and John Bickerstaff

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Multiple Signatory Letter 5

Page 1 of 1

PC_8

Feb. 28, 2008

Theodore Wyka, SPEIS Document Manager
U.S. Department of Energy
1,000 Independence Ave. SW
Washington, D.C. 20585

Dear Manager Theodore Wyka,

RE: Complex Transformation

Twenty years ago it was called Complex 21, now it's Complex Transformation. This proposal, like the last, calls for billions of dollars to be spent on construction projects not justified by military or security needs. Both proposals are in defiant contradiction of U.S. commitments under the nuclear Nonproliferation Treaty.

While Congress has been sleeping, the DOE has been quietly creating a stockpile of long-lived nuclear warheads, thousands of them, thru the Stockpile Life Extension Program, taking old bombs, breaking them down, refurbishing and upgrading them, and putting them back together. Now it's a new bomb, good for another hundred years. But Complex Transformation is not just RRW (Reliable Replacement Warhead), it's also about a whole new weapons complex.

The MNSA (National Nuclear Security Administration) wants this Complex to create, design, build and test new bombs for bigger bangs.

This whole scheme is a perilous departure from the U.S. obligation to pursue complete nuclear disarmament and will compel other countries to invest in nuclear weapons.

Complex Transformation will not make us more secure, it makes us greater targets. Our Country, now over \$9 Trillion in debt, a looming recession, job losses, home mortgages down the drain, states fighting for water, a small health care needs, prisons overcrowded, global warming, etc., etc., we cannot afford to waste any money on bombs, bomb making factories or wars.

Sincerely,

Roy & Vivienne Kell
Roy and Vivienne Kell
28306 Alger Ave.
Madison Heights, MI 48071

CC: Senator Carl Levin
Senator Debbie Stabenow
Representative Sander Levin

Multiple Signatory Letter 6

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PC_9

831 Somerset Dr.
Maryville, TN 37803
February 26, 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

Dear Sir:

Thank you for the opportunity to comment on the draft Complex Transformation SPEIS.

For the sake of our children, our grandchildren, for our own safety, we do not need a new or transformed bomb complex at Y-12 or anywhere else. We need to stop making bombs. We need to stop stockpiling bombs. Our present actions and the proposal, "Complex Transformation," greatly decrease our safety by encouraging other nations to develop their own nuclear weapons.

The highly trained and committed work force already working at Y-12 should be put to work dismantling bombs in the safest manner possible. My friends who work there tell me that that is enough work to keep everyone there employed for another thirty years at least.

For the sake of your children and their children, please consider the long term effects of DOE decisions on both on people who work there, our nation's safety, and on the environment.

Sincerely,

Mildred B. Sieber and Ornette W. Sieber

116A:
213A.1

388

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PC_186

Members of the Hearing Committee we want to thank you for giving us the opportunity to share our deep concerns with you.

I am 85 years old and my wife is 88. We have come here to strongly oppose the building of a whole new and enlarged nuclear weapons complex. We have come on behalf of our daughter, grand-daughters, and their future children and grandchildren.

Building this complex is not a way to make our country and the world more secure and liveable. In fact, it would make our nation and the world more insecure and dangerous. Building such a complex sends a threatening message to the rest of the world and says you must do the same if you will be able to protect yourselves and your coming generations from this dangerous country who wants to hold a nuclear threat over your heads. This is not the way we want the world to see our beloved USA where we have lived for over 85 years.

Like you we would oppose any other nation who would do what is being proposed for our country. For this reason we oppose our country doing it. Instead we urge our beloved nation to lead the other nations in stopping the production of nuclear weapons and rapidly reducing the stock piles of weapons already produced. We need to use our resources in meeting ~~meeting~~ human needs, such as hunger and health.

I speak as a retired pastor and wife who have spent our lives teaching and living the ways of caring, love and peace.

Cordially yours

Leonard and Betty Stark
P. O. Box 183
Pleasant Hill, TN 38578

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213A.1:
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(cont):
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Multiple Signatory Letter 8

Page 1 of 1

MRP-31-2008 05/16/04 FROHELBERT, HORNSTEIN 505-753-3535 10:1703013222 F-1

PC_209

Elberta Hornstein
 1302 N. McCurdy Road
 Espanola, NM 87532 Phone & FAX 505-753-3696

3/5/08 via Fax# 1-703-931-9212

National Nuclear Security Administration
 Mr. Ted Wyka, 77786,
 Office of Transformation NA-10:1

Dear Mr. Wyka,

We not only support the 77786 project, attention is for the Alamosa National Laboratory, but we want the project to be here at Los Alamos. We believe the scientists in charge of plutonium site project are prepared to have complete knowledge about the many issues including safety and management.

Dr. and Mrs. Alamos and its projects for the security and freedom of our country now & for our future. Espinola brought from Los Alamos in another way by supporting our stores and making jobs available to people in our community, thereby raising our standard of living and thereby this small town to survive and prosper.

As - Keeping the plutonium project here at Los Alamos sure a great many side issues, and most importantly, keeping up the security of our great country. We hope you like the project and for it to stay here at Los Alamos.

Sincerely,
 Elberta Hornstein & Nellie H. Lyford

115A 214 115A (cont)

Multiple Signatory Letter 9

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PC_219

March 6, 2008

Theodore Wyka Complex Transformation SPEIS Divisional Mgr.
 US Department of Energy
 1000 Independence Ave. SW
 Washington D.C. 20585

Dear Mr. Wyka,

When will the nonsense, the killing and the polluting of our planet end?

The U.S. views itself as a world leader. World leader of what? More nuclear weapons? Is this the means we should use to create world peace?

It's hard for me to believe that we are a civilized nation. Civilized nations work and talk together to settle problems. They don't kill one another. Are we a moral nation if we continually pile up and build nuclear weapons that more destructive than what was built a short time ago?

Our nation condemns North Korea and Iran for allegedly constructing nuclear weapons. We are doing far worse. Are we not a bigger threat to the world than they?

Our technological knowledge should be used to save humanity, and restore the planet and all things in it. STOP NOW.

George M. M. M. M.
 Patricia M. M. M.

116A 21J 38H

Multiple Signatory Letter 10

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Multiple Signatory Letter 11

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PC_221
 Don and Veronica Caley
 1660 South Hill Road
 Milford Michigan
 48381-2856
 email doncaley@comcast.net

Theodore Wyka
 Complex Transformation SPEIS Document manager
 US Department of Energy
 1000 Independence Ave. SW
 Washington DC 20585

Dear sir,

We believe that the plan to build new nuclear weapons is at once frivolous, profoundly dangerous, illegal and immoral. Nuclear weapons are not just a bigger bomb. They are the end of life for all of us, and our children and grandchildren.

Sincerely yours,
 Don and Veronica Caley

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PC_107

National Nuclear Security Administration, U.S. Department of Energy
 Public Hearing on Draft Complex Transformation
 Supplemental Programmatic Environmental Impact Statement of
 December 2007

Doris and Phillip Smith, co-chairs
 Panhandle Area Neighbors and Landowners (PANAL)
 February 28, 2008

In 1991 when the Department of Energy issued Complex 21 we came forward and addressed the major issues, which had not been included in that document. We called for the DOE to revisit their modernization plan. We said there was no need to build new modern facilities and to continue to build nuclear bombs. We addressed the issues as they related to Pantex and asked that this not be built at Pantex and not in anyone else's backyard. This was a waste of taxpayers' dollars, a waste of natural resources and a major waste for the United States. We said NO to Complex 21!

In 2006 you came at us with Complex 2030 and we again restated our major concerns about our environment, natural resources, health and safety and our belief that this was a tremendous waste of taxpayers dollars and too big of a misguided plan to be initiated in our country. We said NO to Complex 2030!

Now in 2007-2008 you come forth with the same old girl, but in new clothes, this time you call it Complex Transformation. We are here to say "What part of NO do you not understand?"

Instead of building more and new bombs and modernizing the weapons complex, NNSA/DOE should be pursuing a path toward disarmament and complete dismantlement of nuclear weapons. Nuclear weapons are a thing of the past, the Cold War mentality, and we, as taxpayers, will be paying the bill for those years of building up the nuclear establishment until we die. Those future generations following us are going to be paying for all the problems associated with the building of the nuclear age from now until eternity.

The United States should take the lead role to act in accordance with our disarmament obligations in the Non-Proliferation Treaty. It is up to us, the people, to see that these obligations are met, yet how can we comply with the treaty when you put forth a document like Complex Transformation which is nothing more than building a new "Bombplex". How are we, as a Nation, going to stop the proliferation of nuclear materials, stop the nuclear pollution spreading throughout the country, advance the cleanup and environmental management of the billions of tons of radioactive waste resulting from the weapons program if we continue to "modernize, build, store, ship and transport nuclear weapons, and build new facilities".

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 216A

319H

216A
 (cont.)
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 319H
 (cont.)

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 411J
 (cont)
 617J
 51F
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Multiple Signatory Letter 11

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770 We come to you today to again say "NO". Your focus is too narrow, your vision too short, your insight so tainted that you do not even consider anything beyond a "jobs program"! What you should be addressing is a weapons complex that produces NO BOMBS! A NO Production Alternative! Stop this insanity! Show the world that we are serious about disarmament and that we will continue to go forward with dismantlement until we have abolished these weapons of mass destruction. We are killing our children, ourselves and our planet with the continuation of this madness.

8140 Environmental cleanup is a massive program and one that needs to be better managed and better funded. The damage done to the groundwater, rivers, lakes, soils, vegetation and air cannot be rectified. The health issues caused by weapons production, the workers and the neighboring communities, which have been affected, should be more fully addressed. Workers and those people living in communities around nuclear facilities who are suffering from illnesses associated with nuclear weapons work should be compensated. Communities having to live with these facilities in their neighborhoods should be compensated, rather than a cover up being done or a denial of any wrongdoing by the DOE/NNSA.

216A (cont.); 910F NO, we do not believe that Pantex should be selected for a Consolidated Plutonium Center, a Consolidated Uranium Center, a Consolidated Nuclear Production Center, or a Consolidated Nuclear Center housing Special Nuclear Materials. We oppose them for the Panhandle of Texas and we oppose them for the good of our country.

1014E.1 In the Texas Panhandle we have an irreplaceable, finite source of water, the processes at Pantex have already contaminated our Ogallala Aquifer. Remedies are being initiated, however we are not so naive as to think that this massive body of underground water can ever be restored to its natural condition.

67J (cont); 119B Rather than NNSA spending billions of dollars to "transform" Pantex into their "Center of Excellence" which is a joke, they should be applying those dollars to cleaning up the legacy at Pantex.

1214M.3 Pantex is not alone in this legacy, use our taxpayer dollars for cleaning up the contamination problems at all of the DOE/NNSA weapons facilities. Use our taxpayer dollars to manage and store the millions of tons of radioactive and toxic waste generated at these facilities, and STOP generating this lethal waste, which is fatal, poisonous and noxious for thousands of years.

2 DOE/NNSA have a serious problem with waste and one they seem to be skirting. There is no suitable shipping container yet for transporting this waste, there is no suitable storage site for this waste and there is no reason to continue producing this waste. This problem is only escalating and will continue to increase if this proposal, Complex Transformation, is put into effect. As long as you continue to research, develop, test and produce new and modified bombs you will generate this toxic waste with no place to go with it.

319H (cont.) If Congress, so foolhardy, appropriates the hundreds of billions of dollars necessary for this folly, one would only hope that DOE/NNSA would have the courage to stop the process and say, "We made an error of judgment, we understand what "the people" are saying and we will not continue with this plan to transform the complex. The issues of security, safety, environmental responsibility and integrity do matter." Will this happen? NO! We all know that this is not the mentality of the weaponers. They are intent on continuing this government "jobs program" - and at our expense and the expense of our country.

1214M.3 (cont.) We, the neighbors around Pantex, have lived with the storage of plutonium pits, the assembly/disassembly of nuclear weapons, the fabrication and testing of high-explosives, repairing, modification and testing of nuclear weapons and the storage of special nuclear materials, open burning and flashing of explosives and explosive-contaminated materials for sixty years. Isn't that enough to ask from one community? Must we be inundated with more? What's the limit? Where's the need? How much more must we endure?

8140 (cont.) Stop the spreading of nuclear weapons, stop building new bombs, and stop throwing our tax dollars into the wind, start cleaning up in earnest, not just moving waste around! You owe this to us!!!

216A (cont.) Denis and Phillip Smith
18001 El Rancho Rd
Panhandle, TX, 79068
806/335-1050

-30-

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PC-124

4739 Algonquin
Sterling Hts., MI 48310
586-795-4739
robertfehrbach@luno.com
February 27, 2008

Mr. Theodore Wyka
Complex Transformation SPEIS Manager
U.S. Dept. of Energy
1000 Independence Ave. SW
Washington, D.C. 20855

Dear Mr. Wyka:

We are writing to let you know of our very strong objection to any further enlargement of and development of the nuclear facility at Oakridge, TN to produce more sophisticated and lethal nuclear weapons. There is a worldwide growing consensus that nuclear weapons must be abolished altogether. Why is the U.S. adding to their proliferation?

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Our own U.S. history shows that at one time more intelligent minds prevailed regarding the bomb. Men like General Dwight Eisenhower, Admiral William Leahy and General Curtis LeMay all argued against the use of the atomic bomb on moral grounds, calling them "barbarous". They said that wars are not won by killing women and children. At the present time, George Schultz, Henry Kissinger and Sam Nunn have collaborated in writing their position, calling for a nuclear-free world. Robert McNamara and Madeline Albright, cold war warriors who advocated the use of violence against civilian populations, now speak of themselves as "war criminals".

Major supporters of this proliferation are the defense contractors who will profit enormously from the bombs that can wipe out life on earth in one afternoon. Stop the bomb production now. Do not enlarge the nuclear weapons plant at Oak Ridge. Instead, close it! Work with the majority of people both here in the U.S. and around the world to eliminate the threat of nuclear war through the elimination of nuclear weapons.

Thank you.

Sincerely,

Marie Fehrbach

Marie Fehrbach

Bob Fehrbach

Bob Fehrbach

116H
(cont)
31J
(cont)

Multiple Signatory Letter 13

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PC_268

Mr. and Mrs. Augustin H. Parker
36 Arthur Avenue
Marblehead, MA 01945
781-631-5335

April 2, 2008

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

Dear Mr. Wyka,

We are writing in regard to President Bush's nuclear weapons Complex Transformation proposal that would vastly expand our capacity to produce up to 125 new nuclear warheads per year.

1140

This would be a disastrous move in the entirely wrong direction. Nuclear weapons production is already one of the government's most environmentally dangerous programs. Under the President's proposal 50-80 new plutonium pits could be added annually. What are going to do with our nuclear waste?

Of equal importance, such a move would devastate our international relationships in the area on non-proliferation. How can we expect Iran, North Korea and other nations to stop their nuclear programs if we are not only not stopping or reducing ours but adding to it? Our credibility as a world leader is already damaged, and such a program would only enhance and further destroy that. This would accelerate a global arms race that could have devastating results.

21J

It is absolutely essential that the United States be a leader in the movement toward a nuclear free world. President Bush's proposal must not be allowed to happen.

Thank you for accepting public comments on this issue.

Sincerely,

Augustin H. Parker

Augustin H. Parker

Janet Fitch Parker

Janet Fitch Parker

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PC_273

Theodore Wyka
Speis Manager, U.S. Department Of Energy
1000 Independence Avenue SW
Washington, D.C. 20585

Dear Mr. Wyka:

The "Complex transformation" plan for nuclear weapons and the current proposal by the Department Of Energy to rebuild the entire nuclear weapons complex and designing and testing new Thermonuclear weapons is very dangerous because it threatens a new arms race and with that threat the likely nuclear destruction of all of us. It is immoral to plan or create the means of destruction of all human life. We already have enough to destroy the world several times over! We will be in violation of the Non Proliferation Treaty to which we are a signatory and therefore bound by U.S. law. Surely there are better ways to ensure our security than to build weapons of mass destruction! Nuclear disarmament, international conferences sponsored by the U.N., Dealing more effectively with world wide poverty and social injustice, economic and political incentives are just a few avenues open to us instead of domination by nuclear first strike threats. Human survival depends on intelligence not on military threats which lead only to assured destruction!

Sincerely and with deep concern

Maurice Geary and Frances Geary
2724 Wolcott, Ferndale, Michigan
248-545 7002 m-geary@sbcglobal.net
March 27, 2008

Maurice and Frances Geary

PC_240 175

Charles C. and Bernice M. Klosterman
2323 McDaniel Avenue, Apartment 1130
Evanston, Illinois 60201-2576

January 31, 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, D.C. 20585

Dear Sir:

It is our understanding that President Bush has proposed a nuclear weapons Complex Transformation which would add a capacity for producing 50 to 80 plutonium pits annually. Nuclear weapons are already one of the most environmentally harmful programs run by the federal government.

We are informed that building new ones violates the Non-Proliferation Treaty and it surely sends the wrong signal to the rest of the world.

We as citizens are, therefore, strongly opposed to the proposal. Please do not accede to it.

Most sincerely,

Bernice M. Klosterman Charles C. Klosterman
Bernice M. Klosterman Charles C. Klosterman

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Multiple Signatory Letter 16

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Multiple Signatory Letter 17

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PC_301

175 Richdale Ave. #209
Cambridge MA 02140
14 March 2008

Theodore Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation
NA-10.1
Dept. of Energy
1000 Independence Ave, SW
Washington DC 20585

Dear Mr. Wyka

We are very strongly opposed to the proposed Complex Transformation for nuclear bombs and warheads. In reality, this would create up to 125 NEW bombs a year until 2030.

The program would be extremely costly and completely ineffective, both politically and economically, for many reasons. The reasons include the following.

- 23A * It is NOT TRUE that our nuclear arsenal is aging and needs replacement. Experts have stated that current warheads will last another 85-100 years.
- 31L * If new US warheads are built, it will send absolutely the wrong message to countries like Iran and North Korea which may want to build their own nuclear weapons, but which the US is trying to dissuade from developing nuclear arsenals.
- 41F * Expanding our nuclear arsenal will violate our country's solemn commitment, under the Non-Proliferation Treaty, to ultimately ELIMINATE our arsenal.
- * In a recent poll, 72 percent of Americans favor completely destroying our nuclear weapons.
- 50B * The Complex Transformation program will carry a huge price-tag. For the \$17 billion the program will cost, we will make it impossible to meet other critical needs in our country—for instance, for \$17 billion we could provide health care for 8 million children.

Sincerely yours,
John MacDougall
John MacDougall

Marilyn MacDougall
Marilyn MacDougall

Cc. Sen. Kennedy
Sen. Kerry
Rep. Capuano
Sen. Clinton
Sen. Obama
Sen. McCain

PC_338

Gary and Gloria Switzer
5671 Lakeland Ave.
Fremont, MI 49412-9108
231-924-5292

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

March 26, 2008

Dear Mr. Wyka,

We are writing as interested and concerned citizens, who were invited to submit comments on the "Complex Transformation's Supplemental Programmatic Environmental Impact Statement" (SPEIS, DOE/EIS-0236-S4). As citizens concerned about the continuation of the human species and our planet Earth, we are very concerned with the NNSA's proposal, "Complex Transformation." We believe this plan is extremely dangerous, illegal and immoral, and basically frivolous and a waste of tax payers' money.

Dangerous because it increases the likelihood of using nuclear weapons (which would be fatal) and it also provokes and helps to continue the arms race by other countries, especially when the U.S. threatens first strike use of nuclear weapons against any country of its choosing.

Illegal & Immoral because it violates the Nuclear Non-Proliferation Treaty, to which our country is a signatory, thus making it U.S. law. Although our government has already ignored this important treaty in the past, it is time for the United States to take the higher road and lead the way for global abolition of nuclear and all weapons of mass destruction by adopting a plan to look down, dismantle, reduce and eliminate nuclear weapons. Rebuilding the entire nuclear weapons complex with new facilities for maintaining an enduring stockpile of nuclear weapons and for designing, producing, and testing thermonuclear WMDs is ludicrous for the future of humankind. We do not understand why the United States holds the world hostage with its threat of nuclear weapons domination and "scolds" other nations from pursuing WMD due to our threats and when we ourselves have the largest arsenal in the world and is the only country to have used nuclear weapons. "Do as we say and not as we do" doesn't hold much water in today's volatile world with rogue leaders.

Frivolous & Wasteful use of taxpayer's money. Since we already have more than enough nuclear weapons that are capable of destroying the earth and all life on it several times over, and since we already have a federal budget that reflects our country's moral values (41 cents of every dollar of federal income tax we paid in 2006 pays for war and preparing for war while 12 cents of every dollar is spent on poverty in the U.S) we strongly object to the billions of dollars it would take to implement the Bomplex Transformation proposal.

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Mr. Wyka, for all of the world's children, not just those in the United States, but all children of this planet and their children and their grandchildren (future generations), we believe that the continuation of the nuclear arms race robs the human family of sustenance and survival. These weapons are not just "bigger and better bomb models" like making bigger and better cars, but are vehicles of death, destruction, and no future!

While job security for those who are employed at nuclear weapons facilities is a concern, the environmental and health factors of production should be considered. Existing facilities could be turned into plants that produce green products for the building industry or other useful and environmentally friendly products. Certainly a country who has the intelligence to send rockets into space and land on the moon can figure out ways to keep people employed in safe factories that produce life giving products over those with the potential of ultimate destruction of most of the life on our beautiful planet Earth. Our government's responsibility to its citizens is to provide jobs while at the same time provide a safe future, for life not destruction.

Thank you for your time and consideration in reading our comments. We remain hopeful for a world free of nuclear weapons and the end of production of useable nuclear weapons.

Sincerely,
Gary Switzer Gloria Switzer
Gary Switzer and Gloria Switzer

116A(cont.)

5140

Multiple Signatory Letter 18

Page 1 of 1

Mike and Mary Kay Martin
43620 Via Antonio Drive
Sterling Heights, MI 48314
(586) 254-0258

March 1, 2008

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



We believe that any part of the proposed Complex Transformation Plan which leads to the improvement, expansion, or extension of the ability of the U.S. nuclear weapons complex to build nuclear weapons should be disapproved. In particular, we oppose any plan for the rebuilding or expansion of the Y-12 complex in Oak Ridge, Tennessee that would enable that plant to produce new nuclear weapons or components or to refurbish existing nuclear weapons to make them more efficient, powerful, and/or long-lasting.

We believe it is clear that the United States already possesses enough nuclear weapons to destroy all life on earth many times over and that the nation should be moving to actively decommission and destroy these weapons, not to rebuild them and extend their life. If the idea of the plan is to make them "safer," that would be far better accomplished by destroying them than by upgrading them. Transforming Y-12 and other nuclear facilities to perform the disassembly and destruction of nuclear weapons is something we strongly support.

We believe that the continued insistence of the United States on expanding and improving its nuclear capability represents a threat to world peace and only encourages so-called rogue states and terrorists to attempt to obtain nuclear weapons of their own.

Finally, we are deeply concerned about the vast amounts of taxpayers' money that is spent on the development, testing, production, and maintenance of nuclear weapons. Such expenditures rob the nation of funds that are desperately needed to improve our educational system, repair our failing transportation infrastructure, provide adequate health care to all our citizens, and meet a variety of other urgent needs.

We urge those who will make decisions regarding the Complex Transformation Plan to choose peace rather than choosing a path to expanded war-making capability, so that our children, pictured in our family photo above, may someday live in a world free of the threat of nuclear disaster.

Sincerely,

Michael R. Martin
Michael R. Martin

Mary Kay Martin
Mary Kay Martin

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216H

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Multiple Signatory Letter 19

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3-17-08

Mr. Theodore Miller
Complex Transformation
SPEIS Doc. Mgt.
US Dept. of Energy
1000 Independence Ave SW
Washington DC 20585

Dear Sir:

"We oppose the draft proposal for
Complex Transformation" & feel
it is immoral to rebuild nuclear
weapons when the US is attempting
even from entering other nations to
stop this global disaster.
Please stop this madness &
stand as a responsible example
to the world.

Sincerely,
Theodore Miller
1001 Independence
Ave SW
DC 20585

PC_293

What can be
said but,
thank you
so much!

116A
211.1

Multiple Signatory Letter 20

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PC_1720

Levens, Matthew

From: Bill & Margo Cooper [twocoops@localnet.com]
Sent: Sunday, March 30, 2008 6:07 PM
To: Complex2030
Subject: why not? - I await your answer.

Bill & Margo Cooper
1365 County Rt. 60
Onchiota, NY 12989-2101

March 30, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

116A Why, in the name of GOD, do we need nuclear weapons? Let's talk! Violent threats never work in a marriage - conversation does. The way of intimidation and force has brought us where we are. I'm willing to bet on a new direction - are you?

Sincerely,

Bill & Margo Cooper
518-891-6746

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Page 1 of 1

Levens, Matthew

From: Sherwood Johnson [sjohnson@comcast.net]
 Sent: Wednesday, April 02, 2008 11:10 PM
 To: Complex2030
 Subject: Complex Transformation comments

PC_1856

As a teenager growing up in the 80's, I was convinced that I would most likely die as the result of a nuclear war. The odds of a mistake or misunderstanding, much less an overt intentional nuclear attack seemed too great to avoid. Since then, nuclear weapons have been deemphasized with the fall of many communist countries and are now more of a public concern as they relate to their potential use as a terrorist weapon. With the advent of Complex Transformation, the fear of nuclear war has escalated again. . . our children will now get to know the same fear. Growing up that their parents did. . . bringing generations together across the country. In this manner, our precious military weaponry will be escalated and the costs diverted to this program will prevent money from being spent on meaningful, constructive, social uses. After all, why spend money on education or health care when our children expect to be annihilated anyway? This will also continue to promote the United States as a rebel that is to be feared and is above international law (aka the Non-Proliferation Treaty) simply because if we do it, it must be right. We need to lead by force, not by example, if we are to be respected in the world! A good first step would be to use our outdated nuclear arsenal to bomb Paris, Rome, and London, clearing the way for a new nuclear stockpile in the process.

Look, the United States is supposed to be a leader, not a bully. Our goal should be to improve the world - in this case by destroying nuclear weaponry (or at least allowing it to quietly become obsolete). We have far better and more productive issues to spend this money on - health care, education, renewable energy - that will TRULY make our nation better respected and more competitive world wide.

Let common sense prevail in Washington, for once, and the government reflect the will of its people. Abandon Complex Transformation NOW.

Thank you,

Sherwood and Shawna Johnson
 Pittsburgh, PA

16A

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Levens, Matthew

From: WynegarKM@aol.com
 Sent: Tuesday, April 08, 2008 7:08 PM
 To: Complex2030
 Cc: phil.bredesen@state.in.us
 Subject: SPEIS Comment

PC_1571

115A Please consider the strong negative public reaction that there will be in Tennessee and surrounding states to the Consolidated Centers of Excellence (CCE) Alternative. This alternative could move the entire Uranium contents stored at the Oak Ridge site (in a soon to be completed extraordinarily secure new storage facility) to another site in another state. There will be considerable resistance just from the scary possibility of taking that huge amount of uranium and down Tennessee Highways, potentially exposing it to who knows what mischief. It would be impossible to have that many hazardous shipments blend in with normal traffic activities. While we normally support necessary and minimized shipments of hazardous items when the benefits outweigh the risks, for the CCE site transfer alternative, there is no transportation scenario which would be worth the risk to our people, to our environment, and to our national security.

46C Hence, we strongly support the Preferred Alternative, the Distributed Centers of Excellence. Not only is that clearly the most secure alternative path forward, but it is also apparent that the accompanying reduced footprints and streamlined operations will result in excellence in mission performance, and will be acceptable to taxpayers and to Congress who will demand that the implementation of this alternative be executed in the most cost-effective manner possible.

Tom & Kathy Wynegar
 323 Sweetgum Drive (near the junction of I-40 & I-75) Knoxville, Tennessee 37934
 (865) 966-2635

*****Planning your summer road trip? Check out AOL Travel Guides.
 (http://travel.aol.com/travel-guide/united-states?ncid=so1trv0030000000016)

1

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Levens, Matthew

From: Elliot & Vivianne Pierce [vive@pierce@verizon.net]
Sent: Saturday, April 05, 2008 3:57 PM
To: Complex2030
Subject: Proposed new nuclear weapon facility

PC_1602

Elliot & Vivianne Pierce
10705 Brunswick Ave
Kensington, MD 20895-2809

April 5, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

120 We are a politically aware couple, one of whom is a chemist/physicist. We can see the need for maintaining the readiness of our weapon until nuclear disarmament progresses seriously.

21J On the other hand, we see a shattering effect of expanding our nuclear weapon capabilities. Building the proposed new plant would send a contradictory message to other countries, such as Iran and North Korea, who are seeking nuclear weapons.

21J (cont) 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.

120 (cont) This is illogical. It further undermines our country's role in world leadership. Please stop this foolishness!

Sincerely,

Elliot & Vivianne Pierce

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Levens, Matthew

From: Susan Meadows [paulj@cybermesa.com]
Sent: Tuesday, April 08, 2008 10:37 AM
To: Complex2030
Subject: Complex Transformation SPEIS Comment

PC_1548

Dear Sirs/Madame:

I support the idea of reducing the overall nuclear weapons complex and nuclear stockpile reduction. However, the current Complex Transformation plan places too much emphasis on development of new nuclear weapons including plans for plutonium pit production at LANL. The U.S. military complex budget is significantly greater than the next 14 countries with the largest military budgets combined. Our weapons stockpile and military capability is ludicrously superior to any potential enemy while our expenditures for this superiority bankrupt our economy and result in neglect of the aging infrastructure of our nation and the needs of our citizens.

214E DOE has failed to provide any evidence of need for new and more nuclear weapons. The plans for plutonium pit production continue to advance despite that our current stockpile is adequate and not in danger of degradation anytime soon. Lack of water in Northern New Mexico furthermore makes the choice of LANL site environmentally unsustainable, while DOE NEPA documentation fails to address this issue adequately or realistically.

31E The Complex Transformation plan violates the Comprehensive Test Ban Treaty encouraging others to violate it also thereby reducing our national security rather than increasing it. Our current stockpile is enough and will be for the foreseeable future. A new President and the Department of Defense should review future needs of the nuclear complex, not DOE, as already mandated by Congress.

We encourage you to abandon the current Complex Transformation plan pending that review.

Paul Johnson and Susan Meadows
04 County Road 113 South
Santa Fe, NM 87506

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PC_1635

Levens, Matthew

From: Kathleen Skimmer [kskimmer1233@bellsouth.net]
Sent: Saturday, April 05, 2008 9:39 PM
To: Complex2030
Subject: Nuclear weapons complex

Mr. Wyka,
 I am writing to urge compliance with the Nuclear Nonproliferation Treaty. We need to move toward reducing and eliminating nuclear weapons, not creating a new and improved nuclear weapons complex.

We should not continue to stockpile weapons.

Thank you for listening.

Kathleen and John Skimmer
 1158 Martin Mill Pike
 Rockford, Th 37853
 865/977-8262

PC_1106

Levens, Matthew

From: John Alcock [jalcock@asu.edu]
Sent: Thursday, March 27, 2008 12:27 PM
To: Complex2030
Subject: Making triggers for new nuclear weapons

John Alcock
 705 E Loyola Drive
 Tempe, AZ 85282-3836

March 27, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

116A: We hope that you will join us in opposing any effort to begin producing plutonium pits for
 214: nuclear weapons. At a time when we are trying to prevent Iran and North Korea from going
 39H: nuclear, it seems highly inappropriate for our country to be preparing to add to our
 43A: already excessive nuclear arsenal. And at a time when our financial situation is
 precarious, why spend our tax dollars on such an unnecessary and counterproductive
 project?

Thank you for listening.

Sincerely,

John & Sue Alcock
 480 966 2361

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PC_1107

Levens, Matthew

From: John and Laura Locher [justices27@jehoo.com]
Sent: Thursday, March 27, 2008 8:48 PM
To: Complex2030
Subject: building nuclear weapons

18A It is inconceivable to me that in this day and age anyone could possibly approve of building more nuclear weapons. We at present have more than we need. To approve of this plan is to ask for more extremists to single us out and use these very weapons against us. I pray that older heads will prevail and instead of increasing our arsenal, someone will have the courage to actually reduce the threat of nuclear war by reducing the number of nuclear weapons. We must defend ourselves with something other than weapons. Our world has turned to war since the beginning of time and nothing good has ever come of it. Please think with head and your heart and reject this plan.
31F
416A

"Do one thing every day that scares you." Eleanor Roosevelt

John and Laura Locher
Justice Coordinators
Sisters of Mercy
1125 Prairie Dr. NE
Cedar Rapids, IA 52402-4737
319-362-3025 or 365-2284

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PC_1426

Levens, Matthew

From: LaRoy and Mary Seaver [maryseaver@huskeraccess.com]
Sent: Tuesday, February 19, 2008 4:39 PM
To: Complex2030
Subject: Nuclear weapons

LaRoy and Mary Seaver
7005 Shamrock Rd., #105
Lincoln, NE 68506-2980

February 19, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

116A We are deeply disturbed by and strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons.

21 The present nuclear weapons in the world are the greatest threat to the security of all people in the world. Noone is safe as long as they exist.
13A.1 While we assume the world is safe in spite of any that the U.S. has, the rest of the world cannot assume that security. The best thing the world community can do is work to eliminate all that now exist.

31F We are not now complying with our part of the nuclear non-proliferation treaty. To move to new nuclear developments is a rejection of the goal of that treaty and a challenge to all other nations to join us in this weaponry development. That is the worst thing that could happen on our planet.

The CMWR project should be rejected by Congress.

Sincerely,

LaRoy and Mary Seaver
402-484-7665

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PC_ 1430

Levens, Matthew

From: Linda & Joel Morris [lmmorris@bellsouth.net]
Sent: Thursday, February 21, 2008 1:28 PM
To: Complex2030
Subject: Nuclear Weapons

Linda & Joel Morris
 5200 Sunset Road
 Knoxville, TN 37914-4350

February 21, 2008
 Complex Transformation Department of Energy

Complex Transformation Department of Energy:

116A We oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons. We also oppose plans to modify nuclear facilities across the country, making it easier for the U.S. to rebuild its nuclear arsenal.

21J 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. 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.

38A Congress repudiated 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 & Joel Morris
 (865) 971-1549

PC_ 1437

Levens, Matthew

From: Liz and Bob Stone [lestones6@comcast.net]
Sent: Tuesday, February 19, 2008 7:45 PM
To: Complex2030
Subject: Plutonium pits plant

Liz and Bob Stone
 6555 Yount Street
 Yountville, CA 94599-1279

February 19, 2008
 Complex Transformation Department of Energy

Complex Transformation Department of Energy:

116A The administration's proposal to build a plant to produce plutonium pits for nuclear weapons is 180 degrees the wrong way to go. We have many more times the weapons to protect us if that is what they are supposed to do which is doubtful. We need to get rid of these things along with all the other nuclear powers.

21J 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 CMRR projec: is another irresponsible new program that Congress should reject.

Thank you from two old timers.

Sincerely,

Liz and Bob Stone
 (707) 944-8978

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PC_1450

Levens, Matthew

From: Maridale and Bill Moore [mrobilma3@opendoor.com]
Sent: Wednesday, April 23, 2008 11:00 PM
To: Complex2030
Subject: No More Nuclear Weapons

We completely support the Women's International League For Peace and Freedom's (WILPF) statement against Nuclear weapons.

Sincerely,
 Maridale and William Moore
 4268 Hwy 99 S.
 Ashland, OR 97520

16A

PC_1181

Levens, Matthew

From: paul almond [paul@paulalmond.com]
Sent: Thursday, March 27, 2008 1:55 PM
To: Complex2030
Subject: Let's stop Bush's latest madness

paul almond
 54 Malibu Colony Drive
 Malibu, CA 90265-4774

March 27, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy,

1|16A |Joan and I k now we can count on you to oppose this latest plan of Bush -- to build a
 2|1K |plant to produce plutonium pits for nuclear weapons.
 Thank you so much

Sincerely,

paul & Joan Almond
 310-456-2427

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Levens, Matthew

PC_ 1289

From: Bonnie Korman [korman@newmex.com]
Sent: Tuesday, April 29, 2008 10:01 PM
To: Complex2030
Subject: Re: SPEIS NOI to nuclear pit production at LANL

To: Department of Energy, Mr. Theodore Wyka, Complex Transformation SPEIS Document Manager,

We are a couple, husband and wife, who have lived in northern NM for over 35 years. We raised a family here and now have a grandchild, our 3rd generation of New Mexicans. For all that time, and a few years before that, we have been anti-war and against nuclear proliferation.

114H We have been very concerned about LANL-- its continual lack of safety and protection of nearby pueblos and other residents; its history, reality, and ever greater potential for more toxic contamination of the air (the Cerro Grande fires were obviously and especially frightening for Taos residents), water (Santa Fe is at highest risk), and earth (the open, unprotected dump sites are a continuing national scandal); and finally, the adverse, 14M3 deadly impact on humans of cancer and other diseases.

It is our understanding that * the United States and four other nuclear states (Russia, Britain, France, and China) are already legally bound 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 . . ." by Article VI of the Nuclear Non-Proliferation Treaty (NPT). The opinion of the World Court and subsequent U.S. diplomatic agreements has confirmed the binding character of these twin commitments to end the arms race and achieve nuclear disarmament*.

http://www.thebulletin.org/web-edition/features/the-us-nuclear-weapons-complex-pushing-a-new-production-capability

So it logically follows that we are adamantly opposed to the Complex Transformation at LANL and oppose any and all programs and/or construction with the goal of production of fissile plutonium cores, or pits, or any other weapons. Period.

There have been several who put forth the concept of transforming LANL into a facility for production of sustainable, alternative energies, medical innovations, and other peaceful utilization of its capacity and potential. We agree with these enlightened ideas.

Respectfully,
Bonnie Korman & Robert Bishop,
PO Box 80,
Taos, NM, 87571

Levens, Matthew

PC_ 674

From: nathan [nathancoiggins@comcast.net]
Sent: Saturday, February 23, 2008 3:18 PM
To: Complex2030
Cc: terry/hensley; TERRIA STOUT; terry.hensley@comcast.net; James Coggins; M Coggins
Subject: Complex / Bomplex

To whom it may convince:

114K I don't know where to start, I guess I should go back to my earliest memories as a kid wondering if I was going to live to become an adult because of the possibility of nuclear war. Years passed, my neighbor's bomb shelter seem like a ridiculous relic and all that was left to remind me of that era in my life was a friend from Oak Ridge telling stories of losing a lung to cancer when he was a teenager and other teenagers on his street that contracted cancer. Plus wondering how much of the cancer that the infants and others in our area are contracting is related to the three nuclear plants here in the East Tennessee area.

21J Now I hear stories about North Korea, Iran, having or wanting nuclear weapons and other countries even Romania that have had test reactors supplied to them by the United States. Are we going to start an arms race again? I'm just a dumb hillbilly but as the saying goes "Stupid is as stupid does", what are the leaders of "The most civilized country on earth thinking"? Living with a gun to each others heads is no way to live.

3BA When I was a kid I understood we have enough warheads to destroy the earth a couple of times. Isn't Mutually Assured Destruction enough? The current administration persuaded 414O by the nuclear industry thinks we need more nuclear weapons. Hasn't there been enough radiation spread across Tennessee? I know there is big money available to our state but it is not worth it.

21J Instead of new weapons, we should be working feverishly to end the nuclear era across the world.

114K Our kids should not have to worry about the effects (long and short term) of radiation.

516A We should shut down all nuclear industries in the United States and then we will have the credibility to convince other nations to follow.

21J (cont)

May God bless you and guide your decisions,

Nathan, Kathy, James and Chelsey Coggins
Jonesborough, TN

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PC_456

Buenaflor, Justin

From: eduarjabir [francinatra2@gmail.com]

Sent: Thursday, March 06, 2008 6:57 AM

Subject: JESUS PRECIOSOOOO

Attachments: ESTAS A TIEMPO.pps

120 | JESUS TE AMA DESEA SALVARTE AHORA SALUDOS

2116A

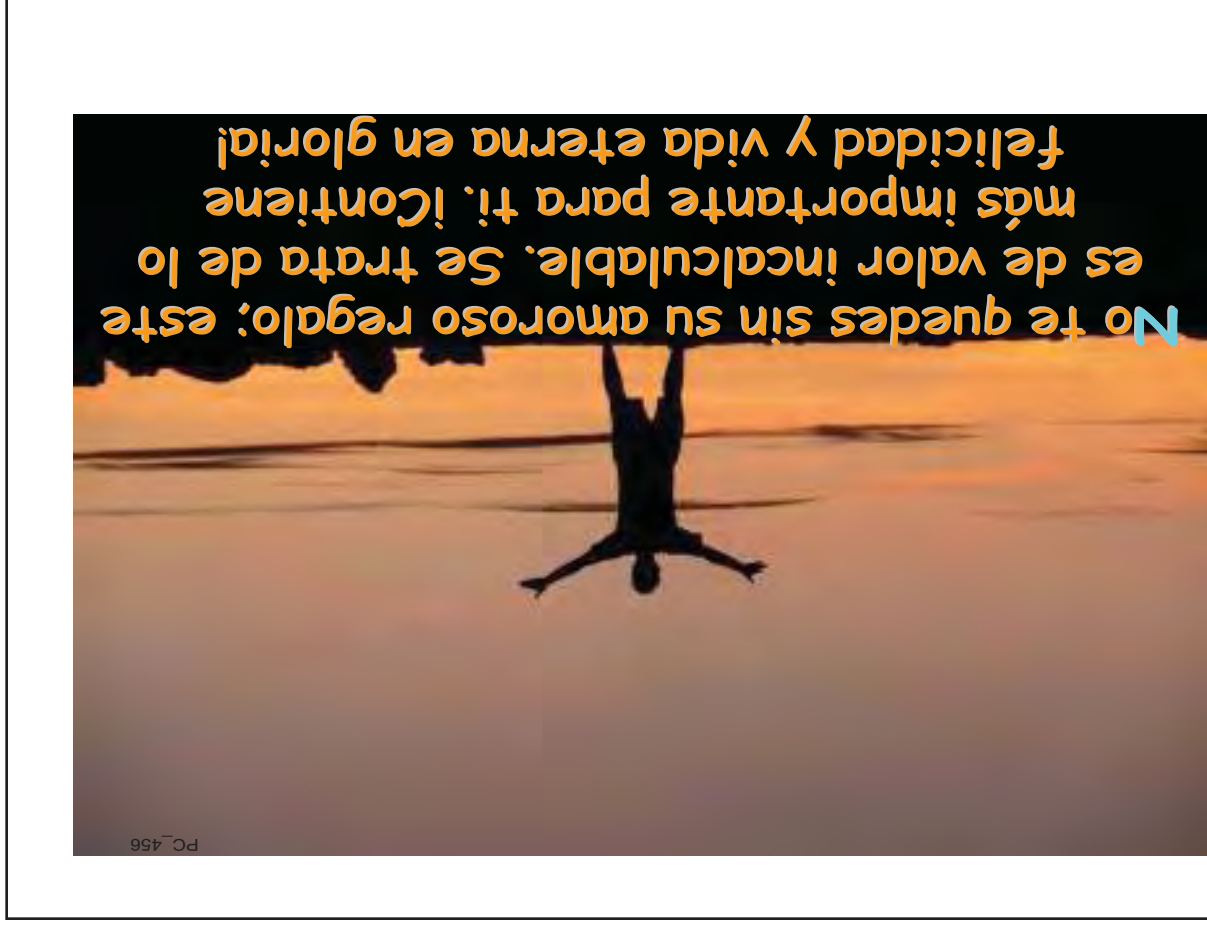
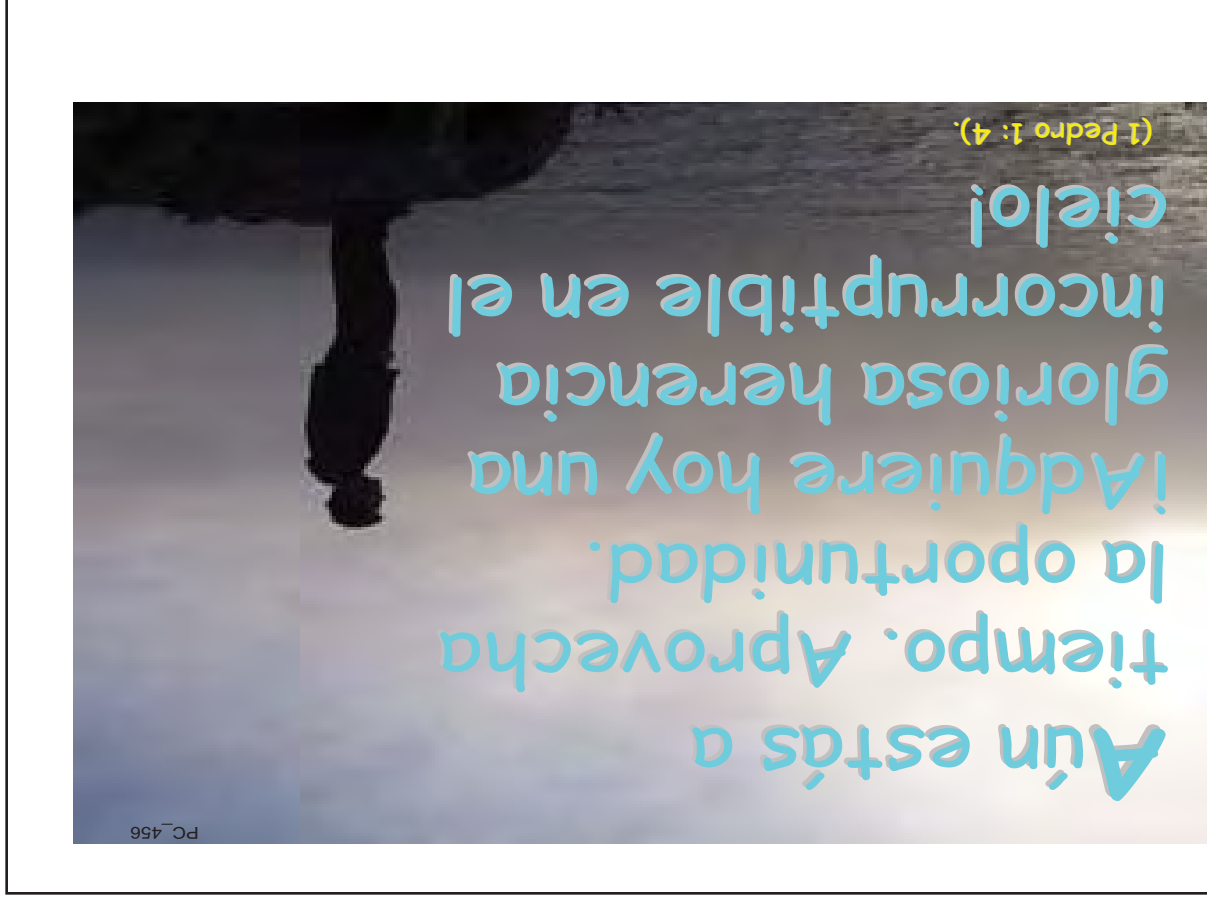


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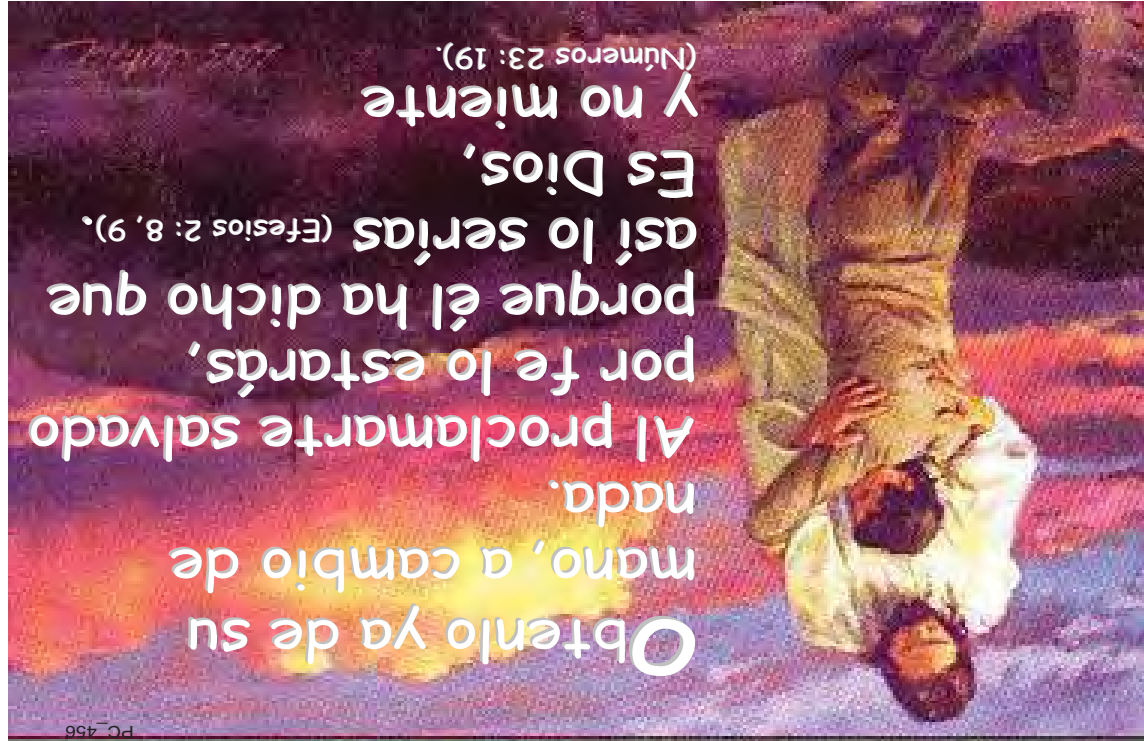


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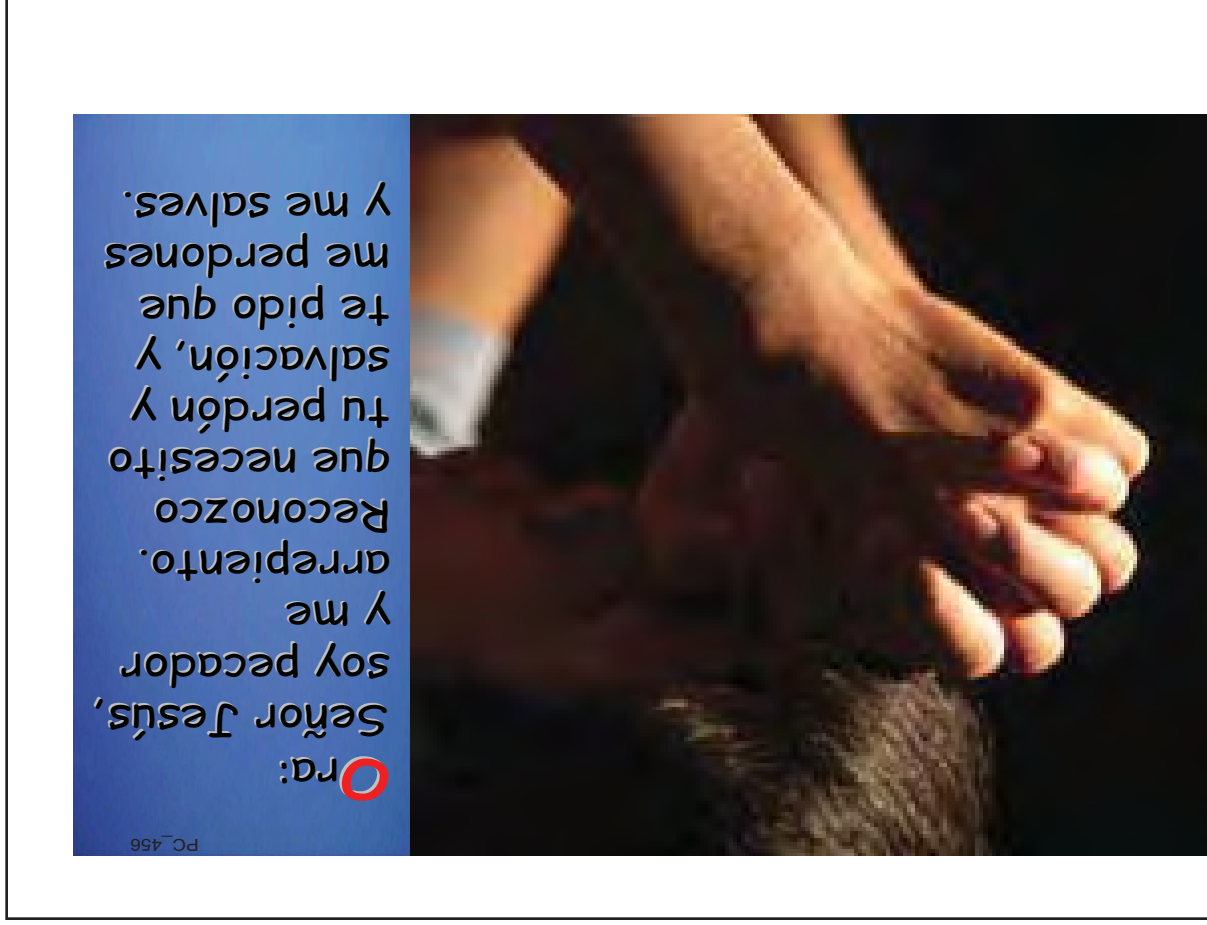


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PC_456

Sé que
derramaste tu
preciosa sangre,
moriste por mí y
resucitaste. Ahora
yo te recibo por
fe como mi único
Salvador, y te
hago Señor de mi
vida




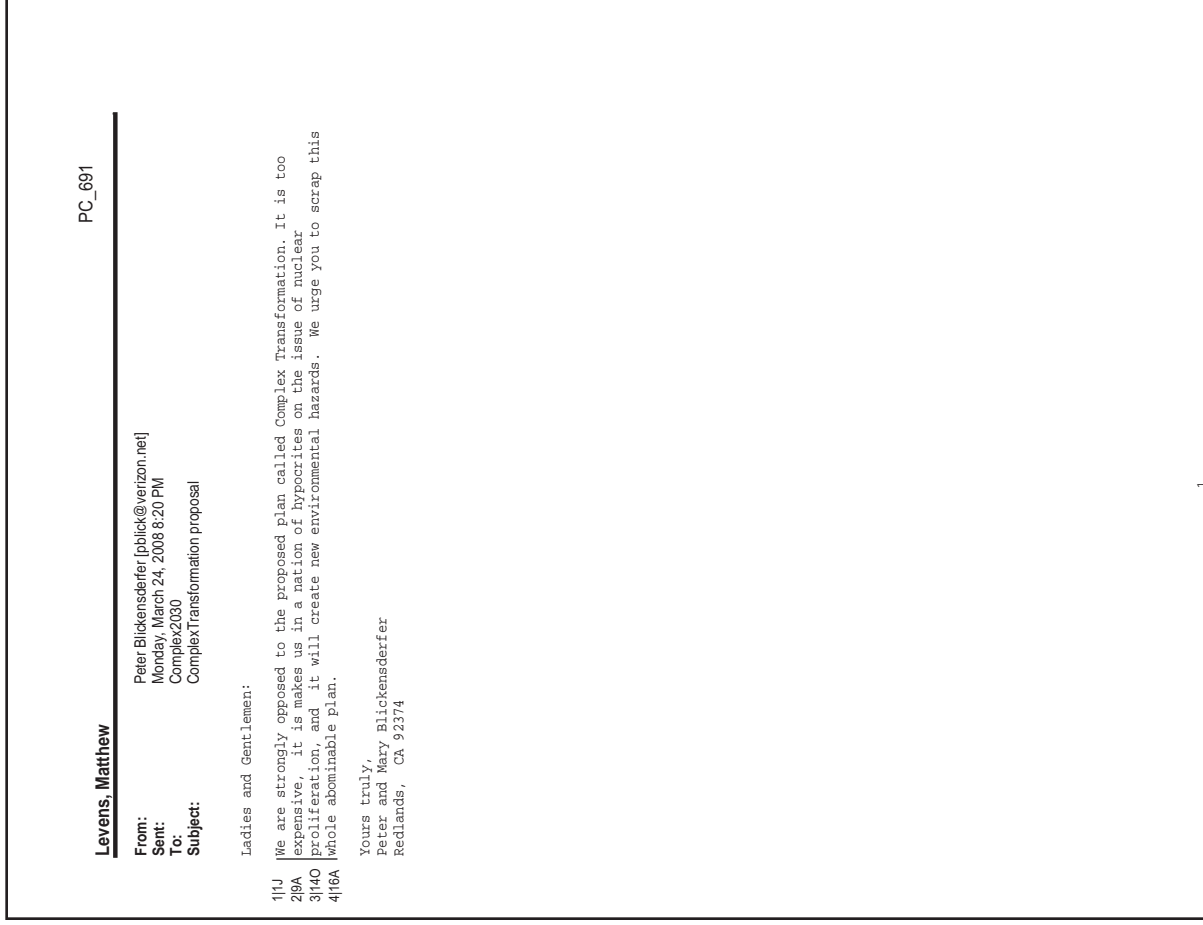
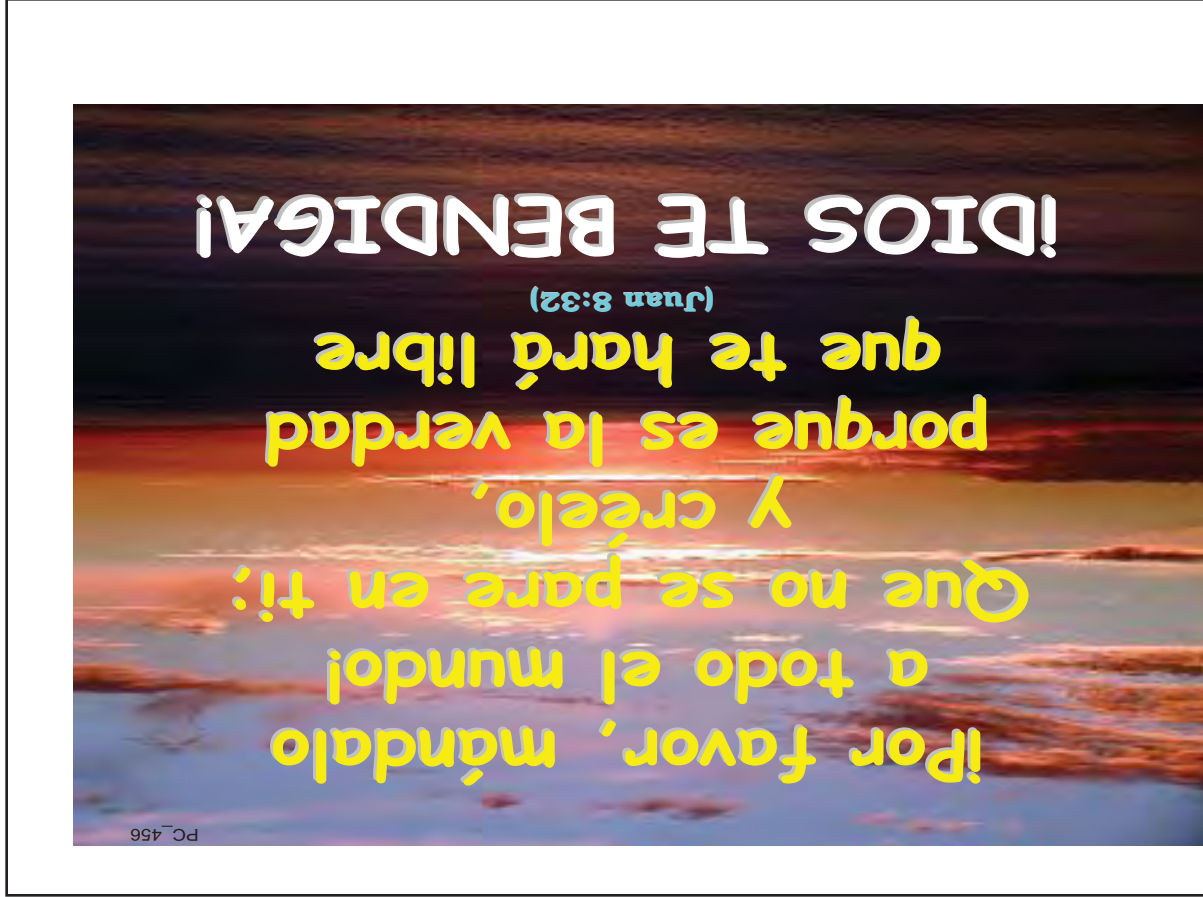
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PC_456

¡Señor mío
y Dios mío
Jesucristo,
perdonarme y
salvarme del
lago de
fuego, con
vida eterna
en el cielo!





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Levens, Matthew

PC_884

From: George & Dorothy Gamble [ggdke@qwest.net]
Sent: Thursday, March 27, 2008 4:26 PM
To: Complex2030
Subject: Opposition to Complex Transformation

George & Dorothy Gamble
201 Vuelta Roble
Santa Fe, NM 87501-1625

March 27, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy

Dear Legislative Leaders and Department of Energy Decision Makers,

This morning we learned that our New Mexico LML produced eleven nuclear pits last year and will produce another 6 or 8 in 2008. This is against the nuclear non-proliferation treaty. Yet another message to the world that we can thumb our noses at the rule of law.

In addition the administration wishes to expand the capacity to produce nuclear pits, 50 to 80 per year, with the funding of the Chemistry and Metallurgy Research Replacement project. We urge you to stop funding of this project. It is unlawful, it makes the world a more dangerous place, it is negative and immoral world leadership. LML and other nuclear facilities could be so helpful in searching for alternative sources of energy, helping to insure the safety of the existing nuclear stockpile in the world, developing more effective responses to natural disasters, and finding out how to isolate disease in humans and plants. Living just miles from LML makes us very sensitive to these issues, but we are also thinking about all the citizens in our country and the world when we make this request. We urge you to engage these wise scientists to make the world a better place.

Sincerely,

George & Dorothy Gamble
505-820-1733

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Levens, Matthew

PC_711

From: Ronjoymason@aol.com
Sent: Thursday, February 28, 2008 12:57 PM
To: Complex2030
Subject: Draft Complex Transformation SPEIS Comments

Dear Mr. Wyka:

We appreciate the opportunity to submit comments re: "Complex Transformation's Supplemental Programmatic Environmental Impact Statement".

11140 It goes without saying that the environmental impact in the process of building any nuclear weapon is tremendous: waste storage, transportation of radioactive materials, possible ground water contamination due to natural disasters to name a few.

211J The idea of building any more nuclear weapons should never be considered when we are in the process of preventing other countries from going nuclear. The U.S. should be in the process of reducing and eliminating its nuclear arsenal and set a standard for other nuclear armed countries to do the same.

3166A We hope your committee will take our views to heart and not issue a clearance of environmental impact for building "Complex Transformation."

Sincerely,

Ronald and Joyce Mason
30840 Running Stream #21
Farmington Hills, MI 48334
248-865-9544

*****Ideas to please picky eaters. Watch video on AOL Living.
(http://living.aol.com/video/how-to-please-your-picky-eater/rachel-campos-duffy/20508272NCID=ao1cmp00300000002598)

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Buenafior, Justin

PC_540

From: jo_huisigh [johuisigh@yahoo.com]
Sent: Thursday, February 21, 2008 9:52 AM
To: Complex2030
Subject: Feb 26 public hearing on Complex Transformation

To all whom it may concern,

We would like to go on record with the following:

We strongly believe 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.

Professor Donald Huisigh
Jo R. Huisigh

11J
211A
316A

Buenafior, Justin

PC_550

From: John Koefler [Vicki.Judice@cox.net]
Sent: Wednesday, March 12, 2008 5:46 PM
To: Complex2030
Subject: Thermonuclear weapons renewal proposal

We are NOT in favor of making more nuclear weapons or rehabilitating our nuclear weapons. We want ALL of them to be dismantled and the facilities put to other more constructive uses. The existence of these weapons is more dangerous than the condition they were constructed to remedy. You should try to find more constructive employment.

116a

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PC_830

Levens, Matthew

From: CARL & SALLY MCKIRGAN [mckirgan123@msn.com]
Sent: Thursday, April 03, 2008 8:01 PM
To: Complex2030; Suzanne Marshall
Subject: Plans for a New Nuclear Weapons Plant at Oakridge


Dear Mr. Theodore Ryke,
 The time for more Nuclear Weapons plants is over. The time for Nuclear Weapons is over!
 A new plant would also violate the Nuclear Nonproliferation Treaty. Stop the insanity of
 war and nuclear weapons. Thank you, Sally McKirgan
 351 Bridge Street,
 Ashland, OR 97520
 541-468-1239

PC_1984

Levens, Matthew

From: George Reading [msgr@iaonet.com]
Sent: Monday, April 28, 2008 8:45 AM
To: Complex2030
Subject: Emailing: Dear Secretary Bodman.wpd

Attachments: Dear Secretary Bodman.wpd

 Dear Secretary Bodman.wpd

The message is ready to be sent with the following file or link
 Dear Secretary Bodman.wpd

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

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PC_1984

Dear Secretary Bodman,

We and many of our friends and neighbors are deeply concerned about LANL's recent development and production of plutonium pits, and existing plans to build a new plutonium pit factory. We request that a 90 day extension be granted so that the case against constructing a new factory can be presented.

We think that the risks from nuclear waste created in making pits will endanger the lives of the people of New Mexico and beyond.

Please consider redirecting the expertise of professionals at LANL toward cleaning up the Los Alamos sites and creating ways to produce safe, sustainable energy.

Sincerely,

Margery and George Reading

HCR 74, Box 22624

El Prado, NM 87529

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314A.3

47J

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Levens, Matthew

PC_2088

Ralph Hutchison [rhp@earthlink.net]
 Thursday, April 24, 2008 10:06 AM
 Complex2030
 comments on Draft SPEIS. letter from students

20 Apr:11 2008

Dear Mr. Wyka,

We are writing to address the proposals presented by the National Nuclear Security Administration's draft programmatic environmental impact statement on the transformation of the US nuclear weapons complex. In the NNSA's draft, four alternative futures are envisioned—each of them would continue the production of nuclear weapons in Oak Ridge through the Stockpile Life Extension Program as well as provide support for the production of new nuclear weapons through the "Reliable Replacement Warheads" regime.

We want to express our unequivocal opposition to each of these plans and to propose an alternative path forward for the Y12 Nuclear Security Complex in Oak Ridge.

We oppose the continued production of nuclear weapons in Oak Ridge for these reasons:

1. Production of nuclear weapons in Oak Ridge contradicts the United States' obligations under the Nuclear Nonproliferation Treaty and undermines efforts to reduce the proliferation of nuclear weapons of mass destruction around the world. Article VI of the NPT obligates the US "to pursue negotiations in good faith on effective measures relating to the 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." This obligation was upheld in a 1996 decision by the World Court which ruled the US and other weapons states have an obligation to achieve nuclear disarmament.

The US assertion that it meets its obligations simply by participating in arms control negotiations with Russia is untenable.

With the signing of the Moscow Treaty in 2001, President George W.

Bush announced the conclusion of arms control negotiations with Russia, revealing the US intention to maintain an arsenal of 2,000 strategic nuclear weapons. Since that time, the US has engaged in "Stockpile Life Extension" at the Y12 plant in Oak Ridge, refurbishing warheads in the current arsenal so they can be reliable for 100-120 years.

Mohammed ElBaradei, director of the International Atomic Energy Agency says this about the Stockpile Life Extension Program currently underway in Oak Ridge: "The US government insists that other countries do not possess nuclear weapons. On the other hand, they are perfecting their own arsenal. I do not think that corresponds with the treaty they signed."

Thomas Graham, leading US arms control negotiator for more than 30 years who spoke in Knoxville in January 2006 as a guest of the Howard Baker Center said, "In exchange for a commitment from the non-nuclear weapons states not to acquire nuclear weapons, the nuclear weapons states, in the Nonproliferation Treaty, undertook to engage in nuclear disarmament negotiations aimed at the ultimate elimination of their nuclear arsenals. But the nuclear weapons states have never really delivered on the disarmament part of this bargain."

The US continues to pursue a policy which is morally and politically untenable—"Do as we say, not as we do." Worst of all, this policy does not work. Rather than dissuade the nuclear ambitions of other nations, it compels the pursuit of a nuclear deterrent in countries which fear the intentions of the United States, ultimately increasing our insecurity.

2. Leading political, military, diplomatic and arms control experts have recognized this is a pivotal moment in history for peace. In January 2007, Henry Kissinger, George Shultz, Sam Nunn and Williams Perry published an op-ed piece in the Wall Street Journal which said, "We endorse the goal of a

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world free of nuclear weapons and working energetically on the actions required to achieve that goal."

On January 15, 2008, these leaders published a second op-ed in The Wall Street Journal. They reported on the response to their previous article, saying they received strong support from a list that includes Mikhail Gorbachev, British foreign secretary Margaret Beckett, Madeleine Albright, Richard Allen, James Baker III, Samuel Berger, Zbigniew Brzezinski, Warren Christopher, William Cohen, Lawrence Eagleburger, Robert McNamara, Colin Powell, Margaret Thatcher and others.

The Kissinger, Shultz, Nunn group described how they convened a gathering of military and policy veterans at the Hoover Institution who reached a consensus on the importance of the vision of a world free of nuclear weapons. The group outlined concrete steps toward a world free of nuclear weapons, saying "In some respects, the goal of a world free of nuclear weapons is like the top of a very tall mountain. From the vantage point of our troubled world today, we can't even see the top of the mountain, and it is tempting and easy to say we can't get there from here. But the risks from continuing to go down the mountain or standing pat are too real to ignore. We must chart a course to higher ground where the mountaintop becomes more visible." Among the steps outlined were strengthening compliance and verification protocols within the NPT. The group also called for "further substantial reductions in US and Russian nuclear forces beyond those recorded in the US-Russia Strategic Offensive Reductions Treaty" (the Moscow Treaty, which obligates the US to reduce its arsenal to 2,000 warheads by 2012.)

The steps envisioned by Shultz, Kissinger and dozens of other leaders around the globe call for an alternative not contemplated in the NNSA's draft EIS—a nuclear weapons complex that produces no nuclear weapons.

4/70

3. The continued production of nuclear weapons, and the proposed creation of a new, or upgraded infrastructure for the production of nuclear weapons diverts valuable resources from pressing social needs. This is the paradox of nuclear weapons which reflects the spiritual death Dr. Martin Luther King, Jr. spoke of. When we devote massive amounts of our common treasure to weapons ostensibly designed to procure our security, we neglect things that provide true security. The life-cycle cost of the alternatives proposed in the NNSA's Complex Transformation document will be in excess of \$150,000,000,000. Were this money invested in housing for low-income Americans, it could provide for the construction of four million Habitat for Humanity homes. Or imagine this money devoted to securing alternative energy sources, improving education, lowering health care costs or stocking food pantries across the country.

4. The economic health of our community does not require the continued production of nuclear weapons in Oak Ridge. In fact, the relentless pursuit of funding for bomb production has undermined efforts to procure other funds for environmental restoration, worker and public health, and positive economic development. The Oak Ridge/Knoxville region presents a community with stunningly attractive benefits to any industry looking for an ample energy supply, a highly educated population, an abundant and willing workforce, unparalleled natural beauty, a business friendly environment, and a demonstrated commitment to cutting edge technology—all located at the intersection of two major transportation corridors. What are the conceivable downsides to corporations looking to invest in a community?

PR efforts notwithstanding, our legacy of contamination and our continued reputation as producers of weapons of mass destruction raise red flags. Knoxville/Oak Ridge has everything the research triangle in North Carolina has, and more. It is that more—the bomb plant and its legacy of contamination—that inhibits economic development.

Our proposal

The Y12 Plant should get out of the bomb production business; money currently expended on Stockpile Life Extension should be re-directed to environmental restoration, weapons dismantlement and disposition operations.

Any new infrastructure planned for Oak Ridge should be designed solely to support dismantlement and disposition operations; it should have complete transparency built in and should be certified by the IAEA if not placed under its administrative control. This is the path to a future verifiably free of nuclear weapons—it is ultimately what the US will demand of Iran and other "nuclear wannabe" nations, and it conforms to the vision of Kissinger, Shultz and their colleagues.

A commitment to dismantlement and disposition in Oak Ridge would lead to full

3/16A (cont)

5/98 (cont)

employment of all the current generation of employees until retirement age—PC-2088 words, our proposal does not have to cost a single worker his or her job.

A commitment to dismantlement and disposition in Oak Ridge could, with the aggressive support of local and state officials, lead to an increase in funding for environmental restoration as money is redirected from Stockpile Life Extension. At current funding levels, the Department of Energy is not meeting its cleanup milestones in Oak Ridge.

6/5D2 The Highly Enriched Uranium storage and disposition facility currently under construction should be retrofitted to allow for complete and unfettered access by international inspectors—full transparency of all operations—and building plans should be modified to provide maximum safeguards against natural events or hostile attacks.

Any new weapons-related facilities in Oak Ridge should be designed and constructed according to the same criteria: maximum safeguards against natural events or hostile attacks; full transparency and complete access to international inspectors.

7/8A In considering the DOE budget request last year, and rejecting funding for the Reliable Replacement Warheads program, Congress called for a reconsideration of US nuclear policy. Such a reconsideration, if Kissinger, Shultz and the conservative Wall Street Journal are any guide, will result in a profound and fundamental shift in US policy, followed by a dramatic downsizing of the nuclear weapons production infrastructure and the zeroing out of our production capacity. Our proposal best positions Oak Ridge to prepare for this shift.

The vision we embrace for the future is not a prisoner of the past. We want a better world for our children, for their children, and for all the world's children.

- Beth Degutis
- Victor G. Degutis
- Kate Gilbert
- Christopher Vogado
- Laura Holliday
- Mindy Flynn
- Andy Shafer
- Ryan Rincon
- Ryan Potocik
- Dustin Wellons
- Jonathan Rosen
- Yukihiko Yamada
- Faye Kemner
- Sarah Downs
- Hannah McMillan
- Nora Luke
- Brett Sharp
- Will Warty
- William Brandon
- Sarah Rich
- Rachel LaRue
- Susan Luke

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PC_2089

Levens, Matthew

From: Ralph Hutchison [oep@earthlink.net]
Sent: Thursday, April 24, 2008 10:01 AM
To: Complex2030
Subject: comments

'A nation that continues year after year to spend more money on military defense than on programs of social uplift is approaching spiritual death.'
- The Rev. Dr. Martin Luther King, Jr.
A Time to Break Silence
April 4, 1967 • Riverside Church

An open letter to leaders in our community and the Department of Energy

24 April 2008

Dear friends,

We are writing to address the proposals presented by the National Nuclear Security Administration's draft, programmatic environmental impact statement on the transformation of the US nuclear weapons complex. In the NNSA's draft, four alternative futures are envisioned—each of them would continue the production of nuclear weapons in Oak Ridge through the Stockpile Life Extension Program as well as provide support for the production of new nuclear weapons through the "Reliable Replacement Warheads" regime.

We want to express our unequivocal opposition to each of these plans and to propose an alternative path forward for the Y12 Nuclear Security Complex in Oak Ridge.

We oppose the continued production of nuclear weapons in Oak Ridge for these reasons:

1. Production of nuclear weapons in Oak Ridge contradicts the United States' obligations under the Nuclear Nonproliferation Treaty and undermines efforts to reduce the proliferation of nuclear weapons of mass destruction around the world. Article VI of the NPT obligates the US "to pursue negotiations in good faith on effective measures relating to the 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." This obligation was upheld in a 1996 decision by the World Court which ruled the US and other weapons states have an obligation to achieve nuclear disarmament.

The US assertion that it meets its obligations simply by participating in arms control negotiations with Russia is untenable.

With the signing of the Moscow Treaty in 2001, President George W. Bush announced the conclusion of arms control negotiations with Russia, revealing the US intention to maintain an arsenal of 2,000 strategic nuclear weapons. Since that time, the US has engaged in "Stockpile Life Extension" at the Y12 Plant in Oak Ridge, refurbishing warheads in the current arsenal so they can be reliable for 100-120 years. Mohammed ElBaradei, director of the International Atomic Energy Agency says this about the Stockpile Life Extension Program currently underway in Oak Ridge: "The US government insists that other countries do not possess nuclear weapons. On the other hand, they are perfecting their own arsenal. I do not think that corresponds with the treaty they signed."

Thomas Graham, leading US arms control negotiator for more than 30 years who spoke in Knoxville in January 2006 as a guest of the Howard Baker Center said, "In exchange for a commitment from the non-nuclear weapons states not to acquire nuclear weapons, the nuclear weapons states, in the Nonproliferation Treaty, undertook to engage in nuclear disarmament negotiations aimed at the ultimate elimination of their nuclear arsenals. But the nuclear weapons states have never really delivered on the disarmament part of this

11F (Continues throughout the letter...)

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The US continues to pursue a policy which is morally and politically untenable—"Do as we say, not as we do." Worst of all, this policy does not work. Rather than dissuade the nuclear ambitions of other nations, it compels the pursuit of a nuclear deterrent in countries which fear the intentions of the United States, ultimately increasing our insecurity.

2. Leading political, military, diplomatic and arms control experts have recognized this is a pivotal moment in history for Peace. In January 2007, Henry Kissinger, George Shultz, Sam Nunn and Williams Perry published an op-ed piece in The Wall Street Journal which said, "We endorse the goal of a world free of nuclear weapons and working energetically on the actions required to achieve that goal."

On January 15, 2008, these leaders published a second op-ed in The Wall Street Journal. They reported on the response to their previous article, saying they received strong support from a list that includes Mikhail Gorbachev, British foreign secretary Margaret Beckett, Madeleine Albright, Richard Allen, James Baker III, Samuel Berger, Zbigniew Brzezinski, Warren Christopher, William Cohen, Lawrence Eagleburger, Robert McNamara, Colin Powell, Margaret Thatcher and others.

The Kissinger, Shultz, Nunn group described how they convened a gathering of military and policy veterans at the Hoover Institution who reached a consensus on the importance of the vision of a world free of nuclear weapons. The group outlined concrete steps toward a world free of nuclear weapons, saying "In some respects, the goal of a world free of nuclear weapons is like the top of a very tall mountain. From the vantage point of our troubled world today, we can't even see the top of the mountain, and it is daunting and easy to say we can't get there from here. But the risks from continuing to go down the mountain or standing pat are too real to ignore. We must chart a course to higher ground where the mountaintop becomes more visible." Among the steps outlined were strengthening compliance and verification protocols within the NPT. The group also called for "further substantial reductions in US and Russian nuclear forces beyond those recorded in the US-Russia Strategic Offensive Reductions Treaty" (the Moscow Treaty, which obligates the US to reduce its arsenal to 2,000 warheads by 2012.)

The steps envisioned by Shultz, Kissinger and dozens of other leaders around the globe call for an alternative not contemplated in the NNSA's draft EIS—a nuclear weapons complex that produces no nuclear weapons.

3. The continued production of nuclear weapons, and the proposed creation of a new or upgraded infrastructure for the production of nuclear weapons diverts valuable resources from pressing social needs. This is the paradox of nuclear weapons which reflects the spiritual death Dr. Martin Luther King, Jr. spoke of. When we devote massive amounts of our common treasure to weapons ostensibly designed to procure our security, we neglect things that provide true security. The life-cycle cost of the alternatives proposed in the NNSA's Complex Transformation document will be in excess of \$150,000,000,000. Were this money invested in housing for low-income Americans, it could provide for the construction of four million Habitat for Humanity homes. Or imagine this money devoted to securing alternative energy sources, improving education, lowering health care costs or stocking food pantries across the country.

4. The economic health of our community does not require the continued production of nuclear weapons in Oak Ridge. In fact, the relentless pursuit of funding for bomb production has undermined efforts to procure other funds for environmental restoration, worker and public health, and positive economic development. The Oak Ridge/Knoxville region presents a community with stunningly attractive benefits to any industry looking for an ample energy supply, a highly educated population, an abundant and willing workforce, unparalleled natural beauty, a business friendly environment, and a demonstrated commitment to cutting edge technology—all located at the intersection of two major transportation corridors. What are the conceivable downsides to corporations looking to invest in a community?

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Our Proposal

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Any new infrastructure planned for Oak Ridge should be designed solely to support dismantlement and disposition operations; it should have complete transparency built in and should be certified by the IAEA if not placed under its administrative control. This is the path to a future verifiably free of nuclear weapons—it is ultimately what the US will demand of Iran and other "nuclear wannabe" nations, and it conforms to the vision of Kissinger, Shultz and their colleagues.

A commitment to dismantlement and disposition in Oak Ridge would lead to full employment of all the current generation of employees until retirement age—in other words, our proposal does not have to cost a single worker his or her job.

A commitment to dismantlement and disposition in Oak Ridge could, with the aggressive support of local and state officials, lead to an increase in funding for environmental restoration as money is redirected from Stockpile Life Extension. At current funding levels, the Department of Energy is not meeting its cleanup milestones in Oak Ridge.

The Highly Enriched Uranium storage and disposition facility currently under construction should be retrofitted to allow for complete and unfettered access by international inspectors—full transparency of all operations—and building plans should be modified to provide maximum safeguards against natural events or hostile attacks.

Any new weapons-related facilities in Oak Ridge should be designed and constructed according to the same criteria: maximum safeguards against natural events or hostile attacks; full transparency and complete access to international inspectors.

In considering the DOE budget request last year, and rejecting funding for the Reliable Replacement Warheads program, Congress called for a reconsideration of US nuclear policy. Such a reconsideration, if Kissinger, Shultz and the conservative Wall Street Journal are any guide, will result in a profound and fundamental shift in US policy, followed by a dramatic downsizing of the nuclear weapons production infrastructure and the zeroing out of our production capacity. Our proposal best positions Oak Ridge to prepare for this shift.

The vision we embrace for the future is not a prisoner of the past. We want a better world for our children, for their children, and for all the world's children.

Dr. Guy Larry Osborne
Professor of Psychology
Carson-Newman College*

Susan Karr
Biology Department
Carson-Newman College

Dr. Ken Morton
Professor and Chair of Chemistry
Carson-Newman College

Dr. Millicent M. Sites, Ph. D.
Professor and Chair, Department of Business and Economics, Carson-Newman College

Dr. Mel Hawkins
Minister and educator, Dandridge, TN

Dr. Larry Ingle
Professor Emeritus, History
University of Tennessee- Chattanooga

Dr. Scott Brunger

Dr. Fran Ansley
Distinguished Professor of Law Emeritus

PC_2089

University of Tennessee

Dr. Susan Ambler
Associate Professor of Sociology
Maryville College

Dr. John Nolt
Professor, Philosophy Department, University of Tennessee, Knoxville

Dr. Annette Mendoza
Lecturer, Department of Philosophy, University of Tennessee

Dr. Heather Douglas
Assistant Professor, Dept. of Philosophy, University of Tennessee

* institutions and affiliations are listed for identification purposes only and do not imply endorsement by the institution.

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PC_1999

Levens, Matthew

From: jane robinson [jane robinson3@comcast.net]
Sent: Saturday, April 12, 2008 1:05 PM
To: Complex2030
Subject: Bombplex

We strongly oppose our government's plans to transform Los Alamos National Laboratory into a facility for making plutonium pits for nuclear weapons, not only at this facility but at any facility in our country. This plan is unacceptable in every respect. We need our government to work with the national community to eliminate nuclear weapons of any kind and live up to the Nonproliferation Treaty we have signed. Let's put our scientists to work on solving the problems of global warming and air, water, and land pollution.

Jane and Jerry Robinson
147 Gonzales Road, House 9
Santa Fe NM 87501
505-992-0028

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PC_2012

Levens, Matthew

From: Joe and Kelly Sidman [the_sidmans@msn.com]
Sent: Thursday, April 10, 2008 12:46 AM
To: Complex2030
Subject: Opposed to Closing of Tonopah Test Range

Mr. Wyka,
We are writing this to add our voices to the hundreds of others who are steadfastly opposed to the closing of the Tonopah Test Range.

We moved here in 2007 to get away from "city life" and now enjoy the peace, quiet, and friendliness of a small town, and also own an ATV and motorcycle repair business (Hi Desert Cycle Werks).

We have learned during our short time in Tonopah that we, as residents, rely immensely on the employees and families of the Tonopah Test Range for a variety of reasons, e.g., our volunteer firefighters, the staff at the Nye County Regional Medical Center, our teachers, employees of both Nye and Esmeralda Counties, among others. I myself now work for Esmeralda County to supplement our business income. Closing TTR would permanently remove residents from this area, seriously affecting the levels of these public service and volunteer workers.

We fully agree with the statement that moving the TTR from Tonopah would destroy this town, and don't quite understand why the other sites being considered are so desirable. It doesn't appear that those alternate sites offer any services and/or "conveniences" that aren't currently available in Nye County in that that all locations are a significant distance from any major city. Has anyone considered the fact that this area desperately needs/wants those services and "conveniences" and that the closing of TTR would probably completely destroy any possibility of that happening?

Another question: The TTR site is an environmental nightmare requiring extensive clean-up. Is the U.S. Government willing to spend the millions of dollars required for that clean-up? If the answer is yes, then please explain to us how the U.S. Government can justify the expenditure of millions of taxpayer dollars while at the same time destroying an area of the country that desperately wants/needs to grow? This land will never be suited for any use other than its current use, no matter how extensive the clean-up. It seems to us that it would be a huge waste of taxpayer dollars to try and convert this land to any other use at this time.

We could list for pages all the reasons why the closing of the Tonopah Test Range would be detrimental to not only the residents of Tonopah, NV, but to this area of the country as a whole. You have seen the reports, Mr. Wyka, as have those who are of a higher authority than you. Combine the facts spelled out in those reports with the well-documented adverse effects to this area caused by the removal of the Stealth Program, it is obvious that the closure of the TTR is the worst possible decision that could be made. To do anything else but keep the TTR open and operating would be a slap in the face to the American public, and especially to the residents of Nye County, NV. Closing the TTR would prove for a fact that the U.S. Government is only concerned with its bottom dollar, not what is in the best interests of the citizens of this country.

We ask that the U.S. Government do what its citizens want and keep the TTR open and fully operational, which will encourage future growth and prosperity in Nye County, NV. Respectfully submitted,

Joe and Kelly Sidman
Hi Desert Cycle Werks
Tonopah, NV

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Levens, Matthew

From: Ward [w@hvegreen@earthlink.net]
Sent: Wednesday, April 30, 2008 9:55 PM
To: Complex2030
Cc: keumbow@greatlakes.net
Subject: Rebuild the BOMB?

To: Theodore Wyka:

Sir:

I wish this was all I had to do with my time. I could do a better job. My knowledge of nuclear things started about 70 years ago when I started to read three different science fiction magazines which were much different then those available today. In the early days the best of science fiction was written by recognized scientists-- Physical scientists, Chemists, Psychologists, Medical specialists, Sociologists, Nuclear scientists, out there in a make believe world of the future. Most people did not know that these scientists, under different names, were the authors of stories about the future. I learned much from them. I have a recent " The Best Of" anthology. Not one story about nuclear power or armaments.

The fiction of cheap, clean, powerful nuclear sources of energy and armaments is still with those who do not know the truth. SIR, I AM AGAINST IT. All The Way!

I am going to ask you to do one thing-- and believe it. Read the most recent The NATION magazine dated May 12. Cover feature: "WHAT NUCLEAR RENAISSANCE? Despite the hype, The Industry Is A Bust" by Christian Parenti. On the same day I read this I also received an email reporting that a foreign mining corporation was scheduled to start mining uranium in the Upper Peninsula of Michigan-- to be sold to China for seven new power plants.

Oh My God! Do you know how filthy the mining of uranium can be. Ask First Nation people in New Mexico about that-- or the people who live in Port Hope, Ontario on the North shore of Lake Ontario.

Have you read the book "METAL OF DISHONOR-- DEPLETED URANIUM"--, How the Pentagon radiates Soldiers and Civilians with DU weapons?

Sir: You, and all government officials will have a legacy that will outlive your lifetime. What will your legacy be regarding Nuclear transformation?

I have read any number of recent print and electronic articles that say there will be no nuclear transformation second generation progress because the bankers will not support it. I must beg you to stop the deplorable news that I read that the American taxpayers will pay for it.

All because a few wealthy corporate policy makers have decided that their stockholders must get paid on the backs of American citizens. Can any fair minded government official even think about continuing to corrupt our way of life further in the name of neo-Capitalism and building a world empire under an administration that should know better.

"NUCLEAR" was a good dream in a science fiction magazine. It is a nightmare in real life. It can very well be the end of a civilization on s small blue planet called EARTH. Who really needs it? There are better, cheaper, cleaner ways to get the job done.

I appreciate this opportunity of an "Open Mike" to express my thoughts. Thank you.

Sincerely, (Signed)

Ward and Dorothy Hodge
312 Kent Court

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PC_2141

Midland, Michigan 48642

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PC_2031

Levens, Matthew

From: LaRoy and Mary Seaver (maroyseaver@hukeraccess.com)
Sent: Wednesday, April 30, 2008 12:33 PM
To: Complex2030
Subject: Nuclear weapons development

LaRoy and Mary Seaver
7005 Shamrock Rd. #105
Lincoln, NE 68506-2980

April 30, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A We are deeply concerned that the administration is asking for funds to modify nuclear facilities across the country which would make possible the development of new nuclear weapons. We ask you to oppose this proposal and deny funding for it.

2|10 This action moves in the directly opposite direction from the one in which the whole world needs to move. It goes contrary to the spirit and intention of the non-proliferation treaty in which we agreed to reduce our nuclear weapons and which we are pushing Iran to carry out. And it is directly contrary to the security needs of our nation and the world.

3|13A1 Nothing is more dangerous to all the citizens of the world, including the U.S., than the presence of nuclear weapons. They have the capacity to destroy life upon the earth. We have weapons stored, as do other nations, that are more destructive than the weapons that destroyed Hiroshima and Nagasaki. The security of all of us cannot be better established until we eliminate all of them. There is absolutely no security gained by improving what we have or producing new ones.

Please reject the administration's proposal.

Sincerely,

LaRoy and Mary Seaver
402-484-7665

PC_2032

Levens, Matthew

From: LaRoy and Mary Seaver (maroyseaver@hukeraccess.com)
Sent: Wednesday, April 16, 2008 12:55 PM
To: Complex2030
Subject: Nuclear weapons development

LaRoy and Mary Seaver
7005 Shamrock Rd. #105
Lincoln, NE 68506-2980

April 16, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A We strongly oppose any and all of the administration's proposals to make more nuclear weapons production more effective.

2|13A1 Our security (ours, our children's, our grandchildren's, our nation's) and that of everybody else on the planet depends upon eliminating nuclear weapons, not being more efficient in their production. Let us join all the other nations in seeking more effective ways to work for all of our security than seeking more efficient ways to kill one another.

Sincerely,

LaRoy and Mary Seaver
402-484-7665

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PC_952

1 TONOPAH TOWN BOARD RESOLUTION NO. 2008- 02.

2 A RESOLUTION URGING THE U.S. DEPARTMENT OF ENERGY, NATIONAL NUCLEAR

3 SECURITY ADMINISTRATION, OFFICE OF TRANSFORMATION TO IMPLEMENT ANY OF THE

4 ALTERNATIVES IN ITS INDEPENDENT BUSINESS CASE ANALYSIS OF COMPLEX

5 TRANSFORMATION FLIGHT TEST FACILITIES THAT DO NOT INVOLVE DOWNSIZING OR

6 RELOCATING MISSIONS FROM THE TONOPAH TEST RANGE

7 WHEREAS, the Town of Tonopah and Nye County has served the nation's defense needs at every turn,

8 and

9 WHEREAS, the Town of Tonopah and Nye County has been home to aircrew training in World War II,

10 nuclear weapons testing since the 1950s, considered as the home for MX, host to the Stealth Fighter program

11 when it was classified and the designated site for the Nation's geologic repository for nuclear waste; and

12 WHEREAS, the Town of Tonopah and Nye County has yet to shy away from doing our patriotic duty,

13 asking only that we be treated with fairness and respect; and

14 WHEREAS, there has been a long-standing injustice that has ensured that the majority of federal

15 investment in the TTR and NTS migrated to Clark County, who bears no burden in return for this benefit; and

16 WHEREAS, the Nye County Board of Commissioners with the full support of the Tonopah Town Board

17 contracted last year with the Center for Economic Development at the University of Nevada to produce a report

18 entitled *Complex 2030 Proposal Estimated Economic Impacts on Northern Nye and Esmeralda Counties* which

19 showed that any reduction at the Tonopah Test Range (TTR) will have significant economic and social impacts on

20 the Town of Tonopah; and

21 WHEREAS, the Department of Energy, National Nuclear Security Administration (NNSA) contracted

22 with TechSource to form a team of subject matter experts to provide an independent assessment of the

23 consolidation options for NNSA's Flight Test Facilities, results of which were detailed in their *Independent*

24 *Business Case Analysis of Complex Transformation Flight Test Facilities* dated December 2007; and

25 WHEREAS, the esteemed experts from TechSource recommended that the most favorable alternative is

to upgrade the TTR with High Tech Mobile, reduce the number of structures to a minimum, and institute

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1 campaign operations whereby TTR is fully active part of the year and in custodial standby for the remainder,

2 resulting in no threat to mission objectives; and

3 WHEREAS, NNSA appears to have disregarded that expert advice, recommending instead that activities

4 be ceased at TTR and relocated to White Sands Missile Range in New Mexico, where the experts from

5 TechSource note that completing facility downsizing or consolidation on schedule is uncertain, Flight Test

6 Facilities performance at an acceptable level is uncertain, and impact on cost to execute a specific weapon

7 program is uncertain;

8 NOW THEREFORE, BE IT RESOLVED by the Tonopah Town Board that strongly urges the NNSA to

9 select alternatives that do not involve downsizing or relocation of TTR Flight Test Operations, but instead

10 develop and implement plans to upgrade the current facilities with High Tech Mobile equipment.

11 BE IT FURTHER RESOLVED that a copy of this resolution is forwarded to Governor Jim Gibbons,

12 Senator Harry Reid, Senator John Ensign, and Congressman Dean Heller.

13

14 ADOPTED this 11th day of April, 2008

15 TONOPAH TOWN BOARD: ATTEST:

16 *Cindy Kaminski* Cindy Kaminski, Chairman

17 *Paul Campos* Paul Campos, Vice-Chairman

18 Terry Rivero, Town Clerk

19

20

21 *Raymond Gallagher* Raymond Gallagher, Member

22 *Thomas Hawkins* Thomas Hawkins, Member

23

24

25

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Page 1 of 1

Don Ellen Newbauer, 713-08
 Phenomenonette, Wisconsin
 Dear Ms. Wyka,
 My husband and I
 oppose the "Complex
 Transformation" proposal.
 Do we not have already
 enough nuclear weapons to
 annihilate the world many
 times over?
 We believe the \$150
 billion dollars should
 be spent on needs for
 less fortunate people in
 our country, not another
 way for the wealthy to
 earn even more money.
 Also we believe strongly
 that the U.S. should follow
 completely the Non-Proliferation
 Treaty. We had to the Native
 Americans & took their land.
 Let's stop lying to Americans.
 Don & Ellen Newbauer
 N4W14634 Schläfer Dr.
 Wisconsin 53051-3236

116A


29A

39B

41F

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 **Monastery of St. Gertrude**
 Idaho Corporation of Benedictine Sisters

Theodore A. Wyka
 Office of Transformation, MA-10.1
 U.S. Department of Energy
 1000 Independence Ave. SW
 Washington D.C. 20585

Dear Ms. Wyka:

We wish to express our strong opposition to the administration's proposal to build a plant to produce plutonium pits for nuclear weapons. Building such a plant would send a contradictory message to other countries, such as Iran, who may be seeking nuclear weapons. How can we ask other countries to forego developing nuclear arsenals when we are simultaneously trying to increase our capacity to build such weapons? We are 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 is time for our country to take true leadership in our world by setting the example and taking serious steps toward nuclear disarmament. These weapons of mass destruction are not making our country or our world safer. Thank you.

Sincerely,
 Carol Ann Karsmuth
 Alfred Oakley
 Kater Cooper
 Cynthia Wilson
 Florine Wandhoff
 Catherine Mansfield
 Sylvia Heiland
 Shiree Kochdiner
 Jean Letander
 Wendy Olin
 Cynthia Harris

Clarion Freshman, OSB
 Mary Marge Beckner
 Colleen Foreman
 Lenora Lomak
 Cecil Marie Wilson
 Sue Ellen Dreffer
 Lynne Beckler

PC_915
 March 31, 2008

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 21U
 319A1

Monastery of St. Gertrude
 465 Kauterville Road
 Cottonwood, ID 83422 408

Shipping Address
 Kauterville Road
 Cottonwood, Idaho 83422

Telephone: 208/962-3224
 Fax: 208/962-7212
 www.signatures.org

Gray Panthers of Metro Detroit

Age And Youth in Action

www.graypanthersmetrodetroit.org



**Co-Conveners: Ethel Schwartz
Randy Block**

April 19, 2008

P.O. Box 37033
Oak Park, MI 48237

PC_990

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, DC 20585

Re: Testimony from Gray Panthers of Metro Detroit

Dear Mr. Wyka:

Gray Panthers of Metro Detroit, an intergenerational social justice organization with members in Southeast Michigan, strongly opposes plans for rebuilding the entire U.S. nuclear weapons complex, no matter what its name. We were opposed to Complex 2030 and are equally opposed to this undertaking under its new name, Complex Transformation.

Complex Transformation appears to be a step in the right direction, when there is talk of downsizing, making the weapons "safer," perhaps reducing nuclear sites. But we must oppose any effort to create new plutonium pits, new buildings, and with them new danger to life on our planet. Complex Transformation violates the nuclear Non-Proliferation Treaty, to which the United States is a signatory, and invites another nuclear arms race. Well known officials from former administrations, such as Henry Kissinger, have started to call for nuclear disarmament. We support them in this effort. There is no safety in renewed nuclear weapons production. It can only end in disaster for all of us.

Gray Panthers understand the concern that workers at the various nuclear sites have for their jobs. We have a history of supporting workers, supporting unions. However, if our scientists would start using their talents and imagination to enhance life on our earth, there would be much work for years to come, including disassembling nuclear warheads and cleaning up nuclear sites. Many thousands of jobs can be created working to create a safer environment, cleaner energy, mass transit, just to name a few steps in a direction that can benefit us all.

Sincerely

Ethel Schwartz
Ethel Schwartz and Randy Block, Co-Chairs
248-669-6343 248-549-5170

cc: Senators Carl Levin and Debbie Stabenow; Representatives Dale Kildee, Joe Knollenberg, Candice Miller, Thaddeus McCotter, Sander Levin, Carolyn Kilpatrick, John Conyers and John Dingell

PC_988

Concerned Citizens of Llano de San Juan, New Mexico
Box 30, Llano, NM 87543
575-587-0202, arstuidio@kitcarson.net

March 29, 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,

This letter is to register our opposition as a concerned group of citizens who reside in the town of Llano de San Juan, New Mexico, to the Complex Transformation Proposals being set forth. We request that a No Production/Clean Up alternative be implemented at LANL.

Elevated levels of radioactivity have already been found in our mountains, water and soil, as cited in a report released July 10, 2007. An additional study was recently released citing high levels of radioactivity in the soil at Trampas Lakes. All of these studies are of deep concern to the residents of our valley.

We oppose any new pit production at LANL until more studies are completed to measure the environmental impact on northern New Mexico, and clean up is in place for the damage already done to our environment. For further discussion please contact Jean Nichols at 575-587-0202.

Sincerely,

Ellen O'Connell
Edna
Lana Green
Janet McDaniel
Catherine Marie
Jeffrey MacArthur
Robert
Andrew
Jeff M...
Leah...
Joanne Berle
Rose Cammiti
Neal Thielke
587-9713
587-7903
87543-575-587-2775
-587-9775
Box 50 87543

Multiple Signatory Letter 54

Page 2 of 2

Sam Stasiak
PO Box 44
Llano NM 87543

[Signature]

Tanya Leberissey
PO Box 9
Llano, NM 87543

Tanya Leberissey
7200 W. Tujate

Bob Ando

Sam Lytle

JOHN BRONASCON I
NBU Box 79
LLANO NM 87543

Gabriel Gonzales
Box 45 Llano NM
87543

John Gottschalk
P.O. Box 23
Llano, N.M. 87543
575 587 1947

Francie K. Gottschalk
Same

harry Gottschau
Box 23 Llano NM 87543

Maggi Younger
PO Box 3 Llano NM 87543

[Signature]
Alberto Castagna
Box 13, 11240, NM
87543

Leroy Craig
PO Box 72
Llano NM 87543

[Signature]

Michael Brown
Box 4 Llano
87543

Julia M. Garcia
Box 4 Llano, 87543

Multiple Signatory Letter 55

Page 1 of 1

Buenaflor, Justin

DSweeton@aol.com
Saturday, April 05, 2008 6:26 PM
To: Complex2030
Subject: Comments in re oak Ridge facility

PC_455

April 5, 2008

Mr. Theodore Wyka,

As citizens of the United States we are asking that our country honor its promise of adherence to the Nuclear Nonproliferation Treaty. With the proposed Complex Transformation plan and Stockpile Life Extension program our country cannot be perceived as complying with this treaty so vital to the survival of our world. We should be an example to all other countries, leading the way in dismantling nuclear weapons and disposing of these materials safely. If we must have a new facility at Oak Ridge, it should be built to dismantle, not create even more dangerous weapons.

Sincerely,
Dan and Beverly Sweeton
305 Walker Lane
Lebanon, TN 37087

*****Planning your summer road trip? Check out AOL Travel Guides.
(http://travel.aol.com/travel-guide/united-states/?ncid=aoltrv00300000000016)

Multiple Signatory Letter 56

Page 1 of 3

Multiple Signatory Letter 56

Page 2 of 3

PC_1996

Levens, Matthew

From: Jackie Cabasso [vsif@earthlink.net]
Sent: Wednesday, April 30, 2008 1:18 PM
To: Complex2030
Cc: MBlum@SantaBarbaraCA.gov; d.coody@fayetteville.ar.us;
JHosierman@ci.pleasanton.ca.us; lbragman@sbcglobal.net
Subject: Comment submitted on behalf of local elected officials
Attachments: Mayors comment letter.doc



Mayors
comment letter.doc

Dear Mr. Wyka,

Attached please find a comment on the Draft Supplemental PBIS for Complex
Transformation submitted on behalf of local elected officials. -- Jackie Cabasso, Western
States Legal Foundation

PC_1996

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
ComplexTransformation@nnsa.doe.gov

April 29, 2008

Dear Mr. Wyka:

We the undersigned local elected officials write to protest the inadequacy of the Complex
Transformation Supplemental Programmatic Environmental Impact Statement, and to oppose the
building of new capacity to design and build nuclear weapons that it contemplates. Under every
alternative considered, the United States aims to improve its ability to design new nuclear
weapons and to manufacture them over the coming decades. The underlying assumption is that
under all foreseeable circumstances, the United States will keep thousands of nuclear weapons
for most of this century, together with the capacity to reconstitute an even larger force.

116A

Almost two decades after the end of the Cold War, a planning process for the U.S. nuclear
weapons complex that refuses even to contemplate a path which would lead to the elimination of
nuclear weapons is unacceptable. The United States has a legal obligation under Article VI of
the 1968 Nuclear Non-Proliferation Treaty (NPT) to negotiate in good faith for the elimination of
its nuclear arsenal as part of a process of global nuclear disarmament. The International Court of
Justice, in its 1996 advisory opinion on the threat and use of nuclear weapons, made clear that
this obligation could not be fulfilled by declarations of good intentions and occasional
negotiations: it requires reaching the result of nuclear disarmament. The Complex
Transformation plan is a roadmap for keeping a large, continually modernized nuclear stockpile
in place a century after the NPT entered into force. No reasonable person can reconcile these
concrete actions with "good faith" progress towards disarmament.

21F

The endless pursuit of military advantage also diverts resources that should be used to build a
world that is both fairer and more sustainable, a far better way than the threat of force to reduce
the tensions that lead to violence. The NPT acknowledged this as well, stating in its preamble
that "the establishment and maintenance of international peace and security are to be promoted
with the least diversion for armaments of the world's human and economic resources."

31B
49B

We face grave challenges to our ability to give all of our people lives that are healthy, safe, and
secure. Spending tens of billions of dollars to build weapons of mass destruction and the
laboratories and factories to maintain them does nothing to solve the real problems we face. It
will not feed, clothe, house, or educate a single child. It will not provide health care for the
millions who can not afford it. It will not educate our work force, or restore decaying
infrastructure, or provide cleaner, less costly energy. Spending on nuclear weapons also creates
fewer jobs than public spending on these kinds of programs - programs that provide real
security, that build a healthier economy at the same time that they provide immediate
improvements in peoples' lives.

59A

Multiple Signatory Letter 56

PC_1996

The end of the Cold War gave us a second chance – a period of time when we no longer were locked in confrontation with other nuclear armed countries. We have squandered almost two decades of opportunity, and must move quickly to eliminate the terrible threat nuclear weapons pose to all humanity before conflicts among nuclear-armed states once again rise to the level that makes disarmament only a distant hope. The Complex Transformation EIS portrays thousands of modern and constantly modernized nuclear weapons as the solution to “unanticipated” future developments. But they are just the opposite, transforming conflicts among nuclear-armed states into threats that can end all states, and all humanity. Nuclear weapons only make dangerous times more dangerous.

In the heart of the last round of nuclear madness, Dr. Martin Luther King observed that these weapons present us with the ultimate choice between “nonviolence and nonexistence.” We are unlikely to get another chance if we fail today to choose – or indeed, as in this Complex Transformation planning process, even to consider – the path away from overwhelming violence.

The National Nuclear Security Administration (NNSA) seeks to absolve itself of responsibility, claiming that it only can consider a path that would leave all humanity under the threat of annihilation for many decades to come because the policy decisions are made by others– by the President and Congress. But this environmental review only reflects a broader and more interactive planning process than NNSA chooses to acknowledge, in which the permanent nuclear weapons bureaucracy plays a central and influential role. Those who represent the nuclear weapons laboratories and factories often have shown themselves more than willing to advocate new kinds of nuclear weapons, and new nuclear weapons research and production technologies in a wide range of public and official venues. NNSA can and should withdraw this document, and begin a new planning process, and an environmental review that for the first time considers a different path: the immediate end of nuclear weapons research and production and the elimination of the nuclear arsenal.

Sincerely,

Marty Blum

Marty Blum
Mayor, Santa Barbara, California
MBBlum@SantaBarbaraCA.gov

Dan Coody
Mayor, Fayetteville, Arkansas
d.coody@fayetteville.ar.us

Jennifer Hosterman
Mayor, Pleasanton, California
JHosterman@ci.pleasanton.ca.us

Lawrence Bragman
Fairfax Town Council, Fairfax, California
lbragman@sbcglobal.net

116A Cont.

613A1

711D
87A

970

Campaign 01

Page 1 of 1

CAMPAIGN 1

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,

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.

116A

28B

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.

38A

45C1

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.

51C

614K

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.

116A
(cont.)

Sincerely

Campaign 02

Page 1 of 1

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

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 new bomb plant (CMR). 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.

Thank you for listening to my opinion which is based on my firm belief that our nation's store of nuclear weapons is a danger to all of the world, not just to ourselves.

Signed:

116A

214K

Campaign 03

Page 1 of 1

CAMPAIGN 3

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 nuclear weapons...", I am writing to ~~oppose~~ these plans and to ask that NNSA consider a "No Proliferator" alternative instead.

The plan to build new nuclear weapons is frivolous, profoundly dangerous, illegal, and 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 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. is a signatory, making it U.S. law.

It is immoral to contemplate, plan for, or 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 and maintain nuclear weapons robs the human family of sustenance and survival.

Very truly yours,

1/70
 2/16A
 3/5C1
 4/1J
 5/1F
 2/16A (cont.);
 7/9H

Campaign 04

Page 1 of 1

CAMPAIGN 4

March 23, 2008

To the Department of Energy:

11/4K | The Complex Transformation project would only add to the nuclear dangers already facing the world.

2/1J | Rather than add any incentives for more nuclear weapons, we should begin the process of nuclear abolition.

Sincerely,

Campaign 05

Page 1 of 1

CAMPAIGN 5

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:

I oppose the DOE's Bombyplex ("Complex Transformation") because the United States does not need new nuclear weapons, and we do not need a massive nuclear weapons infrastructure for the next century, as the draft Supplemental Programmatic Environmental Impact Statement (SPEIS) proposes as its "preferred alternative."

An adequate draft SPEIS should include the alternative of the U.S. not having nuclear weapons, as required by Article VI of the Nonproliferation Treaty, to which the United States is a party. The treaty 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." The alternative of not having nuclear weapons is a reasonable, and, indeed, a required alternative according to the treaty our country has signed.

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, as the draft SPEIS has as its "base case." I also specifically oppose the draft SPEIS "preferred alternative" of having plutonium pit manufacturing and research and development at Los Alamos Lab. The U.S. 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.

I oppose having open-burn/open detonation areas at any site because of the hazard to the public due to air pollution. 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 draft SPEIS also does not adequately analyze the actual environmental impacts of the Bombyplex. For example, it assumes that waste can go to the Waste Isolation Pilot Plant (WIPP) for the next century, even though that dump is to be closed by 2035. An adequate SPEIS must assume that all waste generated would have to be stored and disposed at each facility forever. Pollutants from Los Alamos Labs are in an aquifer used as drinking water for Santa Fe and in the Rio Grande which is a water source for people and agriculture. Pollutants from Sandia National Labs also threaten Albuquerque's drinking water aquifer. Additional production of nuclear weapons will mean more dangerous pollution in our water supplies.

The draft SPEIS is inadequate; it should be revised and re-issued for further public comment.

Yours truly,

1/16A

2/1F

3/5C.1; 1/16A (cont.)

1/16A (cont.)

4/2A

5/14F1

Campaign 06

Page 1 of 1

CAMPAIGN 6

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:

I live within the vicinity of Livermore Lab. I am appalled at the Department of Energy plan to develop new nuclear warheads so close to my home. I am appalled at the disregard for the health and safety of the 7million people in the 30-mile radius at just this site.

As you know, the Lab has been testing weapons in an open-air site 300 near Tracy and they now want to expand it to Uranium 223 and tritium the radioactive hydrogen in the H. bomb right here in Tracy up to 8000 pounds. This senseless weapons development surge is a threat to health and the lives of our communities for generations. We do not need or want any more nuclear or chemical weapons.

This expense is neither wise nor necessary. According to the Tri-Valley Herald, a November review by a panel of experts found the most sensitive component has a life span of at least 85 years or longer. C. Bruce 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 needed to be replaced. This is at a time when the US economy is collapsing under the weight of the cost of the war industry

I also strongly object to the opening of the bio-lab at Livermore where more than 40 deadly microbes such as anthrax, Ebola, SARS, are being grown with the intent to increase them as lethal weapons. This germ warfare lab presents huge risks of accidental employee exposure and in the case of failure of containment, public exposure. According to scientists, the planned use of HEPA airfilters can be ineffective. This site itself is unsafe. It is at risk for a major earthquake

Please consider the potential threats to the health and safety of the people in the surrounding communities and halt these projects.

Sincerely,

1/16A, 2/14K

2/14K (cont.)

3/5C.1;

4/9H

1/16A, (cont.)

2/14K (cont.)

Campaign 07

Page 1 of 1

CAMPAIGN 7

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

April 1, 2008

Dear Mr. Wyka:

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.

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.

Yours truly,

1/16A

Campaign 08

Page 1 of 2

CAMPAIGN 8



Theodore Wyka
Complex Transformation SPEIS Document Mgr.
U.S. Department of Energy
1000 Independence Ave. SW
Washington, DC 20585

April 2, 2008

Dear Mr. Wyka:

We are members of the Sisters of Charity of Nazareth, a religious group made up of Catholic Sisters and our Associates, women and men, dedicated to the values of peace and nonviolence. At the invitation of the Department of Energy's National Nuclear Security Administration, we wish to submit our comments on the proposed Complex Transformation program.

We believe that increasing our already vast stockpile of nuclear weapons is not the way to build a world of security for all peoples of all countries. Peace will never be achieved through the might of deadly force epitomized by nuclear weapons.

We remind the Department of Energy that the United States, through the Nuclear Nonproliferation Treaty of 1970, pledged to undertake nuclear disarmament. The proposed Complex Transformation, which would manufacture possibly as many as 200 new nuclear weapons each year, would completely violate this treaty commitment.

We call on the Department of Energy and our government to take a leadership role among all nuclear and non-nuclear countries by beginning the pledged disarming of this nation's nuclear holdings. We call on our government to take serious steps toward the abolition of nuclear weapons.

We fear that increasing the manufacture of nuclear weapons by the United States would give reason to other countries to counter with expanding their nuclear weapons production. We ask what determines the privileged role of the United States as a nuclear policeman, forbidding other nations to seek nuclear arms while our country engages in an identical dangerous pursuit.

We urge the Department of Energy and our government to channel the billions of dollars (currently \$40 billion each year) now expended on the nuclear stockpile into caring for the needs of the people, especially in the areas of health care, education, housing, and infrastructure.

Finally, we hold that our country needs a different kind of transformation: a transformation from a focus on armed nuclear strength to thoughtful diplomatic policies; a transformation from unconscionable amounts of money spent on nuclear weapons to economic aid for the increasing number of persons who are living in poverty; a transformation from an arrogant stance of nuclear dominance to a humble stance of fellowship and friendship with other peoples of the world.

Our motherhouse is located reasonably near the Oak Ridge Y-12 plant in Tennessee, approximately a four-hour drive from Nazareth. Additionally, we are approximately a three hour

1/13A1

2/1F

3/1J

3/1J
(cont.)

4/9B

5/1B

Campaign 08

Page 2 of 2

drive to Paducah, Kentucky. So we have neighborhood interests in these facilities. In addition, other members of the congregation live in several states where current weapons sites would be "transformed" by the proposed upsurge in nuclear arms manufacture: Arkansas, California, Missouri, Ohio, South Carolina and Tennessee. In reality, in the name of the peace and security which all people seek, we are concerned about the possible proliferation of nuclear weapons in any part of our country.

6/16A

Thank you for this opportunity to voice our objections to the proposed Complex Transformation program.

Sincerely for,

Campaign 09

Page 1 of 1

CAMPAIGN 9

March 30, 2008
 Theodore Wyka
 Office of Transformation (NA-10.1)
 Nuclear Energy Security Administration
 U.S. Department of Energy
 1000 Independence Avenue, SW
 Washington, DC 20585

Theodore Wyka:

It is with great concern that I am writing to you at this time. The United States Department of Energy is proposing to build a new nuclear weapons production with the intent to "maintain an enduring stockpile of nuclear weapons". This project has been given the innocuous name of "the Complex of Transformation".

This is nothing more than the recycling of the DOE's Complex 21 project which was defeated and denied in 1991. Complex 21 was defeated because the American people in a loud voice said "No!" arguing that nuclear weapons are no longer a means of achieving security, in fact with every passing year make our security more precarious and that this proposal stood in defiant contradiction of US commitments under the nuclear Nonproliferation Treaty.

In the 17 years since Complex 21 was defeated there have been no security threats that would indicate a need to proceed with "the Complex of Transformation". In reality there is less of a reason today than there was in 1991. How can our government justify expansion of our nuclear program while actively criticizing countries such as Iran and North Korea for their nuclear programs? If there is no "need" for these countries to develop nuclear weapons how can the United States justify a "need".

There was no reason then and there is no justifiable reason today to "maintain an enduring stockpile of nuclear weapons". Please note that I will do everything in my power as a citizen of these United States to defeat this project.

I would genuinely hope that my concern and the concern of my fellow citizens will aid you in your decision to vote to defeat this project and other like it.

Respectfully,

Name: _____

Address: _____

11/6A:

2/1F

3/1J

4/3A

11/6A (cont.)

Campaign 10

Page 1 of 1

CAMPAIGN 10

March 17, 2008

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

I believe that any part of the proposed Complex Transformation Plan which leads to the improvement, expansion, or extension of the ability of the U.S. nuclear weapons complex to build nuclear weapons should be disapproved. In particular, I oppose any plan for the rebuilding or expansion of the Y-12 complex in Oak Ridge, Tennessee that would enable that plant to produce new nuclear weapons or components or to refurbish existing nuclear weapons to make them more efficient, powerful, and/or long-lasting.

I believe it is clear that the United States already possesses enough nuclear weapons to destroy all life on earth many times over and that the nation should be moving to actively decommission and destroy these weapons, not to rebuild them and extend their life. If the idea of the plan is to make them "safer," that would be far better accomplished by destroying them than by upgrading them. Transforming Y-12 and other nuclear facilities to perform the disassembly and destruction of nuclear weapons is something I strongly support.

I believe that the continued insistence of the United States on expanding and improving its nuclear capability represents a threat to world peace and only encourages so-called rogue states and terrorists to attempt to obtain nuclear weapons of their own.

Finally, I am deeply concerned about the vast amounts of taxpayers' money that is spent on the development, testing, production, and maintenance of nuclear weapons. Such expenditures rob the nation of funds that are desperately needed to improve our educational system, repair our failing transportation infrastructure, provide adequate health care to all our citizens, and meet a variety of other urgent needs.

I urge those who will make decisions regarding the Complex Transformation Plan to choose peace rather than choosing a path to expanded war-making capability, so that we may someday live in a world free of the threat of nuclear disaster.

Sincerely,

116A

23A:
116A
(cont)

31J

49H:
59B

116A
(cont)

Campaign 11

Page 1 of 1

CAMPAIGN 11

1/2E

90-DAY EXTENSION OF TIME

FOR THE COMMENT PERIOD ON THE DRAFT COMPLEX TRANSFORMATION SPEIS

www.nrsa.doe.gov/complextransformation.htm
comments currently due April 10, 2008

Campaign 12

Page 1 of 1

CAMPAIGN 12

March 26, 2008

Dear Mr. Wyka:

As a Sister of Mercy I am deeply troubled to learn that the Department of Energy plans to reauthorize the U.S. nuclear weapons building capacity through the Complex Transformation program. The cost of this program will be at least \$150 billion. 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.

This program clearly violates the Nuclear Nonproliferation Treaty, to which the United States is a signatory. It also provides further evidence that the United States intends to continue developing and expanding its nuclear arsenal while demanding that other countries such as Iran and North Korea abandon their nuclear ambitions.

It is time for the leaders of the United States to lead other nations 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.

116A;
2140

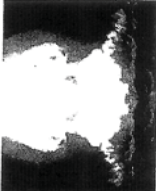
31F;
41J

41J
(cont.)

Campaign 13

Page 1 of 1

CAMPAIGN 13



STOP THE
Bomplex

11J

21
16A

Oppose the Dept. of Energy's "Complex Transformation" plan. Instead of revitalizing the nuclear weapons complex and building new bombplants, the U.S. should fully comply with the Non-Proliferation Treaty and honour our disarmament obligations.

Reject "Complex Transformation"
Stop nuclear pollution and weapons
Enhance our collective global security
Support nonproliferation & disarmament


We need a new nuclear policy,
not new nuclear bombs.

Sincerely,
Address:
City/State

Additional comments:

U.S. Dept. of Energy
Ted Wyka, NA-101
Complex Transformation
Comment

1000 Independence
Ave., SW
Washington D.C., 20585



04/09/2008 WED 15:36 FAX CAMPAIGN 14 @03/016

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

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 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.

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.

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.

Instead of recasting the capacity to produce new, unnecessary nuclear weapons, the DOE should focus on shrinking the still-over-sized 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,
 Theodore Wyka

CAMPAIGN 15

Instead of revitalizing the nuclear weapons complex and building new bomb plants, the U.S. should fully comply with the NPT, the Treaty on the Prohibition of Nuclear Weapons, and our disarmament obligations. I oppose the Dept. of Energy's "Complex Transformation" plan, known as the "Bombplex".

TO:

U.S. Dept. of Energy
Ted Wyka, NA-101
 Complex Transformation
 Comment

1000 Independence Ave SW
 Washington, D.C. 20585

11/F
 216A

Reject "Complex Transformation"
 Stop nuclear pollution and weapons
 Enhance our collective global security
 Support nonproliferation & disarmament

We need a new nuclear policy,
 not new nuclear bombs.

Signature:
 Address:
 City/State:
 My personal note:

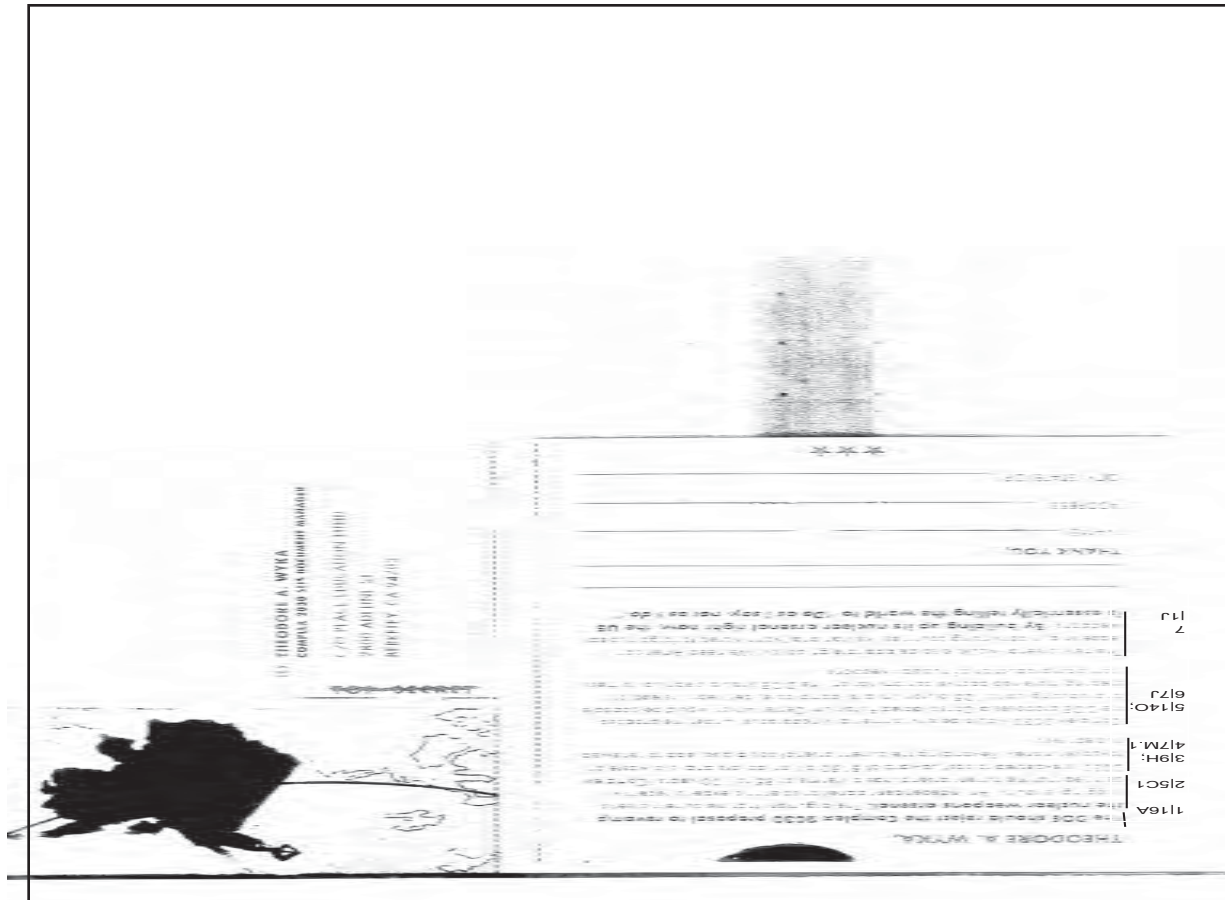
We need a new Future Bombplex

Dept. of Energy

Learn More. Visit www.TrnValleyCares.org

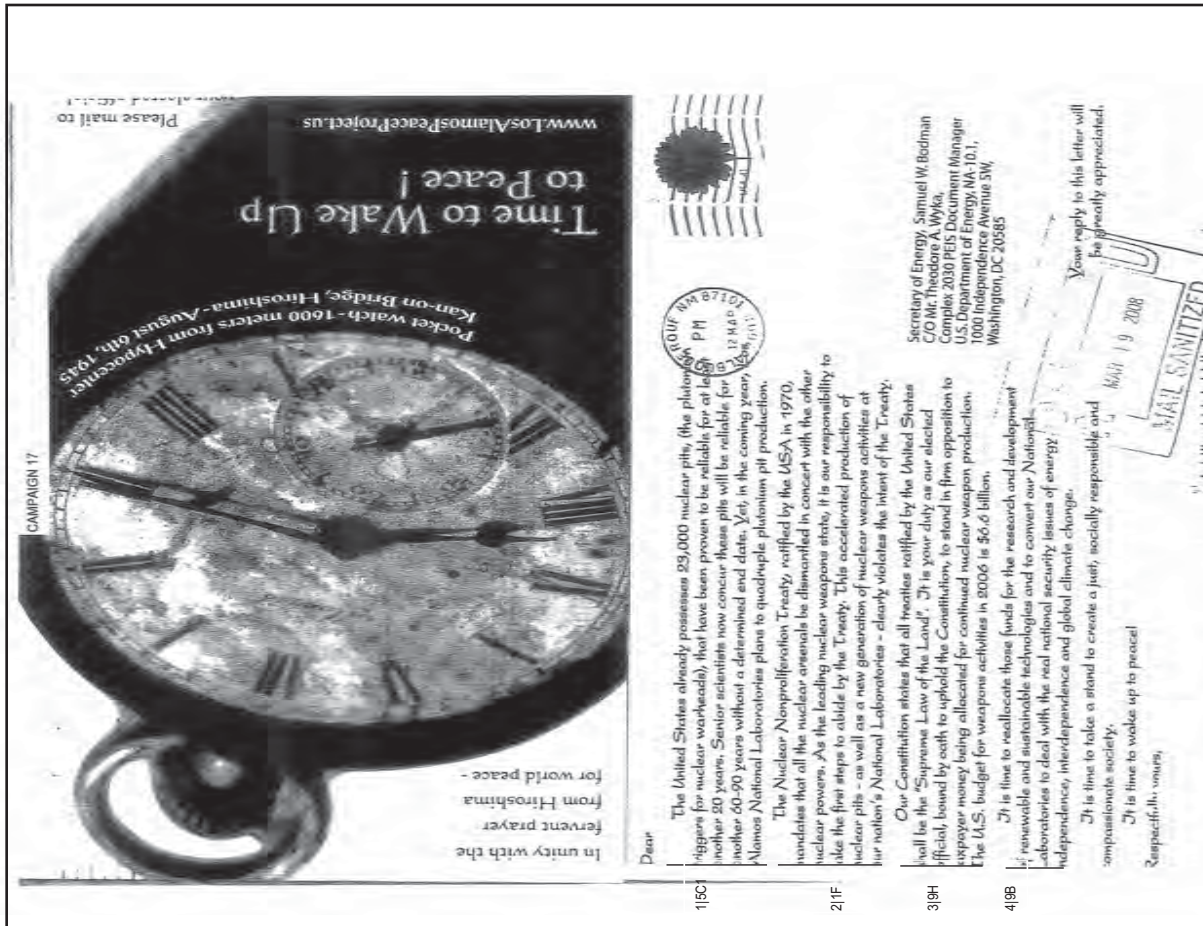
Campaign 16

Page 1 of 1



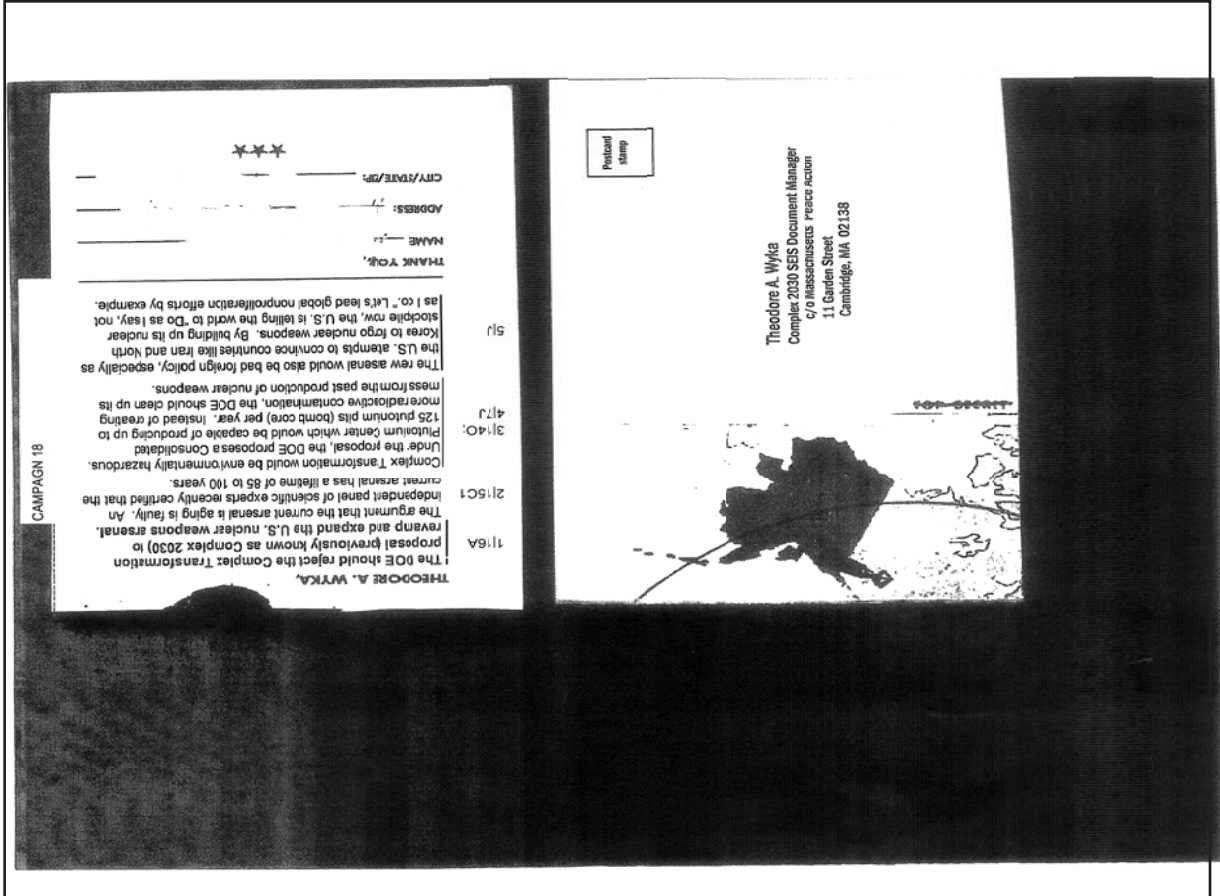
Campaign 17

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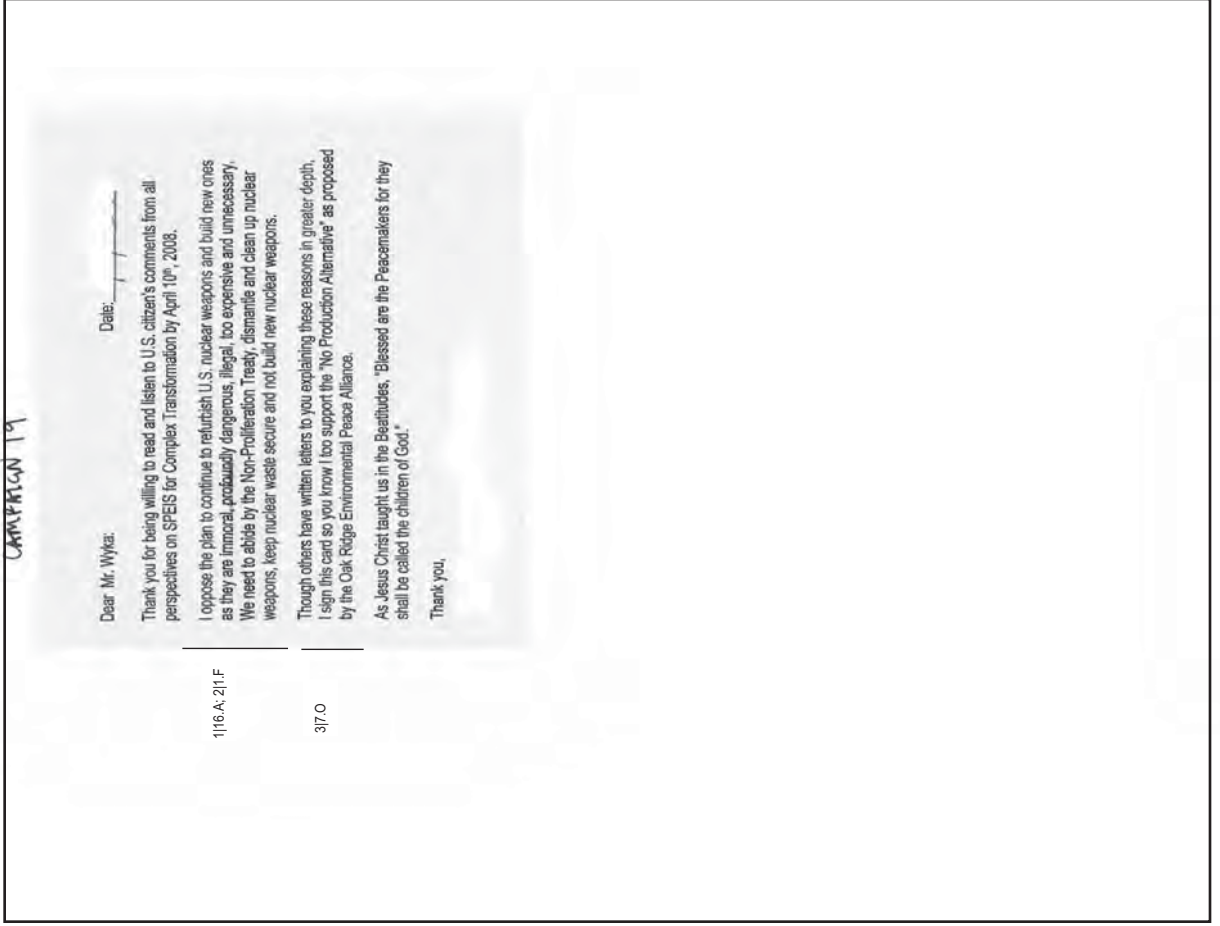
Campaign 18

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Campaign 19

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Campaign 20

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CAMPAIGN 20

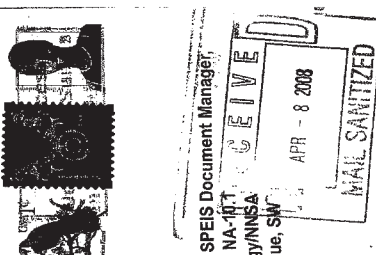
Dear Mr. Theodore Wyka,

1104 I strongly oppose the proposed \$150 billion dollar expenditure for
 1105 the nuclear weapons project "Complex Transformation." This is a
 2104 waste of taxpayers money and is contrary to the requirements of
 2111 the Nuclear Non-Proliferation Treaty (NPT). We need to reduce
 and eventually eliminate nuclear weapons, not spend more money
 developing new ones.

1108 It would be absurd to spend billions of dollars on a new generation
 of nuclear weapons while so many human needs in our declining
 economy continue to go wanting.

Respectfully,

Signature



Mr. Theodore Wyka
 Complex Transformation SPEIS Document Manager
 Office of Transformation, NA-111
 U.S. Department of Energy/NSA
 1000 Independence Avenue, SW
 Washington, D.C. 20585

NSIP NORTH SUBURBAN PEACE INITIATIVE
 1100

Campaign 21

Page 1 of 1

CAMPAIGN 21

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.

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?)

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 2050 by issuing negotiations leading to
 conclusion of a verifiable treaty, under strict and effective international control?

YES NO

YES NO

COMMENTS:

NAME _____
 ADDRESS _____
 SIGNATURE _____ DATE _____

19A

21F

Campaign 22

CAMPAIGN 22

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,

With respect to the Department of Energy (DOE) proposal for Complex Transformation, nuclear weapons are dangerous, expensive and threatening. They contaminate and defile our air, our water and our land now, and into the future. They undermine international security and perpetuate violence throughout our cultures.

I live in North Central New Mexico and have been and will be impacted by expanded nuclear weapons manufacturing at Los Alamos National Laboratory (LANL). I just learned of the transformation complex document and request a 90-day extension of time to provide informed comments.

I do not want to breathe contamination into my body from nuclear weapons research, development and manufacturing.

DOE has not fully addressed the new information about a 50% increase in the possible earthquake at LANL and must do so.

I do not understand why LANL continues to bury waste in unlined pits, trenches and shafts in the volcanic tuff while municipalities have been required for years to build landfills with double liners and leachate collection systems.

The suffering generated by a national security policy where my community bears the burden of 65 years of contamination spreading through the water, air and land is unacceptable.

All people and our communities are intricately tied to the health of rivers, aquifers and other waters. Historic and on-going activities at LANL threaten our cultural, spiritual and ecological survival. To ensure the good health of watersheds downstream and downwind from LANL, and the good health of the Rio Grande and its tributaries to provide safe drinking water, clean water for irrigation and pure natural water for sacred ceremony now and in the future, I do not want DOE to use our precious water or contaminate our land and air for nuclear weapons manufacturing.

116A:
 214C:
 313A1

42E

5114D1

614F
 719E

8114M3

9114E1
 214O
 (cont)

Campaign 22

101F

The Nuclear Non-Proliferation Treaty (NPT), which the U.S. ratified, is an international agreement between countries with and without nuclear weapons technology. In this treaty, the U.S. promised to work towards completely abolishing its nuclear weapons. How can the U.S. simultaneously support the NPT while presenting a proposal for transforming the complex that is founded on new generation of nuclear weapons?

116A
 (cont.)

My neighbors and I are united. We do not see the manufacture of nuclear weapons as addressing the needs of our community or the needs of our country or the needs of the world or as fulfilling our obligation to the NPT. I opposed any proposal now and in the future that will lead to the next generation of nuclear weapons, here at Los Alamos National Laboratory (LANL) or anywhere within the DOE nuclear weapons complex. I oppose any Complex Transformation that will serve as a bomb factory.

There is a new role for the DOE and LANL with Complex Transformation. We challenge DOE and LANL to address and analyze alternatives worthy of the global issues we are all facing, such as:

- Clean up, restoration and remediation of radioactive, toxic and hazardous pollution in air, water and land, both locally and globally
- Enhancing security through conflict resolution and mediation
- Immediately meeting U.S. NPT obligations of stockpile reduction and elimination
- Bolstering non-proliferation programs
- Creating solutions to the outstanding and absolutely critical issues associated with global warming and climate change
- Developing and enhancing non-nuclear, sustainable energy.

Our world is at a critical turning point. This is what we want and we want it now; with the same ferocity, fervor and relentlessness as was dedicated to the Manhattan Project.

My additional comments:

Sincerely,

Print name and address:

1117J

101F (cont)

119B

Campaign 23

CAMPAIGN 23

Mr. Theodore Wyka
C-T SPEIS Document Manager
Office of Transformation, MA-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 a Complex Transformation, with a focus on expanding nuclear weapons manufacturing at Los Alamos National Laboratory (LANL).

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. Many of my neighbors are just being informed of this SPEIS and so I respectfully request a 90-day extension of time so that they can provide 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 CFR 7, paragraph 658)," p. 13-27.

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 breadbasket of Northern New Mexico. Commercial farms in Espanola, Alcalde, Velarde and Dixon provide much local produce. Many people privately grow food for farmers markets and local groceries. With increases in gas prices and therefore in the price of food that comes from far away many of us are working toward a revival in local food production. Currently I grow hay for livestock, as well as apples, cherries, blackberries, plums and pears, but I am looking to increase my production of vegetables and fruits, as well as herbs for culinary and medicinal use. New pit production at LANL threatens this. Accumulated dust from my farmhouse tested with elevated levels of Strontium 90. This is of serious concern and must result in follow up studies before any decisions are made.

214A

214A

214A
(cont.)

Campaign 23

312B

The 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,

cc: Senator Pete Domenici at (505) 988-6611, 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) 346-6761, 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 Jenning at (575) 623-8331, fax (575) 623-9378
House Speaker Ben Ray Lujan at ben.lujan@hmnlegis.gov

Campaign 24

Page 1 of 1

CAMPAIGN 24

116A
(cont.), 518A
6
11F

Sincerely,

Name:
Address:
City/State/Zip:

116A
(cont.), 518A
6
11F

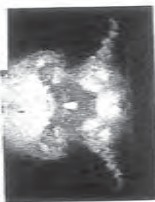
26 cents

116A

21J:
314C:
TO: 49B

U.S. Dept. of Energy
Ted Wyka, NA-10.1
Complex 2030 Comment
1000 Independence Ave., SW
Washington, D.C. 20585

I oppose the Dept. of Energy plans to create devastating new H-bombs at its labs in CA and NM, and then build them at multiple locations across the U.S. This is madness. It will increase proliferation. It will pollute our communities. It will cost hundreds of billions of dollars that could be spent on life-sustaining enterprises. Reject the Complex 2030 plan. Stop the new H-bomb, the so-called "Reliable Replacement Warhead." Instead, fully comply with the Non-Proliferation Treaty and help move the world toward the elimination of nuclear weapons.



STOP THE
Bomplex

Campaign 25

Page 1 of 1

CAMPAIGN 25

From:
Sent:
To:
Subject:

Administrator Thomas P. D'Agostino
National Nuclear Security Administration Department of Energy Washington, DC 20585

Dear Administrator D'Agostino,

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.

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 2006.

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 2070 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 NSSA 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.

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.

Sincerely,

116A
16A
21F
31C
4
1J
5
12B1

1

Campaign 26

Page 1 of 1

CAMPAIGN 26

From: [redacted]
 Sent: [redacted]
 To: [redacted]
 Subject: [redacted]

March 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.

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.

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.

Congress rebuked the Energy Department's last attempts to upgrade the arsenal by defunding the Reliable Replacement Warhead and last year's proposed megascale bomb plan. The CMRR project is another irresponsible new program that should be rejected.

Sincerely,

1

Campaign 27

Page 1 of 1

CAMPAIGN 27

From: [redacted]
 Sent: [redacted]
 To: [redacted]
 Subject: [redacted]

April 6, 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.

Complex Transformation would be environmentally hazardous. Under the proposal, the DOE proposes increasing the number of plutonium pits we can produce in a year. Instead of creating more radioactive contamination, the DOE should clean up its mess from past production of nuclear weapons.

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.

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

Sincerely,

1

Campaign 28

Page 1 of 2

CAMPAIGN 28

From:
Sent:
To:
Subject:

Dear Theodore A. Wyka,
STOP THE BOMBPLEX! CLEAN UP, DON'T BUILD UP!
 The Department of Energy's Complex Transformation Notice of Intent proposed action — to build more nuclear weapons — is dangerous and unnecessary.
 The U.S. cannot produce nuclear weapons while insisting other countries not pursue nuclear capabilities.
 The U.S. should meet its obligations under the Non-Proliferation Treaty to pursue disarmament.
 The U.S. should not waste billions of dollars planning and constructing new weapons manufacturing facilities. It should instead focus its resources on cleaning up its huge mess from past production.
 The document released by NNSA November 29, 2006 "Studies Show Plutonium Degradation in U.S. Nuclear Weapons Will Not Affect Reliability Soon" exposes the faulty premise underlying the proposed Complex Transformation. The EIS process should be stopped immediately to stop the waste of taxpayer money.
 If the EIS process goes forward it must include analysis of the following:

- The EIS should consider the increased threat of other countries getting and using the bomb as a direct result of our resuming nuclear weapons production.
- The EIS must compare the environmental benefits of reducing the size of the U.S. nuclear arsenal with the risks of manufacturing and using nuclear weapons, both by the U.S. and other countries which seek to terrorize or attack the U.S. because of our nuclear posture.
- The EIS must consider the environmental impacts of using nuclear weapons.
- The EIS must compare the cost of total disarmament by 2030 to rebuilding the nuclear weapons complex by 2030.
- The EIS must consider the environmental impacts and security risks of transporting special nuclear materials (plutonium and highly enriched uranium) and nuclear weapons and components via highway across the U.S. to the proposed Bombplex facility.
- The EIS must analyze the environmental impacts and security risks of a terrorist attack on

7113A (cont.) | a plutonium or HEU processing facility at any proposed Bombplex site. The costs of increased security must also be considered in the EIS.

Signed,

Campaign 28

Page 2 of 2

Campaign 29

Page 1 of 1

CAMPAIGN 29

From: [Redacted]
 Sent: [Redacted]
 To: [Redacted]
 Subject: [Redacted]

DOE Complex Transformation

Dear DOE Complex Transformation:

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,

1

Campaign 30

Page 1 of 1

CAMPAIGN 30

From: [Redacted]
 Sent: [Redacted]
 To: [Redacted]
 Subject: [Redacted]

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

In addition, the United States would be more secure if nuclear weapons are eliminated worldwide. The United States should reaffirm 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.

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,

1

Campaign 31

Page 1 of 1

CAMPAGN 31

From: _____
 Sent: _____
 To: _____
 Subject: _____

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.

The reasons for this are numerous, but among them:

The project is not environmentally sound. We need to focus on decreasing our radioactive contamination, not increasing it.

The U.S. is overdue for providing a substantive mode for the world in how we can dismantle our nuclear arsenal instead of fortifying it. Iran and North Korea will not back down if this project is enacted.

This project costs \$150 billion dollars, and does not provide adequate security value for the money. The U.S. needs to also remember that we have an ever-ballooning national debt.

I do not want nuclear testing to continue, and this proposal opens a dangerous path toward that possibility.

By building up its arsenal, the US would essentially be telling the world to "Do as I do, 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,

1

Campaign 32

Page 1 of 1

CAMPAGN 32

From: _____
 Sent: _____
 To: _____
 Subject: _____

Dear Mr. Wyka,

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 to change course and pursue disarmament, not build up our stockpiles.

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.

73% of all Americans support the goal of a world free of nuclear weapons. I am one of them. My idea of Complex Transformation is simple: take the practical steps toward building a world without nuclear weapons.

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 16A
 21J

Campaign 33

Page 1 of 4

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. Theodore Wyka,

I write to submit the following public comment on the Draft Complex Transformation PEIS on behalf of Physicians for Social Responsibility (PSR).

Physicians for Social Responsibility was founded in 1961 by doctors concerned about the consequences of nuclear weapons. Independent studies beginning in the 1960s by physicians and experts from other disciplines have repeatedly demonstrated that the production, use, and testing of nuclear weapons creates environmental health hazards leading to significantly increased human morbidity and mortality. This independent research has often challenged the assumptions underlying information made available to the American public by the U.S. Government regarding nuclear weapons and has contributed to the advancement of the scientific knowledge in this area of vital importance to public policy. My comments today will be based on this independent research conducted over several decades by PSR.

1. The proposed Complex Transformation program endangers the environment and human life and health.

Since the Manhattan Project began, hundreds of thousands of nuclear weapons workers have been exposed to ionizing radiation. In 2000, the government was forced to admit that workers had been harmed by activities at DOE and other facilities, and those deemed injured were to be offered financial and other compensation.¹ Last summer, the Rocky Mountain News reported on the basis of government figures that "[t]he U.S. nuclear weapons program has sickened 36,500 Americans and killed more than 4,000."² These numbers reflect only those individuals that have been approved for government compensation. However, there are countless people that have been exposed and made sick from low-level ionizing radiation for nuclear bomb testing and radiation plumb leaks from weapons facilities.

The DOE PEIS Report for the Complex Transformation 2030 program fails to adequately report to the true environmental and human health impacts of this plan. There are several problems in the analysis that gives a false impression that this program will have limited impact. First, risk estimates are calculated for each alternative at each site for each potential exposure separately (waste exposure, water exposure, air emissions). It is clear that a person receives a cumulative dose of radiation from all sources concurrently and that to handle each exposure risk separately in the final risk estimate for cancer results is a much lower risk calculation. While a collective

¹ Ann Inese, "U.S. nuclear work afflicted 36,500 Americans," *Rocky Mountain News*, August 31, 2007, available at http://www.rockymountainnews.com/frm/local/article/0,1299,DRMN_15_5686694,00.html

CAMPAIGN 33

114K
(cont.)

risk is calculated for the general population this is a risk estimate that reflects the risk from radiation exposures through locally produced food. Again this is dealing with risks attributed to various exposure media separately. Ultimately this inappropriate methodology leads to the final risk estimates for latent cancers to appear much more trivial than the true risk.

Second, the U.S. government still estimates the health risk of low levels of ionizing radiation using "reference man" characteristics. Many people living near proposed Complex 2030 sites do not have the anatomical and physiological characteristics of an average individual as defined for a "reference man." In particular, infants, children, pregnant women, immune compromised and other chronically ill persons would be affected differently by radiation exposure than people who fit the "reference man" criteria. This point clearly demonstrates that vulnerable populations will not be adequately protected from radiation released from various environmental media.

Third, it is clear that the DOE has accepted an unacceptable level of exposure for both the workers and the surrounding communities to each proposed site. As the report states that acceptable and safe amount of radiation exposure to neighboring communities is 5 REMs or 0.05 Sievert per year. The most recent committee report (BEIR VII) calculated the expected cancer risk from a singular exposure of 0.1 Sievert.³ The committee found that in a lifetime approximately 42 out of 100 people will be diagnosed with cancer and one cancer out of these 100 people could result from a single exposure to 0.1 Sievert of low-level radiation above background.⁴

Even more compelling are the results of the largest cohort study of the cancer risk among radiation workers that used exposure and health data from 15 countries that included over 5.2 million person years of follow-up. This rigorous investigation found that the excess relative risk for all cancers excluding leukemia to be statistically compatible with but higher than the BEIR VII risk estimate used to set the assumptions of cancer risk for this DOE PEIS report. Most notably this landmark study found that all of the increase in deaths from all causes and all cancers resulted is from doses of less than 0.05 Sievert or 5 REM, which is the set US standard for annual exposure.⁵ This reinforces the assumption that there is no safe exposure level to radiation in which we would not expect to see an observable effect.

The health risks for workers and residents should be the context in which NNSA considers its Complex 2030 plans. The government should not consider the production of new nuclear weapons while we are still struggling to address past risks to the health of those living near or working in the weapons complex. It is critical that the health consequences of the proposed Complex Transformation 2030 Program be the central consideration for NNSA PEIS report. The final PEIS ought to include a human health risk assessment to take into account the newest research of health effects at varying levels of radiation exposure, characterizes of risk for sensitive populations and for every activity or each proposed Complex 2030 site. Since these

² This report was sponsored by the U.S. Departments of Defense, Energy and Homeland Security, The U.S. Regulatory Commission, and the Environmental Protection Agency.

³ Committee to Assess Health Risks from Exposure to Low Levels of Ionizing Radiation, National Research Council, *Health Risks from Exposure to Low Levels of Ionizing Radiation: BEIR VII-Phase 2*, National Academies of Sciences, 2006. Available at (http://books.nap.edu/catalog.php?record_id=11340)

⁴ Cardis et al (2007). The 15-Country Collaborative study of cancer risk among radiation workers in the nuclear industry: Estimates of radiation-related cancer risks. *Radiation Research*; 167: 396-416.

114K (cont.)

issues are not addressed in the current PEIS this report is not adequate for demonstrating safety of the Complex 2030 plan.

- 1. The assumed national security benefits of the proposed Complex Transformation program do not balance its environmental and public health dangers.

213A1

The Complex Transformation proposal assumes that the development of a "responsive infrastructure" for nuclear weapons production will contribute to U.S. national security. This assumption has not been tested in several important ways.

First, the relationship between nuclear deterrence and U.S. national security is unclear. There is no evidence to suggest that nuclear weapons deter terrorism, the principle national security threat to the United States. Overwhelming nuclear superiority did not protect us from September 11th and offers no identifiable advantage against terrorist supporters in Afghanistan. To the extent that terrorism attempts to provoke American reactions that will incense the world against us, threatening to use nuclear weapons for indiscriminate mass destruction empowers terrorists. Without specification of *who* is being deterred from *what*, there is no way to assess the value of nuclear deterrence for U.S. national security.

Second, the contribution of the future nuclear weapons use or testing to U.S. national security is dubious at best. Independent research demonstrates that the use of a single nuclear weapon could kill tens to hundreds of thousands of civilians and that nuclear explosive testing has already caused 80,000 cancers and 17,000 deaths in the United States. Without any specification of the national security benefit to be derived from the use or testing of nuclear weapons, the principle product of Complex Transformation the relative value of these benefits cannot be compared to the environmental costs.

Third, U.S. partners in the 1968 Treaty on the Non-Proliferation of Nuclear Weapons (NPT) have consistently argued that the production of new nuclear weapons is inconsistent with U.S. obligations under the NPT and the necessary context for stable nuclear nonproliferation. On the other hand, nuclear proliferation is a major identifiable danger to U.S. national security and the impact of eroding the confidence of our Treaty partners in our compliance bears careful review. Complex Transformation is a major step in the direction of new nuclear weapons production and the likely reaction of our NPT partners to this proposal bears directly on its national security benefit.

The argument that Complex Transformation is needed to maintain future capacity is a red herring designed to lower the standard of proof that additional nuclear weapons production will add value to U.S. national security. Independent analysis by the JASONs suggests that decades of service remain in the existing plutonium "pits" produced for the legacy arsenal and there is a growing consensus, subscribed to even by Henry Kissinger, that the most appropriate future number of nuclear weapons is zero. There is no substantial reason to believe that the Complex Transformation proposal will contribute to the national security.

114K; 6-16A; 73A

37M.1 (cont.) 811

- 2. Much wider expert input and public deliberation is necessary to assess the underlying assumptions and full environmental impact of the proposed Complex Transformation program.

This hearing process is insufficient to evaluate the environmental impact of the proposed Complex Transformation program. New studies are needed on the medical, public health, and climate impacts of the life cycle of the Complex Transformation proposal, specifically including the prospective testing and use of the nuclear weapons it will produce.

New research in 2007 by Professors O.B. Tom of the University of Colorado at Boulder and Alan Robock of Rutgers University demonstrates, even a limited, regional nuclear war – such as between India and Pakistan – would have globally significant climatic effects. Dr. Ira Helfand of Physicians for Social Responsibility has argued that these global climate effects would lead to famine and disease claiming more than one billion human lives around the world.

These new conclusions are both relevant to the environmental impact of the Complex Transformation proposal and important to national and global security, but they do not constitute a sufficient basis on which to evaluate the full environmental impact of the future U.S. nuclear arsenal that is the inevitable product of the Complex Transformation proposal under consideration.

Physicians for Social Responsibility specifically requests that:

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 be conducted,
2. The future role of nuclear deterrence and nuclear weapons in support of U.S. national security be articulated by the U.S. Department of Energy with appropriate support from other departments and agencies,
3. The U.S. Department of Energy 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, and
4. That the U.S. Department of Energy abandon the effort to redevelop nuclear weapons production capabilities as costly, destabilizing, unnecessary and unhealthy and 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.

311E (cont.)

93A

102H

1116A; 127J

Thank you for your time in seriously considering these concerns and comments.

Sincerely,

Campaign 34

Page 1 of 1

CAMPAIGN 34

From:
Sent:
To:
Subject:

Complex Transformation

Dear Complex Transformation:

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.

Sincerely,

1

Campaign 35

Page 1 of 1

CAMPAIGN 35

From:
Sent:
To:
Subject:

Complex 2030 Document Manager Theodore A. Wika

Dear Complex 2030 Document Manager WYKA,

The Cold War is over and the United States still has thousands of nuclear weapons. I do not believe that this country needs a vast nuclear weapons complex and the capability to develop and build new types of nuclear bombs. Instead, the United States should be showing leadership in pursuing a world free of nuclear weapons. Your plan, known as "Complex Transformation," takes us down the wrong path.

I support efforts to reduce the nuclear weapons complex and ensure the safety and security of our remaining nuclear weapons and nuclear materials.

Complex Transformation undermines global efforts to prevent other countries and terrorists from developing or acquiring nuclear weapons. It undermines our credibility as a nation committed to nuclear non-proliferation and nuclear disarmament.

The message to others is "do as I say, not as I do."

Nuclear weapons are a grave and growing threat to human civilization. As our nuclear arsenal is reduced, the Department of Energy should focus on downsizing the nuclear weapons complex and on the safe storage, dismantlement, and disposal of nuclear weapons and nuclear materials. We do not need the capacity to build new nuclear weapons.

Sincerely,

1

Campaign 36

Page 1 of 1

CAMPAIGN 36

From:
Sent:
To:
Subject:

Mr. Theodore Wyka
1000 Independence Avenue, SW
Washington, DC 20585

Dear Mr. Wyka,

I would like to submit the following comment on the Draft Complex Transformation PEIS (DOE/EIS-0236-S4). Good god, why do we need any more??? We can destroy the entire world with those we already have!! PLEASE PLEASE 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 harmed by activities at Department of Energy and other facilities, and those deemed injured were to be offered financial and other compensation.

I believe 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 deterrence and nuclear weapons in the U.S. must be clear. A full and thorough nuclear posture review should be completed prior to any final decisions about complex transformation.

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 in alternative analysis that would focus instead on the clean up talks necessary to respond to the significant environmental and public health harms caused by Cold War nuclear weapons production activities.

PLEASE STOP THIS CRAZINESS
Thank you for your time in considering these concerns and comments.
Sincerely,, Cecily

Sincerely,

1

1140;
216A

311E

41C

52H

67J

Campaign 37

Page 1 of 1

CAMPAIGN 37

From:
Sent:
To:
Subject:

March 24, 2008

Theodore A Wyka
Complex 2030 SEIS Document Manager
Office of Transformation, U.S. Department of Energy, 1A-10.1.1000 Independence Avenue, SW.
Washington, DC 20585

Dear Theodore Wyka:

The Department of Energy should reject proposed Complex Transformation project.

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 .

I am also very concerned that revamping the current arsenal could lead to renewed nuclear tests.

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

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 (units core) per year.

Instead of creating more radioactive contamination, DOE should cleanup its mess from past production of nuclear weapons.

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,

1

Campaign 38

CAMPAIGN 38

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:

I oppose the DOE's (Department of Energy's) "Complex 2030 Transformation" proposal because there are several issues and dangers that the people of New Mexico are already facing today, due to past nuclear bomb making and disposing of waste.

Mining is dangerous to people who live close to uranium mines. Building and testing bombs is dangerous to people who live close to the bomb making facilities; transporting the waste is a huge danger to the people who live along the WIPP routes and storing waste is dangerous to our water. A plan to continue building more bombs goes against the Non-Proliferation Treaty and is a threat to our citizens who live here in New Mexico and generations to come.

There is a huge concern that the 700,000 cubic feet of waste in the mixed-waste landfill at Sandia National Labs is perched above our drinking water aquifer and is dangerous to our drinking water. Los Alamos National Laboratory's drinking water wells are contaminated with unsafe strontium 90, neptunium, americium, plutonium and cesium. This is very unsafe and it's a threat to our water and our health.

According to records by the NGO Citizen Action, 555,000,000 gallons of waste water a year is produced by bomb making projects. This is a huge amount of waste water per year and building more bombs for many years to come will be turning New Mexico into a waste water dump! Los Alamos National Labs and Sandia National Lab's air and water monitoring networks are inadequate and unsafe. It should be a rule that SNL and LANL are not harming the neighborhoods that live close to them.

To accelerate bomb-making and further contamination is an environmental justice issue because in Albuquerque the DOE is burning hazardous explosive and radioactive materials openly, endangering the low-income communities which surround Sandia National Labs here in Albuquerque.

I propose that instead of wasting billions of dollars on making more bombs, we use billions of dollars to clean up the contamination already in our state, protect and make sure that our drinking water facilities are not harmed and have adequate air and water monitoring systems, not neglect our "Non-Proliferation Treaty," make sure the neighbors surrounding SNL and LANL are protected and safe, and protect our future, our children's future and the future of New Mexico!

Sincerely,

116A

1140;
21F

414E;
514D

614J

79B;
31F
(cont.)

Campaign 39

CAMPAIGN 39

From:
Sent:
To:
Subject:

Dear:

Please grant a 90 day extension for the INEA comment period for the SPEIS.

After repeated requests from the leaders of the state of New Mexico, our Senators, our Congress, our Environment Department, our Governor, and the other community leaders to extend the comment period to the INEA on the SPEIS for the Complex Transformation plan, Theodore Wyka has refused the request for the extension. The people of New Mexico are appealing to you. This Complex Transformation plan will affect the lives and livelihoods of New Mexicans for generations to come.

Please show us your respect for the insistent requests from the people of New Mexico.
Sincerely,

12E

Campaign 40

Page 1 of 1

The Hon. Samuel Bodman
Secretary of Energy
1000 Independence Ave., SW
Washington, DC 20585

Dear Secretary Bodman:

As an American and a Reform Jew I strongly oppose the Administration's proposal to build a plant to produce plutonium pits for nuclear weapons. The U.S. stands to gain a great deal from a world with fewer nuclear weapons and should therefore be a leader in non-proliferation efforts. As Henry Kissinger and other diplomats explained in a recent Wall Street Journal article, "the vision of a world free of nuclear weapons and practical measures toward achieving that goal would be, and would be perceived as, a bold initiative consistent with America's moral heritage."

116.A

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 project would be able to produce 50 to 80 plutonium pits annually, the first major nuclear weapons production since the end of the Cold War. Building this new plant would send a contradictory message to other countries, such as Iran, that may be seeking nuclear weapons. While the U.S. is asking others to forego their nuclear arsenals, we are simultaneously trying to increase our own capability to produce nuclear weapons.

21.J

The Jewish tradition has long warned of the dangers of militarism and the need to protect innocent lives. We are also commanded to "seek peace and pursue it." (Psalm 34:5) A task which is made significantly more difficult in a world where we continue to pursue new, more deadly nuclear technology.

Congress rebuked the Energy Department's last attempt to upgrade the arsenal by denouncing 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. For this reason, I urge you in the strongest possible terms to oppose the CMRR project and to help make nuclear non-proliferation a priority in the near future.

318.A

Sincerely,

PUBLIC HEARING—NORTH AUGUSTA, SC**February 21, 2008-Afternoon Session**

- 7.A.1 Commentor stated that the SRS should be used for other purposes – a nano-solar power sheet area.
- 14.N.5 Commentor expressed concern about the accidents especially from transferring wastes and the difficulties in transport calculations.
- 14.E.7 Commentor stated that water resources are being depleted and expressed concern about the priority of water use (for this proposal or for drinking water) and whether the PEIS has a solution to the water resource issues in the SRS region.
- 14.F.2 Commentor stated that there is a geologic fault that runs through the SRS region and expressed concern about destructive impacts from a potential earthquake when there are radioactive materials involved.
- 14.E.7 Commentor expressed concern about the lack of adequate water supplies in the SRS region to support the proposal and all its facilities when there is not enough water for citizens/residents to wash cars or fill up pools.
- 14.F.2 Commentor questioned why buried material is not being removed from SRS as it is in an earthquake fault line area.
- 2.A.2 Commentor stated that the hearing process is insufficient to evaluate the environmental impacts of the proposed project and that new studies are needed on the medical, public health, and climate impacts of the life cycle of the Complex process, specifically including respective testing in the use of nuclear weapons that it would produce.
- 14.K.6 Commentor stated that the DOE should compile and disseminate the results of epidemiological studies which have been lacking in the 60-plus years of the nuclear history be conducted and that the DOE abandon the effort to redevelop nuclear weapons due to the fact that they are costly, destabilizing, unnecessary and unhealthy. Commentor stated that the DOE should instead focus on cleanup.
- 14.M.18 Commentor stated that a thorough analysis in the PEIS of reducing the footprint by a third, moving from 60-year-old facilities into a modern building, including modern safety features and modern standards, reducing the transport and movement of nuclear materials dramatically, all of these factors will add up to dramatically reduced environmental safety and security impacts.
- 14.K.4 Commentor stated that radiation is not safe. It causes long-term genetic damage.
- 14.K.6 Commentor requests DOE to compile and disseminate the results of epidemiological studies which have been woefully been lacking in the 60-plus years of nuclear history of our world.

- 7.A.2 Commentor stated that a new fifth alternative should be added that would abandon the first four alternatives.
- 1.E Commentor stated that the U.S. should ratify the CTBT.
- 9.B Commentor states that resources could be better used in other areas.
- 2.C Commentor makes statement pertaining to public involvement.
- 14.E.2 Commentor expresses concerns regarding the adequacy of the water supply.
- 14.E Commentor makes statement regarding water resources.
- 20.0 Commentor makes comment that is out of scope (Vogtle nuclear plant)
- 19.E Commentor makes remark regarding geologic fault.
- 16.A Commentor is opposed to Complex Transformation.
- 1.K Commentor criticizes the current administration and policy.
- 1.F Complex Transformation violates the Nuclear Non-Proliferation Treaty.
- 16.A Commentor is opposed to nuclear weapons. Commentor is opposed to Complex Transformation. Commentor states that Complex Transformation is immoral.
- 14.K Commentor states concerns regarding health and safety.
- 14.O Commentor stated that nuclear weapons and therefore Complex Transformation are hazardous to the environment.
- 1.F Commentor stated that the U.S. should abide by the NPT and disarm.
- 14.M Commentor states concern relating to waste management/clean-up.
- 14.E.7 Commentor expressed concern about water availability at SRS.
- 9.B Commentor states that resources could be better used in other areas.
- 9.H Commentor expressed concern about the amount of taxpayer money required to support Complex Transformation.
- 1.J Commentor expresses opinion that the US should disarm.
- 1.K Commentor criticizes current administration and policy.
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.

- 14.O Commentor stated that nuclear weapons and therefore Complex Transformation are hazardous to the environment.
- 7.M.1, 1Q, 11E Commentor expressed concern about the impacts from potential use or testing of nuclear weapons.
- 14.E Commentor expresses concern regarding water resources.
- 14.M.3 Commentor expresses concern about the storage of nuclear waste and potential health effects.
- 7.F Commentor expresses safety concerns.
- 20.0 Commentor makes a statement that is out of scope.
- 9.H Commentor expressed concern about the amount of taxpayer money required to support Complex Transformation.
- 1.J Commentor stated that the U.S. needs to assert its leadership role in international disarmament efforts.
- 9.E Commentor expresses concern regarding cost.
- 16.A Commentor is opposed to Complex Transformation.
- 1.K Commentor expresses criticism of the current administration and policy.
- 9.H Commentor expressed concern about the amount of taxpayer money required to support Complex Transformation.
- 7.J Commentor stated that the DOE should clean up existing radioactive waste prior to generating more with Complex Transformation.
- 9.D Commentor expresses concerns regarding costs of cleanup.
- 1.F Complex Transformation violates the Nuclear Non-Proliferation Treaty.
- 1.J Commentor stated that the U.S. is being hypocritical by saying that other countries should not have nuclear weapons but that our country continues to maintain a stockpile.
- 9.B Commentor states that resources could be better used in other areas.
- 18.C Commentor makes remark pertaining to economic concerns (personnel).
- 16.A, 20 Commentor stated that Complex Transformation is immoral.
- 9.H Commentor makes statement pertaining to cost.

- 14.O Commentor stated that nuclear weapons and therefore Complex Transformation are hazardous to the environment.
- 7.J Commentor stated that the DOE should clean up existing radioactive waste prior to generating more with Complex Transformation.
- 18.B Commentor makes statement pertaining to general personnel impacts.
- 9.B Commentor states that resources could be better used in other areas.
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.
- 20.0 Commentor makes a statement that is out of scope.
- 14.K Commentor makes remarks regarding health and safety.
- 7.F Commentor raises safety concerns.
- 3.A Commentor makes remark regarding purpose and need.
- 7.A Commentor makes remark concerning other alternatives.
- 1.F Complex Transformation violates the Nuclear Non-Proliferation Treaty.
- 1.K Commentor criticizes the current administration and policy.
- 16.A Commentor is opposed to Complex Transformation.
- 16.A Commentor is opposed to nuclear weapons.
- 3.A Commentor makes a general statement regarding programmatic purpose and need.
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.
- 9.B Commentor states resources could be better used in other areas.
- 1.J Commentor stated that the U.S. is being hypocritical by saying that other countries should not have nuclear weapons but that our country continues to maintain a stockpile.
- 7.J Commentor expresses safety concerns.
- 1.N Commentor makes statement regarding nuclear power in the US
- 18.B Commentor makes remark regarding personnel (facetious)
- 14.K Commentor addresses health and safety concerns in the form of a poem.

- 16.A Commentor is opposed to nuclear weapons.
- 16.A, 20 Commentor stated that Complex Transformation is immoral.
- 14.K Commentor expresses concerns regarding health and safety.
- 2.J Commentor makes statement relating to terminology.
- 1.K Commentor criticizes administration and policy (1980s)
- 16.A Commentor is opposed to nuclear weapons.
- 14.K Commentor makes remark regarding health and safety (referencing Nagasaki survivor)
- 5.I Commentor makes remark regarding the processing or handling of plutonium.
- 9.B Commentor states resources could be better used in other areas.
- 16.A Commentor is opposed to nuclear weapons.
- 16.A Commentor is opposed to nuclear weapons.
- 2A Commentor made a statement about the general NEPA process
- 7.F Commentor expressed safety concerns.
- 14.M.3 Commentor expressed concern about the storage of nuclear waste and potential health effects.
- 7.J Commentor stated that the DOE should clean up existing radioactive waste prior to generating more with Complex Transformation.
- 9.H Commentor expressed concern about the amount of taxpayer money required to support Complex Transformation.
- 14.I Commentor expressed concern about socioeconomics.
- 14.M.3 Commentor expressed concern about the storage of nuclear waste and potential health effects.
- 5.A Commentor makes remark that disarmament should be a programmatic alternative.
- 2.I, 2G Commentor made a statement regarding NEPA compliance (hearings).
- 2.C Commentor is pleased that every comment will be analyzed.

- 11.E Commentor requested additional analysis of the effects to the environment, public health, etc. from use of nuclear weapons
- 14.I Commentor expressed concern about socioeconomics.
- 9.B Commentor stated that resources could be better used to serve the people's need.
- 8.A Commentor stated that Complex Transformation is in opposition to Congress' recent rejection of the RRW.
- 5.I Commentor mentioned onsite plutonium.
- 14.M.3 Commentor expressed concern about the storage of nuclear waste and potential health effects.
- 7.O Commentor stated that a true No Action/Production Alternative where no production would take place should be added to the list of alternatives analyzed.
- 1.F Commentor stated that the U.S. should abide by the NPT and disarm.
- 2.J Commentor makes statement regarding terminology.
- 16.A Commentor is opposed to nuclear weapons.
- 1.J Commentor stated that the U.S. is being hypocritical by saying that other countries should not have nuclear weapons but that our country continues to maintain a stockpile.
- 14.O Commentor stated that nuclear weapons and therefore Complex Transformation are hazardous to the environment.
- 14.K Commentor makes statement related to health and safety.
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.
- 14.E.2 Commentor makes remark questioning the adequacy of the water supply.
- 14.M Commentor makes remark relating to waste management.
- 9.B Commentor states that resources could be better used in other areas.
- 1.K Commentor criticizes current administration and policy.
- 9.H Commentor expressed concern about the amount of taxpayer money required to support Complex Transformation.
- 2.C Commentor expresses gratitude regarding stakeholder involvement.

- 18.E, 2G Commentor is pleased environmental justice was included in the presentation.
- 14.O Commentor addresses cumulative impacts.
- 16.A Commentor is opposed to nuclear weapons.
- 9.B Commentor states resources could be better used in other areas.
- 7.J Commentor makes remark regarding wastes that are spilling.
- 7.F Commentor expresses safety concerns.
- 7.B Commentor expresses concerns regarding the transportation of nuclear materials on highways.
- 16.A, 20 Commentor is opposed to nuclear weapons. Commentor stated that Complex Transformation is immoral.
- 14.O Commentor stated that nuclear weapons and therefore Complex Transformation are hazardous to the environment.
- 14.M.3 Commentor expressed concern about the storage of nuclear waste and potential health effects.
- 14.K Commentor makes remarks related to health and safety.
- 5.I Commentor makes a remark concerning the processing or handling of plutonium.
- 16.A Commentor is opposed to nuclear weapons.
- 1.K Commentor criticizes current administration and policy.
- 5.G Commentor discusses downsizing in-place.
- 1.J Commentor stated that the U.S. is being hypocritical by saying that other countries should not have nuclear weapons but that our country continues to maintain a stockpile.
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.
- 14.N Commentor expressed concern regarding potential accidents.
- 13.A Commentor expresses concern regarding security issues, sabotage, and terrorism.
- 1.K Commentor expresses criticism of the current administration and policy and encourages public involvement.
- 9.B Commentor states that resources could be better used in other areas.

- 14.O Commentor stated that nuclear weapons and therefore Complex Transformation are hazardous to the environment.
- 14.I Commentor expresses comment pertaining to socioeconomics.
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.
- 1.F Complex Transformation violates the Nuclear Non-Proliferation Treaty.
- 9.F Commentor addresses cost-benefit issues.
- 5.A Commentor discusses newly proposed program alternative (not involving continuing nuclear arms race).
- 9.H Commentor expressed concern about the amount of taxpayer money required to support Complex Transformation.
- 14.M Commentor expresses concerns regarding waste management.
- 16.A Commentor is opposed to Complex Transformation.
- 14.E.2 Commentor expresses concerns regarding the adequacy of the water supply.
- 7.B Commentor expresses concerns regarding the transportation of nuclear materials.
- 7.F Commentor expresses safety concerns.
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.
- 1.K Commentor makes a criticism of the current administration and policy.
- 5.A Commentor discussed a newly proposed programmatic alternative (disarmament)
- 16.A Commentor is opposed to nuclear weapons. Commentor is opposed to Complex Transformation.
- 7.E Commentor makes remark regarding security functions.
- 7.F Commentor makes remark regarding cost benefit analysis.
- 9.F Commentor makes remark regarding cost-benefit analysis.
- 14.D Commentor makes remark regarding water resources.
- 1.K Commentor criticizes current administration and policy.
- 1.F Complex Transformation violates the Nuclear Non-Proliferation Treaty.

- 14.M Commentor expresses concern regarding waste.
- 10.F Commentor mentions Pantex.
- 3.A Commentor stated that our country is already in possession of more than enough nuclear weapons than we need.
- 20.0 Commentor makes a remark that is out of scope.
- 7.F Commentor expresses safety concerns.
- 9.B Commentor states that resources could be better used in other areas.
- 1.K Commentor expresses criticism regarding the current administration and policy.
- 9.B Commentor states that resources could be better used in other areas.
- 9.H Commentor expressed concern about the amount of taxpayer money required to support Complex Transformation.
- 1.J Commentor stated that the U.S. is being hypocritical by saying that other countries should not have nuclear weapons but that our country continues to maintain a stockpile.
- 3.A Commentor questions the purpose and need for Complex Transformation.
- 9.B Commentor states that resources could be better used in other areas.
- 14.M Commentor states concerns relating to waste management.
- 1.F Complex Transformation violates the Nuclear Non-Proliferation Treaty.
- 16.A Commentor is opposed to nuclear weapons.
- 16.A Commentor is opposed to nuclear weapons.
- 9.H Commentor expressed concern about the amount of taxpayer money required to support Complex Transformation.
- 16.A Commentor is opposed to nuclear weapons.
- 9.B Commentor states that resources could be better used in other areas.
- 9.H Commentor expressed concern about the amount of taxpayer money required to support Complex Transformation.
- 14.K Commentor makes remark regarding health and safety.

- 14.M.3 Commentor expressed concern about the storage of nuclear waste and potential health effects.
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.
- 1.J Commentor stated that the U.S. is being hypocritical by saying that other countries should not have nuclear weapons but that our country continues to maintain a stockpile.
- 1.F Complex Transformation violates the Nuclear Non-Proliferation Treaty.
- 7.M.1, 1Q
11E Commentor expressed concern about the impacts from potential use or testing of nuclear weapons.
- 9.A Commentor makes a statement regarding cost.
- 14.E.2 Commentor states concerns regarding adequacy of the water supply.
- 16.A Commentor is opposed to nuclear weapons.
- 1.K Commentor criticizes the current administration and policy.
- 3.A Commentor makes a remark questioning general purpose and need.
- 20.0 Commentor makes a remark that is out of scope.
- 9.0 Commentor makes a remark regarding cost and schedule.
- 16.A Commentor is opposed to nuclear weapons.
- 9.H Commentor expressed concern about the amount of taxpayer money required to support Complex Transformation.
- 14.H Commentor makes a statement regarding human resources (generations).
- 2.C Commentor expresses gratitude regarding the public sharing opinions at public meetings.
- 16.A Commentor is opposed to nuclear weapons.
- 1.K Commentor criticizes the current administration and policy.
- 1.J Commentor stated that Complex Transformation will increase the proliferation of nuclear weapons. Commentor stated that the U.S. needs to assert its leadership role in international disarmament efforts.
- 8.A Commentor makes general statement regarding the RRW.

- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.
- 1.F Commentor stated that the U.S. should abide by the NPT and disarm.
- 1.E Commentor stated that the U.S. should ratify the CTBT.
- 9.B Commentor makes statement that resources could be better used in other areas.
- 1.K Commentor criticizes current administration and policy.
- 16.A Commentor is opposed to nuclear weapons.
- 14.D Commentor makes remark regarding radiation spreading through the air.
- 1.N Commentor makes remark regarding nuclear power in the US.
- 16.A Commentor is opposed to nuclear weapons.
- 16.A Commentor is opposed to nuclear weapons.
- 2.J Commentor makes remark regarding terminology.
- 5.I Commentor makes a remark regarding the processing or handling of Plutonium.
- 5.L Commentor makes remark regarding the processing or handling of radioactive isotopes.
- 7.B.1 Commentor raises question regarding the transportation of nuclear materials.
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.
- 1.J Commentor stated that Complex Transformation will further the nuclear arms race. Commentor stated that the U.S. needs to assert its leadership role in international disarmament efforts.
- 2.C Commentor expresses appreciation for being able to provide feedback.
- 16.0 Commentor is opposed to nuclear weapons.
- 9.H Commentor expressed concern about the amount of taxpayer money required to support Complex Transformation.
- 14.M.3 Commentor expressed concern about the storage of nuclear waste and potential health effects.
- 1.F Commentor stated that the U.S. should abide by the NPT and disarm.

- 9.A Commentor expresses comments stating that resources could be better used in other areas.
- 14.E Commentor expresses concern regarding contamination of water resources.
- 14.D Commentor expresses concern regarding air quality.
- 7.J Commentor makes remark regarding cost of clean-up.
- 7.F Commentor expresses safety concerns.
- 11.A Commentor requests additional analysis.
- 14.M.3 Commentor expressed concern about the storage of nuclear waste and potential health effects.
- 19.E Commentor expresses concern regarding seismic protection of proposed facilities.
- 10.H Commentor makes a statement regarding Aiken.
- 1.J Commentor stated that Complex Transformation would be bad foreign policy.
- 14.K Commentor expresses health and safety concerns.
- 9.H Commentor expressed concern about the amount of taxpayer money required to support Complex Transformation.
- 9.B Commentor stated that resources could be better used in other areas.
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.
- 1.J Commentor stated that the U.S. is being hypocritical by saying that other countries should not have nuclear weapons but that our country continues to maintain a stockpile. Commentor stated that Complex Transformation will further the nuclear arms race.
- 2.J Commentor makes statement relating to terminology.
- 9.H Commentor expressed financial concerns relating to Complex Transformation.
- 16.A Commentor is opposed to nuclear weapons.

February 21, 2008-Evening Session

- 1.J Commentor stated that the U.S. needs to assert its leadership role in international disarmament efforts.

- 1.F Commentor states Complex Transformation violates the Nuclear Non-Proliferation Treaty.
- 1.C Commentor remarks on Nuclear Posture Review (2001) (includes Nuclear Posture Review - Anticipated 2009)
- 1.E Commentor stated that the U.S. should ratify the CTBT.
- 7.F Commentor makes statement regarding safety concerns.
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.
- 14.F.2 Commentor expressed concern that SRS is in an earthquake fault zone.
- 7.M.1, 1.Q
11.E Commentor is concerned about the impacts from potential use or testing of nuclear weapons.
- 2.I Commentor expressed concern about NEPA compliance
- 16.A Commentor is opposed to nuclear weapons.
- 15.A Commentor supports Complex Transformation.
- 10.B Commentor is opposed to pit production at Los Alamos.
- 14.K Commentor expressed concerns about health and safety, and that the standard method of assessing radiation risk is inadequate and based on the wrong models.
- 14.O Commentor stated that nuclear weapons and therefore Complex Transformation are hazardous to the environment.
- 11.D Commentor requested additional analysis on environmental effects.
- 11.E, 7.M.1 Commentor requested additional analysis of the effects to the environment, public health, etc. from use of nuclear weapons.
- 1.N.1 Commentor is opposed to the U.S. using nuclear power.
- 1.Q Comment criticizing underground testing.
- 7.M.1 Concern about the impacts from potential use or testing of nuclear weapons.
- 15.A Commentor supports Complex Transformation.
- 5.C Commentor expressed pride re the processing or handling of radioactive isotopes (tritium)

- 1.K Commentor criticizes current administration and policy by expressing wishes for a democratic president in the next election.
- 16.A Commentor is opposed to Complex Transformation.
- 13.A Commentor supports nuclear weapons as part of a defense shield.
- 15.A Commentor supports Complex Transformation.
- 3.A Commentor wants DOE to plan ahead for the next 50-60 years.
- 10.H Commentor expressed support for candidate site - SRS.
- 5.C Commentor supports Distributed Centers of Excellence but is concerned about lack of pit capacity.
- 18.0, 18.A Commentor expressed concern about staffing reductions - site specific.
- 5.I Commentor expressed pride regarding the processing or handling of plutonium.
- 7.M.1, 11.E
1.Q Commentor is concerned about the impacts from potential use or testing of nuclear weapons.
- 9.H Commentor expressed concern about the amount of taxpayer money required to support Complex Transformation.
- 7.J Commentor stated that the DOE should clean up existing radioactive waste prior to generating more with Complex Transformation.
- 16.A Commentor is opposed to nuclear weapons.
- 16.A, 20 Commentor stated that Complex Transformation is immoral.
- 1.F Commentor stated that the U.S. should abide by the NPT and disarm.
- 1.O Commentor criticized war on terror.
- 1.C Commentor mentioned Nuclear Posture Review (2001) (includes Nuclear Posture Review - Anticipated 2009)
- 7.M.1, 11.E
1.Q Commentor is concerned about the impacts from potential use or testing of nuclear weapons.
- 9.B Commentor stated that resources could be better used for cleanup (and states nuclear weapons are evil.)
- 16.0 Commentor is opposed to nuclear weapons.

- 11.E Commentor requested additional analysis of the effects to the environment, public health, etc. from use of nuclear weapons.
- 1.J Commentor stated that the U.S. is being hypocritical by saying that other countries should not have nuclear weapons but that our country continues to maintain a stockpile.
- 15.A Commentor supports Complex Transformation.
- 2.A Commentor compliments Mr. Wyka and also thanks the officials at Savannah River Site.
- 2.C Commentor is pleased with the number and diversity of people attending and participating in the hearing.
- 16.A Commentor is opposed to Complex Transformation.
- 2.J Commentor criticizes use of euphemisms
- 1.K Commentor criticizes current administration and policy.
- 9.A Commentor is opposed to spending money to modernize the existing Complex.
- 9.H Commentor expressed concern about the amount of taxpayer money required to support Complex Transformation.
- 9.B Commentor is concerned there will be reduced funds to cleanup the Savannah River Site and other sites.
- 7.J Commentor stated that the DOE should clean up existing radioactive waste prior to generating more with Complex Transformation.
- 1.G Commentor cites the Moscow Treaty.
- 4.A Commentor states that the no action alternative "is essentially the status quo."
- 7.O Commentor stated that a true No Action/Production Alternative where no production would take place should be added to the list of alternatives analyzed.
- 5.A Commentor states disarmament should be the no action alternative.
- 1.F Commentor states Complex Transformation violates the Nuclear Non-Proliferation Treaty.
- 5.B Commentor feels the no action alternative of disarmament should be considered.

PUBLIC HEARING—OAK RIDGE, TN**February 26, 2008-Afternoon Session**

- 1.J Commentor stated that Complex Transformation will further the nuclear arms race.
- 1.F Commentor stated that the U.S. should abide by the NPT and disarm.
- 3.A Commentor stated that our country is already in possession of more than enough nuclear weapons than we need.
- 16.A Commentor is opposed to nuclear weapons, the contractors who make them, and Complex Transformation.
- 9.B Commentor stated that money spent on weapons is a waste and would be better spent on alternative energy instead.
- 7.M.1 Commentor said nuclear weapons threaten global destruction.
- 15.A, 10.I Commentor supports modernization and siting Complex Transformation at Y-12.
- 2.A Commentor praised the NEPA process.
- 9.A Commentor stated that the Complex should be as cost-effective and efficient as possible.
- 7.J Commentor has always supported accelerated cleanup of the Complex, and a smaller, safer Y-12 site.
- 5.C Commentor expressed support for Distributed Centers of Excellence and the Canned Subassembly Facility.
- 5.A Comment regarding Programmatic Alternatives - newly proposed, but not analyzed in the SPEIS. Commentor suggested nonexistent Alternative Five, dismantlement of the arsenal.
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.
- 1.J Commentor stated that Complex Transformation would be bad foreign policy and lead to further proliferation.
- 14.O Commentor stated that nuclear weapons and therefore Complex Transformation are hazardous to the environment.
- 9.B Commentor stated that money spent on weapons would be better spent on health care, education, and infrastructure instead.

- 15.0, 10.I Commentor believes in the mission of Y-12, to secure democracy with a strong nuclear capability. Commentor supports the UPF.
- 18.B Commentor stated that Oak Ridge has had experience in moving jobs tied to weapons production into other jobs that support industry not tied to weapons production and that jobs isn't a real issue in the Complex Transformation debate.
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.
- 16.A Commentor is opposed to Complex Transformation.
- 1.J Commentor stated that the US needs to move toward nonproliferation.
- 15.0, 10.I Speaking for the Knox Building Trades union, commentor supports the mission of Y-12, and the Uranium Storage Facility.
- 14.I, 10.I Commentor appreciates the economic importance of the Y-12 plant to the local area.
- 2.G Commentor appreciates the support voiced by elected local, state, and federal officials.
- 5.D, 5.D.3 Comment supporting Programmatic Alternative 2: Consolidated Nuclear Production Center; CUC
- 5.E A commentor stated that DOE did not really evaluate a smaller CNPC or consider viable alternatives for consolidation of the complex.
- 7.N Commentor stated that modernization would be less costly, safer, and more secure than the existing Complex. Commentor said it would be senseless to relocate storage facilities and SNM to some other place.
- 18.C Commentor discussed economic concerns of personnel, noted importance of Y-12 to local economy.
- 5.C Commentor expressed support for Distributed Centers of Excellence.
- 10.I Commentor stated that the human resources at Y-12 are highly skilled, unique, and irreplaceable, and supported by local educational infrastructure which cannot be duplicated elsewhere either.
- 10.I Commentor favorable evaluated the role of Oak Ridge in history and defense.
- 15.A Commentor, speaking for CORRE, strongly supports siting Complex Transformation at Y-12.

- 15.0 Commentor stated that modernization would be less costly, safer, and more secure than the existing Complex.
- 10.I Commentor believes in the mission of Y-12, to secure democracy with a strong nuclear capability.
- 2.G Commentor supported earlier comment by County Mayors.
- 7.N Speaking on behalf of his organization, Commentor supports Preferred Alternative.
- 14.I Commentor acknowledged socioeconomic importance of Y-12 facility to local area.
- 14.M.3 Commentor expressed concern about the storage of nuclear waste and potential health effects of work at Y-12, but still supports Preferred Alternative.
- 7.N Commentor supports Preferred Alternative, and said that the current location is the most secure available for the Uranium Processing Facility.
- 15.A Commentor supports modernization and siting Complex Transformation at Y-12.
- 5.C Commentor expressed support for the Uranium Center of Excellence.
- 9.A Commentor believes the Alternative will save money while improving safety and security at the complex.
- 2.G Commentor mentioned letter from SEN Alexander's office expressing the same support.
- 5.G Comment supported downsizing-in-place, but also downsizing the arsenal toward ultimate disarmament.
- 9.B Commentor is opposed to spending money to modernize the existing Complex, and thinks officials ought to consider the USA's disproportionate military spending.
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure; and that true security comes from renewable energy and learning how to live with others.
- 5.D.3 Commentor supports Programmatic Alternative 2: Consolidated Nuclear Production Center; CUC
- 10.I Commentor supports Y-12 and its mission.
- 7.J Commentor supports completion of environmental restoration.

- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.
- 16.A Commentor is opposed to Complex Transformation.
- 1.F Commentor stated that the U.S. should abide by Article 6 of the Constitution and comply with the NPT.
- 20 Commentor is opposed to nuclear weapons on religious grounds.
- 1.J Commentor stated that the U.S. needs to assert its leadership role in international disarmament efforts.
- 7.O Commentor stated that DoE should consider not producing weapons as an alternatives.
- 1.N Commentor said atomic energy isn't clean, it's the dirtiest of all.
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure, and that they are mutually destructive.
- 14.O Commentor stated that nuclear weapons and therefore Complex Transformation are hazardous to the environment.
- 5.J Commentor expressed concern about the health effects due to uranium's use and mining, and the use of depleted uranium in conventional uranium.
- 1.K Commentor criticized the administration and current foreign policy with respect to Iran and proliferation.
- 14.E Commentor expressed concern about existing and potential future contamination of aquifers due to mining of uranium, as well expressing doubt about the waste disposal facility at Yucca Flats [sic].
- 9.B Commentor stated that money, intelligence, and work ethic spent on weapons would be better spent on disarmament, alternative energy, and conflict resolution instead.
- 7.N Commentor supports Preferred Alternative.
- 10.I Commentor avers that Y-12 workforce is committed to transition, modernization, safety, and security.
- 20 Commentor stated that Complex Transformation is immoral.
- 1.J Commentor stated that the U.S. should abide by the NPT and disarm.
- 7.M.1, 11.E Commentor is concerned about the impacts from potential use or testing of
1.Q nuclear weapons.

- 14.O Commentor stated that nuclear weapons and therefore Complex Transformation are hazardous to the God-given environment.
- 16.0 Commentor stated that weapons should be removed from their platform and safely disposed of.
- 13.A.1 Commentor cited the Wall Street Journal op-ed by Nunn, et al, which stated that the possession of nuclear weapons makes our country less secure.
- 1.F Commentor stated that the U.S. should abide by the NPT and work toward disarmament.
- 16.A Commentor is opposed to spending money on Complex Transformation.
- 2.G Commentor rebutted earlier comment that outsiders' comment in public hearing should be discounted.
- 2.E Commentor applauded number of public hearings but suggested locating some away from weapons facilities so as not to bias the results.
- 16.A Commentor is opposed to Complex Transformation. Commentor stated is opposed to nuclear weapons and criticized past uses of them in historical context.
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.
- 1.K Commentor stated that the DOE is attempting to use Complex Transformation as a means of maintaining the nation's defense budget.
- 14.O Commentor stated that nuclear weapons and therefore Complex Transformation are hazardous to the environment.
- 14.M Commentor stated that there are significant amounts of nuclear waste currently in storage (approximately 35 million gallons of high level nuclear waste in underground tanks) and they have been in the same condition for the past 20 years without any change.
- 16.A Commentor is opposed to Complex Transformation.
- 16.A Commentor is opposed to Complex Transformation.
- 9.B Commentor stated that resources would be better spent on social problems, global warming, and other environmental concerns which have all been ignored while attention and resources have been spent on nuclear weapons.
- 1.F Complex Transformation violates the Nuclear Non-Proliferation Treaty. Commentor stated that the U.S. should abide by the NPT and disarm.

- 1.J Commentor stated that the U.S. is being hypocritical by saying that other countries should not have nuclear weapons but that our country continues to maintain a stockpile.
- 7.E Commentor stated that the only security we will ever have is if nuclear weapons are off the face of the earth.
- 10.I Commentor spoke well of Oak Ridge's, and Y-12's, role in history.
- 7.N Commentor supports Complex Transformation, specifically Preferred Alternative, Distributed Centers of Excellence, meaning uranium at Y-12.
- 10.I Commentor stated that the craft and skills at Y-12 are unique.
- 7.E Commentor stated the safety and security are workforce values and that Transformation will increase safety and security while decreasing cost by modernizing large old facilities into smaller modern ones.
- 10.I Commentor averred that Y-12 is a cost-effective, safe workplace.
- 1.K Commentor criticized the current administration for being willing to drop a nuclear weapons on countries who do not have nuclear weapons.
- 7.M.1, 11.E Commentor is concerned about the impacts from potential use or testing of
1.Q nuclear weapons.
- 1.F Commentor stated that the U.S. should abide by the NPT and disarm.
- 16.A Commentor is opposed to Complex Transformation.
- 15.A, 10.I Commentor praised Y-12 and the nuclear weapons complex on behalf of the University of Tennessee, and the B&W Community Relations Council.
- 5.C Commentor expressed support for Distributed Centers of Excellence.
- 9.A, 10.I Commentor believes the expertise at Y-12 cannot be duplicated elsewhere.
- 7.N Speaking on behalf of his organization, Commentor supports Preferred Alternative, especially the Uranium Production [sic] Facility and CoE.
- 7.J Commentor supports environmental restoration.
- 14.I Commentor hopes to partner with state and local organizations to create the workforce of the future, particularly in crafts and engineering.
- 14.O Commentor stated that nuclear weapons are hazardous to the environment.

- 16.0 Commentor is opposed to nuclear weapons, civil defense, and the concept of deterrence; that Complex Transformation is immoral and will exacerbate the arms race.
- 1.J Commentor stated that the U.S. is being hypocritical by saying that other countries should not have nuclear weapons but that our country continues to maintain a stockpile.
- 7.O Commentor stated that a true No Action/Production Alternative where no production would take place should be added to the list of alternatives analyzed. Commentor stated that the Transformation which is really needed is dismantlement.
- 18.B Commentor stated that dismantling the weapons would provide good jobs for Oak Ridge personnel.
- 1.K Commentor criticized current administration and its foreign policy.
- 3.A Commentor stated that our country does not need another nuclear weapons facility.
- 16.0 Commentor is opposed to nuclear weapons.
- 14.I Commentor acknowledged socioeconomic importance of Y-12 in the region.
- 15.A, 10.I Commentor supports siting Complex Transformation at Y-12.
- 15.A Comment believes modernization will ensure safe, efficient operations at Y12.
- 7.N Commentor, speaking for the City Council of Oak Ridge, expressed support for the Preferred Alternative and the Uranium Center of Excellence.
- 5.C Commentor expressed support for Distributed Centers of Excellence, especially for Uranium Processing at Y-12, and urged that NNSA proceed with design of the UPF.
- 15.A, 10.I Commentor supports siting Complex Transformation at Y-12.
- 5.C Commentor expressed support for Distributed Centers of Excellence, as well as the Uranium Center of Excellence being located at Y-12, and recommended that DoE and NNSA compete the special materials forge facility at Y-12.
- 7.J Commentor stated that the region is prepared to work with DoE's EM office to clean up existing radioactive waste at Y-12.

- 1.F Commentor stated that Complex Transformation violates the NPT and the only alternative that would comply with the NPT is a No Production Alternative.
- 2.I Commentor stated that the public hearing process is improper because the prior work in reference to the development of the alternatives has not been completed.
- 2.C Commentor stated that due to inadequate development of the alternatives, the public hearing process must be restarted because the stakeholders are not proportionally represented.
- 2.E Commentor stated that if a nuclear attack were to occur it would be on population centers, so public hearings should be held in/around major populations centers for a project of this scale.
- 2.J Commentor stated that the language in the SPEIS are clearly biased with a lot of euphemisms that do not present the material in an evenhanded way to members of different sides of the issue.
- 11.E Commentor stated that a broad health risk assessment done by impartial parties including a cost-benefit study to assess what money could be spent on instead of on something that would negatively impact public health.
- 9.B Commentor stated that resources could be better spent elsewhere.
- 7.O Commentor stated that a true No Action/Production Alternative where no production would take places should be added to the list of alternatives analyzed.
- 1.J Commentor stated that Complex Transformation will further the nuclear arms race.
- 16.A Commentor is opposed to Complex Transformation.
- 9.B Commentor stated that Y-12 should be used to destroy nuclear weapons and ameliorate the environmental damage caused through nuclear weapons production.
- 7.F Commentor stated that nuclear weapons do not make the US more safe.
- 14.K Commentor expressed reservations about health and safety in Oak Ridge.
- 14.E Commentor expressed concern about water quality in Oak Ridge.
- 16.0 Commentor is opposed to the nuclear arms race.
- 18.C Commentor respects economic concerns of Y-12 workers.
- 1.F Complex Transformation violates the Nuclear Non-Proliferation Treaty.

- 1.K Commentor indirectly criticized current administration for failing to honor treaties.
- 15.0 Commentor noted the important economic role of federal programs in Tennessee.
- 15.A, 10.I Commentor supports siting Complex Transformation at Y-12.
- 9.A Commentor noted that Y-12 programs are safe, effective, and secure.
- 5.J Commentor mentioned that uranium handling operations were invented in Tennessee.
- 15.A, 10.I Commentor supports siting Complex Transformation at Y-12.
- 15.A Commentor believes modernization will create a safer, more secure and cost-effective Complex.
- 5.C Commentor expressed support for Distributed Centers of Excellence, in particular for the uranium processing facility to be located at Y-12.
- 7.N Speaking on behalf of her organization, Commentor supports Preferred Alternative.
- 10.I Commentor believes in the mission of Oak Ridge and Y-12, to provide national security, secure democracy with a strong nuclear capability.
- 5.C Comment supporting Programmatic Alternative 2: Consolidated Nuclear Production Center; CUC
- 10.B Commentor is opposed to the CMRR Project.
- 1.J Commentor stated that the U.S. is being hypocritical by saying that other countries should not have nuclear weapons but that our country is trying to increase its present capacity to produce nuclear weapons. Commentor states that US should be a leader in disarmament.
- 8.A Commentor stated that Complex Transformation is in opposition to Congress' recent rejection of the RRW.
- 16.0 Commentor is opposed to nuclear weapons.
- 16.A Commentor is opposed to Complex Transformation.
- 3.A Commentor stated that our country is already in possession of more than enough nuclear weapons than we need.
- 16.0 Commentor believes in the total abolition of nuclear weapons.

- 7.O Commentor will not support any plan which does not provide for abolition and dismantlement of nuclear weapons.
- 1.F Abolition of nuclear weapons must be accomplishment via universal international treaties.
- 16.0 Commentor is opposed to the production of new nuclear weapons.
- 1.J Commentor stated that the production of new nuclear weapons makes our country less secure by encouraging proliferation.
- 1.J Commentor stated that the U.S. is being hypocritical by saying that other countries should not have nuclear weapons but that our country continues to maintain a stockpile. Commentor stated that U.S. should lead by example.
- 9.B Commentor stated that money spent on weapons would be better spent on human needs instead.
- 7.J Commentor stated that the DOE should clean up existing radioactive waste prior to generating more with Complex Transformation.
- 1.F Commentor stated that the U.S. should abide by the NPT and disarm.
- 1.K Commentor criticized the current administration, the war in Iraq, and policy.
- 16.0 Commentor is opposed to the use of nuclear weapons in the past on Japan.
- 1.C Commentor cited list of states in NPT.
- 16.0 Commentor is opposed to nuclear weapons.
- 11.D Commentor applauded analysis on environmental effects.
- 2.J Commentor doesn't believe the transformation will be truly real.
- 11.E Commentor requested additional analysis of the effects to the environment, public health, etc. from operation of nuclear weapons facilities.
- 14.M.3 Commentor expressed concern about the storage of nuclear waste and potential health effects, especially on the unanalyzed offsite population.
- 2.E Commentor stated that DoE should expand the hearing locations beyond just weapons productions sites to get a truly representative sample of public opinion.
- 16.A Commentor is opposed to Complex Transformation.
- 1.F Commentor stated that Complex Transformation is in violation of the NPT and that the SPEIS still fails to analyze an alternative that meets the NPT.

- 1.F Commentor stated that Complex Transformation is in violation of the NPT and that the SPEIS still fails to analyze an alternative that meets the NPT.
- 1.J Commentor stated that the alternatives proposed in the SPEIS send a dangerous message to the rest of the world and will provoke a new global nuclear arms race. Commentor stated that the U.S. needs to assert its leadership role in international disarmament efforts.
- 9.B Commentor stated that the money spent on maintaining the stockpile and on Complex Transformation would be better spent on social and infrastructure needs.
- 14.I Commentor stated that a disarmament alternative would not end work at Y-12 and that, in fact, workers could be used to dismantle the nuclear weapons backlog and to safely clean up past environmental contamination.
- 16.0 Commentor is opposed to Complex Transformation.
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.
- 1.J Commentor stated that the U.S. is being hypocritical by saying that other countries should not have nuclear weapons but that our country continues to maintain a stockpile.
- 9.B Commentor stated that resources could be better used to address human want.
- 7.N Commentor supports Preferred Alternative.
- 5.C Commentor expressed support for Distributed Centers of Excellence, especially Oak Ridge for Uranium, and Los Alamos for Plutonium.
- 15.0 Commentor believes modernization will preserve institutional knowledge while enhancing productivity, reducing cost, and improving safety and security.
- 5.D.3 Commentor supports Programmatic Alternative 2: Consolidated Nuclear Production Center; CUC
- 7.J Commentor requested stability in DOE environmental management program to clean up existing radioactive waste.
- 7.N Commentor supports Preferred Alternative.
- 16.A Commentor is opposed to Complex Transformation. Commentor is opposed to nuclear weapons.
- 7.M.1 Concern about the impacts from potential use or testing of nuclear weapons.
- 7.E Comment concerning day-to-day security functions

- 7.F Comment regarding safety concerns
- 16.A Commentor is opposed to spending money to modernize the existing Complex.
- 1.F Complex Transformation violates the Nuclear Non-Proliferation Treaty.
- 14.O Commentor stated that nuclear weapons and therefore Complex Transformation are hazardous to the environment.
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.
- 16.A Commentor is opposed to nuclear weapons.
- 1.J Commentor stated that the U.S. needs to assert its leadership role in international disarmament efforts.
- 1.F Commentor stated that there should be an alternative that complies with NPT.
- 9.B Commentor stated that resources could be better used on human needs.
- 7.O Commentor stated that a true No Action/Production Alternative where no production would take place should be added to the list of alternatives analyzed.
- 1.F Commentor stated that the U.S. should abide by the NPT, stop the SLEP, and disarm.
- 2.G Commentor cited signatures on letter of support for Complex Transformation at Y12, by Regional Mayors of Knox, Anderson, Blount, Loudon, Cocke, Roane, Hamblen, Union, Scott, Jefferson, Grainger, and Sevier Counties of Tennessee.
- 10.I Commentor supports siting Complex Transformation at Y-12.
- 5.C Commentor expressed support for Distributed Centers of Excellence, especially for Uranium at Y-12.
- 7.J Commentor believes Complex Transformation will expedite the clean up of existing radioactive waste.
- 16.0 Commentor is opposed to nuclear weapons because they encourage violence.
- 1.J Commentor said proliferation must be stopped.
- 16.A Commentor said those responsible for Complex Transformation will obstruct peace on earth.
- 16.A Commentor is opposed to Complex Transformation.

- 1.F Commentor stated that the U.S. should abide by the NPT and disarm.
- 10.I Commentor supports siting Complex Transformation at Y-12, and commended the workers of Y-12 for their talents and dedication to safety and security.
- 14.K Commentor commended commitment of employees to health and safety.
- 10.I Commentor expressed support for Y-12's future.
- 5.A Commentor suggested that the preferred alternative should be to not build a weapons plant.
- 16.0 Commentor is opposed to nuclear weapons, and has gone to jail for protesting.
- 7.M.1 Commentors believes that if weapons exist, they will be used.
- 9.B Commentor stated that resources could be better used for health and education.
- 14.O Commentor stated that nuclear weapons and therefore Complex Transformation are hazardous to the environment.
- 2.J Commentor criticized document for false logic, euphemisms, and doublespeak.
- 7.O Commentor stated that a true No Action/Production Alternative where no production would take place should be added to the list of alternatives analyzed.
- 1.K Commentor impugned motives of management versus labor.
- 1.F, 7.0 Commentor used playground allegory to mock Complex Transformation as it relates to the NPT.
- 18.C Commentor acknowledged economic concerns of workers at Y-12.
- 7.J, 9.B Commentor suggested money would be better spent on cleaning up creeks in Oak Ridge and that Y-12 workers are the best-equipped to do that.
- 16.A Commentor is opposed to Complex Transformation.
- 1.F Commentor stated that the U.S. should abide by the NPT and disarm.
- 9.B Commentor stated that money spent on weapons would be better spent on alternative energy instead.
- 1.J Commentor stated that Complex Transformation will increase the proliferation of nuclear weapons.
- 9.E Commentor thinks that Alternatives are lacking detail regarding cost.
- 16.0 Commentor urged public officials to abolish nuclear weapons.

- 15.A Commentor supports Complex Transformation to make it smaller, more secure and responsive.
- 5.D.3 Commentor supports modernization and the Uranium Storage Facility, and construction of the new Uranium Processing Facility.
- 7.J Commentor supports environmental restoration.
- 7.O Commentor stated that a true No Action/Production Alternative where no production would take place was advocated by 33,000 public comments which were ignored by the DOE and this alternative should be added to the list of alternatives analyzed.
- 1.J Commentor stated that the U.S. needs to assert its leadership role in international disarmament efforts.
- 1.F Complex Transformation violates the Nuclear Non-Proliferation Treaty. Commentor stated that the U.S. should abide by the NPT and disarm.
- 7.J Commentor stated that the DOE should clean up existing radioactive waste prior to generating more with Complex Transformation.
- 2.H Commentor stated that the SPEIS is flawed in that it assumes that each site starts out equally in reference to the evaluation of the environmental impacts from various alternatives. Commentor stated that true baseline data must be obtained prior to performing such environmental analyses as it is the central purpose of the document.
- 14.O Commentor stated that profound environmental contamination at the proposed sites is responsible for radical differences in the baseline data used to assess the environmental impacts.
- 14.E Commentor expressed concern about the levels of contaminants in the water supply as stated in the SPEIS.
- 5.C.2 Commentor stated that until a complete EIS at Y-12 is performed, no final decision can be made concerning siting a UPF at Y-12 and the SPEIS cannot be used to site the UPF only to use Y-12 as a proposed location.
- 2.I Commentor stated that any decision made during the EIS process must be provisional and no final decisions can be made prior to the ROD.
- 16.A Commentor is opposed to nuclear weapons. Commentor is opposed to Complex Transformation.
- 7.N Commentor supports Preferred Alternative so ATLC's union members can continue to do their work.

- 9.A Management and Labor are looking and succeeding at finding ways to make Y-12 more efficient.
- 7.O Commentor will not support a plan that does not provide for dismantlement and abolition of bombs.
- 1.F Commentor stated that the U.S. should abide by the NPT and disarm.
- 3.A Commentor stated that our country is already in possession of more than enough nuclear weapons than we need.
- 1.B Commentor criticized doctrines of first strike and preemptive war.
- 5.C Commentor expressed support for Distributed Centers of Excellence, especially keeping uranium processing in Oak Ridge.
- 9.H Commentor does not want to see tax money spent on relocating existing function when it can be used to modernize it instead.
- 7.F Commentor said Alternative Two is the safest, most efficient, and cost-effective choice.
- 13.E Commentor cited the report by the Defense Science Board that marginalizing the nuclear mission led to the mishandling of nuclear weapons from Minot to Barksdale AFBs; and that therefore the nuclear mission ought to receive more attention and resources than it has lately.
- 10.I Commentor believes in the mission of Y-12, to secure democracy with a strong nuclear capability.
- 5.C Commentor expressed support for Distributed Centers of Excellence as being the best basis for continued deterrence in today's world.
- 16.A Commentor is opposed to Complex Transformation for moral reasons.
- 1.J Commentor stated that the U.S. needs to assert its leadership role in international disarmament efforts.
- 7.N Commentor supports Preferred Alternative.
- 5.D.3 Comment supports Programmatic Alternative 2: Consolidated Nuclear Production Center; CUC, because facilities are already here.
- 15.0, 10.I Commentor supports spending money to modernize the existing Complex because the skills are already here and nowhere else.
- 7.E Commentor stated that day-to-day security functions cost too much at the existing Complex.

- 7.J, 10.I Commentor stated that the DOE should remove Alpha and Beta buildings because they are obsolete and wasteful of resources.
- 16.A, 20 Commentor is opposed to Complex Transformation on religious grounds; that nuclear weapons constitute blasphemy.
- 14.O Commentor stated that nuclear weapons and therefore Complex Transformation are hazardous to the environment.
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.
- 9.B Commentor stated that money spent on weapons would be better spent on mass transit, and wind and solar energy instead.
- 15.A, 10.I Commentor acknowledged Y-12's role in national security, and supports modernization and siting Complex Transformation at Y-12.
- 5.C Commentor expressed support for Distributed Centers of Excellence.
- 7.N Commentor supports NNSA's Preferred Alternative.
- 2.G Commentor cited co-signers of letter from leaders of surrounding communities: Mayor Bill Haslam of Knoxville; Mayor Winfred Shoopman of Clinton; Mayor Edy Ford of Farragut; and Mayor Troy Beets of Kingston.
- 9.B Commentor stated that resources would be better spent on the poor, energy, nuclear energy, clean energy, nuclear medicine, and dismantlement of nuclear weapons.
- 16.A Commentor is opposed to Complex Transformation.
- 14.O Commentor stated that nuclear weapons and therefore Complex Transformation are hazardous to the environment.
- 16.A Commentor is opposed to Complex Transformation.
- 9.B Commentor stated that resources spent on nuclear weapons would be better spent on defending the planet.
- 7.O Commentor stated that a no production option would result in a reduction in the hazardous materials in Oak Ridge, as well as future economic and reputation benefit.
- 5.C Commentor expressed support for Distributed Centers of Excellence on behalf of his union.
- 10.I Commentor averred that Y-12 has been successful at its national security mission for 65 years due to the skill of its workers.

- 5.C Commentor expressed support for Distributed Centers of Excellence, and praised the workforce of Y-12.
- 10.I Commentor supports siting Complex Transformation at Y-12.
- 10.I Commentor admires dedication to safety and security at Y-12.
- 9.A, 5.D Commentor is opposed to spending money to duplicate the functions of Y-12 elsewhere.
- 1.F Commentor stated that the U.S. has more nuclear weapons than when it signed the NPT, and it should abide by the NPT and disarm.
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure, and that the end of the Cold War has not meaningfully reduced the threat. Commentor said that the current system of alert is an accident waiting to happen.
- 16.0 Commentor stated that the best use of Y-12 would be for disassembling American and Russian nuclear weapons.
- 2.C Commentor drew a distinction between local speakers and out-of-towners.
- 2.A Commentor does not think venue was intended for debate on validity of nuclear weapons.
- 15.0 Commentor supports the past role of nuclear weapons in history and current role national security, especially given nuclear proliferation to Pakistan and North Korea.
- 1.N, 7.M Comment hopes nuclear expertise can be applied to current energy situation.
- 10.I Commentor is proud of Y-12 workers' skill and safety record.
- 10.I Commentor supports siting Complex Transformation at Y-12.
- 5.C Commentor expressed support for Distributed Centers of Excellence.
- 10.I Commentor states that Y-12 has a highly skilled and trained workforce, and the commentor supports that.
- 16.0 Commentor is opposed to Complex Transformation and believes it is immoral. Commentor is opposed to nuclear weapons, and believes that building them is a crime against humanity.
- 9.B Commentor is opposed to spending money on weapons.
- 14.O Commentor stated that nuclear weapons and therefore Complex Transformation are hazardous to the environment.

- 16.0 Commentor said nuclear weapons are bad because they're so powerful.
- 1.N Commentor said nuclear power isn't green because it requires mining uranium, which is bad. Commentor believes nuclear power contaminates water which contaminates the ocean. Commentor stated that nuclear waste is buried and contaminates aquifers and drinking water.

February 26, 2008-Evening Session

- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.
- 5.D.3 Commentor stated that the availability of the latest generation in high security buildings at Y-12 positions the facility well for the future as well as the skilled workforce. Commentor supports NNSA's preferred alternative of continuing uranium missions at Y-12.
- 1.J Commentor stated that Complex Transformation will further the nuclear arms race. Commentor stated that the U.S. is being hypocritical by saying that other countries should not have nuclear weapons but that our country continues to maintain a stockpile.
- 16.A Commentor expresses that in looking at the document page 7 discusses that majority of the comments expressed oppose the Nuclear Weapons Program and the U.S. National Security Policies.
- 5.D.3 Commentor expressed continued support of the Y-12 modernization efforts, including the construction of the HEU manufacturing facility, the UPF, and cleanup.
- 1.F Commentor stated that there should be an alternative that complies with NPT.
- 13.A.1 Commentor stated that the use of nuclear material is no longer a viable deterrent.
- 5.C Commentor favors the Distributed Centers of Excellence alternative
- 5.D Commentor speaks in favor of consolidation to one site of each of the many alternatives.
- 10.I Commentor is a proud supporter of Y-12. Commentor states that Y-12 is well on its way to a transformed Uranium Center of Excellence that will in a timely manner reach NNSA goals of smaller, safer, less expensive, more cost effective and secure uranium facilities.
- 5.C Commentor urges selection of Distributed Centers of Excellence for continuing enriched uranium facilities at Y-12.

- 2.C Commentor states that the enthusiastic community support for this large nuclear defense plant so close to our cities ought to be given a great of weight by NNSA.
- 1.C, 1.G Commentor states that with Nuclear posture review of 2001 and with the Moscow Treaty of 2003 NNSA ought to be able to assign most of these programs to one or the other National Security Labs.
- 5.D Commentor is in favor of consolidation of these programs at one of the National Security Labs, rather than duplicating efforts.
- 7.N, 10.I Commentor supports the preferred alternative at Y-12
- 10.I Commentor states that the Y-12 plant remains one of the most professional and dedicated facilities in our nuclear complex.
- 15.A Commentor supports siting Complex Transformation at Y-12.
- 18.0, 18.A Commentor states that DOE and its subcontractors have had a very significant impact on local economy that would be adversely affected by moving the work elsewhere.
- 13.A.1 Commentor is concerned about the safety of the world in reference to Complex Transformation and nuclear weapons.
- 1.F Complex Transformation violates the Nuclear Non-Proliferation Treaty. Commentor stated that the U.S. should abide by the NPT and disarm.
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.
- 1.J Commentor stated that the U.S. needs to assert its leadership role in international disarmament efforts.
- 7.J Commentor stated that the DOE should clean up existing radioactive waste prior to generating more with Complex Transformation, specifically at Y-12.
- 10.I Commentor supports siting Complex Transformation at Y-12.
- 5.D.3 Commentor states that the City Manager of Oakridge, Tennessee endorses the preferred alternative for the Y-12 National Security Complex as described in the Supplemental Programmatic EIS, which maintains Y-12 as the the Center of Excellence for Uranium Manufacturing and R&D at Y-12.
- 1.J Commentor states that the U.S. has shown incredible restraint to other countries regarding nuclear proliferation, and they have not shown any restraint towards us.
- 1.J Commentor states that the U.S. is the most responsible country in the world concerning nuclear weapons.

- 10.I Commentor supports siting Complex Transformation at Y-12.
- 13.0 Commentor states that killing innocent people is not a way to achieve goals.
- 13.A Commentor states that use of nuclear weapons is terrorism because of the impact on civilians.
- 1.F Commentor states that the U.S. has not complied with the Nuclear Nonproliferation Treaty.
- 1.J Commentor states that the U.S. tells other countries not to build nuclear weapons, but we propose to build more. Disarmament should begin now.
- 6.0 Commentor states that the alternatives do not include disarmament and that this is not democratic.
- 1.J Commentor states the US should pursue disarmament as the true path to global and national security.
- 13.A.1 Commentor states that Complex Transformation will goad other countries into pursuit of nuclear weapons. Commentor states that Complex Transformation will make the United States an even bigger target for terrorist activities because the United States will be seen as a key player in developing nuclear weapons.
- 14.M Commentor states that it is time to develop nuclear waste technologies to protect air, water, and earth.
- 10.I Commentor states that the facilities at Y-12 need to be modernized/replaced to support the skilled workforce.
- 5.C Commentor supports the Uranium Center of Excellence at Y-12.
- 16.A Commentor states that we do not need bombs.
- 1.J Commentor states that building new bombs will not meet national security needs and will discourage other nations from disarming their nuclear weapons and encourage others to build their own.
- 1.F Commentor states the the U.S. must honor its commitment to the Nuclear Nonproliferation Treaty.
- 7.0 Commentor states that the NNSA should adopt a fifth alternative, nonproduction of nuclear weapons.
- 1.J Commentor is against nuclear proliferation.
- 9.B Commentor expresses that resources could be better used in other areas.
- 16.A Commentor is against Complex Transformation.

- 2.J Commentor makes a remark about rhetoric.
- 10.I Commentor supports siting Complex Transformation at Y-12.
- 10.I Commentor supports Y-12 National Security Complex's modernization efforts, including the construction of the HEUF, UPF, and accelerated cleanup.
- 5.C Commentor supports maintenance of vital missions at Y-12 and supports its designation as the Center of Excellence for uranium and canned assemblies.
- 10.I Commentor supports siting Complex Transformation at Y-12. Commentor states the Y-12 National Security Complex in Oak Ridge is a source of pride for the people of Tennessee and the nation, and its role is essential to protecting America.
- 10.I Commentor states that Y-12 and the people of Tennessee can play a vital role in Complex Transformation because of the existing skilled workforce and high tech facilities.
- 2.H.1 Commentor suggests that very few have necessary knowledge/information to understand and estimate the ramifications of Complex Transformation.
- 3.A Commentor does not see the purpose and need for Complex transformation for either national policy or foreign policy.
- 16.A Comment expresses general opposition to Complex Transformation.
- 1.J Commentor states that Complex Transformation tells rest of world that United States is back in the atomic business. Commentor stated that Complex Transformation will further the nuclear arms race. Commentor stated that Complex Transformation will increase the proliferation of nuclear weapons.
- 16.A Commentor states that the community produces weapons of mass destruction and they have been presented with false choices. The only alternative that is democratic is disarmament of weapons of mass destruction.
- 1.K Commentor states that it is irresponsible to be presented with alternatives of jobs and investments for new nuclear weapons or the status quo of current production.
- 1.J Commentor states that the proposed facilities will be looked at by other nations as starting a new arms race.
- 13.A Commentor states that the proposed facilities will make us targets rather than making us safer.
- 10.I Commentor supports siting Complex Transformation at Y-12.
- 10.I Commentor supports siting Complex Transformation at Y-12.

- 15.0 Commentor states that the consensus of his community, state, and nation supports a strong national defense, including the use of nuclear weapons.
- 7.N Commentor supports the Preferred Alternative.
- 5.D.3 Commentor states that Y-12 is the best choice to be the Uranium Center of Excellence.
- 10.I Commentor states that Y-12 has an outstanding past history and experience in the mission, and also has a trained and experienced workforce.
- 10.I Commentor states that the Oak Ridge community should be considered.
- 5.J Commentor states that modernizing the uranium capability at Y-12 is the lowest cost, most expedient, and the lowest environmental impact alternative.
- 10.I Commentor is impressed with the efforts of the Environmental, Safety & Health Production and Nuclear Materials Control and Accountability at Y-12. Commentor believes Y-12 is ready for the next mission.
- 10.I Commentor supports siting Complex Transformation at Y-12.
- 16.A Commentor states that building and stockpiling nuclear weapons for years to come is of great concern both locally and globally, as are the economic commitments we will have to make for upcoming centuries if we allow Complex Transformation to move forward.
- 2.A Commentor is glad that citizens can voice their opinions at public hearings and have a voice in the future of the community.
- 9.A Commentor acknowledges that it will take billions of dollars to construct and operate the new complex, which will make up to 150 new nuclear weapons per year.
- 1.J Commentor states that former national leaders have recently stated that we should pursue nuclear disarmament.
- 1.F Commentor states that we have not upheld the obligations of the Nuclear Nonproliferation Treaty.
- 9.B Commentor states that the budget of the Departments of Defense and Energy far exceed the budgets for social programs, and depleting resources in much needed domestic areas and maintaining and building new nuclear weapons is a complete dichotomy to any of our world religious values.
- 13.A Commentor states that the making and stockpiling of nuclear weapons is life threatening not only to humans, but to all life.

- 7.J Commentor states that there is enough environmental cleanup and disarmament work to keep Oak Ridge workers employed for years to come.
- 1.K Commentor states that this generation has compete defiance toward international cooperation in setting priorities for a more safe and secure world.
- 5.F Commentor states that the Capability-Based Alternative is the only alternative worth considering.
- 7.N Commentor states that the Preferred Alternative does not make sense and that it is not consistent with the stated purposes and it also has the worst environmental impact.
- 16.A Commentor states that the politicians that came to support Y-12 need to plan for the future of Oak Ridge and that there is no future in nuclear weapons.
- 15.A Commentor supports siting Complex Transformation at Y-12.
- 14.M Complex transformation will improve waste management practices of radioactive material.
- 10.I Commentor states that Y-12 is innovative in its manufacturing techniques.
- 14.I Commentor states that Y-12 is very important to the socioeconomics of the region.
- 15.A, 10.I Commentor states that work at Y-12 is important to security of this country.
- 2.A Commentor states that commenting at a formal public hearing about whether nuclear weapons can have a benign environmental impact is a contradiction in terms.
- 10.I Commentor supports siting Complex Transformation at Y-12.
- 16.A Commentor states that nuclear weapons kill everything indiscriminately.
- 3.A Commentor calls for an end to nuclear weapons.
- 13.A.1 Commentor states that rouge states do not care whether the U.S. has nuclear weapons to counteract their actions or not.
- 7.B.1 Commentor states that the weakest link in the nuclear weapons program is the transportation of nuclear materials between sites.
- 13.A Commentor states that terrorists could attack a major city where nuclear weapons components are under transport, causing horrendous results.
- 16.A Commentor was 1 of 4 people who performed a "skit" demonstrating opposition to the nuclear weapons program.

- 10.I Commentor supports siting Complex Transformation at Y-12.
- 5.C Commentor is in support of the Distribution Centers of Excellence. Commentor believes the uranium processing facilities and storage facilities should be kept in Oak Ridge.
- 14.K Commentor has absolute confidence that the facilities will have absolute minimum impact on the health and safety of the community.
- 15.A Commentor supports the project.
- 10.I Commentor supports project as he had been at Y-12 for 28 years.
- 13.A Commentor discusses security at Y-12.
- 10.I Commentor supports siting Complex Transformation at Y-12.
- 15.A Commentor values strong nuclear program.
- 5.D Commentor states that mission should be brought to Y-12 for the economic benefit of the community.
- 16.A Commentor states that we cannot love our enemies if we continue to build bombs and that a downsizing alternative should be discussed as a way to get rid of these weapons.
- 9.B Commentor states that the preferred alternative will bring more destruction and take funds away from other causes such as education and the environment.

PUBLIC HEARING—AMARILLO, TX

February 28, 2008-Afternoon Session

- 5.C Commentor supports the DCE and rejects the Consolidated Centers of Excellence alternative.
- 1.H Commentor stated that the Department of Defense should be conducting the public hearings pertaining to the US nuclear weapons policy.
- 2.H Commentor expressed gratitude for the DOE having made important information readily available.
- 1.J Commentor stated that the world powers (US, Russia, etc.) need to assert their leadership roles in international disarmament efforts. Commentor stated that these efforts should include but not be limited to the sponsoring of a public conference by the DOE and DoD for citizens and scientists from both Russia and the US to discuss nuclear disarmament issues, the use of nuclear power, and the control/disposal of nuclear material. Commentor stated that the President should address the nation on the issue of dismantlement.

- 20 Commentor made specific comments in regards to management/storage/disposal of plutonium pits by the US and Russian governments. Commentor specifically stated that the prospect of shipping Russian Pu to France for use in their reactors should be considered.
- 1.B Commentor stated that it is imperative that the US appropriately handle the issue of dismantling weapons while maintaining a viable deterrent through renovating the current stockpile without diminishing the credibility of the dismantlement process.
- 3.A Commentor stated that the DOE needs to revisit their modernization plan and that new nuclear weapons are not necessary.
- 9.H Commentor expressed concern about the amount of taxpayer money required to support Complex Transformation.
- 14.O Commentor stated that nuclear weapons and therefore Complex Transformation are hazardous to the environment.
- 1.F Commentor stated that US should comply with the NPT.
- 7.J Commentor questioned how the US will be able to support cleanup efforts if the weapons program is modernized through Complex Transformation.
- 7.O Commentor stated that a true No Action/Production Alternative where no production would take places should be added to the list of alternatives analyzed.
- 1.J Commentor stated that the U.S. needs to assert its leadership role in international disarmament efforts.
- 9.B Commentor stated that resources would be better spent on the management of radioactive wastes as well as on the environmental cleanup at all DOE/NNSA facilities, specifically at Pantex.
- 14.K Commentor stated that the public health issues related to Complex Transformation should be more fully addressed. Commentor stated that those suffering from health issues as a result of Complex Transformation should be compensated.
- 16.A, 10.F Commentor is opposed to Complex Transformation. Commentor is opposed to Complex Transformation at Pantex.
- 14.E.1 Commentor expressed concern about existing and potential future contamination of the Ogallala Aquifer.
- 14.M.3 Commentor expressed concern about the storage of nuclear waste and potential health effects.

- 7.F Commentor expressed concern about the security, safety, environmental responsibility, and integrity of the Pantex plant.
- 9.H Commentor expressed concern about the amount of taxpayer money required to support Complex Transformation.
- 7.J Commentor stated that Complex Transformation is a violation of the NPT.
- 9.B Commentor stated that resources would be better spent on creating better living circumstances and improving health care.
- 2.0 Commentor told a story about a woman who was released from a nursing home, unable to care for herself, and living under dehumanizing conditions.
- 15.A Commentor supports the dismantlement and reduction of the Complex.
- 8.B Commentor is opposed to the RRW and expressed concern about the attempts by Complex Transformation to secure funding for a proposal already rejected by Congress.
- 1.F Commentor stated that Complex Transformation is in violation of the NPT.
- 1.J Commentor stated that the U.S. is being hypocritical by saying that other countries should not have nuclear weapons but that our country continues to maintain a stockpile.
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.
- 14.M Commentor expressed concern about the contamination at Rocky Flats and Los Alamos.
- 14.E Commentor expressed concern about the contamination of the perched aquifers near Pantex.
- 14.O Commentor stated that irreversible environmental damage is inevitable if nuclear weapons R&D is continued.
- 14.E.1 Commentor expressed concern about existing and potential future contamination of the Ogallala Aquifer.
- 1.E Commentor stated that the U.S. should ratify the CTBT.
- 1.J Commentor stated that the U.S. needs to assert its leadership role in international disarmament efforts.
- 15.A Commentor supports Complex Transformation. Commentor supports Complex Transformation at Pantex as it would encourage future growth for new projects.

- Commentor stated that Pantex would be well suited for the project due to the community's good work ethic.
- 9.B Commentor stated that the DOE as well as its laboratories should be refocused on creating safe energy sources.
- 1.F Commentor stated that the DOE should comply with the NPT.
- 8.B Commentor is opposed to Complex Transformation predicated the creation of the RRW.
- 14.E.1 Commentor expressed concern about existing and potential future contamination of the Ogallala Aquifer.
- 16.A Commentor is opposed to Complex Transformation. Commentor is opposed to siting Complex Transformation at Pantex.
- 1.F Complex Transformation violates the Nuclear Non-Proliferation Treaty.
- 1.J Commentor stated that the U.S. needs to assert its leadership role in international disarmament efforts.
- 7.M.1 Commentor expressed concern about the impacts from potential use or testing of nuclear weapons.
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.
- 1.F Commentor stated that the US is obligated to comply with the NPT
- 4.A Commentor supports the No Action Alternative
- 7.J Commentor stated that the DOE should clean up existing radioactive waste prior to generating more with Complex Transformation.
- 9.H Commentor expressed concern about the amount of taxpayer money required to support Complex Transformation.
- 14.E.1 Commentor expressed concern about existing and potential future contamination of the Ogallala Aquifer.
- 14.E Commentor is concerned about the groundwater quality and the ineffectiveness of current state and federal oversight.
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.
- 16.A Commentor is opposed to Complex Transformation.

- 9.H Commentor expressed concern about the amount of taxpayer money required to support Complex Transformation.
- 1.J Commentor stated that Complex Transformation will further the nuclear arms race.
- 2.H Commentor expressed gratitude concerning the posting of references for the draft SPEIS on the Complex Transformation website.
- 2.B Complex Transformation should be released as a stand alone EIS.
- 12.0 Commentor expressed concern about the role of KCP being left out of the SPEIS.
- 9.H Commentor expressed concern about the amount of taxpayer money required to support Complex Transformation. Specifically, the Commentor mentioned the omission in the SPEIS of the impacts from spending \$500 million taxpayer dollars.
- 1.F Commentor stated that the majority of comments stated that Complex Transformation violates the Nuclear Non-Proliferation Treaty and that the DOE should comply by the NPT and disarm, however, that this alternative was not included in the SPEIS.
- 7.0 Commentor stated that a true No Action/Production Alternative where no production would take places should be added to the list of alternatives analyzed. Commentor stated that such an alternative would lead the way to addressing the horrendous environmental legacy of nuclear weapons production. Commentor stated that a No Production Alternative would enhance the economic status of communities in which these facilities have been located. Commentor stated that the No production Alternative is the only viable way to comply with the NPT, show leadership in disarmament efforts, and stopping proliferation.
- 5.B Commentor stated that the need for weapons design activities will shift and some will be needed to be maintained, while others will be reduced i.e. plutonium operations. Specifically, the Commentor stated that uranium operations would be located at Y-12, while weapons assembly operations would cease and resources would transition to disassembly and the need for HE as well as tritium production would no longer exist.
- 11.A Commentor stated that the co-location of storage facilities for some or all Cat I and II SNM under international administrative control should be analyzed in the No Production Alternative.
- 9.B Commentor stated that resources would be better spent on clean up and environmental remediation of communities down wind and down stream of the Complex facilities. Commentor stated that the direction of resources toward dismantlement and cleanup would create jobs and improve the environmental quality of the communities.

- 15.A Commentor supports Complex Transformation. Commentor supports siting Complex Transformation at Pantex. Commentor stated that Pantex is well suited for all NNSA missions due to its competent workforce, low utility costs, and positive business climate.
- 16.A Commentor opposes any option under Complex Transformation that would lead to the cessation of functions at Pantex.
- 5.D Commentor supports the CPC, CUC, CNPC and/or the CNC under the DCE alternatives.
- 14.L Commentor stated that the selection of Pantex would also avoid significant transportation costs and risks.
- 16.A Commentor is opposed to Complex Transformation. Commentor stated that Complex Transformation is immoral.
- 20.0 Commentor stated that the New York Philharmonic should play before the NNSA
- 7.O Commentor stated that a true No Action/Production Alternative where no production would take places should be added to the list of alternatives analyzed.
- 16.A Commentor is opposed to Complex Transformation.
- 5.A.1 A Commentor stated that we do not need five nuclear weapons production sites and that two, or maybe three, are enough. Another Commentor stated that he felt that pit production and assembly/disassembly/HE should both be performed at two facilities, and that High Explosives R & D should be performed at five sites.
- 1.D A Commentor noted that we should not rely on the last generation nuclear weapons but we need a new nuclear weapon which will serve a different world situation.
- 14.K.2 A Commentor stated that workers and those living in communities around nuclear facilities with illnesses associated with nuclear weapons work should be compensated
- 13.E.4 A Commentor expressed concern that nuclear weapons are not treated with the proper care as evidenced by the recent incident of several warheads being accidentally flown by the Air Force.
- 1.H A Commentor stated that he was in support of the distributed centers of excellence alternative. The Commentor further stated he was glad it was DOE sponsoring the meeting rather than the Defense Department which does not ever have such meetings. The Commentor then went on to thank the Department for providing the public with so much information. Another Commentor stated that for a topic as important as how many weapons are in the stockpile as nations disarm, the Department of Defense should be involved. He went on to state that

he was aware that there were technical issues such as the proportion of deuterium and lithium, or spoilage, with the pit which required disassembly and assembly.

- 1.J A Commentor stated that he was appreciative of the dismantlement work done by Pantex and looked forward to the day when there would be less than 500 nuclear weapons possessed by either Russia or the U.S.
- 20.0 A Commentor stated the importance of the Russians and the U.S. following through with their commitment to dispose of plutonium from dismantled weapons and went on to suggest Russia send their plutonium, in the form of MOX fuel, to France for user in French power generating reactors.
- 1.J A Commentor expressed concern that there was a question of perception of the commitment to disarmament from a nation that was constantly assembling and reassembling its weapons, but that he was confident the Department of Defense and DOE and the Office of the President were committed and could work this issue out.

February 28, 2008-Evening Session

- 2.H Commentor stated that information necessary for determining the future of the project has not been made available i.e. the JASON study.
- 15.A Commentor stated that he understands why the NNSA would want to retain a reserve capacity for pit production in excess of what currently exists.
- 5.G Commentor supports stockpile renovation with the simultaneous retiring of existing weapons.
- 1.B Commentor stated that this project is a matter that should be addressed by the Department of Defense. Commentor stated that the NNSA should urge the DoD to hold a series of public hearings on nuclear defense policy and disarmament during 2009.
- 1.H Commentor stated that that the DoD needs to address the issue of pit renovation, but it has yet to do so and instead makes the public talk to the representatives at the public meetings instead.
- 2.C Commentor stated that the US and other countries i.e. Russia should be forthcoming about their respective stockpiles.
- 1.J Commentor stated that the US is under pressure to disarm but retain a valid deterrent in light of the acquisition of nuclear weapons by foreign nations.
- 7.A Commentor expressed concern about the creation of new types of weapons that are smaller/more complex and capable of deadlier results and the impacts this could have on the nation's security.

- 7.M.1 Commentor expressed concern about the potential use of nuclear weapons in the future.
- 7.M.1 Commentor expressed concern about the impacts from potential use or testing of nuclear weapons.
- 1.N Commentor stated that there is interrelatedness between the nuclear weapons race and the use of nuclear power and the inevitable tradeoffs made.
- 1.F Commentor is opposed to the US violating international peace treaties.
- 2.E Commentor expressed concern about the location of the hearings not being in any major urban areas and instead being in areas with vested interests.
- 9.B Commentor stated that resources would be better spent on health care for those who do not have access to it.
- 2.A Commentor stated that the proposal's alternatives are fundamentally flawed because only four options are provided.
- 7.0 Commentor stated that a true No Action/Production Alternative where no production would take places should be added to the list of alternatives analyzed.
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.
- 1.J Commentor stated that Complex Transformation will further the nuclear arms race. Commentor stated that Complex Transformation is a hypocritical action that undermines international efforts to stop nuclear proliferation.
- 16.A Commentor is opposed to Complex Transformation.
- 16.A Commentor is opposed to Complex Transformation.
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.
- 16.A Commentor is opposed to Complex Transformation.
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.
- 1.J Commentor stated that the U.S. needs to assert its leadership role in international disarmament efforts and adopt a comprehensive and balanced nuclear nonproliferation strategy.
- 1.G Commentor stated that there should be a further reduction in stockpile numbers below those required by the Moscow Treaty.

- 1.C Commentor stated that the DOE is premature in its proceeding with this proposal in the absence of a plan for the future role of the complex that will be determined by the next administration's NPR.
- 1.G Commentor stated that there should be a further reduction in stockpile numbers below those required by the Moscow Treaty.
- 1.F Commentor stated that Complex Transformation is in violation of the NPT and will serve to further complicate international nonproliferation efforts.
- 1.E Commentor stated that the US should ratify the CTBT.
- 2.H Commentor expressed gratitude for the availability of reference documents online.
- 1.F Commentor stated that US is in violation of the NPT and that the NNSA should assess an alternative that complies with the NPT.
- 7.O Commentor stated that a true No Action/Production Alternative where no production would take places should be added to the list of alternatives analyzed. Commentor stated that a No Production Alternative would help address the legacy of environmental contamination from nuclear weapons production.
- 14.O Commentor stated that nuclear weapons and therefore Complex Transformation are hazardous to the environment.
- 9.B Commentor stated that resources would be better spent on cleanup and environmental remediation. Commentor stated that resources would be better spent on renewable energy research.
- 1.C Commentor stated that the project is premature as the stated mission could change with the next Administration's NPR.
- 3.A Commentor questioned the need for Complex Transformation and why the current stockpile is not adequate to meet the stated national security requirements.
- 11.D Commentor stated that an analysis should be performed to assess the impacts of using a nuclear weapon.

PUBLIC HEARING—TONOPAH, NV

March 4, 2008-Evening Session

- 9.F Commentor stated that NNSA is incorrect in their cost-benefit analysis that relocation operations from TTR to WSMR and that it will not result in the cost savings that the analysis is representing.

- 6.C.1 A Commentor stated that an earlier NNSA study performed by NA-10, indicated that high-tech mobile at Tonopah was at least 20 million dollars less than high-tech mobile at White Sands Missile Range.
- 6.C.3 A Commentor stated that the environmental impacts to clean up Tonopah if flight tests were to be moved to another facility are too low and do not account for all test drops conducted over the entire life of Tonopah. The Commentor goes on to state that if all past tests were factored into the cost of closing Tonopah, the cost would be too high.
- 6.C.2 A Commentor stated that moving Flight Test Operations from Tonopah would pose a scheduling problem since NNSA would share the range with others. The Commentor went on to state that testing at White Sands would cost more and could exhibit high levels of technical risk, since White Sands does not have the experience of Tonopah and cannot perform all aspects of testing currently performed at Tonopah.
- 6.C.2 A Commentor stated that he was concerned that the comparison of Tonopah to White Sands was using real data for Tonopah and not using real data for White Sands. The Commentor further stated he was skeptical that White Sands would be cost less than Tonopah and that he wanted to see the cost study which compared Tonopah to White Sands.
- 6.C.1 One Commentor stated that if DOE were to relocate Flight testing to another site, Tonopah would collapse and the hospital would fold. This hospital serves more than Tonopah and would have a much larger impact than is analyzed in the SPEIS. Another Commentor stated that the 135 direct and 256 total job loss associated with the closure of Tonopah was not the only factor which should be considered and that Tonopah serves a larger area than just the community of Tonopah. The Commentor went on to say that closure of Tonopah would close a hospital, gas stations and stores that service a broad area of central Nevada.
- 13.A Commentor stated that TTR has been recognized as one of the most secure NNSA sites and should be included/noted in the analysis. Commentor stated that closing such a secure facility would be a detriment to the national security.
- 15.A Commentor supports keeping the flight testing operations at TTR.
- 2.B Commentor stated that the data represented in the documents is false and that the analysis is lacking.
- 7.K Commentor questioned when and where the NNSA was given permission to design the New Triad which defines the delivery of our weapons systems.
- 1.G Commentor questioned how the US is certain that Russia has complied with the Moscow Treaty and is concerned that if the Russians have not complied that the US will be making the US more susceptible by reducing the national stockpile.

- 14.K Commentor stated that many people in the community have sacrificed their health to the DOE and the mission at TTR.
- 15.A Commentor supports keeping flight testing at TTR. Commentor stated that TTR is a very unique facility that maintains an important capability for the NNSA.
- 9.A Commentor stated that running TTR is very cost effective.
- 7.J Commentor stated that the environment surrounding TTR is unable to be remediated and should be used for what it already is, which is a flight testing facility.
- 14.I Commentor requests additional socioeconomic analysis to encompass the impact to Central Nevada as a whole.
- 10.E Commentor is discussing the impacts of TTR's proposed closure.
- 18.0, 18.A Commentor stated that TTR was dealt a devastating blow when the Stealth Bomber program was transferred to New Mexico.
- 9.E Commentor is discussing the costs of Complex Transformation not only monetary but also environmental and encroachment costs.
- 6.C.5 Commentor stated that there is sympathy for the 135 people who would lose jobs, what about the 135 people who got cancer because of nuclear testing?
- 15.A Commentor supports Complex Transformation.
- 14.O Commentor stated that nuclear weapons and therefore Complex Transformation are hazardous to the environment.
- 14.I Commentor stated that Nye County needs the jobs provided by Complex Transformation. Commentor stated that the loss of jobs at Tonopah would result in a subsequent loss of community services as some workers at Tonopah are also volunteers in the community. Commentor stated that relocating the flight testing mission from Tonopah or operating the range in campaign mode would result in significant negative socioeconomic consequences.
- 14.J Commentor stated that the citizens of Nye County are dependent upon the jobs provided by the DOE and that taking away those jobs could be considered an environmental justice issue.
- 18.0, 18.A Commentor expressed concern about the jobs that would be lost/staff reductions from the potential relocation of NNSA flight testing operations from Tonopah.
- 14.I Commentor stated that relocating the flight testing mission from Tonopah could result in negative socioeconomic consequences.

- 7.E Commentor questioned the ability of WSMR to maintain the security of the stockpile.
- 6.C.1 Commentor expressed concerned about the lack of data from WSMR to NNSA in reference to and at what cost WSMR will conduct the flight tests if relocated from TTR. Commentor stated that TTR already has the capabilities and has performed more analyses and provided more data than what has been provided by WSMR in reference to the potential relocation of flight testing from TTR to WSMR.
- 18.0, 18.A Commentor stated that the TTR community is very dependent on and involved with TTR and the current decision making process pertaining to relocation of flight testing operations and expressed concern about the loss of jobs at TTR.
- 14.I Commentor stated that relocating the flight testing mission from Tonopah could result in negative socioeconomic consequences.
- 14.I Commentor stated that relocating the flight testing mission from Tonopah could result in negative socioeconomic consequences.
- 18.0, 18.A Commentor stated that the TTR community is very dependent on and involved with TTR and the current decision making process pertaining to relocation of flight testing operations and expressed concern about the loss of jobs at TTR. Commentor stated that the dependency of the community on TTR makes it more susceptible to the impacts from relocating the flight testing mission as opposed to a larger community with a more diversified economy.
- 9.F Commentor stated that NNSA is incorrect in their cost-benefit analysis that relocation operations from TTR to WSMR and that it will not result in the cost savings that the analysis is representing.
- 15.A Commentor supports keeping flight testing operations at TTR due to the site's long history of flight testing operations for NNSA. Commentor stated that there are capabilities at TTR that cannot be found at any other NNSA site.
- 13.A Commentor stated that TTR has been recognized as one of the most secure NNSA sites and should be included/noted in the analysis.
- 6.C.1 Commentor questioned whether the future site of flight testing operations will be capable of performing at the same level as TTR.
- 18.0, 18.A Commentor expressed concern about the fact that the majority of workers at TTR are contractors who will lose jobs and not be included in those individuals transferred to other forms of employment, and noted that this needs to be reflected in the analysis.
- 6.C.1 Commentor questioned the type and quality of data that WSMR was providing SNL in reference to flight testing operations. Commentor expressed concerned

about the lack of data from WSMR to NNSA in reference to and at what cost WSMR will conduct the flight tests if relocated from TTR.

- 11.A Commentor stated that the SPEIS lacks an analysis of moving flight testing operations comparative to an independent analysis on the same issue which found the option to retain the mission at TTR more economically beneficial than relocating the operations somewhere else. Commentor stated that specifically the reason why flight testing should remain at TTR is because the operations have been conducted at TTR successfully and other sites do not have as much experience.
- 18.0, 18.A Commentor stated that the TTR community is very dependent on TTR and expressed concern about the loss of jobs at TTR and the effect that it will have on the familial aspect of the community.

PUBLIC HEARING—LAS VEGAS, NV

March 6, 2008-Afternoon Session

- 16.A Commentor is opposed to nuclear weapons.
- 14.N.2 A commentor noted that building nuclear weapons could be changing if located 45 minutes from Las Vegas, NV.
- 14.K.22 Commentor stated nuclear fallout has caused cancer and other health problems.
- 8.A Commentor stated that Complex Transformation is in opposition to Congress' recent rejection of the RRW.
- 1.B Commentor stated that several of the current presidential candidates have stated that they would like to see a world free of nuclear weapons.
- 9.H Commentor expressed concern about the amount of taxpayer money required to support Complex Transformation.
- 14.K.22 Commentor stated that the Western Shoshone has experienced adverse health effects known to be plausible from exposure to ionized radiation due to the unique lifestyles which produce unique exposure pathways.
- 14.K.22 Commentor stated that ventings from the fallout of underground and previous aboveground testing would affect vast regions of the Great Basin, where the Western Shoshone were exposed to radiation due to the unique lifestyle of the tribe.
- 6.D.3 Commentor expressed concern about the abandonment of testing sites and the potential for groundwater contamination extending far beyond what is estimated.

- 14.E.26 Commentor expressed concern about the effect of contamination on the Amarogosa Desert and Ash Meadows aquifer.
- 1.F Commentor stated that the U.S. should abide by the NPT and disarm.
- 5.C.1 Commentor stated that Complex Transformation is not necessary as the statement that the current arsenal is aging is faulty in light of the study certifying that the current arsenal has a pit lifetime of between 85 and 100 years.
- 7.M.1 Commentor expressed concern about the impacts from potential use or testing of nuclear weapons.
- 14.E.15 Commentor raised numerous issues concerning contamination at the NTS.
- 1.E Commentor stated that the U.S. should ratify the CTBT.
- 14.K Commentor stated that health concerns are a major issue.
- 1.J Commentor stated that the U.S. is being hypocritical by saying that other countries should not have nuclear weapons but that our country continues to maintain a stockpile.
- 14.N Commentor states that the possibility of a facility accident poses an environmental risk as well as health risks.
- 14.D.9 Commentor stated that the SPEIS should analyze the effects of nonradiological air pollutants, specifically around NTS. The analysis should include effects on the elderly and children.
- 14.H.2 A commentor stated that the SPEIS did not include information regarding indigenous peoples' perspectives of radiation in general and what irradiation (exposure) to plants, game, and minerals means to them
- 13.A Commentor stated that the possession of nuclear weapons makes our country less secure.
- 14.O Commentor stated that nuclear weapons and therefore Complex Transformation are hazardous to the environment.
- 1.B Commentor states that the existence of the Tonopah Test Range and the Nevada Test Site on Shoshone Land is a trespass if the US doesn't make a claim under the treaty of Ruby Valley.
- 16.A Commentor is opposed to Complex Transformation.
- 14.E.1 Commentor expressed concern about existing and potential future contamination of groundwater.

- 14.K Commentor states that due to the Shoshone's unique lifestyle they are exposed to more radiation than the average American citizen living near the TTR and the Nevada Test Site.
- 7.M.1 Commentor expressed concern about the impacts from potential use or testing of nuclear weapons.
- 2.H Commentor stated that the Shoshone are very concerned about stigma-related impacts that are essentially absent in these NEPA processes.
- 2.C Commentor states that the Tribal Perspective isn't included in the SPEIS.
- 16.A Commentor is opposed to nuclear weapons.
- 2.G Commentor queries why isn't anyone allowed the same amount of time to present their counterarguments that the NNSA is allowed to sell Complex Transformation.
- 2.J Commentor states that government employees are trained to misrepresent things that are disingenuous, deceitful, and ill advised such as the term pit in the SPEIS. Commentor says that the pit is actually a trigger and should be termed that way.
- 9.H Commentor expressed concern about the amount of taxpayer money required to support Complex Transformation.
- 9.B Commentor stated that resources could be better used to correct the nation's economy.
- 14.M.3 Commentor expressed concern about the storage of nuclear waste and potential health effects.
- 7.M.1 Commentor expressed concern about the impacts from potential use or testing of nuclear weapons.
- 14.N Commentor expressed concern about the capability of current nuclear weapons facilities being able to withstand natural disasters.
- 1.F Commentor stated that the U.S. should abide by the NPT and disarm.
- 3.A Commentor stated that our country is already in possession of more than enough nuclear weapons than we need.
- 1.K Commentor is critical of the current administration and policy.
- 14.K Commentor stated that US military personnel are being exposed to radiation and should receive medical treatment at no cost to them.
- 16.A Commentor is opposed to Complex Transformation.

- 9.A Commentor is opposed to spending money to modernize the existing Complex.
- 14.M.3 Commentor expressed concern about the storage of nuclear waste and potential health effects.
- 14.O Commentor stated that nuclear weapons and therefore Complex Transformation are hazardous to the environment.
- 10.D Commentor states that the land the Nevada Test Site resides on is actually owned by the Shoshone Nation.
- 1.C Commentor states that the Nuclear Posture Review and Complex Transformation are ways for the US Government to make new stuff to kill more indigenous people, the land, and our mother, and the water.
- 9.B Commentor stated that resources could be better used to research natural renewable resources.
- 7.F Commentor states that there is no safety or security with any nuclear waste or nuclear anything.
- 3.A Commentor stated that our country is already in possession of more than enough nuclear weapons than we need.
- 1.J Commentor stated that the U.S. is being hypocritical by saying that other countries should not have nuclear weapons but that our country continues to maintain a stockpile.
- 2.A Commentor states that the NEPA process involves the public.
- 14.K Commentor states the Research and Development kills by testing on indigenous people of the Marshall Islands and the Bikini Atoll.
- 4.A Commentor states that the No Action Alternative is the way we die.
- 14.I Commentor states that there is no socioeconomics in death.
- 14.J Commentor states that there is no environmental justice when you kill people.
- 14.N Commentor states that accidents are bound to happen and create death.
- 7.B Commentor states that transporting nuclear material is hazardous and will create death.
- 1.J Commentor stated that the U.S. is being hypocritical by saying that other countries should not have nuclear weapons but that our country continues to maintain a stockpile.

- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.
- 1.F Complex Transformation violates the Nuclear Non-Proliferation Treaty.
- 10.D Commentor stated that using Nevada as a location for Complex Transformation is a bad idea.
- 14.I.1 Commentor stated that engaging in the development of new nuclear weapons mere miles from the state center of commerce threatens the economy of the entire state.
- 13.A Commentor stated that the possession of nuclear weapons makes our country less secure.
- 9.H Commentor expressed concern about the amount of taxpayer money required to support Complex Transformation.
- 16.A Commentor is opposed to nuclear weapons.
- 20.0 Commentor's statement is out of scope.
- 1.J Commentor stated that the U.S. is being hypocritical by saying that other countries should not have nuclear weapons but that our country continues to maintain a stockpile.
- 16.A Commentor is opposed to Complex Transformation.
- 1.J Commentor stated that the U.S. is being hypocritical by saying that other countries should not have nuclear weapons but that our country continues to maintain a stockpile.
- 14 J 1 One Commentor indicated that Native Americans are disproportionately affected by NNSA's radioactive contamination because of their lifestyle. Another Commentor stated that redevelopment of the nuclear weapons complex would adversely affect the environment and lives of Native Americans whose lands are widely used for radioactive storage, uranium mining, and for testing of ICBMs, despite their protest.
- 6 C 4 A Commentor indicated that use of Tonopah Test Range requires the permission of the Western Shoshone Nation, which, to date, DOE/NNSA has not requested. The Commentor went on to indicate that because of this, use of Tonopah Test Range is a trespass.
- 6 C 3 A Commentor expressed concern that there was groundwater contamination at Tonopah Test Range and that it might not be cleaned up should Tonopah be closed.

- 1 L A Commentor stated that it is not acceptable for the U.S. to say its nuclear weapons are for defense and that those of North Korean or Iran would be aggressive, offensive weapons. We are all members of the United Nations, which already has sanctions on North Korea and Iran, and we should work this issue out through the United Nations process. Another Commentor stated that we have 5000 nuclear weapons, already, and if we cannot work world disarmament out through the United Nations we already have enough weapons.
- 14 N 2 A Commentor noted that the building and rebuilding of all of these nuclear weapons could be damaging if located 45 minutes from the entertainment capital of the world.
- 6 C 5 A Commentor stated that although there was sympathy for the 135 people at Tonopah that could loose their jobs, what about the 135 people downwind of the nuclear test site that have gotten cancer because of the nuclear testing?
- 2 K 27 A Commentor stated that the NNSA/DOE proposal is disingenuous and deceitful and hides the true meaning of the actions by using terms such as “transformation”, “pits”, “best business practice”, “centers of excellence”, etc.
- 1 F A Commentor stated that we should look toward South Africa where the government unilaterally disarmed without consequence. We should do the same because if you can risk nuclear war you can risk disarmament.
- 20 A Commentor stated that it is the people who make decisions and that the DOE program managers should do what is morally right and be the ones to make the decision not make weapons. Another Commentor stated that the political leaders should take immediate and deliberate steps toward multilateral disarmament. This Commentor stated that such actions would involve the Department of Energy with such actions as increased weapons dismantlement.
- 1 N 1 A A Commentor stated that uranium is a non-renewable resource and that experts have told him we only have a 30 to 40 year supply and that when that runs out, we are only left with nuclear weapons and nuclear waste
- 14 K 1 and A Commentor noted that the health and safety analysis is deficient and does not: 14.K.4 1) account for cumulative worker exposure (water, waste, and food cumulatively) , 2) analysis is only for a healthy male and should include a fetus, infant pr a child, all of which are known to be more susceptible to the effects of radiation, and 3) there are studies that show there are significant cancer risks from a singular exposure as low as 0.1 sievert which were not used in the analysis.

March 6, 2008-Evening Session

- 1.K Commentor is critical of the current administration and policy.
- 8.A Commentor stated that Complex Transformation is in opposition to Congress' recent rejection of the RRW.
- 16.A Commentor is opposed to Complex Transformation.
- 5.C Commentor stated that Complex Transformation is not necessary as the statement that the current arsenal is aging is faulty in light of the study certifying that the current arsenal has a pit lifetime of between 85 and 100 years.
- 1.K Commentor is critical of the current administration and policy.
- 9.A Commentor is opposed to spending money to modernize the existing Complex.
- 6.C.5 Commentor expressed sympathy for those 135 individuals who may lose their jobs if something were to happen to TTR and questioned what might happen to the 135 people living downwind of the nuclear test site and have gotten cancer as a result of that testing.
- 9.B Commentor stated that resources could be better used to correct the nation's economy.
- 1.J Commentor stated that Complex Transformation would be bad foreign policy.
- 14.I Commentor expressed concern regarding socioeconomic effects of Complex Transformation.
- 14.K Commentor is concerned about the health effects of nuclear testing.
- 14.K Commentor stated that Physicians for Social Responsibility was founded by physicians concerned about the health consequences of nuclear weapons.
- 16.A Commentor is opposed to nuclear weapons.
- 6.B Commentor states that tritium research is unnecessary.
- 7.O Commentor stated that a true No Action Alternative where no production would take places should be added to the list of alternatives analyzed.
- 14.M.1 Commentor stated that our experience at Rock Flats and many other sites the degree of contamination that dealing with plutonium results in.
- 7.O Commentor stated that a true No Action Alternative where no production would take places should be added to the list of alternatives analyzed.

- 11.D Commentor stated that the environmental testing performed by the DOE is really testing of the weapons and the components to determine if they are safe yet accomplish their goals of destruction.
- 11.E Commentor stated that the assessment of workers' exposure and potential public exposure is inadequate in this PEIS.
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.
- 16.A Commentor opposes Complex Transformation
- 1.F Commentor stated that the U.S. should abide by the NPT and disarm.
- 1.J Commentor stated that Complex Transformation will further the nuclear arms race.
- 4.A Commentor stated that the No Action Alternative only differs from the other 3 proposals by not stating the total amount of bombs produced. Instead the No Action Alternative categorizes the production number as classified information .
- 16.A Commentor is opposed to Complex Transformation.
- 9.F Commentor requested a Cost-Benefit Study prior to proceeding with this proposal.
- 1.F Commentor stated that the U.S. should abide by the NPT and disarm.
- 1.E Commentor stated that the U.S. should ratify the CTBT.
- 7.O Commentor stated that a true No Action Alternative where no production would take places should be added to the list of alternatives analyzed.
- 9.B Commentor stated that resources could be better used to correct the nation's economy.
- 15.A Commentor is opposed to Complex Transformation.
- 9.A Commentor stated that resources could be better used to correct the nation's economy.
- 18.B Commentor stated that if the proposed Flight Test Operation programs leaves TTR there will be a severe impact for the personnel.
- 15.A Commentor supports Complex Transformation
- 1.F Commentor supports the United States' position on the NPT as well as Complex Transformation.

- 5.C Commentor states that the DOE should have pit production at two locations for security purposes.
- 6.A Commentor states that the assembly/disassembly of high explosives should be done at both Pantex and the Nevada Test Site.
- 6.B Commentor supports Tritium Research and Development consolidation at the Savannah River Site.
- 6.C Commentor supports moving the Flight Test Operations from TTR to Las Vegas.
- 1.B Commentor supports environmental analysis.
- 1.N.1.A Commentor stated that uranium is a non-renewable resource with limited supply and when that is gone all we will have left is weapons and waste.

PUBLIC HEARING—SOCORRO, NM

March 10, 2008-Evening Session

- 2.D Commentor remarks on process notification and references something that happened on the radio recently.
- 14.O Commentor stated that nuclear weapons and therefore Complex Transformation are hazardous to the environment.
- 16.A Commentor opposes pits.
- 2.D Commentor expressed concern about the lack of notification about the public meeting for Socorro, NM.
- 14.I.2 Commentor expressed concern for the national defense programs at LANL that are dependent on the success of the weapons complex.
- 15.A.1 Commentor supports Complex Transformation.
- 5.C Commentor expressed support for Distributed Centers of Excellence
- 1.K Commentor is critical of the current administration and policy.
- 13.A Commentor stated that the possession of nuclear weapons makes our country less secure.
- 9.B Commentor stated that resources could be better used in other areas such as building energy conservation.
- 2.C Commentor is concerned about stakeholder involvement.

- 7.O Commentor stated that a true No Action/Production Alternative where no production would take place should be added to the list of alternatives analyzed.
- 5.C.1 Commentor stated that Complex Transformation is not necessary as the statement that the current arsenal is aging is faulty in light of the study certifying that the current arsenal has a long lifetime.
- 9.A Commentor is opposed to spending money to modernize the existing Complex.
- 16.A Commentor is opposed to the CMRR Project.
- 10.B Commentor expressed concern about the candidate site - LANL.
- 1.J Commentor stated that Complex Transformation will further the nuclear arms race.
- 9.H Commentor expressed concern about the amount of taxpayer money required to support Complex Transformation.
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.
- 5.I Commentor said that plutonium manufacturing is not the answer for the future of local youth.
- 16.A Commentor is opposed to nuclear weapons. Commentor is opposed to Complex Transformation.
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.
- 1.F Commentor stated that there should be an alternative that complies with NPT.
- 1.J Commentor stated that Complex Transformation will increase the proliferation of nuclear weapons.
- 1.E Commentor stated that the U.S. should ratify the CTBT.
- 16.0 Commentor is opposed to manufacturing new nuclear weapons.
- 2.0 Commentor mentions others' comment in public hearing.
- 1.F Commentor stated that the U.S. should abide by the NPT and disarm.
- 1.J Commentor stated that the U.S. is being hypocritical by saying that other countries should not have nuclear weapons but that our country continues to maintain a stockpile.
- 16.A Commentor stated that Complex Transformation is immoral.

- 5.C.1 Commentor questions the production of more pits.
- 14.M.1 Commentor expressed concern about contamination at Rocky Flats
- 3.A Commentor stated that our country is already in possession of more than enough nuclear weapons than we need.
- 10.B Commentor expressed support for candidate site - LANL, but for existing program only.
- 1.J Commentor stated that Complex Transformation will increase the proliferation of nuclear weapons.
- 1.C Commentor mentions the Nuclear Posture Review (2001) (includes Nuclear Posture Review - Anticipated 2009)
- 16.A Commentor is opposed to Complex Transformation.
- 14.O Commentor stated that nuclear weapons and therefore Complex Transformation are hazardous to the environment.
- 9.B Commentor mentions the "unfunded environmental liability from legacy operations of the weapons complex."
- 7.O Commentor stated that a true No Action/Production Alternative where no production would take place should be added to the list of alternatives analyzed.
- 7.N Commentor supports Preferred Alternative.

PUBLIC HEARING—ALBUQUERQUE, NM

March 11, 2008-Afternoon Session

- 2.A.2 Commentor stated that the hearing process was inadequate. New studies are necessary on health and climate impacts, including testing and use of nuclear weapons.
- 14.C Commentor expressed concern about air quality and noise impacts of NNSA sites.
- 14.O Commentor stated that nuclear weapons and therefore Complex Transformation are hazardous to the environment.
- 9.B Commentor stated that resources could be better used to correct the nation's economy.
- 2.G Commentor is concerned about the Public hearing comments.
- 14.M Commentor expressed concern about the nuclear waste contamination in general.

- 14.I Commentor expressed concern about Socioeconomics
- 9.B Commentor stated that resources could be better used to correct the nation's economy.
- 16.A Commentor is opposed to Complex Transformation.
- 1.N.1 Commentor stated that nuclear power is not clean and that it has been rejected by the private financial sector because it is costly. Commentor expressed concern about the government proposing the use of nuclear power in lieu of more practical alternatives.
- 14.M.19 Commentor stated that there aren't any monitoring wells in the mixed waste landfill that go down to the groundwater as the law requires.
- 14.E.27 Commentor stated that these sites have contaminated the air and water and that there are plans for a thermal treatment unit to burn open-air high explosive wastes.
- 2.H.1 Commentor stated that he/she has put in numerous Freedom of Information Act requests and there has been no response for over a year.
- 2.K.28 Commentor stated that there is an analysis that states that it is not required to look at the no-production alternative and that there is no citation in the Atomic Energy Act or NPR that legally requires the DOE to go forward with the design, development, and production of nuclear weapons.
- 1.F Commentor stated that Complex Transformation violates the Nuclear Non-Proliferation Treaty.
- 7.M.1 Commentor expressed concern about the impacts from potential use or testing of nuclear weapons.
- 1.F Commentor stated that Complex Transformation violates the Nuclear Non-Proliferation Treaty.
- 16.G Commentor is opposed to siting Complex Transformation at SNL/NM.
- 5.C.1 Commentor stated that Complex Transformation is not necessary as the current arsenal has a pit lifetime of between 85 and 100 years.
- 10.B The Commentor expresses concerns about building nuclear weapons in the candidate site- Los Alamos National Lab (LANL).
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.

- 14.K Commentor expressed concern about existing and potential future of water resource.
- 14.E.27 Commentor has concerns about a thermal treatment facility used to burn in the open air wastes at SNL/NM.
- 16.A Commentor is opposed to nuclear weapons.
- 1.F Commentor stated that Complex Transformation violates the Nuclear Non-Proliferation Treaty.
- 16.A Commentor is opposed to nuclear weapons.
- 2.G Commentor is concerned about the Public hearing comments.
- 9.B Commentor stated that resources could be better used to correct the nation's economy.
- 16.A Commentor stated that resources could be better used to correct the nation's economy.
- 7.A Commentor supports Preferred Alternative.
- 15.A Commentor supports Complex Transformation.
- 14.M.1 Commentor expressed concern about the contamination in Rocky Flats.
- 15.A Commentor supports Complex Transformation.
- 1.K Commentor criticizes the current government administration and policy.
- 1.J Commentor stated that the U.S. is being hypocritical by saying that other countries should not have nuclear weapons but that our country continues to maintain a stockpile.
- 1.F Commentor stated that Complex Transformation violates the Nuclear Non-Proliferation Treaty.
- 2.0 Commentor states that Complex Transformation Policy is against National Environmental Policy Act (NEPA).
- 2.B Commentor is concerned whether to prepare a new PEIS versus a supplemental PEIS.
- 2.G Commentor is concerned about the Public hearing comments.
- 7.N Commentor supports Preferred Alternative.

- 9.B Commentor stated that resources could be better used to correct the nation's economy.
- 10.B The Commentor expresses concerns about building nuclear weapons in the candidate site- Los Alamos National Lab (LANL).
- 11.B Commentor expects that more analysis should be done before a decision in favor of Complex transformation is made...
- 11.E Commentor requested additional analysis of the effects to the environment, public health, etc. from use of nuclear weapons.
- 14.K Commentor expressed concern about the health and safety of public caused from nuclear waste.
- 16.A Commentor is opposed to nuclear weapons.
- 10.G Commentor expressed support for candidate sites - SNL/NM.
- 14.M Commentor expressed concern about the nuclear waste contamination in general.
- 14.O Commentor stated that nuclear weapons and therefore Complex Transformation are hazardous to the environment.
- 11.0 Commentor suggests that additional analysis in general should be made.
- 7.O Commentor stated that a true "No Action/Production Alternative" where no production would take places should be added to the list of alternatives analyzed.
- 3.A Commentor stated that our country is already in possession of more than enough nuclear weapons than we need.
- 16.A Commentor is opposed to Complex Transformation.
- 19.E Commentor expressed concern regarding seismic protection of proposed facilities.
- 9.B Commentor stated that resources could be better used to correct the nation's economy.
- 1.F Commentor stated that Complex Transformation violates the Nuclear Non-Proliferation Treaty.
- 9.B Commentor stated that resources could be better used to correct the nation's economy.
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.

- 9.B Commentor stated that resources could be better used to correct the nation's economy.
- 9.E Commentor expressed concern about the cost of each alternative.
- 7.J Commentor stated that the DOE should clean up existing radioactive waste prior to generating more with Complex Transformation.
- 10.B The Commentor expresses concerns about building nuclear weapons in the candidate site- Los Alamos National Lab (LANL).
- 14.0 Commentor expressed concern about existing and potential future of water resource.
- 14.M.2 Commentor expressed concern about the contamination in Los Alamos Nation Lab (LANL).
- 14.N Commentor expressed concern about the capability of current nuclear weapons facilities being able to withstand natural disasters.
- 14.J Commentor expressed concern about the adverse effect on environment resulted from use of nuclear weapons.
- 16.A Commentor is opposed to nuclear weapons.
- 2.G Commentor is concerned about the Public hearing comments.
- 9.B Commentor stated that resources could be better used to correct the nation's economy.
- 1.K Commentor criticizes the current government administration and policy.
- 9.0 Commentor is concerned about the cost and schedule of the Complex Transformation Project.
- 5.I Commentor expressed pride re the processing or handling of plutonium.
- 16.A Commentor is opposed to Complex Transformation.
- 1.F Commentor stated that Complex Transformation violates the Nuclear Non-Proliferation Treaty.
- 14.O Commentor stated that nuclear weapons and therefore Complex Transformation are hazardous to the environment.
- 7.J Commentor stated that the DOE should clean up existing radioactive waste prior to generating more with Complex Transformation.
- 7.A Commentor stated other alternatives or NNSA program functions in general.

- 7.O Commentor stated that a true "No Action/Production Alternative" where no production would take places should be added to the list of alternatives analyzed.
- 9.B Commentor stated that resources could be better used to correct the nation's economy.
- 10.B The Commentor expresses concerns about building nuclear weapons in the candidate site- Los Alamos National Lab (LANL).
- 14.I Commentor expressed concern about Socioeconomics.
- 14.O Commentor stated that nuclear weapons and therefore Complex Transformation are hazardous to the environment.
- 16.A Commentor is opposed to Complex Transformation.
- 1.C Commentor criticizes the Nuclear Posture Review (2001).
- 1.F Commentor stated that Complex Transformation violates the Nuclear Non-Proliferation Treaty.
- 7.M.1 Commentor expressed concern about the impacts from potential use or testing of nuclear weapons.
- 9.B Commentor stated that resources could be better used to correct the nation's economy.
- 1.F Commentor stated that Complex Transformation violates the Nuclear Non-Proliferation Treaty.
- 7.0 Commentor stated that a true "No Action/Production Alternative" where no production would take places should be added to the list of alternatives analyzed.
- 14.0 Commentor expressed concern about existing and potential future of water resource.
- 16.A Commentor is opposed to nuclear weapons.
- 5.I Commentor expressed pride re the processing or handling of plutonium.
- 1.F Commentor stated that Complex Transformation violates the Nuclear Non-Proliferation Treaty.
- 14.E Commentor expressed general concern about water resource.
- 14.M Commentor expressed concern about the nuclear waste contamination in general.
- 14.N Commentor expressed concern about the capability of current nuclear weapons facilities being able to withstand natural disasters.

- 7.J Commentor stated that the DOE should clean up existing radioactive waste prior to generating more with Complex Transformation.
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.
- 9.B Commentor stated that resources could be better used to correct the nation's economy.
- 2.E Commentor stated that resources could be better used to correct the nation's economy.
- 9.B Commentor stated that resources could be better used to correct the nation's economy.
- 10.B The Commentor expresses concerns about building nuclear weapons in the candidate site- Los Alamos National Lab (LANL).
- 15.A Commentor supports Complex Transformation.
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.
- 14.E Commentor expressed general concern about water resource.
- 9.B Commentor stated that resources could be better used to correct the nation's economy.
- 10.G Commentor expressed support for candidate sites - SNL/NM.
- 14.E Commentor expressed general concern about water resource.
- 14.H Commentor expressed concern about Cultural and Archaeological Resources.
- 14.O Commentor stated that nuclear weapons and therefore Complex Transformation are hazardous to the environment.
- 14.M Commentor expressed concern about the nuclear waste contamination in general.
- 5.I Commentor expressed pride re the processing or handling of plutonium.
- 1.0 Commentor comments on the general policies related to nuclear weapons.
- 1.K Commentor criticizes the current government administration and policy.
- 3.A Commentor stated that our country is already in possession of more than enough nuclear weapons than we need.

- 5.C.1 Commentor stated that Complex Transformation is not necessary as the current arsenal has a pit lifetime of between 85 and 100 years.
- 9.B Commentor stated that resources could be better used to correct the nation's economy.
- 7.0 Commentor stated other alternatives or NNSA program functions in general.
- 1.F Commentor stated that Complex Transformation violates the Nuclear Non-Proliferation Treaty.
- 1.E Commentor stated that the U.S. should ratify the Comprehensive Test Ban Treaty (CTBT).
- 1.J Commentor stated that Complex Transformation will further the nuclear arms race.
- 16.A Commentor is opposed to Complex Transformation.
- 14.K Commentor expressed concern about the health and safety of public caused from nuclear waste.
- 14.E Commentor expressed general concern about water resource.
- 14.O Commentor stated that nuclear weapons and therefore Complex Transformation are hazardous to the environment.
- 2.G Commentor is concerned about the Public hearing comments.
- 16.A Commentor is opposed to Complex Transformation.
- 14.K Commentor expressed concern about the health and safety of public caused from nuclear waste.
- 7.J Commentor stated that the DOE should clean up existing radioactive waste prior to generating more with Complex Transformation.
- 2.G Commentor is concerned about the Public hearing comments.
- 1.K Commentor criticizes the current government administration and policy.
- 9.B Commentor stated that resources could be better used to correct the nation's economy.
- 5.I Commentor expressed pride re the processing or handling of plutonium.
- 5.C.1 Commentor stated that Complex Transformation is not necessary as the current arsenal has a pit lifetime of between 85 and 100 years.

- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.
- 5.I Commentor expressed pride re the processing or handling of plutonium.
- 7.N Commentor supports Preferred Alternative.
- 10.B The Commentor expresses concerns about building nuclear weapons in the candidate site- Los Alamos National Lab (LANL).
- 13.A Commentor stated that the possession of nuclear weapons makes our country less secure.
- 7.N Commentor supports Preferred Alternative.
- 5.C Commentor expressed support for Distributed Centers of Excellence
- 15.A Commentor supports Complex Transformation.
- 10.B Commentor expressed support for candidate site - LANL.
- 5.I Commentor expressed pride re the processing or handling of plutonium
- 9.A Commentor discusses cost-effectiveness.
- 11.E Commentor requested additional analysis of the effects to the environment, public health, etc. from use of nuclear weapons.

March 11, 2008-Evening Session

- 4.A Commentor supports the No Action Alternative.
- 16.A Commentor is opposed to Complex Transformation.
- 8.0 Commentor expressed concern about the proposal since the CPC, CMRR, and the NPF are preparing for a much larger mission under section 3.1.1.1 of the National Defense Authorization Act where exploration of a RRW was authorized by Congress. Commentor stated that a RRW is similar to a Trojan Horse, which relies on the false front of reliability but leads a new generation of cruise missiles and bombs.
- 8.B.2 Commentor requested that accurate numbers be provided in regards to the maximal output and the maximal waste or reduce the facilities down to the honest size required to make replacement pits for current weapons.
- 14.K.9 Commentor stated that someone she knows who is a resident in the Sandia area has had a serious medical family history including epilepsy, cancer, and leukemia.

- 14.K.2 Commentor stated that she is trying to help her friend who is a resident in the Sandia area get compensated for her husband's death from a struggle with cancer, but that they are running into setbacks due to his clearance level.
- 14.O.3 Commentor stated that New Mexico is one of the 6 sites around the US that has been identified as being at risk for radioactive contamination of the water supply due to previous radioactive waste disposal at DOE nuclear weapons sites and the leaching that can occur.
- 14.O.3 Commentor stated that local environmental studies have shown that there are radionuclides attached to the sediment in the Cochiti Reservoir area as well as radionuclides in the areas surrounding the laboratories, and some of the stream samples collected.
- 14.E.12 Commentor stated that the mixed waste landfill has over 700,000 cubic feet of hazardous radioactive waste and online pits and trenches over Albuquerque's drinking water supply.
- 14.E.27 Sandia continues to plan for open air burning at the thermal treatment unit for explosives, which releases toxic chemicals into the air that people breathe in Albuquerque.
- 14.E.13 Commentor stated that the EIS has not addressed the 175,000 kg of additional hazardous waste that is going to be generated annually at SNL.
- 14.J.6 Commentor stated the the EIS has not addressed environmental justice issues concerning the wastes generated at SNL and have reported the same minority and low-income populations for SNL as LANL.
- 16.G Commentor stated that there are numerous facilities at SNL that are going to be involved in the weapons business and that they are all having negative impacts on the environment.
- 14.O.6 Commentor stated that numerous cumulative impacts are not analyzed, including those related to GNEP i.e. water issues.
- 7.M.1 Commentor expressed concern about the impacts from potential use or testing of nuclear weapons.
- 14.O Commentor stated that nuclear weapons and therefore Complex Transformation are hazardous to the environment.
- 14.E.2 Concerned stated that the natural water supply isn't enough to support the public and the national labs post Complex Transformation.
- 9.B Commentor stated that resources could be better used to correct the nation's economy.

- 16.A Commentor is opposed to nuclear weapons.
- 2.G Commentor stated that these same hearings occurred in 2007 also and that it appears that the comments voiced during those hearing were disregarded and now a new set of hearings is offered, perhaps with the hopes that the public opinion will be what the DOE wants to hear.
- 1.K Commentor is critical of the current administration and policy.
- 1.F Complex Transformation violates the Nuclear Non-Proliferation Treaty.
- 14.O Commentor stated that nuclear weapons and therefore Complex Transformation are hazardous to the environment.
- 9.B Commentor stated that resources could be better used to correct the nation's economy.
- 16.A Commentor is opposed to Complex Transformation.
- 14.M.3 Commentor expressed concern about the storage of nuclear waste and potential health effects.
- 14.M.3 Commentor expressed concern about the storage of nuclear waste and potential health effects.
- 16.A Commentor is opposed to nuclear weapons.
- 7.M.1 Commentor expressed concern about the impacts from potential use or testing of nuclear weapons.
- 9.B Commentor stated that resources could be better used to correct the nation's economy.
- 1.K Commentor is critical of the current administration and policy.
- 1.F Commentor stated that the U.S. should abide by the NPT and disarm.
- 1.J Commentor stated that the U.S. is being hypocritical by saying that other countries should not have nuclear weapons but that our country continues to maintain a stockpile.
- 16.A Commentor is opposed to Complex Transformation.
- 9.B Commentor stated that resources could be better used to correct the nation's economy.
- 2.A Commentor stated that the current PEIS is deceptive because the actual facilities will be capable of producing far more plutonium pits than stated.

- 10.C Commentor stated that the proposed 308,000 square feet proposed pit facility at LANL is not a 50 to 200 pit per year production facility.
- 14.A Commentor stated that a 9,000 square feet building is more adequate for the pit production facility.
- 5.I Commentor relates the process of plutonium pit production to that of creating a clay pot or a bronze bowl.
- 8.A Commentor stated that Complex Transformation is in opposition to Congress' recent rejection of the RRW.
- 8.B Commentor stated that the notion of a reliable replacement warhead is a similar Trojan horse.
- 14.M Commentor stated that Los Alamos cannot handle the true amount of toxic waste that would come from these proposals.
- 11.A Commentor stated that to evaluate the alternatives adequately, the maximum rates of plutonium processing waste must be estimated based on maximum rates of production.
- 16.A Commentor is opposed to Complex Transformation.
- 2.E Commentor requested an extension of the comment period.
- 14.O Commentor stated that nuclear weapons and therefore Complex Transformation are hazardous to the environment.
- 14.E Commentor expressed concern about existing and potential future contamination of Albuquerque's drinking water supply.
- 14.G Commentor is concerned that open air burning will be detrimental to natural biological resources and systems.
- 2.H Commentor is concerned about the availability of information related to Complex Transformation.
- 19.E Commentor is concerned about the probability of seismic activity at Sandia.
- 14.M Commentor expressed concern about the storage of nuclear waste and potential health effects.
- 14.I Commentor is concerned about socioeconomic justice for the native people in New Mexico.
- 14.E.2 Concerned stated that the natural water supply isn't enough to support the public and the national labs post Complex Transformation.

- 7.0 Commentor stated that he coined the term no-production alternative and the DOE should cite him whenever the use the term.
- 1.J Commentor stated that the U.S. should abide by the NPT and disarm.
- 9.B Commentor stated that resources could be better used to correct the nation's economy.
- 16.A Commentor is opposed to nuclear weapons.
- 9.H Commentor expressed concern about the amount of taxpayer money required to support Complex Transformation.
- 16.A Commentor is opposed to nuclear weapons.
- 14.M Commentor stated that the DOE's track record for nuclear waste storage is a little bit of more than just speckled.
- 15.A Commentor supports Complex Transformation
- 14.E Commentor expressed concern about existing and potential future contamination of the public water supply.
- 14.K Commentor is concerned about the health effects of nuclear weapons production, testing, and storage.
- 11.E Commentor requests additional analysis of the effects to the environment, public health, etc. from the use of nuclear weapons.
- 7.J Commentor stated that the DOE should clean up existing radioactive waste prior to generating more with Complex Transformation.
- 14.K Commentor expressed concern about nuclear weapons production and potential health effects.
- 14.O Commentor stated that nuclear weapons and therefore Complex Transformation are hazardous to the environment.
- 16.A Commentor is opposed to nuclear weapons.
- 9.B Commentor stated that resources could be better used to correct the nation's economy.
- 9.H Commentor expressed concern about the amount of taxpayer money required to support Complex Transformation.
- 15.A Commentor supports Complex Transformation

- 6.A Commentor stated that Sandia National Lab is committed to lead the science and engineering for high explosives research and development.
- 13.A Commentor stated that the possession of nuclear weapons makes our country less secure.
- 18.0, 18.A Commentor stated that the NNSA has a set goal of 20 to 30 percent reduction in nuclear weapons work force over the course of ten years.
- 15.A Commentor supports Complex Transformation
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.
- 1.J Commentor stated that Complex Transformation will further the nuclear arms race.
- 1.F Commentor stated that the U.S. should abide by the NPT and disarm.
- 7.O Commentor stated that a true No Action Alternative where no production would take places should be added to the list of alternatives analyzed.
- 16.A Commentor is opposed to nuclear weapons.
- 1.J Commentor stated that the U.S. is being hypocritical by saying that other countries should not have nuclear weapons but that our country continues to maintain a stockpile.
- 7.J Commentor stated that the DOE should clean up existing radioactive waste prior to generating more with Complex Transformation.
- 15.A Commentor supports Complex Transformation
- 10.B Commentor supports the preferred alternative because it validates that LANL will continue to be a national security laboratory.
- 13.A Commentor stated that the possession of nuclear weapons makes our country less secure.
- 15.A Commentor supports Complex Transformation
- 9.B Commentor stated that resources could be better used to correct the nation's economy.
- 14.M.1 Commentor is concerned about environmental degradation resulting from nuclear waste storage similar to what exists at Rock Flats.
- 5.G Commentor supports the capability-based alternative because it exhibits the lowest nuclear warhead production rate.

- 20.0 Commentor's statement is out of scope.
- 9.H Commentor expressed concern about the amount of taxpayer money required to support Complex Transformation.
- 16.A Commentor is opposed to Complex Transformation.
- 2.C Commentor stated that she believes there are LANL and SANL employees who disagree with Complex Transformation but may not be able to express their views in public.
- 14.I Commentor stated that they hope we can find a way to have jobs for New Mexicans that are healthy, sustainable and good for the whole planet.
- 16.A Commentor is opposed to Complex Transformation.
- 14.M.3 Commentor expressed concern about the storage of nuclear waste and potential health effects.
- 13.A Commentor is concerned about the security of Los Alamos National Lab.
- 1.K Commentor is critical of the current administration and policy.
- 1.J Commentor stated that the U.S. is being hypocritical by saying that other countries should not have nuclear weapons but that our country continues to maintain a stockpile.
- 1.J Commentor stated that the U.S. is being hypocritical by saying that other countries should not have nuclear weapons but that our country continues to maintain a stockpile.
- 16.A Commentor is opposed to nuclear weapons.
- 13.A Commentor stated that the possession of nuclear weapons makes our country less secure.
- 13.A Commentor stated that the possession of nuclear weapons makes our country less secure.
- 1.F Commentor stated that the U.S. should abide by the NPT and disarm.
- 1.K Commentor is critical of the current administration and policy.
- 9.B Commentor stated that resources could be better used to correct the nation's economy.
- 9.H Commentor expressed concern about the amount of taxpayer money required to support Complex Transformation.

- 16.A Commentor is opposed to Complex Transformation.
- 7.J Commentor stated that the DOE should clean up existing radioactive waste prior to generating more with Complex Transformation.
- 16.A Commentor is opposed to nuclear weapons.
- 1.F Commentor stated that the U.S. should abide by the NPT and disarm.
- 14.0 Commentor stated that nuclear weapons and therefore Complex Transformation are hazardous to the environment.
- 16.A Commentor is opposed to Complex Transformation
- 14.M.3 Commentor expressed concern about the storage of nuclear waste and potential health effects.
- 9.B Commentor stated that resources could be better used to correct the nation's economy.
- 16.A Commentor is opposed to Complex Transformation.
- 14.M.3 Commentor expressed concern about the storage of nuclear waste and potential health effects.
- 14.E Commentor expressed concern about existing and potential future contamination of the public water supply.
- 7.J Commentor stated that the DOE should clean up existing radioactive waste prior to generating more with Complex Transformation.
- 2.B Commentor stated that this SPEIS is inadequate and should be revised and reissued.

PUBLIC HEARING—LOS ALAMOS, NM

March 12, 2008-Evening Session

- 7.O Commentor stated that a No Action Alternative where no production would take place should be added to the list of alternatives analyzed.
- 14.O Commentor expressed concern about impacts to environment.
- 18.0 Commentor stated that the implication in the planning is that particular laboratories will be increasing and therefore programs will be lost as others gain, so employees might perhaps have to move in order to remain in their profession if programs are transferred from one site to another.
- 14.M Commentor expressed concern about waste production and cleanup.

- 9.B Commentor stated that resources could be better used for other purposes.
- 1.F Complex Transformation violates the Nuclear Non-Proliferation Treaty.
- 1.K Commentor is critical of current administration policies.
- 7.N Commentor supports Preferred Alternative.
- 15.A Commentor supports Complex Transformation.
- 10.B Commentor expressed appreciation of economic and community activities at LANL.
- 15.A Commentor supports Complex Transformation at LANL.
- 7.N Commentor supports Preferred Alternative.
- 3.A Commentor stated that our country should continue to decrease nuclear weapons
- 15.A Commentor supports Complex Transformation at LANL.
- 8.A Commentor expressed that level of production should be dependent upon replacement warhead decisions.
- 1.F Commentor supports continued weapon reduction in accordance with NPT.
- 15.A Commentor supports Complex Transformation.
- 14.M Commentator supports alternative that will provide waste remediation.
- 15.A Commentor supports Complex Transformation.
- 7.N Commentor supports Preferred Alternative.
- 7.E Comment concerning day-to-day security functions
- 5.I Commentor expressed pride re the processing or handling of plutonium
- 14.N.1 Commentor stated there is no plan for evacuation of LANL in the event of an emergency.
- 10.B Commentor expressed support for candidate sites - LANL
- 7.F Comment regarding safety concerns
- 5.G Downsizing-in-place
- 15.A Commentor supports Complex Transformation.

- 16.A Commentor is opposed to nuclear weapons
- 9.A Commentor stated that resources could be better used to research energy alternatives.
- 13.A Commentor stated that possession of nuclear weapons could lead to sabotage or accidents.
- 7.N Commentor supports Preferred Alternative.
- 15.A Commentor supports Complex Transformation.
- 7.E Commentor stated that the preferred alternative will enhance safety and security.
- 10.B Commentor expressed support of research done at Los Alamos.
- 15.A Commentor supports Complex Transformation at LANL.
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country more secure.
- 15.A Commentor supports Complex Transformation.
- 10.B Commentor supports scientific activities at LANL.
- 7.N Commentor supports Preferred Alternative.
- 7.N Commentor supports Preferred Alternative.
- 2.C Stakeholder involvement
- 1.F Commentor stated that there should be an alternative that complies with NPT.
- 15.A Commentor supports Complex Transformation.
- 5.F Programmatic Alternative 3: Capability-Based
- 14.M.18 Commentor stated that the SPEIS should analyze the environmental benefits of selecting the preferred alternative compared with the No Action Alternative.
- 14.O Commentor stated that nuclear weapons and therefore Complex Transformation are hazardous to the environment.
- 14.D Commentor expressed concern about Air Quality and Noise
- 7.E Comment concerning day-to-day security functions
- 7.F Comment regarding safety concerns

- 15.A Commentor supports Complex Transformation.
- 15.0 Commentor supports downsizing.
- 10.B Commentor expressed support for candidate site - LANL
- 5.D.2 Comment regarding Programmatic Alternative 2: Consolidated Nuclear Production Center; CPC; commentor noted JASON study.
- 11.D Commentor requested additional analysis on environmental effects
- 15.A Commentor supports the preferred alternative.
- 1.J Commentor stated that the U.S. needs to assert its leadership role in international disarmament efforts.
- 5.C.1 Commentor stated that the pit lifetimes last considerably longer than previously thought.
- 7.J Commentor stated that the DOE should clean up existing radioactive waste.
- 15.A Commentor supports Complex Transformation at LANL.
- 7.N Commentor supports Preferred Alternative.
- 7.E Commentor expressed confidence that the preferred alternative will increase safety and security.
- 7.N Commentor supports Preferred Alternative.
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country more secure.
- 15.A Commentor supports Complex Transformation.
- 10.B Commentor supports scientific activities at LANL.
- 14.M.3 Commentor supports Complex Transformation because it reduces nuclear operations footprint.
- 7.E Commentor stated that reducing stockpile will enhance security
- 9.A Commentor expressed that it is more cost effective to downsize in place.
- 10.B Commentor expressed support of research done at Los Alamos.
- 7.N Commentor supports Preferred Alternative.
- 18.B Commentor expressed concern about impacts to personnel.

- 14.I Commentor stated the review of socioeconomic impacts is inadequate.
- 11.A Commentor requested additional analysis of impacts to personnel
- 9.G Commentor requested information related to timeline.
- 15.A Commentor supports Complex Transformation.
- 5.C Commentor supports Distributed Centers of Excellence.
- 9.A Commentor supports spending money to modernize the existing Complex
- 7.N Commentor supports Preferred Alternative.
- 15.A Commentor supports Complex Transformation
- 13.A.1 Commentor stated that the use of nuclear material is a viable deterrent.
- 15.A Commentor supports Complex Transformation.
- 13.A.1 Commentor stated that having strong nuclear production complex is a deterrent.
- 10.B Commentor supports continued HE experiments and research at LANL.
- 7.N Commentor supports Preferred Alternative.
- 15.A Commentor supports Complex Transformation.
- 7.N Commentor supports Preferred Alternative.
- 5.D.2 Programmatic Alternative 2: Consolidated Nuclear Production Center; CPC
- 5.I Commentor expressed pride re the processing or handling of plutonium
- 7.M.1 Commentor supports Preferred Alternative.
- 14.M.19 Commentor questioned the compliance with Federal law of the SNL/NM mixed waste landfill.
- 15.0 Commentor supports Complex Transformation
- 5.I Commentor supports processing and handling plutonium at LANL.
- 7.E Commentor stated that the preferred alternative will enhance safety and security.
- 10.B Commentor supports continued utilization of LANL
- 2.H Commentor appreciated web access to draft SPEIS.
- 9.D Commentor expressed concern regarding the cost of cleanup.

- 16.A Commentor is opposed to Complex Transformation.
- 13.A Commentor stated that possession of nuclear weapons could lead to use by terrorists.
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.
- 12.0 Document fails to mention KCP.
- 16.A Commentor is opposed to Complex Transformation.
- 14.O Commentor is concerned about downstream and downwind environmental contamination.
- 1.J Commentor stated that Complex Transformation will increase the proliferation of nuclear weapons.
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.
- 14.M.3 Commentor expressed concern about contamination and waste remediation at LANL.
- 14.K Commentor expressed concern regarding elevated cancer levels.
- 3.A Commentor stated that our country is already in possession of more than enough nuclear weapons.
- 7.N Commentor supports Preferred Alternative.
- 15.A Commentor supports Complex Transformation at LANL.
- 15.A Commentor supports Complex Transformation at LANL.
- 7.N Commentor supports Preferred Alternative.
- 7.N Commentor discusses the preferred alternative.
- 15.A Commentor supports Complex Transformation.
- 9.H Commentor expressed concern about the amount of taxpayer money required to support Complex Transformation.
- 14.E Commentor expresses belief that the water at Los Alamos is safe.
- 15.A Commentor supports Complex Transformation at LANL.

- 5.C.1 A commentor stated that the preferred alternative would not increase capability for pit production – there is no proposed expansion – utilizing existing facilities, more pits could have been made than have been built in the past
- 14.I.2 A commentor stated that other Lab work, including work on non-proliferation would be adversely affected if there were no weapons work at LANL
- 14.K.9 A commentor stated that there are increased cancer in children in LANL.
- 2.E.2 A commentor stated that there should have been a hearing in Taos
- 2.F A commentor stated that the LANL fact sheets do not agree on a number of factual references in the SPEIS summary and she gives examples and asks who is telling the truth
- 6.B A commentor was strongly opposed to moving gas transfer systems from Los Alamos to Sandia - The GTS facilities at LANL are modern and functional and it is not cost effective to move
- 14.D.3 A commentor stated that there is inadequate air and ground water monitoring of air (open burning and open detonation)
- 5.N.7 A commentor stated that the SPEIS should consider moving all plutonium from LLNL, not just Category I/II plutonium.

March 13, 2008-Afternoon Session

- 7.J.1 A commentor stated that the weapons complex has gone from 14 to 7 or 8 sites fails to recognize that there were more than 600 sites engaged in production of nuclear weapons and many of these sites still require cleanup.
- 14.I.1 A commentor stated that in the event the number of jobs fall as a result of consolidation or transfer of functions, NNSA need more socioeconomic analysis of community disruption, housing, schools and services. Commentor added that the impact on recruitment of new lab employees needs to be analyzed because employment will be lower.
- 14.D.3 Commentor stated that there is not an adequate monitoring network around LANL to detect contaminants from open detonation, open burning, depleted uranium high explosives, solvents, and other radionuclides associated with such activities.
- 14.D.3 Commentor questioned the use of the National Academies of Science review on the groundwater monitoring program at LANL and its conclusions that the current network is inadequate.

- 18.0 Commentor stated that the DOE should treat all the facility reductions more carefully in order to give new jobs and restructuring for the staff to maintain the same level of skill and knowledge.
- 14.K.9 A commentor stated that LANL has significantly more melanoma, non-Hodgkins lymphoma, ovary cancer, prostate cancer, testes cancer and breast cancer in Los Alamos compared with the rest of the state of New Mexico
- 5.C.1 A commentor stated that the only pits NNSA could ever require to be made would be novel pits that are not in the current stockpile
- 7.N.1 A commentor stated that the SPEIS provides insufficient specific discussion of the environmental benefits that would result from selection of the preferred alternative compared with no action
- 15.A Commentor supports Complex Transformation.
- 7.N Commentor supports Preferred Alternative.
- 14.M.5 Commentor supports Complex Transformation.
- 5.F Programmatic Alternative 3: Capability-Based
- 9.A Commentor is opposed to spending money to modernize the existing Complex.
- 7.E Comment concerning day-to-day security functions
- 7.F Comment regarding safety concerns
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.
- 1.J Commentor stated that the U.S. is being hypocritical by saying that other countries should not have nuclear weapons but that our country continues to maintain a stockpile.
- 1.O Commentor criticized the war on terror.
- 1.B Presidential Directives, Public law, and current policies
- 14.D Commentor expressed concern about Air Quality and Noise
- 7.J Commentor stated that the DOE should clean up existing radioactive waste prior to generating more with Complex Transformation.
- 15.A Commentor supports Complex Transformation.

- 10.B Commentor stated that a limited production capacity for LANL is not incompatible with state of the art science.
- 9.B Commentor stated that resources could be better used to correct the nation's economy.
- 7.J Commentor stated that the DOE should clean up existing radioactive waste prior to generating more with Complex Transformation.
- 1.Q Underground testing
- 7.J Commentor stated that the DOE should clean up existing radioactive waste prior to generating more with Complex Transformation.
- 14.N.6 Commentor stated that the EIS claims "In the event of a facility accident at LANL, the chances of fatalities would also increase." If we go to summary page 8, S-81. Facility accidents -- and this is for the preferred alternative -- the consolidated plutonium center. "Accident with the highest consequences to the off-site population is the beyond evaluation basic earthquake and fire. Approximately 26 latent cancer fatalities in the off-site population could result from such an accident. Off-site maximally exposed individual, the MEI, would receive a dose of 87.5 ram. Statistically MEI would have one chance in 19 of a latent cancer fatality. "When probabilities are taken into account, the accident with the highest risk is the explosion in a feed casting furnace. For this accident, the latent cancer fatality risk to the maximally exposed individual would be approximately nine times ten to the minus four, or approximately one in 1,000. For the population, the latent cancer fatality risk would be 0.19 or approximately one in five."
- 14.I.2 Commentor stated that without the nuclear weapons complex, programs designed to provide for national security (i.e. IAEA inspection training) would not be possible because there would be no financial support base for them.
- 15.A Commentor supports Complex Transformation.
- 7.E Comment concerning day-to-day security functions
- 7.F Comment regarding safety concerns
- 14.M.1 Commentor expressed concern about contamination at Rocky Flats
- 1.F Complex Transformation violates the Nuclear Non-Proliferation Treaty.
- 1.E Commentor stated that the U.S. should ratify the CTBT.
- 16.A Commentor supports Complex Transformation.
- 9.A Commentor is opposed to spending money to modernize the existing Complex.

- 10.I Commentor expressed support for candidate sites - Y-12.
- 6.B Tritium R&D
- 10.H Commentor expressed support for candidate sites – SRS.
- 7.E Comment concerning day-to-day security functions.
- 7.F Comment regarding safety concerns.
- 15.A Commentor supports Complex Transformation.
- 7.N Commentor supports Preferred Alternative.
- 9.A Commentor is opposed to spending money to modernize the existing Complex.
- 10.B Commentor expressed support for candidate sites – LANL.
- 14.M.2 Commentor expressed concern about contamination at LANL.
- 2.E Comment on the number/location of public hearings.
- 7.O Commentor stated that a true No Action/Production Alternative where no production would take place should be added to the list of alternatives analyzed.
- 20.0 Comment was out of scope.
- 9.F Cost-Benefit Study.
- 11.A Commentor requested additional analysis - general .
- 9.H Commentor expressed concern about the amount of taxpayer money required to support Complex Transformation.
- 9.B Commentor stated that resources could be better used to correct the nation's economy.
- 16.A Commentor is opposed to Complex Transformation.
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.
- 1.J Commentor stated that the U.S. is being hypocritical by saying that other countries should not have nuclear weapons but that our country continues to maintain a stockpile.
- 7.M.1 Concern about the impacts from potential use or testing of nuclear weapons.
- 14.K Commentor expressed concern about health and safety.

- 1.F Complex Transformation violates the Nuclear Non-Proliferation Treaty.
- 2.E Length of comment period, number, and location of public hearings.
- 2.F Public hearing format and fact sheets.
- 14.D Commentor expressed concern about Air Quality and Noise.
- 14.D Commentor expressed concern about the use of water.
- 19.E Commentor expressed concern re seismic protection of proposed facilities.
- 14.N Commentor expressed concern about the capability of current nuclear weapons facilities being able to withstand natural disasters.
- 14.M.2 Commentor expressed concern about contamination at LANL.
- 11.D Commentor requested additional analysis on environmental effects.
- 16.A Commentor is opposed to Complex Transformation.
- 7.J Commentor stated that the DOE should clean up existing radioactive waste prior to generating more with Complex Transformation.
- 7.N Commentor supports Preferred Alternative.
- 13.A Sabotage and terrorism-general.
- 10.B Commentor expressed support for candidate sites - LANL
- 1.O Commentor criticized the war on terror.
- 7.N Commentor supports the preferred alternative.
- 15.A Commentor expresses support for Los Alamos employees.
- 10.B Commentor discusses LANL to illustrate non-nuclear initiatives.
- 16.A Commentor is opposed to nuclear weapons.
- 1.J Commentor stated that the U.S. needs to assert its leadership role in international disarmament efforts.
- 9.H Commentor expressed concern about the amount of taxpayer money required to support Complex Transformation.
- 1.C Nuclear Posture Review (2001) (includes Nuclear Posture Review - Anticipated 2009)

- 1.B Presidential Directives, Public law, and current policies
- 8.A Commentor stated that Complex Transformation is in opposition to Congress' recent rejection of the RRW.
- 15.A Commentor supports Complex Transformation.
- 9.B Commentor stated that resources could be better used to correct the nation's economy.
- 1.N Comment on the need for nuclear power.
- 7.N Commentor supports Preferred Alternative.
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.
- 15.A Commentor supports Complex Transformation.
- 7.E Comment concerning day-to-day security functions
- 7.F Comment regarding safety concerns
- 1.F Complex Transformation violates the Nuclear Non-Proliferation Treaty.
- 1.N Nuclear power
- 15.0 Commentor supports Complex Transformation.
- 10.A Commentor expressed support for candidate sites - LANL
- 13.A Commentor stated that the possession of nuclear weapons makes our country less secure.
- 14.D Commentor expressed concern about Air Quality and Noise
- 7.F Comment regarding safety concerns
- 1.F Complex Transformation violates the Nuclear Non-Proliferation Treaty.
- 3.A Commentor stated that our country is already in possession of more than enough nuclear weapons than we need.
- 14.M.1 Commentor expressed concern about contamination at Rocky Flats
- 7.E Comment concerning day-to-day security functions
- 7.N Commentor supports Preferred Alternative.

- 15.A Commentor supports Complex Transformation.
- 7.E Comment concerning day-to-day security functions
- 7.E Comment concerning day-to-day security functions
- 7.F Comment regarding safety concerns
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.
- 7.N Commentor supports Preferred Alternative.
- 5.G Downsizing-in-place
- 2.D Process - notification
- 16.A Commentor is opposed to Complex Transformation.
- 1.J Commentor stated that Complex Transformation will further the nuclear arms race.
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.
- 3.A Commentor stated that our country is already in possession of more than enough nuclear weapons than we need.
- 5.C.1 Commentor stated that Complex Transformation is not necessary as the statement that the current arsenal is aging is faulty in light of the study certifying that the current arsenal has a pit lifetime of between 85 and 100 years.
- 7.J Commentor stated that the DOE should clean up existing radioactive waste prior to generating more with Complex Transformation.
- 9.B Commentor stated that resources could be better used to correct the nation's economy.
- 14.M.1 Commentor expressed concern about contamination at Rocky Flats
- 14.E Commentor expressed concern about existing and potential future contamination of the Ogallala Aquifer.
- 14.K Commentor expressed concern about health and safety

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- 7.N Commentor supports Preferred Alternative.
- 15.A Commentor supports Complex Transformation
- 7.E Commentor expressed concern about the safety and security of LANL.
- 14.O Commentor expresses concern regarding cumulative impacts over the next 50 to 75 years.
- 14.K Commentor expressed concern about the health and safety of public caused from nuclear waste.
- 10.B.1 Commentor said NNSA lacks competence and is missing 300 kilograms of plutonium.
- 16.A Commentor is opposed to nuclear weapons.
- 1.N.1 Commentor stated that nuclear power facilities that produce plutonium make the US more endangered.
- 14.I.2 Commentor stated that the project will support many other capabilities that the laboratory uses for other national security as well as energy interests and to support other federal agencies.
- 14.K.6 Commentor stated that the US DOE should make public and disseminate the results of epidemiologic studies on the effects of radiation exposure.
- 1.F Commentor stated that Complex Transformation violates the Nuclear Non-Proliferation Treaty.
- 7.M.1 Commentor expressed concern about the impacts from potential use or testing of nuclear weapons.
- 11.E Commentor requested additional analysis of the effects to the environment, public health, etc. from use of nuclear weapons.
- 13.E.4 Commentor questioned whether nuclear weapons are treated with proper care and cited weapons accidentally flown by the U.S. Air Force.
- 14.E Commentor expressed general concern about water resource.
- 14.M.1 Commentor expressed concern about the contamination in Rocky Flats.
- 14.O Commentor stated that nuclear weapons and therefore Complex Transformation are hazardous to the environment.

- 14.K Commentor expressed concern about the health and safety of public caused from nuclear waste.
- 7.O Commentor stated that a true "No Action/Production Alternative" where no production would take places should be added to the list of alternatives analyzed.
- 2.H Commentor states concern about the proper Availability of information.
- 7.M.1 Commentor states concern about the proper Availability of information.
- 7.J Commentor stated that the DOE should clean up existing radioactive waste prior to generating more with Complex Transformation.
- 2.J Commentor is concerned about use of euphemisms.
- 16.A Commentor is opposed to nuclear weapons.
- 14.M.1 Commentor discusses contamination at Rocky Flats.
- 14.M Commentor discusses waste management.
- 1.J Commentor is against proliferation of nuclear weapons.
- 7.J Commentor states Los Alamos needs to clean up.
- 14.0 Commentor stated that nuclear weapons and therefore Complex Transformation are hazardous to the environment.
- 16.A Commentor states nuclear weapons production at Los Alamos should be shut down.
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.
- 8.B.2 Commentor wants the SPEIS to consider RRW's impact on reprocessing, proliferation, and terrorist acts.
- 2.J Commentor is concerned about use of euphemisms.
- 16.A Commentor is opposed to Complex Transformation.
- 7.B Commentor commented on transportation of nuclear materials; involving technical questions concerning schedules and operational procedures.
- 14.L Commentor expressed concern about Transportation.
- 10.0 Commentor commented on candidate sides in general.

- 14.N Commentor expressed concern about the capability of current nuclear weapons facilities being able to withstand natural disasters.
- 7.F Commentor expressed concerns about general safety.
- 13.A Commentor stated that the possession of nuclear weapons makes our country less secure.
- 1.K Commentor criticizes the current government administration and policy.
- 15.A Commentor supports Complex Transformation.
- 13.A Commentor stated that until the time comes, we must live with our weapons as responsibly as quietly as we can.
- 15.A Commentor supports Complex Transformation
- 1.J Commentor stated that Complex Transformation will further the nuclear arms race.
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.
- 16.A Commentor is opposed to nuclear weapons.
- 14.M.1 Commentor stated that the ecosystems of Colorado were contaminated by Rocky Flats.
- 14.M.2 Commentor states that LANL has continued to poison the ecosystems of New Mexico and they must be stopped.
- 1.B Commentor states that we need to use the Constitution of the United States.
- 1.K Commentor is critical of the current administration and policy.
- 14.O Commentor stated that nuclear weapons and therefore Complex Transformation are hazardous to the environment.
- 14.K Commentor states that if the government fails to serve your constitutional actions and do not stop this very real threat to the health and well-being of the people of New Mexico then we as citizens shall not hesitate to file criminal charges and bring civil action against you personally in your professional capacity for the crimes against the people of New Mexico and the world.
- 14.M.3 Commentor expressed concern about the storage of nuclear waste and potential health effects.
- 16.A Commentor is opposed to nuclear weapons. Commentor is opposed to Complex Transformation.

- 14.M.1 Commentor discusses contamination at Rocky Flats.
- 9.H Commentor expressed concern about the amount of taxpayer money required to support Complex Transformation.
- 1.J Commentor stated that Complex Transformation would be bad policy.
- 2.A Commentor expresses opinion about NEPA process and compliance.
- 14.E Commentor expresses concern regarding water resources (cleanliness and adequacy).
- 14.M.2 Commentor discusses contamination at LANL.
- 1.F Commentor states that we should not proliferate nuclear weapons.
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.
- 9.B Commentor stated that resources could be better used to correct the nation's economy.
- 16.A Commentor is opposed to Complex Transformation.
- 15.A Commentor supports Complex Transformation.
- 7.N Commentor supports Preferred Alternative.
- 7.B Commentor is concerned about the transportation of nuclear materials.
- 7.J Commentor discusses clean up.
- 14.M.2 Commentor discusses contamination and Los Alamos.
- 16.A Commentor is opposed to nuclear weapons.
- 14.K Commentor discusses health and safety.
- 15.A Commentor expresses general support for Complex Transformation.
- 7.J Commentor mentions the legacy cleanup goal.
- 14.M.1 Commentor discusses contamination at Rocky Flats.
- 1.G Commentor discusses support of the Moscow Treaty.
- 20.0 Commentor makes out of scope remarks.
- 16.A Commentor is opposed to Complex Transformation.

- 1.F Commentor stated that the U.S. should abide by the NPT and disarm.
- 1.J Commentor stated that the U.S. is being hypocritical by saying that other countries should not have nuclear weapons but that our country continues to maintain a stockpile.
- 14.K Commentor states that these politicians forget that these labs and bomb making factories are a great risk to public health and environment in New Mexico.
- 14.D Commentor states that at a higher level of pit production, LANL could increase airborne pollutants by 28 percent.
- 14.E Commentor expressed concern about existing and potential future contamination of the public water supply.
- 1.C Commentor stated that since the incoming President will complete a new nuclear posture review in 2009 what is the rush to complete Complex Transformation
- 9.B Commentor stated that resources could be better used to correct the nation's economy.
- 10.B The Commentor expresses concerns about building nuclear weapons in the candidate site- Los Alamos National Lab (LANL).
- 7.A Commentor stated other alternatives or NNSA program functions in general.
- 9.A Commentor is opposed to spending money to modernize the existing Complex.
- 9.H Commentor expressed concern about the amount of taxpayer money required to support Complex Transformation.
- 3.A Commentor stated that our country is already in possession of more than enough nuclear weapons than we need.
- 9.B Commentor stated that resources could be better used to correct the nation's economy.
- 7.F Commentor expressed concerns about general safety.
- 14.M.2 Commentor expressed concern about the contamination in Los Alamos Nation Lab (LANL).
- 14.E Commentor expressed general concern about water resource.
- 14.K Commentor expressed concern about the health and safety of public caused from nuclear waste.
- 14.O Commentor stated that nuclear weapons and therefore Complex Transformation are hazardous to the environment.

- 14.M.1 Commentor discusses contamination at Rocky Flats.
- 16.A Commentor is opposed to nuclear weapons.
- 5.C.1 Commentor stated that Complex Transformation is not necessary as the current arsenal has a pit lifetime of between 85 and 100 years.
- 3.A Commentor stated that our country is already in possession of more than enough nuclear weapons than we need.
- 7.M.1 Commentor expressed concern about the impacts from potential use or testing of nuclear weapons.
- 1.J Commentor stated that the U.S. is being hypocritical by saying that other countries should not have nuclear weapons but that our country continues to maintain a stockpile.
- 16.A Commentor is opposed to Complex Transformation.
- 11.B Commentor expects that more analysis should be done before a decision in favor of Complex transformation is made...
- 1.F Commentor stated that Complex Transformation violates the Nuclear Non-Proliferation Treaty.
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.
- 16.A Commentor is opposed to Complex Transformation.
- 9.B Commentor stated that resources could be better used to correct the nation's economy.
- 14.O Commentor stated that nuclear weapons and therefore Complex Transformation are hazardous to the environment.
- 7.E Commentor expressed concern about the safety and security of LANL.
- 14.O Commentor expressed concern about existing and potential future of water resource.
- 15.A Commentor supports Complex Transformation.
- 7.E Commentor expressed concern about the safety and security of LANL.
- 7.F Commentor expressed concerns about general safety.
- 2.H Commentor states concern about the proper Availability of information.

- 1.F Commentor stated that Complex Transformation violates the Nuclear Non-Proliferation Treaty.
- 8.A Commentor stated that Complex Transformation is in opposition to Congress' recent rejection of the RRW.
- 8.E Commentor questions on the Relationship between RRW and Complex Transformation.
- 3.A Commentor stated that our country is already in possession of more than enough nuclear weapons than we need.
- 5.C.1 Commentor stated that Complex Transformation is not necessary as the current arsenal has a pit lifetime of between 85 and 100 years.
- 14.K Commentor cites studies relating to Cancer.
- 14.I Commentor references socioeconomics.
- 14.E Commentor references contamination at Buchman wells.
- 7.0 Commentor mentions the no-bound option.
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.
- 2.C Commentor states that people who work at Los Alamos should not be given equal consideration with their testimony due to conflict of interest.
- 1.F Complex Transformation violates the Nuclear Non-Proliferation Treaty.
- 3.A Commentor states that we do not need more nuclear bombs.
- 14.M.3 Commentor expressed concern about the storage of nuclear waste and potential health effects.
- 13.A.1 Commentor stated that the use of nuclear material is no longer a viable deterrent.
- 14.N Commentor expresses that there is no plan for safe evacuation in the event of an accident or terrorist attack.
- 14.M.2 Commentor discusses contamination at LANL.
- 1.B Commentor discusses that the Los Alamos nuclear industry be banned in secrecy.
- 7.N Commentor supports Preferred Alternative.
- 15.A Commentor supports Complex Transformation.

- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.
- 7.E Commentor expressed concern about the safety and security of LANL.
- 7.F Commentor expressed concerns about general safety.
- 15.A Commentor supports Complex Transformation.
- 14.E.2 Commentor expressed concern about the adequacy of water supply.
- 14.0 Commentor expressed concern about existing and potential future of water resource.
- 14.M Commentor expressed concern about the nuclear waste contamination in general.
- 7.J Commentor stated that the DOE should clean up existing radioactive waste prior to generating more with Complex Transformation.
- 19.E Commentor expressed concern regarding seismic protection of proposed facilities.
- 16.A Commentor is opposed to Complex Transformation.
- 15.A Commentor supports Complex Transformation.
- 9.H Commentor expressed concern about the amount of taxpayer money required to support Complex Transformation.
- 16.A Commentor is opposed to nuclear weapons.
- 1.J Commentor requests reduction of nuclear weapons.
- 13.A.1 Commentor indicates nuclear weapons are "not so much a deterrent as it is a provocation."
- 7.N Commentor supports Preferred Alternative.
- 7.E Commentor expressed concern about the safety and security of LANL.
- 7.F Commentor expressed concerns about general safety.
- 5.C.1 Commentor stated that Complex Transformation is not necessary as the current arsenal has a pit lifetime of between 85 and 100 years.
- 15.A Commentor supports Complex Transformation.
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.

- 14.E Commentor expressed general concern about water resource.
- 14.O Commentor stated that nuclear weapons and therefore Complex Transformation are hazardous to the environment.
- 11.E Commentor requested additional analysis of the effects to the environment, public health, etc. from use of nuclear weapons.
- 16.A Commentor is opposed to nuclear weapons.
- 16.A Commentor is opposed to nuclear weapons. Also comments that the hearings are a "sham"
- 1.B The Commentor discusses bureaucratic history.
- 16.A Commentor is opposed to nuclear weapons.
- 9.B Commentor feels resources could be better spent on commutations.
- 14.K Commentor discusses health and safety.
- 14.J Commentor discusses environmental justice issues related to Native Americans.
- 16.A Commentor is opposed to nuclear weapons.
- 14.E Commentor expressed general concern about water resource.
- 20.0 Commentors comments were out of context!
- 14.O Commentor stated that nuclear weapons and therefore Complex Transformation are hazardous to the environment.
- 9.B Commentor stated that resources could be better used to correct the nation's economy.
- 14.M.2 Commentor expressed concern about the contamination in Los Alamos Nation Lab (LANL).
- 16.A Commentor is opposed to Complex Transformation.
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.
- 1.J Commentor stated that Complex Transformation will further the nuclear arms race.
- 7.M.1 Commentor expressed concern about the impacts from potential use or testing of nuclear weapons.

- 14.O Commentor stated that nuclear weapons and therefore Complex Transformation are hazardous to the environment.
- 14.E Commentor expressed general concern about water resource.
- 7.J Commentor stated that the DOE should clean up existing radioactive waste prior to generating more with Complex Transformation.
- 5.L Commentor expressed pride re the processing or handling of radioactive isotopes
- 14.K Commentor expressed concern about the health and safety of public caused from nuclear waste.
- 3.A Commentor stated that our country is already in possession of more than enough nuclear weapons than we need.
- 5.C.1 Commentor stated that Complex Transformation is not necessary as the current arsenal has a pit lifetime of between 85 and 100 years.
- 9.H Commentor expressed concern about the amount of taxpayer money required to support Complex Transformation.
- 16.A Commentor is opposed to nuclear weapons.
- 14.E.1 Commentor expressed concern about existing and potential future contamination of the Ogallala Aquifer.
- 14.M.2 Commentor queried if the DOE would drink the water from the Buchman wells or from Cochiti Lake on a daily basis.
- 14.M.1 Commentor states that LANL isn't any different from Rocky Flats therefore if Rocky Flats was closed why hasn't LANL been closed.
- 7.J Commentor states that LANL should be declared a Superfund site and cleaned up as such.
- 3.A Commentor stated that our country is already in possession of more than enough nuclear weapons than we need.
- 5.C.1 Commentor stated that Complex Transformation is not necessary as the statement that the current arsenal is aging is faulty in light of the study certifying that the current arsenal has a pit lifetime of between 85 and 100 years.
- 1.F Commentor stated that there should be an alternative that complies with NPT.
- 7.F Commentor queries that if the DOE safety team arrived at LANL and conducted a surprise inspection would it pass?

- 14.I Commentor states that the Pueblo people were not adequately compensated for the land the DOE seized from them.
- 14.K Commentor asks would Northern New Mexico be better off environmentally or health and safety-wise if there was no weapons work at LANL
- 7.N Commentor supports Preferred Alternative.
- 5.C Commentor supports the programmatic proposed action: distributed centers of excellence.
- 15.A Commentor supports Complex Transformation
- 7.E Commentor states that the preferred alternative dramatically combines the nuclear materials in the US making it easier to protect these materials.
- 7.F Commentor states that most of the investment is going to be made to make the existing facilities safer and more secure.
- 16.A Commentor is opposed to nuclear weapons.
- 7.N Commentor supports Preferred Alternative.
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.
- 15.A Commentor supports Complex Transformation.
- 7.F Commentor expressed concerns about general safety.
- 7.E Commentor expressed concern about the safety and security of LANL.
- 2.H Commentor states concern about the proper Availability of information.
- 2.J Commentor is concerned about use of euphemisms.
- 16.A Commentor is opposed to nuclear weapons.
- 14.O Commentor stated that nuclear weapons and therefore Complex Transformation are hazardous to the environment.
- 3.A Commentor stated that our country is already in possession of more than enough nuclear weapons than we need.
- 7.M.1 Commentor expressed concern about the impacts from potential use or testing of nuclear weapons.
- 16.A Commentor is opposed to Complex Transformation.

- 14.K Commentor expressed concern about the health and safety of public caused from nuclear waste.
- 1.C Commentor criticizes the Nuclear Posture Review (2001).
- 9.H Commentor expressed concern about the amount of taxpayer money required to support Complex Transformation.
- 7.F Commentor expressed concerns about general safety.
- 15.A Commentor supports Complex Transformation.
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.
- 9.A Commentor is opposed to spending money to modernize the existing Complex.
- 16.A Commentor is opposed to Complex Transformation.
- 14.O Commentor expressed concern about existing and potential future of water resource.
- 20.0 Commentors comments were out of context!
- 2.F Commentor is concerned about the short duration of Public hearing and inadequacy of format and fact sheets
- 9.H Commentor expressed concern about the amount of taxpayer money required to support Complex Transformation.
- 7.O Commentor stated that a true "No Action/Production Alternative" where no production would take places should be added to the list of alternatives analyzed.
- 5.D.2 Commentor stated that Complex Transformation Scheme should consider a safe Consolidated Plutonium Center (CPC)
- 1.K Commentor criticizes the current government administration and policy.
- 1.K Commentor criticizes the current government administration and policy.
- 3.A Commentor stated that our country is already in possession of more than enough nuclear weapons than we need.
- 1.J Commentor stated that the U.S. is being hypocritical by saying that other countries should not have nuclear weapons but that our country continues to maintain a stockpile.
- 16.A Commentor is opposed to Complex Transformation.

- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.
- 9.B Commentor stated that resources could be better used to correct the nation's economy.
- 8.A Commentor stated that Complex Transformation is in opposition to Congress' recent rejection of the RRW.
- 14.K Commentor expressed concern about the health and safety of public caused from nuclear waste.
- 16.A Commentor is opposed to Complex Transformation.
- 11.E Commentor requested additional analysis of the effects to the environment, public health, etc. from use of nuclear weapons.
- 11.B Commentor expects that more analysis should be done before a decision in favor of Complex transformation is made.
- 9.H Commentor expressed concern about the amount of taxpayer money required to support Complex Transformation.
- 3.A Commentor stated that our country is already in possession of more than enough nuclear weapons than we need.
- 14.M Commentor expressed concern about the nuclear waste contamination in general.
- 16.A Commentor is opposed to nuclear weapons.
- 1.J Commentor is in favor of nonproliferation and total disarmament.
- 7.J Commentor is for complete cleanup.
- 19.E Commentor expressed concern regarding seismic protection of proposed facilities.
- 15.A Commentor supports Complex Transformation.
- 16.A Commentor is opposed to nuclear weapons.
- 5.C.1 Commentor discusses engines. Commentor indicates we don't need new pits.
- 3.A Commentor questions purpose and need.
- 1.C Commentor discusses nuclear posture review.
- 9.H Commentor disagrees that project is good economic development.
- 2.I Commentor states concern about NEPA Compliance.

- 14.E Commentor expressed general concern about water resource.
- 14.O Commentor stated that nuclear weapons and therefore Complex Transformation are hazardous to the environment.
- 16.A Commentor is opposed to Complex Transformation.
- 1.J Commentor stated that the U.S. is being hypocritical by saying that other countries should not have nuclear weapons but that our country continues to maintain a stockpile.
- 2.A Commentor states that Complex Transformation Policy is against National Environmental Policy Act (NEPA).
- 9.B Commentor expresses that resources could be better used in other areas.
- 16.A Commentor is opposed to nuclear weapons.
- 2.I Commentor states concern about NEPA Compliance.
- 1.F Commentor stated that Complex Transformation violates the Nuclear Non-Proliferation Treaty.
- 16.A Commentor is opposed to nuclear weapons.
- 7.0 Commentor stated that a true "No Action/Production Alternative" where no production would take places should be added to the list of alternatives analyzed.
- 14.O Commentor stated that nuclear weapons and therefore Complex Transformation are hazardous to the environment.
- 9.H Commentor expressed concern about the amount of taxpayer money required to support Complex Transformation.
- 7.J Commentor stated that the DOE should clean up existing radioactive waste prior to generating more with Complex Transformation.
- 9.B Commentor stated that resources could be better used to correct the nation's economy.
- 1.J Commentor stated that the U.S. is being hypocritical by saying that other countries should not have nuclear weapons but that our country continues to maintain a stockpile.
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.
- 16.A Commentor is opposed to Complex Transformation.

- 1.B Commentor criticizes current presidential directives, public law, and current policies.
- 14.O Commentor stated that nuclear weapons and therefore Complex Transformation are hazardous to the environment.
- 16.A Commentor is opposed to Complex Transformation.
- 9.B Commentor stated that resources could be better used to correct the nation's economy.
- 9.H Commentor expressed concern about the amount of taxpayer money required to support Complex Transformation.
- 9.H Commentor expressed concern about the amount of taxpayer money required to support Complex Transformation.
- 14.O Commentor expressed concern about existing and potential future of water resource.
- 14.E Commentor expressed general concern about water resource.
- 14.M Commentor expressed concern about the nuclear waste contamination in general.
- 16.A Commentor is opposed to Complex Transformation.
- 9.B Commentor stated that resources could be better used to correct the nation's economy.
- 7.J Commentor stated that the DOE should clean up existing radioactive waste prior to generating more with Complex Transformation.
- 2.J Commentor is concerned about use of euphemisms.
- 7.M.1 Commentor expressed concern about the impacts from potential use or testing of nuclear weapons.
- 16.A Commentor is opposed to Complex Transformation.
- 1.C Commentor criticizes the Nuclear Posture Review (2001).
- 3.A Commentor stated that our country is already in possession of more than enough nuclear weapons than we need.
- 14.M Commentor expressed concern about the nuclear waste contamination in general.
- 9.H Commentor expressed concern about the amount of taxpayer money required to support Complex Transformation.

- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.
- 16.A Commentor is opposed to Complex Transformation.
- 5.C.1 Commentor stated that Complex Transformation is not necessary as the current arsenal has a pit lifetime of between 85 and 100 years.
- 7.0 Commentor stated that a true "No Action/Production Alternative" where no production would take places should be added to the list of alternatives analyzed.
- 14.M.2 Commentor expressed concern about the contamination in Los Alamos Nation Lab (LANL).
- 14.E Commentor expressed general concern about water resource.
- 19.E Commentor expressed concern regarding seismic protection of proposed facilities.
- 7.E Commentor expressed concern about the safety and security of LANL.
- 7.F Commentor expressed concerns about general safety.
- 7.J Commentor stated that the DOE should clean up existing radioactive waste prior to generating more with Complex Transformation.
- 9.B Commentor stated that resources could be better used to correct the nation's economy.
- 14.E Commentor discusses water resources in Los Alamos County and LANL.
- 14.M Commentor mentions radioactive and chemical waste that will occur from proposed pit production at Los Alamos.
- 14.K Commentor mentions health and safety of New Mexicans.
- 14.O Commentor mentions potential cumulative impacts.
- 16.A Commentor is opposed to Complex Transformation. Commentor is opposed to nuclear weapons.
- 1.F Commentor stated that Complex Transformation violates the Nuclear Non-Proliferation Treaty.
- 16.A Commentor is opposed to Complex Transformation.
- 5.F Commentor expressed concern about 'capability based' alternatives and its directives.

- 3.A Commentor stated that our country is already in possession of more than enough nuclear weapons than we need.
- 1.J Commentor stated that the U.S. is being hypocritical by saying that other countries should not have nuclear weapons but that our country continues to maintain a stockpile.
- 9.B Commentor stated that resources could be better used on education.
- 16.A Commentor is opposed to nuclear weapons.
- 15.A Commentor supports Complex Transformation.
- 7.N Commentor supports Preferred Alternative.
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.

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March 18, 2008-Evening Session

- 15.A Commentor supports Complex Transformation
- 6.B Commentor stated that he doesn't agree with the fact that the DOE is going to perform more open-air tests or tritium research and development.
- 14.O Commentor stated that nuclear weapons and therefore Complex Transformation are hazardous to the environment.
- 15.A.1 Commentor is opposed to nuclear weapons.
- 7.M Commentor expressed concern about the impacts from potential use or testing of nuclear weapons.
- 14.N.10 Commentor stated that nuclear weapons and therefore Complex Transformation are hazardous to the environment.
- 6.D.3 Commentor stated that Site 300 is not an acceptable location for open-air tests involving tritium and other toxic substances because of their risks to the community and that these tests should end.
- 6.D.3 Commentor stated that open-air bomb tests and the other bomb tests at Site 300 should be closed to all agencies and that the permits for such testing be withdrawn.
- 5.N.8 Commentor stated that plutonium does not need to be moved around the country twice and that it should be taken to the safest, most secure, and most remote location and not be used in nuclear weapons experiments ever again.

- 14.K.5 Commentor stated that a human health risk assessment of proposed nuclear weapons production activities, future nuclear weapons testing, environmental cleanup of the legacy nuclear weapons production complex and the future use of nuclear weapons be conducted.
- 3.A Commentor stated that our country is already in possession of more than enough nuclear weapons than we need.
- 14.L.1 Commentor expressed concern about waste management in general
- 1.F Commentor stated that there should be an alternative that complies with NPT.
- 16.0 Commentor is opposed to Complex Transformation.
- 2.E.2 Commentor stated that if the NNSA really wanted to hear from our elective officials, you probably should have chose a different time to come here, and perhaps you will decide to visit us again.
- 20.0 Commentor stated that to have 10 cops at the meeting is absurd and he is going to ask the NNSA to reimburse the local police department for their wages.
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.
- 9.H Commentor expressed concern about the amount of taxpayer money required to support Complex Transformation.
- 16.A Commentor is opposed to Complex Transformation.
- 14.D Commentor stated that the open-air testing should be stopped in general and not transferred to another community.
- 3.A Commentor stated that our country is already in possession of more than enough nuclear weapons than we need.
- 7.J Commentor stated that the DOE should clean up existing radioactive waste prior to generating more with Complex Transformation.
- 9.D Commentor stated that the DOE claims to not have enough money to cover the cleanup cost and their solution is to take the waste to a disposable site it too expensive.
- 5.L Commentor expressed concern regarding the processing or handling of radioactive isotopes, especially tritium.
- 5.H Commentor criticized the lack of detail in discussion of Alternatives, and criticized the production of special nuclear material for weapons (tritium) in civilian power reactors (Watts Bar, Tennessee).

- 1.N Commentor criticized the commingling of civilian and weapons-related nuclear power.
- 16.A Commentor is opposed to nuclear weapons.
- 1.J Commentor stated that the U.S. is being hypocritical by saying that other countries should not use civilian systems for nuclear weapons but we do.
- 1.J Commentor stated that the U.S. is being hypocritical by saying that other countries should not have nuclear weapons but that our country continues to maintain a stockpile.
- 11.E Commentor states that the final PEIS should include a human health risk assessment that takes into account the newest research on health effects at varying levels of radiation exposure and characterizes the risk for sensitive populations at each proposed Complex Transformation site.
- 2.I Commentor states that the SPEIS doesn't comply with the NEPA process because it doesn't adequately demonstrate the safety of the Complex Transformation plan.
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.
- 1.F Commentor stated that the U.S. should abide by the NPT and disarm.
- 11.B Commentor requests that the future role of nuclear deterrents and nuclear weapons in support of US national security be articulated by the DOE with appropriate support from other departments and agencies.
- 7.J Commentor stated that the DOE should clean up existing radioactive waste prior to generating more with Complex Transformation.
- 16.A Commentor is opposed to Complex Transformation.
- 1.O Commentor stated that tomorrow will mark the 5th anniversary of the U.S. invasion and occupation on Iraq, a war launched on the pretext of ending a nuclear weapons program that did not exist.
- 3.A Commentor stated that our country is already in possession of more than enough nuclear weapons than we need.
- 1.K Commentor is critical of the current administration and policy.
- 1.B Commentor states that the possession and creation of nuclear weapons are away for the US to further slipping economic hegemony for a few decades more.

- 1.J Commentor stated that the U.S. is being hypocritical by saying that other countries should not have nuclear weapons but that our country continues to maintain a stockpile.
- 7.M.1 Commentor expressed concern about the impacts from potential use or testing of nuclear weapons.
- 1.F Commentor stated that the U.S. should abide by the NPT and disarm.
- 14.O Commentor stated that nuclear weapons and therefore Complex Transformation are hazardous to the environment.
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.
- 2.I Commentor states that the SPEIS doesn't comply with the NEPA process because it doesn't consider the direct, indirect and cumulative effects of the proposed project in conjunction with the policies and the reasonable foreseeable future actions of other agencies or persons.
- 1.F Commentor stated that Complex Transformation violates the Nuclear Non-Proliferation Treaty.
- 1.J Commentor stated that the U.S. is being hypocritical by saying that other countries should not have nuclear weapons but that our country continues to maintain a stockpile.
- 7.M.1 Commentor expressed concern about the impacts from potential use or testing of nuclear weapons.
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.
- 5.C.1 Commentor stated that Complex Transformation is not necessary as the statement that the current arsenal is aging is faulty in light of the study certifying that the current arsenal has a pit lifetime of between 85 and 100 years.
- 11.A Commentor requested additional analysis regarding timely and adequate responses to emergency situations.
- 14.O Commentor stated that nuclear weapons and therefore Complex Transformation are hazardous to the environment.
- 11.E Commentor requested additional analysis relating to the environmental and human health impacts of Complex Transformation.

- 14.M.1 Commentor expressed concern about contamination at Rocky Flats stating that the DOE continues to underestimate the releases of radioisotopes and exposure of its workers and the public.
- 14.K Commentor stated that the NNSA needs to reveal the full extent and health consequences of human exposure to depleted uranium, tritium and other toxicant releases from the Site 300.
- 16.A Commentor is opposed to Complex Transformation.
- 16.A Commentor is opposed to nuclear weapons.
- 9.B Commentor stated that resources could be better used to correct the nation's economy.
- 2.H Commentor requests that the NNSA spend more time discussing the actual impact on our environment than their role in the nuclear weapons complex during the public hearings.
- 11.E Commentor requests that the NNSA provide the details that a citizen needs to determine the actual impact on the environment such as the air we breathe, water we drink, and the soil our food is grown in instead of telling us there are going to decrease the carbon footprint of the nuclear weapons complex.
- 2.C Commentor states that as a stakeholder in environment the SPEIS does not provide enough info for a true EIS.
- 20.0 Commentor's statement is out of scope.
- 6.B Commentor stated that LLNL will keep the tritium research and development under the preferred alternative.
- 14.O Commentor stated that nuclear weapons and therefore Complex Transformation are hazardous to the environment because too much tritium has been released around LLNL.
- 11.D Commentor requested additional environmental analysis regarding the Tritium Facility Modernization Project including the new tritium facility.
- 11.C Commentor requested additional analysis regarding the National Ignition Facility.
- 5.L Commentor stated that the Livermore Lab and the DOE must remove all tritium from Livermore due to the threat it poses to human health and the environment.
- 5.I Commentor stated that the plutonium and highly enriched uranium stored at LLNL is proposed to be transported under the SPEIS. However, the commentor is concerned that the DOE will leave enough behind to make targets and do other experiments.

- 19.E Commentor expressed concern regarding the vulnerability of a plutonium producing plant to a seismic event.
- 13.A Commentor expressed concern regarding the vulnerability of LLNL to a terrorist attack.
- 7.B Commentor stated that the SPEIS should be revised to decrease the amount of plutonium transport. Therefore, it should be taken to the most safe and secure location to decrease the chance of an accident or attack.
- 5.M Commentor expressed concern regarding the disposal of special nuclear material (SNM).
- 7.M.1 Commentor expressed concern about the impacts from potential use or testing of nuclear weapons.
- 14.D Commentor expressed concern about open-air bomb tests and their impact on Air Quality and Noise.
- 7.J Commentor stated that the DOE should clean up existing radioactive waste prior to generating more with Complex Transformation.
- 9.B Commentor stated that resources could be better used on civil science and technology initiatives.
- 9.D Commentor expressed concern regarding the decreased budget that the DOE labs are receiving in recent years for cleanup.
- 5.A Commentor states that there should not be two full-service labs as the product of Complex Transformation but, one lab should be dedicated to green energy research.
- 1.F Commentor stated that there should be an alternative that complies with NPT.
- 9.F Commentor states that the DOE should calculate the reduction in overhead costs if LLNL had no nuclear research but instead focused on green energy research.
- 9.H Commentor expressed concern about the amount of taxpayer money required to support Complex Transformation.
- 2.E.1 Commentor requests an extension of the comment period.
- 2.H Commentor stated that the DOE should include all of the information that can be placed in the unclassified portion of Complex Transformation plan to do so and most certainly not to classify the impacts of a terrorist attack.
- 16.A Commentor is opposed to Complex Transformation.

- 14.K Commentor states that Complex Transformation brings us and pulls us to potential death, illness, loss of life, the loss of the ability to work, and adds to the destruction of the life of families
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.
- 5.J Commentor stated that the Navajos at Window Rock have come to the conclusion and stood by each other at the expense of good-paying jobs, no more mining of uranium
- 14.O Commentor stated that nuclear weapons and therefore Complex Transformation are hazardous to the environment.
- 20.0 Commentor's statement is out of scope.
- 20.0 Commentor's statement is out of scope.
- 16.A Commentor is opposed to nuclear weapons.
- 14.O Commentor stated that nuclear weapons and therefore Complex Transformation are hazardous to the environment.
- 5.H Commentor states that the only DOE site that will stay open is the LLNL which is closer to a metropolitan area than any other site.
- 16.A Commentor stated that Complex Transformation is immoral.
- 1.0 Commentor expressed concern about health and safety
- 5.J Commentor discussed the processing or handling of uranium
- 1.B Commentor stated that Complex Transformation involves important decisions about the future of our nuclear weapons complex and those decisions should not be made in the final days of the Bush Administration.
- 1.C Commentor stated that the 2001 Nuclear Posture Review is extremely suspect.
- 11.0 Commentor requested additional analysis regarding the long-lasting consequences of Complex Transformation.
- 16.A Commentor is opposed to Complex Transformation.
- 8.E Commentor states that in exchange for giving up a number of outdated buildings that the department no longer wants or needs, the DOE will get a number of new facilities that will pave the way for the development of new nuclear weapons through the Reliable Replacement Warhead program.
- 5.E Commentor states that DOE did not really evaluate consolidation of the complex.

- 11.E Commentor states that the DOE didn't seriously consider consolidating the Kansas City Plant with Sandia National Laboratory in New Mexico because of the pressure to maintain jobs in the Kansas City area.
- 2.I Commentor states that the SPEIS is legally inadequate in a number of respects.
- 2.C There is no rational basis for excluding the Kansas City Plant from the Complex Transformation proposal other than DOE's desire to move forward with plans for a new Kansas City Plant with a lower level of environmental analysis and less public involvement.
- 9.C Commentor states that the DOE purposely delays maintenance to increase projected cost savings.
- 14.K Commentor states that Site 300 is not an acceptable location for open-air tests involving tritium due to the location of Tracy, CA.
- 9.B Commentor stated that resources could be better used to diversify the national laboratory's missions in increasing research in the areas of global warming and renewable energy.
- 14.E.3 A commentor stated that DOE self regulates contaminants in groundwater
- 14.E.3 A commentor stated that EPA safe drinking water standards for radionuclides do not provide adequate reproductive protection
- 14.M.4 A commentor stated that WIPP will not have the capacity to dispose of future TRU wastes
- 5.C.1 A commentor stated that the only need for new pits is new design weapons
- 14.O.1 A commentor stated that the cumulative impact of concentrating weapon building and testing at three sites within a few hundred miles of each other in the single state of New Mexico needs to be considered
- 14.E.4 A commentor stated questioned water metering at LANL and asked what is being done to conserve water or is it to monitor contamination.
- 14.E.3 A commentor stated that the Buchman diversion project (Santa Fe water supply) depends on wells radioactively contaminated
- 2.C A commentor stated that NNSA should give money to the tribes (San Ildefonso – Cochiti) to have independent lab tests done of air and water pollution
- 14.E.3 A commentor stated that hazardous radioactive materials from LANL has entered the groundwater at LANL

- 14.A.2 A commentor questioned if there is any intent to return to the San Ildefonso Pueblo the land taken from them over the years?
- 2.K.9 A commentor stated that cancer rates are higher in Los Alamos than the rest of the state.
- 14.N.1 A commentor stated that there is no plan for safe evacuation of Los Alamos – or anywhere else- in the event of a catastrophic accident or terrorist attack.

PUBLIC HEARING—LIVERMORE, CA

March 19, 2008-Afternoon Session

- 14.O Commentor expressed concern regarding cumulative environmental impacts.
- 8.A Commentor stated that Complex Transformation is in opposition to Congress' recent rejection of the RRW.
- 6.D.1, 6.D.2 Commentor opposed to closing CFF.
- 1.J Commentor stated that U.S. should take a leadership role in eliminating nuclear weapons.
- 1.F Commentor stated that U.S. should abide by NPT.
- 1.C Commentor expressed concern regarding nuclear posture review.
- 5.J Commentor expressed concern regarding mining and transporting uranium.
- 7.F Commentor expressed concern that selling nuclear weapons does not make our country safer.
- 20.0 Commentor expressed concerned about Biolab.
- 6.D.3 Commentor expressed concern about hydrodynamic testing at LLNL and the SPEIS should consider closing Site 300.
- 16.A Commentor is opposed to nuclear weapons.
- 14.K Commentor expressed concern regarding health and safety impacts of elevated radiation levels.
- 1.F Commentor stated that the U.S. should abide by the NPT and disarm.
- 9.A Commentor noted percentage of LLNL budget devoted to nuclear weapons.
- 9.B Commentor stated that a better use of resources than creating nuclear weapons.

- 9.H Commentor expressed concern about the amount of taxpayer money required to support Complex Transformation
- 16.A Commentor is opposed to Complex Transformation.
- 1.J Commentor stated that the U.S. is being hypocritical by redeveloping the nuclear stockpile.
- 16.A Commentor is opposed to Complex Transformation.
- 14.N.7 A commentor noted that the impact of an accident (or other release scenarios including earthquake or terrorism attack) with tritium at LLNL were not considered in the Draft SPEIS and must be.
- 8.B Commentor is opposed to RRW.
- 9.H Commentor expressed concern about the amount of taxpayer money required to support Complex Transformation.
- 1.J Commentor stated that Complex Transformation would increase proliferation.
- 16.A Commentor is opposed to Complex Transformation.
- 3.A Commentor is opposed to building a larger plutonium complex.
- 5.C.1 Commentor stated that Complex Transformation is not necessary in that studies have determined the current pit lifetime is between 85 and 100 years.
- 9.H Commentor expressed concern regarding the amount of taxpayer money required to support Complex Transformation.
- 1.C Commentor noted that legislation is pending asking the next President to complete a new nuclear posture review.
- 1.B Commentor noted that there has been a moratorium on nuclear testing.
- 8.A Commentor expressed concern regarding RRW and possible testing.
- 1.J Commentor stated that Complex Transformation will increase nuclear proliferation.
- 14.K.18 Commentor requested that the history of tritium releases at LLNL be included in the SPEIS and wants to know what NNSA is doing to prevent future releases to air, water, sewage, soil and groundwater.
- 13.A.1 Commentor stated that possession of nuclear weapons does not make the U.S. safer.
- 1.F Commentor stated Complex Transformation is not in compliance with NPT.

- 7.M.1 Commentor expressed concern about the impacts from potential use of nuclear weapons.
- 8.A Commentor stated that Complex Transformation is in opposition to Congress' recent rejection of the RRW.
- 1.C Commentor expressed support of Nuclear Policy and Posture Review Act
- 9.E Commentor is concerned about the cost for various nuclear weapons programs.
- 6.B Commentor expressed concern regarding the Tritium R & D program at LLNL.
- 7.A Commentor expressed concern regarding alternatives that include dismantling and refraining from designing and building new nuclear weapons.
- 1.F Commentor stated that Complex Transformation violates NPT.
- 1.C Commentor stated that nuclear posture review should consider treaty obligations.
- 16.A Commentor is opposed to nuclear weapons.
- 13.A Commentor expressed concern regarding national security policy.
- 1.K Commentor expressed criticism of current administration policies regarding national security.
- 1.J Commentor expressed concern that proliferation was an impediment to peace.
- 1.O Commentor expressed concern that nuclear weapons reduce the barriers to conventional war on terror.
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.
- 16.A Commentor is opposed to nuclear weapons.
- 1.J Commentor stated that U.S. is being hypocritical by saying that other countries should not have nuclear weapons.
- 1.O Commentor expressed concern that U.S. invaded Iraq even though they had no WMD.
- 9.B Commentor stated that resources could be better used to improve energy efficiency.
- 16.A Commentor is opposed to Complex Transformation.
- 15.A Commentor supports Complex Transformation at LLNL.

- 7.F Commentor stated that every effort should be made to minimize adverse impacts.
- 5.C Commentor supports proposed Centers of Excellence.
- 16.A Commentor is opposed to nuclear weapons.
- 16.C Commentor is opposed to siting Complex Transformation at LLNL.
- 9.B Commentor is opposed to expenditure of university money for LLNL.
- 8.0 Commentor is opposed to RRW.
- 1.E Commentor stated that U.S. should ratify CTBT.
- 1.J Commentor supports nonproliferation.
- 16.A Commentor is opposed to nuclear weapons.
- 1.F Commentor state U.S. should abide by NPT.
- 9.B Commentor stated that resources could be better used for more worthwhile purposes.
- 7.A Commentor stated that the SPEIS should evaluate benefits of disarmament.
- 15.A Commentor supports Complex Transformation
- 5.C Commentor supports Center of Excellence at LLNL
- 10.C Commentor is proud of special and significant role of LLNL.
- 16.A Commentor is opposed to Complex Transformation.
- 1.B Commentor expressed concern regarding national nuclear policy.
- 9.F Commentor expressed concern about the costs associated with closing plants and requested additional information associated with efficiency.
- 16.A Commentor is opposed to nuclear weapons.
- 16.A Commentor is opposed to nuclear weapons.
- 1.C Commentor stated that alternatives should not be based on current nuclear posture review.
- 1.F Commentor stated that U.S. should abide by NPT.
- 9.E Commentor stated that cost of alternatives to comply with treaty enforcement should be considered.

- 18.0, 18.A Commentor is concerned about possible staff reductions and associated impacts at LLNL.
- 18.C Commentor is concerned about negative economic impacts associated with staff reductions at LLNL.
- 15.A Commentor supports Complex Transformation.
- 5.C Commentor supports LLNL as Center of Excellence.
- 9.G Commentor expressed concern that support for LLNL will require steady and long-term funding.
- 10.C Commentor noted quality and dedication of LLNL employees.
- 14.I Commentor suggested mitigation of job losses through investing in city infrastructure as well as encouraging and facilitating start-up companies.
- 5.N.1 Commentor is opposed to transferring special nuclear material from LLNL to other sites.
- 7.B Commentor expressed concern about the transportation of nuclear material from LLNL.
- 7.B Commentor expressed concern about the transportation of nuclear material from LLNL. 16.A Commentor is opposed to nuclear weapons.
- 1.O Commentor expressed concern about using war on terror to launch war in Iraq.
- 1.F Commentor stated that U.S. should abide by NPT.
- 1.J Commentor stated that U.S. needs to lead in nonproliferation.
- 7.A Commentor stated advocacy for an alternative that considered human security.
- 16.A Commentor is opposed to nuclear weapons.
- 14.K Commentor is concerned about environmental and health impacts of nuclear weapons facility.
- 16.A Commentor is opposed to nuclear weapons.
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.
- 1.J Commentor stated that the US is being hypocritical by saying that other countries should not have nuclear weapons when the US continues to maintain a stockpile.
- 1.F Commentor stated that the U.S. should abide by NPT.

- 9.F Commentor expressed concern that the U.S. is only considering the benefits to economic development, but should also consider the costs of possible weapons use.
- 16.A Commentor is opposed to nuclear weapons.
- 1.J Commentor stated that U.S. needs to lead the world in abolishing nuclear weapons.
- 16.A Commentor is opposed to nuclear weapons.
- 13.A.1 Commentor stated possession of nuclear weapons is no longer a deterrent.
- 7.F Commentor supports reducing nuclear stockpile.
- 8.A Commentor is opposed to production of new or adapted warheads.
- 16.A Commentor is opposed to nuclear weapons.
- 13.A Commentor stated that the possession of nuclear weapons makes our country less secure.
- 9.B Commentor stated that resources could be better used for constructive purposes.
- 16.A Commentor is opposed to Complex Transformation.
- 1.J Commentor stated that Complex Transformation will increase proliferation.
- 7.M.1 Commentor expressed concern that the development of nuclear weapons will lead to the use of those weapons.
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.
- 1.F Commentor stated that Complex Transformation violates NPT.
- 18.B Commentor expressed concern regarding the impacts to personnel if LLNL is shutdown.
- 2.B Commentor stated that the SPEIS should be rejected and redone.
- 7.E Commentor expressed concern regarding security if LLNL is shutdown.
- 13.A Commentor expressed concern that if LLNL is shutdown unemployed personnel would use knowledge gained in ways that would undermine U.S. security.
- 9.B Commentor stated that resources could be used to develop energy alternatives or engineering programs.

- 15.A Commentor supports Complex Transformation.
- 5.D Commentor supports consolidation.
- 5.I Commentor supports removal of plutonium.
- 2.H Commentor expressed appreciation for public hearings, outreach and education.<http://crs.tetrattech-ffx.com/commentResponse/faces/comment/addCommentByAuthor.jspx#>
- 16.A Commentor is opposed to Complex Transformation.
- 9.B Commentor stated that resources could be used to better purposes.
- 16.A Commentor is opposed to Complex Transformation.
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.
- 1.J Commentor stated that the U.S is being hypocritical by saying that others countries should not have nuclear weapons.
- 1.F Commentor stated U.S. should abide by NPT.
- 9.B Commentor stated that resources could be better used cleaning up contamination from LLNL.
- 14.K Commentor expressed concern for health and safety impacts associated with contamination from plutonium and tritium.
- 16.A Commentor is opposed to Complex Transformation.
- 5.L Commentor is opposed to processing radioactive tritium at LLNL.
- 14.O Commentor expressed concern regarding cumulative environmental impacts.
- 6.B Commentor expressed concern regarding the Tritium Modernization Project.
- 5.I Commentor expressed concern regarding the safe handling of plutonium at LLNL.
- 16.A Commentor is opposed to Complex Transformation.
- 9.B Commentor stated that resources would be better used to address energy problems.
- 1.N Commentor is concerned that nuclear power plants elsewhere in the world will be used for weapons production.

- 1.F Commentor expressed concern that weapons production violates NPT.
- 16.A Commentor is opposed to nuclear weapons.
- 9.B Commentor stated that resources could be better used to take care of health care and education.
- 14.E Commentor expressed concern regarding plutonium in drinking water.
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.
- 1.K Commentor expressed concern with current administration policy.
- 16.A Commentor is opposed to nuclear weapons.
- 14.O Commentor expressed concern regarding cumulative environmental impacts associated with nuclear weapons production.
- 1.O Commentor stated that possession of nuclear weapons did not prevent 9-11.
- 1.J Commentor expressed concern that Complex Transformation would increase proliferation of nuclear weapons.
- 9.B Commentor stated that resources could be better used to convert LLNL to peaceful research.
- 1.F Commentor stated U.S. should abide by NPT.
- 13.A Commentor expressed concern that nuclear technology is vulnerable to terrorism
- 16.A Commentor is opposed to nuclear weapons.
- 1.O Commentor expressed concern that war on terror does not justify use of weapons.
- 16.A Commentor is opposed to nuclear weapons.
- 2.G Commentor expressed concern that earlier hearing comments were discounted.
- 1.J Commentor expressed concern that U.S. is continuing proliferation.
- 13.A.1 Commentor stated that the use of nuclear material is no longer a viable deterrent.
- 1.F Commentor stated the U.S. should abide by NPT.
- 15.A Commentor supports Complex Transformation.
- 5.D Commentor supports facility consolidation where appropriate.

- 18.B Commentor noted that SNL had reduced its nuclear weapons oriented workforce by 15 percent since October 2003.
- 9.H Commentor expressed concern about the amount of taxpayer money required to support Complex Transformation.
- 5.C.1 Commentor stated that Complex Transformation is not necessary because studies show the current arsenal has a 100 year lifetime.
- 8.A Commentor is opposed to RRW and weapons testing.
- 3.A Commentor stated that the nuclear stockpile can be reduced without Complex Transformation
- 1.C Commentor stated that Complex Transformation is based upon 2001 nuclear posture review.
- 1.J Commentor stated that Complex Transformation would increase proliferation.
- 16.A Commentor is opposed to nuclear weapons.
- 13.A.1 Commentor stated that the elimination of nuclear weapons will make the U.S. more secure.
- 15.A Commentor supports Complex Transformation as it would take advantage of LLNL's capabilities and provide long-term stability for the lab.
- 5.C Commentor supports Preferred Alternative One.
- 9.E Commentor requested addition analysis of costs for alternatives, specifically, Commentor questioned whether the preferred alternative provides an unclassified cost ratio such as two times or 20 percent extra for the use of raw versus cast processes.
- 5.H Commentor requested additional analysis of preferred alternative. Specifically, Commentor questioned whether the preferred alternative included facilities of funding to develop, qualify, produce and certify WR cases to the same specs and processes as current WR for each current stockpile system. Commentor stated that he 50/80 alternative agrees with the assessment of what is needed to support either the sleep (phonetic) or curatorship or best combo stockpile futures but that there are more types of pits than just the gray W-ADA (phonetic) and questioned whether the preferred alternative would include facilities and funding to support, manufacture, and certify all pit types in the current stockpile. Commentor questioned whether the preferred alternative included facilities and funding to timely produce WR quality fog bank as needed for any and all rebuilds of the current stockpile. Commentor questioned whether the preferred alternative provides a mechanism by which a small, agile, cost effective contractor could

- compete or compliment major contractors for overdue deliverables of WR material processes, methodology and assessment certification, etc.
- 8.B.1 Commentor stated that it was imperative that the Complex Transformation and RRW be separately considered.
- 16.A Commentor is opposed to Complex Transformation.
- 8.B Commentor is opposed to RRW.
- 1.J Commentor stated that Complex Transformation will increase nuclear weapon proliferation.
- 1.F Commentor stated that the U.S should abide by NPT and disarm.
- 8.F Commentor stated that it would be hypocritical to proceed with RRW.
- 1.C Commentor supports a new nuclear policy review.
- 9.B Commentor expressed support for use of research facilities to peaceful pursuits.
- 15.A Commentor supports Complex Transformation
- 10.C Commentor expressed appreciation for contributions of LLNL.
- 10.G Commentor expressed appreciation of SNL.
- 10.A Commentor expressed support of proposed transformation of East Bay regional laboratories.
- 1.O Commentor expressed concern regarding the toll resulting from the war on terror.
- 16.A Commentor is opposed to Complex Transformation.
- 1.K Commentor is opposed to administration policy.
- 8.B Commentor is opposed to RRW.
- 9.H Commentor expressed concern about the amount of taxpayer money required to support Complex Transformation.
- 1.F Commentor stated that U.S. must abide by NPT.
- 15.A Commentor supports Complex Transformation
- 16.A Commentor is opposed to nuclear weapons.
- 7.F Commentor expressed concern about safety issues associated with nuclear weapons.

- 7.J Commentor expressed concern regarding cleanup of plutonium sludge.
- 14.M.1 Commentor stated that contamination was extensive at Rocky Flats.
- 16.A Commentor is opposed to Complex Transformation.
- 14.K Commentor expressed concern regarding health impacts associated with radioactive materials at LLNL.
- 19.E Commentor expressed concern regarding LLNL location in a seismic zone.
- 1.J Commentor expressed concern regarding proliferation.
- 1.F Commentor stated that U.S. should abide by NPT.
- 7.A Commentor stated that transformation would mean removing radioactive materials from LLNL.
- 8.B Commentor is opposed to RRW.
- 16.A Commentor is opposed to Complex Transformation.
- 1.C Commentor expressed concern with nuclear posture review.
- 1.F Commentor stated that U.S. should abide by NPT.
- 5.N.1 Commentor expressed concern that consolidation of SNM should first resolve not to create additional waste.
- 10.C Commentor is opposed to the plutonium facility at LLNL.
- 14.M.3 Commentor expressed concern about the storage of nuclear waste.
- 9.B Commentor stated that resources would be better used to eliminate nuclear waste and toward education.
- 14.K Commentor expressed concern about safety and health especially to women and children.
- 7.O Commentor stated that a no weapon development alternative should be added to the SPEIS.
- 15.A Commentor supports Complex Transformation.
- 13.A.1 Commentor stated that nuclear weapons ensures national security.
- 5.G Commentor supports smaller nuclear infrastructure.
- 5.C Commentor supports Centers of Excellence.

- 10.C Commentor expressed appreciation for LLNL contributions to the community.
- 13.A.1 Commentor stated that nuclear weapons are required to maintain a credible defense.
- 15.A Commentor supports Complex Transformation.
- 5.G Commentor supports downsizing nuclear stockpile.
- 14.K Commentor expressed confidence in health and safety precautions at LLNL.

March 19, 2008-Evening Session

- 9.B Commentor stated that resources could be better used to correct the nation's economy.
- 1.O Commentor criticized the war on terror.
- 8.B.2 Commentor stated that much wider input from public deliberation is necessary to assess the underlying assumptions and full environmental impact of a proposed transformation program; new studies are made on the medical publishing health and climate impact of a life cycle of the Complex Transformation proposal specifically including the prospective testing and the use of nuclear weapons they produce.
- 11.0 Commentor stated that a human health risk assessment of proposed nuclear weapons production activities, future nuclear weapons testing, environmental cleanup of a legacy of nuclear weapons production complex and the future use of nuclear weapons be conducted.
- 14.K.18 Commentor stated that work with tritium should be permanently moved out of the Livermore area and new uses of tritium at the Lab should be barred, including its use in the National Ignition Facility.
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.
- 16.A Commentor is opposed to Complex Transformation.
- 9.B Commentor stated that resources could be better used to correct the nation's economy.
- 16.A Commentor is opposed to nuclear weapons.
- 14.O Commentor stated that nuclear weapons and therefore Complex Transformation are hazardous to the environment.
- 7.M.1 Commentor expressed concern about the impacts from potential use or testing of nuclear weapons.

- 3.A Commentor stated that our country is already in possession of more than enough nuclear weapons than we need.
- 14.M Commentor stated that the US already has nuclear waste which will be active for thousands of years.
- 1.F Commentor stated that Complex Transformation violates the Nuclear Non-Proliferation Treaty.
- 7.A Commentor would rather see a green science lab over another nuclear lab
- 10.C Commentor expressed support for candidate sites - LLNL
- 5.N.1 Commentor stated that the Complex Transformation proposed moves Livermore Lab singularly more than any other DOE sites.
- 9.G Commentor questioned the time frame for this transition.
- 9.A Commentor expressed concern about the amount of taxpayer money required to support Complex Transformation.
- 11.A Commentor questions the practical goal of providing a smaller site to store weapons and considers this to be an significant oversight for political reasons.
- 9.B Commentor stated that resources could be better used to correct the nation's economy.
- 14.I Commentor expressed concern about Socioeconomics
- 16.A Commentor is opposed to Complex Transformation.
- 14.H Commentor expressed concern about Cultural and Archaeological Resources
- 15.A Commentor supports Complex Transformation.
- 16.A Commentor is opposed to Complex Transformation.
- 1.K Criticism of the current administration and policy
- 9.B Commentor stated that resources could be better used to correct the nation's economy.
- 9.A Commentor is opposed to spending money to modernize the existing Complex.
- 15.A Commentor supports Complex Transformation.
- 10.C Commentor expressed support for candidate sites - LLNL
- 13.0 Sabotage and terrorism-general

- 7.F Comment regarding safety concerns
- 8.A Commentor stated that Complex Transformation is in opposition to Congress' recent rejection of the RRW.
- 1.F Complex Transformation violates the Nuclear Non-Proliferation Treaty.
- 1.J Commentor stated that the U.S. is being hypocritical by saying that other countries should not have nuclear weapons but that our country continues to maintain a stockpile.
- 16.A Commentor is opposed to Complex Transformation.
- 5.C Programmatic Proposed Action: Distributed Centers of Excellence
- 16.A Commentor is opposed to Complex Transformation.
- 2.G Public hearing comments.
- 2.F Public hearing format and fact sheets.
- 2.E Length of comment period, number, and location of public hearings
- 16.A Commentor is opposed to Complex Transformation.
- 7.O Commentor stated that a true No Action Alternative where no production would take places should be added to the list of alternatives analyzed.
- 14.O Commentor stated that nuclear weapons and therefore Complex Transformation are hazardous to the environment.
- 14.K Commentor expressed concern about health and safety issues.
- 9.B Commentor stated that resources could be better used to correct the nation's economy.
- 1.F Commentor stated that the U.S. should abide by the NPT and disarm.
- 15.A Commentor supports Complex Transformation.
- 16.A Commentor is opposed to Complex Transformation.
- 13.A Sabotage and terrorism-general
- 1.J Commentor stated that the U.S. is being hypocritical by saying that other countries should not have nuclear weapons but that our country continues to maintain a stockpile.
- 1.O Commentor criticized the war on terror.

- 16.A Commentor is opposed to Complex Transformation.
- 14.D Commentor expressed concern about Air Quality and Noise
- 14.D Commentor expressed concern about Air Quality and Noise
- 1.O Commentor criticized the war on terror.
- 16.A Commentor is opposed to Complex Transformation.
- 1.J Commentor stated that the U.S. is being hypocritical by saying that other countries should not have nuclear weapons but that our country continues to maintain a stockpile.
- 1.J Commentor stated that the U.S. is being hypocritical by saying that other countries should not have nuclear weapons but that our country continues to maintain a stockpile.
- 8.B Commentor is opposed in creating new nuclear weapons and the Reliable Replacement Nuclear Warhead Program.
- 16.A Commentor is opposed to Complex Transformation.
- 1.O Commentor stated the War on Terror as being illegal.
- 9.B Commentor stated that resources could be better used to correct the nation's economy.
- 14.O Commentor stated that nuclear weapons and therefore Complex Transformation are hazardous to the environment.
- 16.A Commentor is opposed to nuclear weapons.
- 14.K Commentor expressed concern about health and safety
- 13.A Sabotage and terrorism-general
- 11.A Commentor requested additional analysis - general
- 13.A Sabotage and terrorism-general
- 16.A Commentor is opposed to Complex Transformation.
- 1.F Complex Transformation violates the Nuclear Non-Proliferation Treaty.
- 1.J Commentor stated that the U.S. is being hypocritical by saying that other countries should not have nuclear weapons but that our country continues to maintain a stockpile.

- 9.B Commentor stated that resources could be better used to correct the nation's economy.
- 16.A Commentor is opposed to Complex Transformation.
- 1.J Commentor stated that the U.S. is being hypocritical by saying that other countries should not have nuclear weapons but that our country continues to maintain a stockpile.
- 7.M.1 Concern about the impacts from potential use or testing of nuclear weapons
- 16.A Commentor is opposed to nuclear weapons.
- 14.K Commentor expressed concern about the impact on both human health and the environment if production of nuclear weapons continues.
- 14.O Commentor stated that nuclear weapons and therefore Complex Transformation are hazardous to the environment.
- 1.F Complex Transformation violates the Nuclear Non-Proliferation Treaty.
- 1.J Complex Transformation violates the Nuclear Non-Proliferation Treaty.
- 13.A Commentor stated that the Complex Transformation proposal will encourage other nations to enhance their programs or start producing nuclear weapons
- 2.C Stakeholder involvement
- 11.D Commentor requested additional analysis on environmental effects
- 7.M.1 Concern about the impacts from potential use or testing of nuclear weapons.
- 11.D Commentor requested additional analysis on environmental effects
- 11.E Commentor requested additional analysis of the effects to the environment, public health, etc. from use of nuclear weapons
- 7.J Commentor stated that the DOE should clean up existing radioactive waste prior to generating more with Complex Transformation.
- 16.A Commentor is opposed to Complex Transformation.
- 13.G Sabotage and terrorism-general
- 1.J Commentor stated that the U.S. is being hypocritical by saying that other countries should not have nuclear weapons but that our country continues to maintain a stockpile.

- 1.C Nuclear Posture Review (2001) (includes Nuclear Posture Review - Anticipated 2009)
- 1.F Complex Transformation violates the Nuclear Non-Proliferation Treaty.
- 10.G Commentor expressed support for candidate sites - SNL/NM.
- 10.I Commentor expressed support for candidate sites - Y-12.
- 12.0 Commentor had a general question on KCP.
- 10.C Commentor expressed support for candidate sites – LLNL.
- 16.A Commentor is opposed to Complex Transformation.
- 9.H Commentor expressed concern about the amount of taxpayer money required to support Complex Transformation.
- 10.C Commentor expressed support for candidate sites – LLNL.
- 6.B Tritium R&D
- 8.B Opposition to RRW.
- 7.J Commentor stated that the DOE should clean up existing radioactive waste prior to generating more with Complex Transformation.
- 9.B Commentor stated that resources could be better used to correct the nation's economy.
- 7.A Other comment concerning
- 1.F Complex Transformation violates the Nuclear Non-Proliferation Treaty.
- 1.K Criticism of the current administration and policy
- 1.0 Commentor stated that the Bush's war in Iraq is now 5 years old and that we all paid dearly for it.
- 16.A Commentor is opposed to Complex Transformation.
- 1.F Complex Transformation violates the Nuclear Non-Proliferation Treaty
- 1.J Commentor stated that the U.S. is being hypocritical by saying that other countries should not have nuclear weapons but that our country continues to maintain a stockpile.
- 16.A Commentor is opposed to Complex Transformation.

- 1.O Commentor criticized the war on terror.
- 1.F Complex Transformation violates the Nuclear Non-Proliferation Treaty.
- 1.J Commentor stated that the U.S. is being hypocritical by saying that other countries should not have nuclear weapons but that our country continues to maintain a stockpile.
- 13.A Comment on sabotage and terrorism.
- 1.J Commentor stated that the U.S. is being hypocritical by saying that other countries should not have nuclear weapons but that our country continues to maintain a stockpile.
- 14.O Commentor stated that nuclear weapons and therefore Complex Transformation are hazardous to the environment.
- 7.J Commentor stated that the DOE should clean up existing radioactive waste prior to generating more with Complex Transformation.
- 14.K Commentor expressed concern about health and safety.
- 3.A Commentor stated that our country is already in possession of more than enough nuclear weapons than we need.
- 16.A Commentor is opposed to nuclear weapons.
- 1.F Complex Transformation violates the Nuclear Non-Proliferation Treaty.
- 9.B Commentor stated that resources could be better used to correct the nation's economy.
- 1.B Commentor stated that the U.S. Government nuclear policies has been arming and disarming simultaneously for many years.
- 16.A Commentor is opposed to nuclear weapons.
- 1.J Commentor stated that the U.S. is being hypocritical by saying that other countries should not have nuclear weapons but that our country continues to maintain a stockpile.
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.
- 1.N Commentor questioned the need for nuclear power.
- 9.H Commentor expressed concern about the amount of taxpayer money required to support Complex Transformation.

- 9.B Commentor stated that resources could be better used to correct the nation's economy.
- 14.E.1 Commentor expressed concern about protecting water resources worldwide
- 16.A Commentor is opposed to Complex Transformation.
- 14.K Commentor expressed concern about health and safety.
- 7.M.1 Concern about the impacts from potential use or testing of nuclear weapons.
- 6.B Commentor referred to two accidents that occurred in 1965 and 1970 that released tritium.
- 11.D Commentor requested additional analysis on environmental effects.
- 7.J Commentor stated that the DOE should clean up existing radioactive waste prior to generating more with Complex Transformation.
- 10.C Commentor expressed support for candidate sites – LLNL.
- 7.F Comment regarding safety concerns.
- 9.B Commentor stated that resources could be better used to correct the nation's economy.
- 2.K.29 Commentor ASKed what is meant by “react to new developments?”
- 7.M Proposed Future of the nuclear weapons complex
- 1.J Commentor stated that the U.S. is being hypocritical by saying that other countries should not have nuclear weapons but that our country continues to maintain a stockpile.
- 14.K Commentor expressed concern about health and safety
- 13.A Comment on sabotage and terrorism.
- 14.M.8 Commentor questioned the analysis of waste that might result from production of an RRW as well as the analysis of waste that would be produced by all of the alternatives
- 16.A Commentor is opposed to Complex Transformation.
- 9.B Commentor stated that resources could be better used to correct the nation's economy.
- 14.0 Commentor stated that nuclear weapons and therefore Complex Transformation are hazardous to the environment.

- 16.A Commentor is opposed to nuclear weapons.
- 1.J Commentor stated that the U.S. is being hypocritical by saying that other countries should not have nuclear weapons but that our country continues to maintain a stockpile.
- 7.A Commentor wants DOE to consider moving into the direction of a green lab.
- 15.A Commentor supports Complex Transformation.
- 2.G Commentor questioned the public hearing process
- 13.A Comment on sabotage and terrorism.
- 16.A Commentor is opposed to Complex Transformation.
- 1.J Commentor stated that the U.S. is being hypocritical by saying that other countries should not have nuclear weapons but that our country continues to maintain a stockpile.
- 1.O Comment on the war on terror.
- 9.B Commentor stated that resources could be better used to correct the nation's economy.
- 13.A Comment on sabotage and terrorism.
- 7.A Comment concerning alternatives or NNSA program functions.
- 1.F Complex Transformation violates the Nuclear Non-Proliferation Treaty.
- 7.0 Commentor stated that a true No Action/Production Alternative where no production would take place should be added to the list of alternatives analyzed.
- 16.A Commentor is opposed to Complex Transformation.
- 13.A Comment on sabotage and terrorism.
- 1.J Commentor stated that the U.S. is being hypocritical by saying that other countries should not have nuclear weapons but that our country continues to maintain a stockpile.
- 1.O Comment on the war on terror.
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.
- 1.F Complex Transformation violates the Nuclear Non-Proliferation Treaty.

16.A Commentor is opposed to Complex Transformation.

1.B Presidential Directives, Public law, and current policies.

PUBLIC HEARING—WASHINGTON, DC

March 25, 2008-Afternoon Session

- 1.J A Commentor stated that the President or the Secretary of Defense has not made and statements since 2002. He went on to state that May of 2008 would be a good time and that such a statement would show the world that the U.S. and Russia were committed to disarmament. The Commentor then stated that he hoped Secretary Bodman would urge the President to make such a statement.
- 1.A A Commentor stated that the Complex Transformation plans were in violation of the World Court ruling on the illegality of the use or threat of the use of nuclear weapons.
- 2.H.2 Commentor stated that the NNSA has ignored thousands of public comments submitted during scoping that requested the NNSA analyze the full range of reasonable alternatives for consolidating the nuclear weapons complex between now and 2030.
- 14.O.6 Commentor stated that the plans outlined in the EIS rely upon implementation of the GNEP which itself would lead to environmental disaster as outlined in the report by Robert Alvarez, Senior Policy Advisor to the US Secretary of Energy from 1993 to 1999.
- 20.0 A Commentor stated that Complex Transformation relies on the implementation of the Global Energy Nuclear Partnership (GNEP).
- 7.J.1 A Commentor stated that DOE is already way behind mandated environmentally clean-up requirements and that Complex Transformation will make the situation worse to the point of threatening our environment.
- 7.A.7 A Commentor stated that the Department of Energy National Weapons Laboratories should pursue actions other than weapons activities.
- 16.A Commentor is opposed to nuclear weapons.
- 14.M Commentor stated that her dad was a geologist with the Atomic Energy Commission in the 1940's and he warned her and her brother about the dangers of nuclear waste.
- 14.M.1 Commentor stated that she aided in the closure of Rock Flats due to contamination issues.

- 7.J Commentor states that the Rocky Flats site isn't being cleaned up properly or safely and she will do everthing possible to prevent this site from becoming a Wildlife Refuge.
- 7.O Commentor stated that a true No Action Alternative where no production would take places should be added to the list of alternatives analyzed.
- 14.0 Commentor stated that nuclear weapons and therefore Complex Transformation are hazardous to the environment.
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.
- 10.E Commentor stated that the Tonopah Test Range has a direct impact on the local economy of Nye County.
- 18.0, 18.A Commentor stated that the Nye County Board of County Commissioners prefer the alternatives that will add good paying jobs to Nye County.
- 7.F Commentor is asking why anyone would even consider alternatives that have the potential to compromise the safety, surety, and reliability of our nuclear arsenal.
- 16.A Commentor is opposed to Complex Transformation.
- 2.H.2 Commentor stated that the Draft SPEIS does not evaluate all reasonable alternatives.
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.
- 9.H Commentor expressed concern about the amount of taxpayer money required to support Complex Transformation.
- 9.B Commentor stated that resources could be better used to secure peace through more effective means than nuclear weapons.
- 14.K Commentor stated that no mother, no healthcare practitioner could reasonably support the DOE's plan that continues to endanger the lives of all citizens of this planet with the increased number of nuclear weapons.
- 15.A Commentor supports Complex Transformation
- 7.N Commentor supports Preferred Alternative.
- 14.K Commentor stated that the Preferred Alternative will ensure the health and security of the DOE workers.
- 7.F Commentor stated that he has personal responsibility to the safety and security of this entire enterprise.

- 7.E Commentor stated that he has a personal responsibility to the safety and security of this entire enterprise.
- 7.J Commentor stated that Complex Transformation will allow the DOE to clean up the environmental issues that remain across the complex.
- 7.N Commentor supports Preferred Alternative.
- 15.A Commentor supports Complex Transformation
- 10.B Commentor states that more than 60 percent of voters who voted in the previous New Mexico elections and are likely to vote in the next election have positive feelings for the work carried out at LANL.
- 10.J Commentor states that more than 60 percent of voters who voted in the previous New Mexico elections and are likely to vote in the next election have positive feelings for the work carried out at SNL.
- 2.E.2 Commentor stated that more public hearings should have been included at sites outside of the DOE sites.
- 7.O Commentor stated that a true No Action Alternative where no production would take places should be added to the list of alternatives analyzed.
- 16.A Commentor is opposed to Complex Transformation.
- 14.O.6 Commentor stated that Complex Transformation relies upon the Global Nuclear Partnership (GNEP).
- 8.A Commentor stated that Complex Transformation is in opposition to Congress' recent rejection of the RRW.
- 5.C.1 Commentor stated that Complex Transformation is not necessary as the statement that the current arsenal is aging is faulty in light of the study certifying that the current arsenal has a pit lifetime of between 85 and 100 years.
- 9.H Commentor expressed concern about the amount of taxpayer money required to support Complex Transformation.
- 14.M.1 Commentor states that the NNSA spend more energy investigating what went wrong at Rocky Flats than trying to resurrect a new Rocky Flats.
- 1.F Commentor stated that the U.S. should abide by the NPT and disarm.
- 9.B Commentor stated that resources could be better used to research green energy solution.
- 7.F Commentor states that the look forward to continuing their work with Congress and the next administration to make a safer and more secure nuclear policy.

- 7.E Commentor states that the look forward to continuing their work with Congress and the next administration to make a safer and more secure nuclear policy.
- 7.J Commentor stated that the DOE should clean up existing radioactive waste prior to generating more with Complex Transformation.
- 1.B Commentor states that the United States was once a nation that used to share with and help other countries but now we have turned into a dysfunctional country with malice towards many.
- 7.M.1 Commentor expressed concern about the impacts from potential use or testing of nuclear weapons.
- 1.F Commentor stated that the U.S. should abide by the NPT and disarm.
- 9.H Commentor expressed concern about the amount of taxpayer money required to support Complex Transformation.
- 16.A Commentor is opposed to Complex Transformation.
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our world less secure.
- 2.E.1 Commentor requested a 90 day extension to the comment period.
- 2.B Commentor stated that the SPEIS is based on the 1996 Stockpile Stewardship and Management Program and therefore is unacceptable due to the age of the SSMP.
- 12.0 Commentor stated that another piece missing from the current SPEIS is the lack of any reference to the Kansas City Plant.
- 1.F Commentor stated that there should be an alternative that complies with NPT.
- 9.H Commentor expressed concern about the amount of taxpayer money required to support Complex Transformation.
- 7.J Commentor stated that some of the nuclear weapons production sites in use during the Cold War have not been cleaned up properly.
- 9.D Commentor states that the DOE's budget in 2009 for cleanup is more than what's being proposed for Complex Transformation.
- 14.O Commentor stated that nuclear weapons and therefore Complex Transformation are hazardous to the environment.
- 14.O Commentor stated that nuclear weapons and therefore Complex Transformation are hazardous to the environment.

- 1.C Commentor stated that nuclear weapons and therefore Complex Transformation are hazardous to the environment.

PUBLIC HEARING—ESPAÑOLA, NM

March 27, 2008-Afternoon Session

- 16.A Commentor is opposed to Complex Transformation.
- 2.F.1 Commentor stated that Tewa translation should have been provided.
- 14.K.7 Commentor expressed concern about the lack of seismic engineering safety features that should be installed given the seismicity of the region and the structural design of the CMRR and that the DOE should look into why this is not being done.
- 9.B Commentor stated that resources would be better spent on sustainable environment and energy policy.
- 9.E Commentor stated that the cost of concrete would increase if the CMRR is built.
- 14.M.2 Commentor expressed concern about the contamination at LANL and the lack of state control/oversight over the cleanup of radionuclides at LANL.
- 14.K Commentor expressed concern about the public health effects from nuclear weapons operations and Complex Transformation.
- 16.A Commentor is opposed to Complex Transformation.
- 1.J Commentor stated that the U.S. needs to assert its leadership role in international disarmament efforts.
- 16.A Commentor is opposed to Complex Transformation.
- 14.O Commentor stated that nuclear weapons and therefore Complex Transformation are hazardous to the environment.
- 7.J Commentor stated that massive contamination at high altitudes in the Sangre de Cristo Mountains was found and cleanup should be the priority.
- 11.D Commentor stated that additional environmental analysis pertaining to the radioactive contamination found in the Sangre de Cristo Mountains i.e. source, health impacts, etc.
- 16.A Commentor is opposed to Complex Transformation.
- 9.B Commentor stated that resources would be better spent on renewable energy.
- 16.A Commentor is opposed to Complex Transformation.

- 15.A Commentor supports the preferred alternative and Complex Transformation. Commentor supports siting Complex Transformation at LANL.
- 2.A Commentor stated that the project and public hearings are a mockery of NEPA.
- 16.A Commentor is opposed to Complex Transformation.
- 14.K Commentor expressed concern about the public health impacts from nuclear weapons operations and Complex Transformation.
- 14.O Commentor requested that the cumulative impacts from operations throughout the state of New Mexico be considered in the SPEIS.
- 14.I Commentor expressed concern about the disparity between the supposed positive economic impacts from the DOE sites in NM and the actual negative socioeconomic status that many counties in the state are experiencing.
- 7.J Commentor stated that the DOE should clean up existing radioactive waste prior to generating more with Complex Transformation.
- 15.A Commentor supports Complex Transformation as it will provide a way to achieve cleanup goals and reduce and modernize the current complex and supporting facilities.
- 2.F.1 Commentor stated NNSA should have provided translators.
- 14.M Commentor stated that the US will have to secure and manage the existing plutonium currently being stored.
- 1.G Commentor stated that the US has been in compliance with the Moscow Treaty in destroying 1/3 metric ton of plutonium pits.
- 18.C Commentor stated that the region needs LANL to stay funded and active so that an economic development can take place within the city and valley in order to mitigate further budget cuts at LANL.
- 14.E.8 Commentor requested an explanation of water conservation programs at LANL.
- 14.E.11 Commentor stated that the future water use at LANL must be analyzed taking into account quality and quantity available for agricultural activities.
- 5.I Commentor requests that DOE/NNSA and LANL to create a reporting process with the City of Espanola regarding environmental impacts from plutonium production and operations at LANL.
- 11.A Commentor requested that the City of Espanola's review of the environmental and economic impacts from LANL be included in LANL's ASER.

- 2.A Commentor stated that the SPEIS is not a real EIS specifically because under NEPA a 'no build' alternative is required, which is lacking from the current SPEIS.
- 3.A Commentor stated that our country is already in possession of more than enough nuclear weapons than we need.
- 8.A Commentor stated that Complex Transformation is in opposition to Congress' recent rejection of the RRW.
- 14.I Commentor stated that most supporters believe that economic growth will occur as a result of Complex Transformation but the opposite is more likely.
- 16.A Commentor is opposed to Complex Transformation.
- 5.F Commentor supports the alternative to make the complex more responsive by reducing and consolidating operations.
- 16.A Commentor is opposed to the capability-based alternative as it is no longer viable.
- 1.J Commentor stated that the U.S. needs to assert its leadership role in international disarmament efforts.
- 18.C Commentor stated that a mission change at LANL would not result in a loss of jobs and would be beneficial for the region.
- 9.B Commentor stated that resources would be better spent researching renewable energy.
- 14.H Commentor made specific comments pertaining to the rights of Native Americans (specifically the Pueblo of San Ildefonso) and how their ancient and sacred spaces should be granted the same protection as national monuments, parks, etc. and not subject to construction of facilities for mass destruction.
- 16.A Commentor is opposed to Complex Transformation.
- 1.J Commentor stated that the U.S. needs to assert its leadership role in international disarmament efforts.
- 14.N Commentor expressed concern about the impacts and subsequent uselessness of the land if a catastrophic event occurred at LANL.
- 2.B Commentor requested that a moratorium be placed on the SPEIS until a true SPEIS inclusive of health impact studies is completed to establish a true baseline for analysis.
- 2.E Commentor requested a 90 to 120 day extension of the public comment period.

- 9.B Commentor stated that resources would be better spent on community organizations and education.
- 7.J Commentor stated that the DOE should clean up existing radioactive waste prior to generating more with Complex Transformation.
- 1.J Commentor expressed concern about the furthering of the nuclear arms race.
- 16.A Commentor is opposed to Complex Transformation.
- 2.E Commentor requested a 90 day extension of the public comment period.
- 19.E Commentor expressed concern about defects with the construction of the CMRR in relation to new seismic information and the lack of DOE action to fix the defaults or install seismic engineered safety features.
- 7.F Commentor stated that it is extremely difficult to completely safeguard nuclear weapons.
- 14.K Commentor expressed concern about the public health effects of nuclear weapons operations and Complex Transformation, specifically the elevated cancer rates in the LANL region.
- 9.B Commentor stated that the resources existing at LANL and DOE should be spent on positive solutions to current global problems. Commentor stated that resources would be better spent on renewable energy research and environmental restoration.
- 4.A Commentor supports the No Action Alternative.
- 5.B Commentor supports any alternative that consolidates the complex to be more efficient and generate less waste.
- 7.J Commentor stated that cost savings from the consolidation of the complex should be used to fund cleanup at LANL.
- 9.B Commentor stated that DOE should not be funding increases in pit production when funding could be used for cleanup at LANL.
- 9.D Commentor stated that insufficient budgeting is an important factor resulting in a lack of funding for cleanup at LANL.
- 19.A Commentor stated that technical approach, project oversight, and management breakdowns are important factors resulting in a lack of funding for cleanup at LANL.
- 2.E Commentor requested a 90 day extension of the public comment period.
- 15.A Commentor supports LANL for the preferred alternative.

- 13.A Commentor stated that LANL can meet the nation's security needs.
- 13.A Commentor stated that the possession of nuclear weapons makes our country less secure.
- 14.K Commentor expressed concern about the public health impacts from nuclear weapons and Complex Transformation.
- 11.E Commentor stated that an analysis of the effects to the environment, public health, etc. from use of nuclear weapons is warranted.
- 18.D Commentor stated that more jobs could be created from cleanup operations and nuclear weapons production operations.
- 1.F Commentor stated that Complex Transformation violates the Nuclear Non-Proliferation Treaty and the US should comply and disarm.
- 9.B Commentor stated that resources would be better spent on researching renewable energy.
- 1.K Commentor stated that the government is insane and treats its citizens like they are insane for objecting to Complex Transformation.
- 2.E Commentor requested a 90 day extension of the public comment period.
- 14.M.2 Commentor expressed concern about the current contamination of the environment from discharges at LANL.
- 7.J Commentor stated that the DOE should clean up existing radioactive waste prior to generating more with Complex Transformation.
- 15.A Commentor supports siting Complex Transformation at LANL as it provides a strong socioeconomic base for the surrounding communities and is capable of successfully carrying out the missions as outlined by NNSA.
- 3.A Commentor stated that our country is already in possession of more than enough nuclear weapons than we need.
- 14.E Commentor expressed concern about the water in the region of LANL.
- 14.K Commentor expressed concern about the public health effects from nuclear weapons operations and Complex Transformation.
- 16.A Commentor is opposed to Complex Transformation.
- 2.C Commentor urged attendees to take advantage of the opportunity to give input about the SPEIS.
- 15.A Commentor supports the preferred alternative.

- 7.J Commentor stated that the DOE should clean up existing radioactive waste.
- 15.A Commentor supports the preferred alternative.
- 1.J Commentor stated that the U.S. needs to assert its leadership role in international disarmament efforts.
- 1.J Commentor stated that the U.S. is being hypocritical by saying that other countries should not have nuclear weapons but that our country continues to maintain a stockpile.
- 13.A Commentor expressed concern about the ability of our country to maintain national security against terrorists which are illusive and typically work in small groups.
- 9.B Commentor stated that resources would be better spent on research that sustains and promotes life.
- 16.A Commentor is opposed to Complex Transformation.
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.
- 14.M.2 Commentor expressed concern about the environmental contamination from operations at LANL.
- 7.F Commentor expressed concern about the ability of LANL to ensure the safety of its employees.
- 5.C.1 Commentor stated that new plutonium pits are not necessary.
- 7.J Commentor stated that the DOE should clean up existing radioactive waste prior to generating more with Complex Transformation.
- 16.A Commentor is opposed to Complex Transformation. Commentor stated that Complex Transformation is immoral.
- 1.J Commentor stated that the U.S. needs to assert its leadership role in international disarmament efforts.
- 16.A Commentor is opposed to Complex Transformation. Commentor is opposed to nuclear weapons.
- 8.B Commentor is opposed to the RRW.
- 14.O Commentor stated that nuclear weapons and therefore Complex Transformation are hazardous to the environment.

- 14.M.2 Commentor expressed concern about the contamination from plutonium pits at LANL.
- 15.A Commentor supports the preferred alternative at LANL.
- 14.I Commentor stated that economic development of the valley is dependent on LANL
- 7.J Commentor stated that the DOE should clean up existing radioactive waste prior to generating more with Complex Transformation.
- 2.E Commentor expressed gratitude for the Espanola hearing being added to the NNSA public hearing schedule. Commentor stated that he/she had requested an extension of the public comment period.
- 14.I Commentor stated that the future of the community is heavily dependent upon the future of LANL.
- 2.C Commentor stated the importance of expressing concerns and opinions regarding future of LANL at the location most convenient to interested residents in the community.
- 1.C Commentor stated that the DOE is premature with Complex Transformation as the new administration could redefine the nuclear weapons policy with its NPR.
- 18.B Commentor stated that if LANL is not included in the Complex Transformation it will not close and jobs will not be lost immediately.
- 14.M.2 Commentor expressed concern about the existing contamination at LANL since WIPP is full.
- 14.E.2 Commentor expressed concern about the adequacy of the water supply in the area surrounding LANL if a significant amount of the water supply will be used for the Complex Transformation at LANL.
- 14.O Commentor stated that the lasting regional consequences from Complex Transformation will be environmental contamination and not economical in nature.
- 2.B Commentor stated that the SPEIS is difficult to read and lengthy. Commentor stated that the environmental impacts should be displayed and easily accessible.
- 2.E Commentor stated that due to the difficulty in reading of the SPEIS that the comment period be extended 90 days.
- 14.M Commentor expressed concern about the storage/management of TRU and low level radioactive wastes from the preferred alternative in Area G which is proposed to be closed in 2015.

- 16.A Commentor is opposed to Complex Transformation.
- 7.0 Commentor stated that a true No Action/Production Alternative where no production would take places should be added to the list of alternatives analyzed.
- 5.A Commentor requests an alternative where the laboratories are used for life-affirming research.
- 13.A.1 Commentor stated that the possession of nuclear weapons makes our country less secure.
- 1.0 Commentor stated that resources would be better spent on providing humanitarian aid.
- 14.E Commentor expressed concern about water contamination specifically from operations at LANL.
- 16.A Commentor is opposed to Complex Transformation.
- 14.E.2 Commentor expressed concern about the adequacy of the water supply and stated that only 1 percent of the water on the planet is potable which is currently being contaminated by plutonium operations.
- 14.M.3 Commentor expressed concern about the storage of nuclear waste and potential health effects.
- 9.B Commentor stated that resources would be better spent on researching ways to cleanup the planet.
- 1.J Commentor stated that the U.S. needs to assert its leadership role in international disarmament efforts.
- 14.M.2 Commentor stated that LANL has greatly improved its environmental and safety compliance and is closely permitted and overseen by outside agencies.
- 15.A Commentor stated that the improvements made by LANL will be effective in ensuring the success of Complex Transformation.
- 14.K Commentor expressed concern about the public health effects from nuclear weapons operations and Complex Transformation.
- 16.A Commentor is opposed to Complex Transformation.
- 2.E Commentor requested a 90 day extension of the public comment period.
- 11.D Commentor requested that DOE provide a summary view chart with the potential environmental impacts including information pertaining to radionuclides in the water supply.

- 14.O Commentor requested that DOE provide a summary view chart with the potential environmental impacts including information pertaining to radionuclides in the water supply.
- 14.M.2 Commentor expressed concern about the environmental contamination from LANL operations.
- 1.F Commentor stated that the U.S. should abide by the NPT and disarm.
- 7.J.1 A commentor stated that DOE and the Lab have missed several milestones and failed to comply with technical requirements in the 2005 fence to fence cleanup order and that 60 years of legacy contamination has not been addressed. The commentor added that the Lab budget continues to increase and cleanup budget continues to fall further behind
- 13.B.1 A commentor questioned whether the proposed action establishes this region (Los Alamos) as a nuclear target and creates additional problems?
- 14.O.1 A commentor stated that the SPEIS needs to look at cumulative impacts (economic and health) from activities at all New Mexico sites including White Sands, Uranium enrichment in Lea County, WIPP and the “endless stream of nuclear facilities.”
- 14.M.4 A commentor stated that WIPP capacity is spoken for by legacy waste – there is no room at WIPP for new TRU waste
- 14.E.3 A commentor stated that stormwater from LANL contains 38,000 times the clean water standard for certain pollutants
- 14.K.8 A commentor stated that DOE needs to examine the source of Cs137 found at high elevations in the Sangre de Cristo Mountains. The levels are almost at action levels
- 14.K.7 A commentor stated that CMRR is being built in a defective manner and will not comply with DOE requirements – need to install necessary seismic fasteners and ties
- 13.B.1 A commentor stated that pit manufacturing at LANL would make LANL a preemptive first strike target
- 2.C A commentor stated that the Los Alamos site is “sacred space for the TEWA pueblo of the San Ildefonso people and requested funding to educate people to what is being proposed at LANL
- 20.0 A commentor stated that she has very high uranium levels in her hair and asked where did it come from?

- 14.J.1 A commentor stated that an impact of a severe accident could well be the extinction of the way of life for Native Americans (particularly the Santa Clara Pueblo) – if the land becomes contaminated, their way of life will come to an end.

Comment Response Document, Chapter 3
COMMENT SUMMARIES AND RESPONSES

Comment Response Document, Chapter 3

COMMENT SUMMARIES AND RESPONSES

INTRODUCTION

This chapter summarizes all of the comments the National Nuclear Security Administration (NNSA) received on the *Draft Complex Transformation Supplemental Programmatic Environmental Impact Statement* (SPEIS) and provides NNSA's responses to those comments. As discussed in Chapter 1 of this Comment Response Document (CRD), NNSA received approximately 100,000 comment documents on the Draft SPEIS from federal agencies; state, local, and tribal governments; public and private organizations; and individuals. In addition, during the 20 public hearings that NNSA held, more than 500 speakers made oral comments. NNSA has placed this material, including the names of commentors, comment summaries, and the public hearing transcripts on the project website (www.complextransformationspeis.com).

Although the closing date of the public comment period was April 30, 2008, NNSA was able to process all comments that it received, and to prepare comment summaries and responses, including late received comments, for inclusion in this CRD.

HOW NNSA CONSIDERED PUBLIC COMMENTS

NNSA assessed and considered public comments on the Draft Complex Transformation SPEIS, both individually and collectively. Some comments led to SPEIS modifications; others resulted in a response to answer or explain policy questions, to refer readers to information in the SPEIS, to answer technical questions, to explain technical issues, or to provide clarification. A number of comments provided valuable suggestions on improving the SPEIS. As applicable, the responses in this chapter identify changes that NNSA made to the SPEIS as a result of comments.

The following list highlights key aspects of NNSA's approach to capturing, tracking, and responding to public comments on the Draft SPEIS:

- At the beginning of the public comment period, NNSA developed a list of major issue categories as a starting point for capturing and tracking public comments that were anticipated. As comments were received, they were reviewed and "binned" into applicable issue categories, or into new issue categories that were created. Because binning was a continuous process during the public comment period, issue categories were expanded and augmented as necessary to ensure that comments were binned into a proper issue category. If an existing comment bin was not specific enough, a new bin was created. Additionally, because comments relevant to some of the original issue categories were not raised by the public, some of the issue categories developed by NNSA are blank (see for example, issue code 1.I below).

- NNSA reviewed and considered every comment received, including written and oral comments made during the public hearings, to identify, categorize and summarize those comments. As shown in Chapter 2 of this CRD, the written documents received have been annotated with sidebars and comment codes. Those sidebars and codes provide the information that identifies where those comments are addressed. In some cases, multiple comment codes were assigned to a comment to indicate that an identified comment was considered in multiple comment summaries and responses. With respect to comments made during the public hearings, Chapter 2 of this CRD presents the comments that were identified as well as the comment summaries and responses that were assigned to those comments.
- After comment identification, NNSA grouped individual comments by categories and assigned each comment group to an expert in the appropriate discipline to prepare the response.
- Comment summaries are intended to capture the substantive issue(s) raised by a comment for a specific issue. Comments grouped and summarized for response are, of necessity, paraphrased, but NNSA made every effort to capture the essence of comments included in a comment summary. If the meaning of a comment was not clear, NNSA attempted to interpret the comment and respond based on that interpretation. In some cases, NNSA used specific language from one or more commentors to develop a particular comment summary. This should not be interpreted to mean that NNSA considered any comment to be more or less important than other comments received relative to that comment summary; rather, NNSA felt that a comment's particular language was a reasonable articulation of many comments for a particular subject. In some cases, a commentor submitted a comment that was so unique that it was responded to individually.
- In some instances, a comment summary and response are related to another comment summary and response. In these instances, the comment response directs the reader to that related comment summary and response.
- Senior-level experts reviewed and revised each comment summary and response to ensure technical and scientific accuracy, clarity, and consistency, and to ensure that the response addressed the summarized comments.

In this process, NNSA has attempted to provide an accurate record of the comments received, as well as NNSA's responses to those comments. The responses indicate whether any changes were made to the Complex Transformation SPEIS and the reasons for making those changes. Section 1.3 describes the organization of this CRD and the tables provided in Chapter 1 to assist readers in tracking their comments to the appropriate comment summary and response. Each commentor should readily be able to locate their comment, the comment summary in which those comments were summarized, and the response that addresses those comments.

ORGANIZATION OF COMMENT AND RESPONSE SUMMARIES

The comment summaries and responses that follow are organized within issue codes, as shown

in Chapter 1, Table 1.3-1, of this CRD. For example, issue code 1 contains comments related to nuclear weapon policies. Within this issue code, specific comment summaries and responses related to topics such as Presidential Decision Directives, the Nuclear Posture Review, new weapons design, the *Comprehensive Test Ban Treaty*, and non-proliferation may be found. Depending upon the comments that were received on the Draft SPEIS, some topics within an issue code contain many comment summaries and responses. For example, issue code 2.K contains specific comments that were received on Chapters 1 through 3 of Volume I of the Draft SPEIS. Within this issue code there are 29 comment summaries and responses (2.K.1 through 2.K.29). Comment summaries and responses within issue codes are not presented in any particular order of importance.

In some instances, a similar topic is addressed in multiple comment summaries and responses. This occurred due to the fact that comments were often intertwined, and the binning process captured these comments in multiple issue codes. While this resulted in some redundancy within some of the comment summaries, NNSA decided that redundancy was preferred to potentially omitting some comments. In those instances where similar topics are addressed in multiple summaries and responses, cross-references are provided to the similar summary and response.

1.0 NUCLEAR WEAPON POLICIES -- GENERAL

Within this issue category, commentors raised general questions regarding policies related to nuclear weapons, as well as the specific comments that are discussed in sub-categories 1.A through 1.Q below. Commentors also expressed concern about the nation's spending priorities and the impacts of nuclear weapons activities on the health and safety of people.

Response: *Policies related to nuclear weapons are established by the President and the Congress. Please see the comment-responses in this issue category for specific comments and responses related to nuclear weapons policies. With respect to spending priorities, such decisions are made by the President and the Congress. Chapter 5 of the SPEIS addresses the potential impacts to human health and safety for the alternatives considered. Please see comment-response 14.K for specific comments and responses related to health and safety.*

1.A WORLD COURT

Commentors stated that the Complex Transformation plans were in violation of the World Court ruling on the illegality of the use or threat of the use of nuclear weapons and other weapons of mass destruction.

Response: *The World Court Advisory Opinion (Legality of the Use or Threat of Nuclear Weapons, Advisory Opinion, I.C.J. Reports 1996, p. 226 [July 8, 1996]) did not find a prohibition on the possession of nuclear weapons by any state. The Advisory Opinion of the World Court does not address any of the elements of the reasonable alternatives; rather, it primarily dealt with the use or threat of use of nuclear weapons. Accordingly, NNSA believes that*

transformation plans do not violate the Advisory Opinion.

1.B PRESIDENTIAL DIRECTIVES, PUBLIC LAW, AND CURRENT POLICIES

A commentator noted that we should not rely on the last generation of nuclear weapons but on a new nuclear weapon which will serve a different world situation. Other commentators stated that there should be a moratorium on new warhead designs stating that new warhead designs are not needed now or in the foreseeable future and new nuclear weapons for new missions are unneeded, costly, and undermine international non-proliferation efforts.

Response: *NNSA is required to maintain nuclear weapons capability, including the capability to design, develop, produce, and certify new warheads. Maintenance of the capability to certify weapon safety and reliability requires an inherent capability to design and develop new weapons. NNSA has not been directed to produce new-design nuclear weapons. While NNSA has been engaged in weapons design activities involving the development of a Reliable Replacement Warhead (RRW), the Congress has not provided funding at this time for further development of an RRW; and NNSA has not been directed to produce new-design weapons. Decisions on the type and number of warheads that this nation requires for national security are made by the President and the Congress and not by NNSA. See comment-response Section 8 and Section 2.5 of Volume I of the SPEIS for information on the relationship between RRW and complex transformation. See Section 2.5 of Volume I of the SPEIS for a discussion of an RRW. See also comment response 1.D for related discussion.*

1.C NUCLEAR POSTURE REVIEW

Commentors raised the following major issues related to the 2001 Nuclear Posture Review:

- The 2001 Nuclear Posture Review (NPR) does not reflect the changed threat environment since September 11, 2001, and should not be used to establish or define NNSA's programmatic requirements;
- It makes no sense for Complex Transformation to proceed now, before a new NPR is completed in 2009 by the incoming Administration, as is currently required by the Congress;
- A new Draft SPEIS document should incorporate the outcome of Senator Feinstein's bill S1914 [S1914 had not been enacted as of September 2008, *however, the Congress did separately establish a requirement to complete a new NPR in 2009*], and the recommendations from the bipartisan panel formed by the passage of the bill put forward by Representative Tauscher [*the Bipartisan Panel's recommendations resulting from their reevaluation of the U.S. Nuclear Strategic Posture are due December 1, 2008*].

- The 2001 NPR, which lays out the direction for American nuclear forces over the next 5-10 years, is obsolete;
- The NPR is a document issued by the Department of Defense (DoD) and cannot establish requirements for NNSA;
- Because the NPR is neither Presidential Direction nor law, NNSA cannot base its projected requirements on that document.
- Sections of the Draft SPEIS that cite the 2001 NPR as binding in establishing the Agency's purpose and need for action, or that employ it to narrow the range of reasonable alternatives for detailed analysis, should be deleted or revised.
- While the 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; and
- Until the size and characteristics of the future arsenal are determined, it is premature to build new facilities related to the production of weapons components including pit production, the Chemistry and Metallurgy Research Replacement Nuclear Facility (CMRR-NF), and the Uranium Processing Facility (UPF).

Response: *The commentors are correct in stating that the Nuclear Posture Reviews do not establish requirements for NNSA. The requirements that NNSA uses to base or define its programmatic requirements are established by the current Presidential Decision Directives (PDDs) (which define the current and projected stockpile levels); The Nuclear Weapons Stockpile Plans (NWSPs), that specifies the types of weapons and quantities of each weapon type by year; statutes; and the judgment of NNSA in consultation with DoD and experts at NNSA's national laboratories. Based on these requirements, NNSA makes reasonable predictions as to the necessary configuration and capacity of the nuclear weapons complex for the future. Chapter 2 of the SPEIS discusses the major national security policy requirements and considerations that are most relevant to determining the need for action. Included in that discussion are PDDs, legislation, the Nuclear Posture Review, the Nuclear Weapons Stockpile Plan (NWSP), and related treaties. While that list is not exhaustive, it does represent, in NNSA's view, the most significant documents that define the nuclear weapons program for the reasonably foreseeable future.*

NNSA believes the Draft SPEIS analysis is consistent with and supports these national security requirements and policies. NNSA has no basis to predict that nuclear weapons will not be a part of this Nation's national security policy over the time period covered in this SPEIS. The range of alternatives analyzed in this SPEIS covers the range that NNSA believes could reasonably evolve from any changes to National policy with regard to the size and number of nuclear weapons in the foreseeable future. Accordingly, there is no reason to delay some decisions on Complex Transformation pending a new Nuclear

Posture Review or the recommendations of the Bipartisan Panel reevaluating the United States Nuclear Strategic Posture.

Both the Distributed Centers of Excellence Alternative and the Consolidated Centers of Excellence Alternatives provide a capability to perform all of the functions necessary to maintain a safe, secure, and reliable stockpile; while the Capability-Based Alternative provides this level of support for stockpile sizes that would be significantly smaller than the current stockpile and, therefore, would not meet the requirements of the current PDD. See also the discussion in comment-response 7.O describing a new “No Net Production/Capability-Based Alternative” that has been added to Chapter 3 of Volume I of the Final SPEIS.

1.D NEW WEAPONS DESIGN

Commentors stated that the United States should not rely on the last generation of nuclear weapons but needs a new nuclear weapon that will serve a different world situation.

Response: *While NNSA maintains the ability to design new weapons, it does so only at the direction of the President with appropriate funding from the Congress. To date, NNSA has not been directed to develop a new nuclear weapon which would address a new threat or target. If directed by the President and the Congress, NNSA would pursue a reliable replacement for warheads currently in the stockpile (see Section 2.5 of Volume I of the SPEIS). See also comment-response 1.B for related discussion.*

1.E COMPREHENSIVE TEST BAN TREATY

Commentors stated that the proposed alternatives for Complex Transformation are in direct violation of the *Comprehensive Test Ban Treaty* (CTBT).

Response: *The CTBT has not entered into force because the United States has not ratified the treaty and, therefore, does not constrain any activity of the United States. None of the alternatives addressed as part of Complex Transformation would result in a return to nuclear testing; in fact, the alternatives seek to avoid a need for testing. NNSA ensures the safety and reliability of the Nation’s nuclear weapons through the science-based Stockpile Stewardship Program; which has enabled the continued annual certification of the stockpile without underground testing.*

1.F TREATY ON THE NON-PROLIFERATION OF NUCLEAR WEAPONS

Commentors raised the following major issues related to the nuclear non-proliferation treaty (NPT):

- NNSA appears to have ignored thousands of public comments submitted during the scoping process requesting that NNSA analyze the

full range of reasonable alternatives for consolidating the nuclear weapons complex, including alternatives that would both support and reflect implementation of our nation's obligation under the NPT to negotiate, in good faith, progressive reduction and eventual elimination of its nuclear arsenal, in concert with other nuclear states;

- The proposed alternatives for Complex Transformation are in direct violation of Article VI of the NPT, and the Constitution of the United States requires compliance with the NPT;
- Political leaders should take immediate and deliberate steps toward multilateral disarmament, which would involve such actions as increased weapons dismantlement. because the alternatives do not implement disarmament;
- The United States should look toward South Africa where the government unilaterally disarmed without consequence;
- People make decisions, and NNSA's program managers should do what is morally right and be the ones to make the decision not to make weapons; and
- A disarmament alternative is inherently reasonable and should be included as an alternative in the SPEIS.

Response: *Over the past 20 years, the United States has worked to help establish an international security environment conducive to progress toward disarmament. The United States has also made significant progress toward achieving the nuclear disarmament goals set forth in the Preamble and Article VI to the Treaty on the Non-Proliferation of Nuclear Weapons, and has a strong record of compliance with its Article VI obligations. The nuclear arms race that was in full swing when the NPT was opened for signature has been halted. The United States has taken dramatic steps toward the goal of nuclear disarmament, including working to resolve destabilizing global and regional tensions; reducing its nuclear forces and nuclear weapons stockpile, through both unilateral and bilateral initiatives; and working cooperatively with allies and partners further to reduce nuclear threats.*

However, even after the Cold War, international dangers remain, and nuclear deterrence will continue to be a cornerstone of U.S. national security policy for the foreseeable future. Thus, NNSA's responsibilities for ensuring the safety and reliability of the U.S. nuclear weapons stockpile will also continue.

Under the NPT, the parties agreed not to transfer nuclear weapons or other devices, or control over them, and not to assist, encourage, or induce non-nuclear states to acquire nuclear weapons and have agreed 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 (Article VI)." However, the treaty does not mandate disarmament or specific stockpile reductions by nuclear states, and it does not address actions

of nuclear states in maintaining their stockpiles. Section 2.14 of Volume 1 of the SPEIS addresses these issues.

Stockpile stewardship contributes positively to U.S. arms control and non-proliferation policy goals by providing the United States with continued confidence in its weapons to allow further reductions in stockpile size and to meet its NPT Article VI obligations. Maintenance of a safe and reliable stockpile is consistent with working toward the NPT goal of eliminating nuclear weapons worldwide at some unspecified time in the future.

The Nuclear Weapons Stockpile Plans (NWSPs) specify the types of weapons and quantities of each weapon type by year (Section 2.1.6 of Volume 1 of the SPEIS). The NWSP is developed based on DoD force structure requirements necessary to maintain nuclear deterrence and comply with existing arms control treaties while pursuing further arms control reductions. Although NNSA believes it is unreasonable to speculate, NNSA has considered that a future national security policy framework could define a path to a smaller stockpile. The SPEIS analyzes a smaller weapon stockpile for the purpose of a sensitivity analysis of manufacturing capacities and, similarly, has added an alternative that would provide no net additions to the stockpile (See Comment Response 7.O and Section 3.6.3 of Volume 1 of the Final SPEIS). However, unilateral denuclearization is not a reasonable alternative for this SPEIS because it does not satisfy current national security policy.

It is reasonable to assume that United States confidence in the safety and reliability of the nuclear weapons stockpile would remain as important, if not more important, in future arms control negotiations to reduce its stockpile further which could further the goals of the NPT. The path to a very small (100s) or no stockpile would require the negotiation of complex international treaties, most likely with provisions that require international verification inspections of nuclear weapons related facilities. On a gradual path to a very small or no stockpile, size alone would not change the purpose and need, proposed actions, and alternatives in this SPEIS as they relate to capabilities. The issues of maintaining the core competencies of the United States in nuclear weapons, and the technical problems of a smaller, aging stockpile in the absence of nuclear testing remain the same. NNSA disagrees with the assertion that the alternatives in the SPEIS do not comply with the Constitution or the NPT.

1.G

MOSCOW TREATY

Commentors stated that the *Moscow Treaty* should allow for the assignment of duplicative programs to one of the two Nuclear Physics Laboratories rather than continuing with redundant programs. A commentor stated that the United States has been in compliance with the *Moscow Treaty* in destroying plutonium

pits. Commentors stated that there should be a further reduction in stockpile numbers below those required by the *Moscow Treaty*.

Response: *The SPEIS examines a range of alternatives that could be used to support a range of nuclear weapons stockpiles that could reasonably be foreseen as directed by the President, including alternatives that represent a substantial reduction from those levels contemplated by the Moscow Treaty. Decisions on stockpile size and type are made by the President and Congress. See comment-response 7.A.7 for more information on the assignment of certain functions to the national laboratories.*

1.H DEPARTMENT OF DEFENSE INVOLVEMENT

A commentor stated that for a topic as important as how many weapons are in the stockpile as nations disarm, the Department of Defense (DoD) should be involved.

Response: *NNSA invited other agencies to be cooperating agencies under the Council on Environmental Quality (CEQ) and DOE NEPA Regulations. The U.S. Air Force and the U.S. Army Garrison White Sands Missile Range are Cooperating Agencies on this SPEIS and are therefore involved. DoD, through the Nuclear Weapons Council and other entities, is also involved in the development of national security decisions that are reflected in the PDD and the NWSP. The public hearings were held by NNSA because these hearings concern NNSA's proposed actions that are subject to the requirements of NEPA. See also comment-response 2.E for a discussion of the public hearings.*

1.I NOT USED

1.J PROLIFERATION AND NON-PROLIFERATION

1.J and 1.J.1 The following comments related to proliferation and non-proliferation were received:

- Maintaining nuclear weapons was not a deterrent but in fact made the world less safe by encouraging other countries to obtain these weapons;
- The United States has more than enough nuclear weapons already;
- The dismantlement work done by Pantex was appreciated;
- It will be a great day when fewer than 500 nuclear weapons are possessed by either Russia or the United States;
- The United States should unilaterally disarm because if a country can risk nuclear war it can risk disarmament.
- Sometimes the disarmament process slows down and it is necessary to get it on track again.

- It was a good idea for Pantex to sponsor a conference like the one in the spring of 1995 (Commentor provided no further identification of the 1995 conference).
- There is a question of perception of the commitment to disarmament from a nation that is constantly assembling and reassembling its weapons;
- If the DoD, DOE, and the Office of the President were committed to disarmament, they could make it work;
- The President or the Secretary of Defense have not made any statements on disarmament since 2002. May 2008 would be a good time to make such a statement to show the world that the United States and Russia are committed to disarmament;
- The United States is hypocritical when it urges other countries to refrain from development of nuclear weapons while it continues to maintain a stockpile;
- The United States needs to assert its leadership role in international disarmament efforts;
- Complex Transformation will further the nuclear arms race and it will be a bad foreign policy.
- The Complex Transformation SPEIS 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's resumption of nuclear weapons production; and
- The SPEIS improperly sidesteps non-proliferation impacts, international law and treaty obligations.

Response: *As a result of previous treaties and the current Moscow Treaty, the Nation's nuclear weapons stockpile has been significantly reduced. However, even after the Cold War, international dangers remain, and nuclear deterrence will continue to be a cornerstone of U.S. national security policy for the foreseeable future. Thus, NNSA's responsibilities for ensuring the safety and reliability of the U.S. nuclear weapons stockpile will also continue. The NPT has a goal of nuclear disarmament and recognizes that disarmament can occur only after negotiation of new treaties among the nuclear weapons states.*

NNSA believes that the United States nuclear weapons program, including modest modernization efforts involving life extension programs, the contemplation of replacement warheads, or complex transformation has not had and will not have any impact on either horizontal (increasing the number of nuclear weapons states) or vertical (increasing the number of nuclear weapons in nuclear weapons states) proliferation. The United States nuclear weapons programs are not the only factors that might affect whether other nations might develop nuclear weapons of their own. Some nations that are not declared nuclear states have the ability to develop nuclear weapons. The

credibility of the United States nuclear umbrella is an extremely significant restraint to proliferation. Continued United States engagement in security cooperation with allies including a military presence, modern and flexible military forces, and the extension of a smaller but safe, reliable and capable nuclear deterrent to allies are key elements in assuring them that they can count on the United States, and do not need to seek their own nuclear forces. The loss of confidence in the safety or reliability of the weapons in the United States stockpile could result in a corresponding loss of credibility of the United States nuclear deterrent and could provide an incentive to other nations to develop their own nuclear weapons programs.

Proliferation incentives for other states, such as international competition or the desire to deter conventional armed forces, would remain unchanged regardless of whether NNSA implemented any of the alternatives analyzed in the SPEIS. NNSA and other agencies of the United States government participate in many government-to-government negotiations intended to reduce the risks of nuclear proliferation.

The United States nuclear weapons programs are unlikely to increase incentives for terrorists to acquire weapons of mass destruction (WMD); those incentives are already high and are unrelated to United States nuclear (or conventional) defense capabilities. The United States nuclear weapons programs are also unlikely to have any impact on rogue state proliferation. Indeed, there is no indication that very significant reductions in the numbers of United States (and Russian) nuclear weapons, and in the alert levels of nuclear forces, over the past two decades, coupled with no United States nuclear testing and very little modernization, have caused other nations to slow down covert programs to acquire capabilities to produce nuclear weapons. On the contrary, these programs have accelerated during this period. Nor did the United States restraint convince other nations to forego testing. Rather, other nations appear to seek WMDs in response to their own perceived security needs, in part, to deter the United States from taking steps to protect itself and allies in each of these regions. In this regard, their incentives to acquire WMDs may be shaped more by the United States advanced conventional weapons capabilities and our demonstrated will to employ them to great effect in Bosnia, Kosovo, Afghanistan, and during both wars with Iraq than to anything the United States has done, or is doing, in the nuclear weapons arena.

1.K

CURRENT ADMINISTRATION POLICY

The following comments were received regarding the nuclear weapons policies of the current Administration:

- The Administration is using fear mongering techniques;
- Complex Transformation is a counterproductive and disastrous lame-duck administration effort;

- The United States government is willing to kill innocent people in Iran because we do not want them to develop nuclear weapons when the

United States is the only country to have used nuclear weapons against civilian or military targets;

- The Administration should not continue the RRW program; and
- The current Administration's foreign policy efforts have been unsuccessful and given the United States a bad reputation.

Response: *NNSA understands that many people have strong opinions regarding policies of any administration; however, many of the comments regarding the current Administration address issues outside the scope of Complex Transformation. NNSA's role in the nuclear weapons program is to maintain weapons capability, including the capability to design, develop, produce, and certify new warheads. DoD is responsible for deployment and, if necessary, use of nuclear weapons. Neither NNSA nor DOE decide the role of nuclear weapons in national policy. Nuclear weapons policy is decided by the President and the Congress. NNSA and DoD implement U.S. nuclear weapons policy according to those decisions. The role of the RRW in Complex Transformation is addressed in Section 2.5 of Volume 1 of this SPEIS. Additional information on the RRW is addressed in comment-responses 1.B and 8. Comment-response 16 contains comments opposing Complex Transformation and NNSA's responses to those comments.*

1.L

INTERNATIONAL RELATIONS

The following comments were received regarding the nuclear weapons policies of the current Administration with regard to international relations:

- Policies of the current Administration have damaged international relations and the United States should pursue policies of diplomacy.
- It is not acceptable for the United States to say its nuclear weapons are for defense and that those of North Korea or Iran would be offensive weapons. We are all members of the United Nations, which already has sanctions on North Korea and Iran, and we should work this issue out through the United Nations process.
- The United States has 5,000 nuclear weapons already and should work on world disarmament through the United Nations.

Response: *The present Administration is responsible for two major reductions in nuclear weapons stockpile, has secured numerous quantities of SNM from areas in the former Soviet Union, and has worked with other nations to limit the proliferation of technologies of concern in other nations. None of these actions could have occurred without substantial diplomacy on the part of the United States. The present Administration is committed to limiting proliferation and continues to negotiate with other countries.*

The scope of the Complex Transformation SPEIS is limited to the analysis of alternatives that would make the Complex smaller, more responsive, efficient and secure. This is not to say that NNSA is not interested in reducing the stockpile or proliferation.

As discussed in Section 2.1.6 of Volume I of the SPEIS, the size and composition of the U. S. Nuclear Weapons Stockpile are determined by the Nuclear Weapons Stockpile Plan (NWSP). The NWSP is normally issued each year by the President and creates the requirements for nuclear weapons that NNSA is required to meet. The NWSP and the actual size and composition of the U.S. nuclear stockpile are classified.

1.M NOT USED

**1.N and
1.N.1 NUCLEAR POWER IN THE UNITED STATES**

The following general comments were received regarding nuclear power in the United States:

- Civilian and weapons-related nuclear activities should not be commingled;
- The nuclear weapons race, the use of civilian nuclear power, and the inevitable tradeoffs made are all inter-related;
- Both support and opposition to civilian nuclear power was expressed;
- The United States should not use nuclear power because it encourages other nations to use nuclear power which might lead to proliferation of nuclear weapons;
- Additional use of nuclear power could be part of the solution to global climate concerns;
- Nuclear power should not be used until the problems associated with nuclear waste are adequately resolved; and,
- Nuclear material in weapons should be turned into fuel for reactors to help reduce greenhouse gases and global warming.

Response: *No proposed action or alternative in Complex Transformation involves civilian nuclear power. The issue of commercial nuclear technology (as related to electricity production and disposition of spent nuclear fuel) is not within the scope of this SPEIS. Likewise, issues such as proliferation and global warming, as related to commercial nuclear technology, are beyond the scope of this SPEIS. These issues are more relevant to electrical energy generation from civilian nuclear power plants. See comment-response 1.J for additional information related to proliferation issues.*

1.N.1.A A commentator stated that uranium is a non-renewable resource and that experts have told him we only have a 30 to 40 year supply and that when that runs out, we will be left with only nuclear weapons and nuclear waste.

Response: *The availability of and the longevity of uranium resources is beyond the scope of this PEIS. NNSA already possesses a more than adequate supply of uranium for purposes of the nuclear weapons program. NNSA's uranium that is surplus to the nuclear weapons program is made available for the manufacture of civilian nuclear reactor fuel. Nuclear waste is addressed in comment-response 14.M.*

1.O WAR ON TERROR

The following comments were received regarding the war on terror:

- Consolidation plans should account for possible terrorist attacks on DOE facilities;
- The production of nuclear warheads would increase the likelihood of a terrorist attack and would worsen the war on terror situation and nuclear weapon production is not a good way to fight terrorists.
- War is horrible; and
- The United States is not fighting the war on terror correctly.

Response: *As noted in Section 3.16.6 of Volume I of this SPEIS, NNSA conducted an assessment of potential impacts from intentional destructive acts, such as terrorism. The methodology used to evaluate potential impacts associated with a terrorist threat and the methodology by which NNSA assesses the vulnerability of its sites to terrorist threats and then designs its response systems and the results of that assessment are in a classified appendix to the SPEIS. The "horror of war" is beyond the scope of the SPEIS. The comments concerning the efficacy of the war on terror are noted; however, those issues are beyond the scope of the SPEIS. Only the President can authorize the use of nuclear weapons. Accordingly, the use of nuclear weapons is not within the scope of this SPEIS. See also comment-responses 7.E and 13 for further related discussion.*

1.P INTERNATIONAL ATOMIC ENERGY AGENCY INSPECTIONS

The following comments were received regarding International Atomic Energy Agency (IAEA) issues:

- All nuclear weapons material inventories in the United States should be placed under IAEA safeguards which would allow for IAEA inspections and ensure that it could not be used in weapons;
- As more nuclear weapons are disassembled, that material should also be placed under IAEA safeguards and inspections; and

- Facilities newly built or substantially modified should have transparency designed in to facilitate international inspection of all special nuclear materials.

Response: *Under the NPT and the Agreement Between the United States and the IAEA for the Application of Safeguards in the United States, the United States is not obligated to place facilities storing surplus nuclear weapons material under international control. IAEA inspection authority is limited as to Nuclear Weapons States (NWS), such as the United States, to listed facilities that have no direct national security significance. In the event that the United States places any facility storing this material under IAEA safeguards, as a NWS, it could withdraw such facility from IAEA safeguards without giving advance notification. So, even if the facilities where this material is stored are subject to IAEA inspection, there could be no “assurance that it [the nuclear material] could not be used in weapons.” One of the difficulties in placing surplus nuclear materials under IAEA safeguards is that the facilities storing the surplus material are also the facilities storing national security materials and international inspection of these facilities would be inconsistent with national security. DOE has had facilities storing some surplus SNM under IAEA inspection during the 1990’s. DOE has stated that it intends to apply IAEA safeguards to its surplus plutonium “as soon as practicable” (65 FR 1608, January 11, 2000). The United States and Russia have agreed to place surplus fissile nuclear materials removed from their nuclear weapons programs under IAEA verification. This SPEIS will not be used to inform decisions on the construction of storage facilities for surplus plutonium or enriched uranium where IAEA safeguards applicability might be appropriate.*

1.Q

1.Q and

1.Q.1

UNDERGROUND TESTING

The following comments were received regarding underground nuclear testing:

- The United States should continue the nuclear testing moratorium and never conduct additional underground tests;
- Maintaining the ability to conduct these tests sends the wrong message to other members of the world community;
- The United States must comply with the CTBT, which would preclude any underground testing by the United States;
- Commentors were opposed to any future tests;
- Implementation of new weapons designs, such as for the RRW program, would make return to testing more likely;
- Commentors questioned NNSA’s continued ability to certify the stockpile as reliable, safe and secure in the absence of testing and questioned how much longer NNSA’s Life Extension Program could avoid testing;

- Commentors questioned the extent of environmental harm done from past underground testing and questioned whether any future underground testing would cause similar harm;
- Groundwater at the Nevada Test Site (NTS) is contaminated by past testing; and
- The SPEIS needs to examine the environmental impacts of conducting underground tests.

Response: *Since September 1992, the United States has refrained from any weapons testing involving a nuclear detonation. The CTBT has not entered into force because the United States has not ratified the treaty and, therefore, does not constrain any activity of the United States. NNSA maintains the ability to conduct an underground nuclear test at the direction of the President within 24-36 months of receiving such direction (50 USC 2528a).*

The decision to develop an RRW would be made by the President and the Congress. NNSA will not make a decision on whether to proceed with an RRW based on this SPEIS.

A decision to conduct testing involving a nuclear detonation is outside the scope of Complex Transformation SPEIS. Such a decision would be made by the President, who would direct NNSA to conduct a test. The environmental impacts of underground nuclear testing were addressed in two EISs: Environmental Impact Statement for the Nevada Test Site and Off-Site Locations in the State of Nevada (DOE 1996b) and Programmatic Environmental Impact Statement for Stockpile Stewardship and Management (DOE 1996d).

2.0 NEPA PROCESS

Within this issue category, commentors stated that the Complex Transformation violates NEPA, and provided specific comments related to the NEPA process which are discussed in comment-responses 2.A through 2.K below.

Response: *NEPA requires the preparation of an Environmental Impact Statement for major federal actions significantly affecting the quality of the human environment. The SPEIS was prepared pursuant to NEPA and the DOE and CEQ implementing regulations. See comment-response 2.A for additional information on NEPA compliance.*

2.A GENERAL NEPA PROCESS AND COMPLIANCE

The following comments were received regarding the general NEPA process and compliance:

- The Draft Complex Transformation SPEIS was difficult to read and understand;
- The environmental impacts of the use of a nuclear weapon should be analyzed in the Complex Transformation SPEIS;
- Commentors questioned whether the SPEIS is a political document or an environmental document;
- The NEPA process was not followed correctly and the analysis is flawed;
- By defining an alternative as supporting a stockpile smaller than what is needed, the SPEIS prejudices the outcome;
- Complex Transformation SPEIS is a good example of how NEPA should work;
- NNSA was thanked for providing such good information;
- Commentors appreciated the NNSA forum and hoped the NNSA would send their message of opposition to nuclear weapons to DoD and the White House; and
- New studies are needed and should be included in the SPEIS on the medical, public health, and climate impacts of the life cycle of the Complex Transformation proposal.

Response: *Changes have been made in the SPEIS to facilitate readability. The SPEIS was prepared by NNSA in response to the requirements of NEPA and the DOE and CEQ regulations. As such, NNSA believes that the Draft SPEIS was adequate. The Draft SPEIS assessed the direct, indirect, and cumulative environmental impacts of the reasonable alternatives for the proposed action and the No Action Alternative. In discussing alternatives, the NNSA uses different assumptions about stockpile size, some of which support current national policy and some that would not support it. This was done to help analyze sensitivities that might result in potential changes in configuration of the nuclear weapons complex in the event a new policy is implemented that results in a smaller stockpile. As explained in Chapter 1 of Volume 1 of the SPEIS, within the timeframe analyzed in the SPEIS, NNSA believes that nuclear weapons will remain a cornerstone of national policy. In response to public comments on the Draft SPEIS, NNSA has made changes to the SPEIS as described in Section 1.6.2.2 of Volume 1 of the SPEIS. Additionally, NNSA has prepared this Comment Response Document, which describes the comments received on the Draft SPEIS and NNSA's responses to those comments. Commentors should be aware that NEPA only applies to federal agencies and does not apply to the Office of the President. Whether DoD provides a forum for those opposed to nuclear weapons is beyond the scope of this SPEIS.*

NNSA makes use of current and well-documented scientific models and data that are widely used to analyze environmental impacts for the purpose of compliance with NEPA. The analysis methods used are essentially the same as those used in preparation of several DOE EISs that have recently been issued in final form or have been reviewed, in draft, by the public. In general, the

data, models, assumptions, and other information used in the SPEIS are drawn from published sources and have been subjected to scientific peer review. Chapter 12 of Volume II of the SPEIS lists the documented sources of information and Appendix B describes the methods used to assess impacts, including the models used in the analyses. With respect to the use of nuclear weapons, that issue is not within the SPEIS scope. See comment-response Section 14 for discussion related to specific resources. As described above, NNSA makes use of current and well-documented scientific models and data to analyze potential environmental impact. NNSA is unaware of any studies that have been conducted on climate impacts of the life cycle of the Complex, and such studies are not believed necessary to analyze the impacts of the proposed action or alternatives.

2.A.1

During the public comment period on the Draft SPEIS, the following comments were received regarding the manner in which NNSA addressed public scoping comments:

- The Draft SPEIS does not meet the minimum legal requirements for responding to public comments. While the Draft SPEIS acknowledges that 33,000 comment documents were received during scoping, it provides no index of the commentors, so commentors cannot determine that NNSA considered and responded to their scoping comments.
- The SPEIS was not responsive to the concerns of the public as expressed in their comments on scoping.
- Even though the NTS is not considered a Preferred Alternative for consolidating plutonium and SNM facilities, the Draft SPEIS nevertheless fails to adequately address key concerns raised by Nevada in its December 2006 scoping comments 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, current and future activities at NTS, the transportation of SNM both in Nevada and nationally, and the proposed relocation of NNSA flight test operations from the Tonopah Test Range (TTR) to another DoD facility.

Response: *NNSA considered all scoping comments in developing the SPEIS and believes that the SPEIS is responsive to these scoping comments. For example, as a result of the scoping process, NNSA made the following significant changes to the scope of the SPEIS as originally described in the 2006 NOI:*

- *A Consolidated Centers of Excellence (CCE) Alternative was added as a reasonable alternative (Section 3.5 of Volume I).*
- *A discussion was added of effects on the Complex of an even smaller nuclear weapons stockpile than the current level envisioned under the Moscow Treaty (Section 3.6.3 of Volume I).*

- *A discussion was added of an RRW's possible impact on the nuclear weapons stockpile and decisions about Complex Transformation. An analysis was added to determine what, if any, changes to the Complex would be required if an RRW were to be developed (Chapter 2 of Volume I).*
- *A more detailed analysis of the potential impacts of NNSA flight testing was added in order to inform the public and NNSA of the potential socioeconomic impacts on the Tonopah community from the alternatives (Section 5.15.4.2 of Volume II).*
- *An analysis of a smaller pit production capacity (50–80 ppy) was added (Section 3.4.1.2 of Volume I).*
- *A more detailed explanation of why the KCP's operations are not included in this SPEIS was added (Section 1.5.2.1 of Volume I).*

Each of these changes was included in the Draft SPEIS issued for public review. Section 1.6.2 of Volume 1 of the SPEIS presents summaries of the scoping comments and their disposition. Appendix D of the SPEIS presents more details regarding NNSA's consideration of scoping comments. Chapter 6 of the SPEIS presents cumulative impacts. See also comment-response 14.O.5 for more information on cumulative impacts regarding NTS.

2.A.2

Commentors stated that the hearing process was insufficient to evaluate the environmental impact of the proposed Complex Transformation program and that new studies are needed on the medical, public health, and climate impacts of the life cycle of the Complex Transformation proposal, specifically including the prospective testing and use of the nuclear weapons it would produce.

Response: *The hearing process, including 20 public hearings in 13 cities, was only a part of the NEPA process for Complex Transformation. The SPEIS includes analysis of public health issues associated with the proposed actions and alternatives, and uses the best available information. This information is presented in Chapter 5 and more specific information on human health is presented in Appendix C. The environmental impacts of testing or use of nuclear weapons are beyond the scope of the SPEIS. Comment-responses 1.Q and 1.Q.1 provide additional information on underground nuclear weapons testing. Use of nuclear weapons is not an action under the purview of NNSA and therefore not within the scope of this SPEIS. See comment–response 2.A for discussion of additional studies of climate impacts.*

2.B

SPEIS VERSUS NEW PEIS

Commentors stated that NNSA should prepare a stand-alone PEIS rather than a Supplement to a PEIS that is more than 10 years old. Some commentors concluded that as a matter of law NNSA must stop the SPEIS process and instead issue a new, stand alone Draft PEIS if it intends to consider a proposed action of new-design nuclear weapons.

Response: *The Stockpile Stewardship and Management Program (SSMP) has existed since before the creation of DOE going back to the Energy Research and Development Administration and the Atomic Energy Commission. This Complex Transformation SPEIS represents an updating of the Stockpile Stewardship and Management PEIS to provide a current environmental analysis of the proposed action and its reasonable alternatives. The SPEIS analyzes a continuing reduction in the size, locations and capacity of the nuclear weapons complex to reflect changing conditions in the world that have allowed a continued reduction in the nuclear weapons stockpile maintained by this nation for national security purposes. Complex Transformation reflects the new purpose and need brought about by these changes. This SPEIS could have been prepared as a standalone PEIS, and it would have been substantially the same. The public involvement process used by NNSA in preparing the SPEIS and the breadth and rigor of impact analysis are not different because this is a Supplemental PEIS. The proposed action is not premised on new-design nuclear weapons.*

2.C

STAKEHOLDER INVOLVEMENT

The following comments were received regarding stakeholder involvement:

- NNSA should provide funding to independent organizations for the purpose of obtaining an independent review of the SPEIS and its references;
- Tribal members were not sufficiently included in NNSA's planning system; arrangements should be made to include them in such important issues;
- NNSA should provide funding to the tribes to have independent laboratory tests done of air and water pollution; and
- There is no rational basis for excluding the Kansas City Plant from the Complex Transformation SPEIS, other than DOE's desire to move forward with a new Kansas City Plant with a lower level of environmental analysis and less public involvement.

Response: *The SPEIS was prepared pursuant to NEPA and the DOE and CEQ implementing regulations. NEPA and the agency regulations provide mechanisms for involvement of stakeholders, including non-governmental organizations, tribal members and other members of the public, in the preparation of an EIS such as this SPEIS. There is no requirement under NEPA or its implementing regulations that would require NNSA to provide funding for independent organizations to obtain an independent review of the SPEIS or its references; nor is there a requirement that NNSA provide funding for the conduct of independent laboratory testing of air and water pollution. NNSA has provided numerous opportunities for interested stakeholders, including tribal governments and members of those tribes, to obtain information and provide comments as part of the process established by NEPA for the preparation of*

EISs. NNSA believes that it has complied fully with all requirements for the preparation of this SPEIS, including those related to involvement of stakeholders.

The comment relating to NEPA compliance regarding the Kansas City Plant is addressed in comment-response 12.

2.C.1 NOT USED

2.C.2 Some commentors believed it was inappropriate for LANL contractor employees to provide comment (as LANL employees as distinguished from private citizens) at the hearings.

Response: *NNSA may not refuse comments or limit participation in the NEPA process. If LANL employees were providing comments on behalf of LANL and they identified themselves as such, it is up to their employer to determine if their comments were consistent with the position or policy of the organization.*

2.C.3 A commentor stated that their limited tribal resources were being used to conduct monitoring and respond to NNSA's Complex Transformation SPEIS. This use of tribal resources negatively impacted self-governance due to the deployment of limited human and technical resources from normal day-to-day affairs and did not allow for adequate participation in the SPEIS NEPA process. Because such funding issues impact tribal fiscal balances, the commentor requested funding to monitor and respond to the SPEIS.

Response: *NNSA appreciates the time and effort expended by all those who thoughtfully review and provide comments on its NEPA documents. Reviewing and providing comments on draft EISs and EAs is a voluntary activity on the part of those who have an interest in proposed federal actions.*

2.C.4 Impacts to the government-to-government relationship between the Western Shoshone tribes and the Federal government are further strained over conflict in ownership of the NTS and TTR.

Response: *NNSA's Nevada Site Office has a long history of consulting on a government-to-government basis with American Indian tribes, including the Western Shoshone, through the Consolidated Group of Tribes and Organizations (CGTO). DOE's relationship with the CGTO began in 1991 and has included several significant milestones: (1) The first time American Indian tribes played an active role in the development of a major federally-sponsored EIS (the NTS SWEIS) from the early planning stages to the publishing of the final document; (2) Inclusion of American Indian monitors in NTS archaeological projects; (3) The NTS American Indian Rock Art Study, which responded to general cultural concerns for a highly significant American*

Indian resource on the NTS; and (4) Native American Graves Protection and Repatriation Act consultation on the NTS collection and eventual repatriation and reburial of items qualified by CGTO representatives (see Halmo 2001 in Chapter 12 of Volume II).

2.D PROCESS NOTIFICATION

Commentors stated that NNSA could have provided broader coverage for notices for the hearings. Those commentors stated that many people were unaware of the hearings and therefore their input was not obtained.

Response: *NNSA followed CEQ and DOE NEPA Guidance for notice and conduct of public meetings. NNSA published a schedule of meetings in the Federal Register (73 FR 2023, January 11, 2008), on the SPEIS website, and advertised the times and locations for them in local newspapers prior to each of the 20 meetings in 13 cities.*

2.E LENGTH OF COMMENT PERIOD, NUMBER AND LOCATION OF PUBLIC HEARINGS

The following comments were received relative to the length of the public comment period, and the number and location of public hearings:

- The public hearings are biased as they were located in areas that benefit from nuclear weapons production projects;
- A public hearing should be held in Española, New Mexico, which is downwind of LANL and home to low income and minority populations who are unable to travel the distance on poor roads;
- Public hearings should be held in Taos County, New Mexico; there should be one additional hearing geared toward and translated for the indigenous populations in New Mexico;
- NNSA should hold meetings in major cities with at least one hearing in each state;
- NNSA should hold meetings at various locations in the country and also extend the comment period ranging from 60-120 days;
- If a nuclear attack were to occur it would be on population centers, so public hearings should be held in major population centers for a project of this scale; and
- The length of the public comment period should not be extended.

Response: *NNSA conducted 20 public hearings in 13 locations around the country, including in Española, NM and Washington, D.C. Most of those hearings were conducted in cities located near NNSA facilities, where impacts from proposed changes could occur. These hearings enabled a substantial number of interested parties to participate and offer oral and written comments. In addition to public hearings, NNSA provided many other ways for*

interested parties to submit comments, including e-mail, via the world wide web, facsimile, and regular mail. All comments were considered equally, regardless of the manner submitted.

- 2E.1** Commentors requested extensions of the comment period. Commentors stated that adequate time for significant public participation and complete response to public comment also is required.

Response: *The comment period on the Complex Transformation SPEIS was originally set for 90 days (from January 11, 2008 until April 10, 2008). This comment period was twice as long as the minimum required by CEQ. Prior to the end of this comment period, NNSA extended the public comment period by 20 additional days, until April 30, 2008 (73 FR 19829, April 11, 2008). This*

Comment Response Document provides NNSA's response to all comments received, including late comments.

- 2.E.2** Commentors stated that NNSA should have held a hearing in Taos, New Mexico. Commentors stated that the Complex Transformation public hearings were only conducted at cities near NNSA facilities and that maintaining and building nuclear weapons are national issues which impact all people. Accordingly, hearings on such issues should have been conducted in all major cities.

Response: *NNSA held 20 public meetings in 13 cities near NNSA facilities where impacts resulting from proposed actions could occur. In addition, NNSA held one meeting in Washington, D.C. This large number of meetings enabled a substantial number of interested parties to participate and offer oral and written comments. Although some commentors requested additional meetings in Taos, NNSA believed that these interested parties could be served by the meetings in Santa Fe, Socorro, Española (which is in Taos County, NM), Los Alamos, and Albuquerque. In addition to the public hearings, NNSA also provided many other ways for interested parties to submit comments, including e-mail, via the world wide web, facsimile, and regular mail. All comments were considered equally regardless of the manner submitted. See comment-response 2.E for related discussion.*

2.F PUBLIC HEARINGS AND FACT SHEETS

A commentor observed that the LANL fact sheets available at the hearing provided information in conflict with the Complex Transformation fact sheets available at the hearing.

Response: *Fact sheets used at the Complex Transformation public meetings were prepared with a national message so as to be applicable at each of the 20 meetings held around the nation. At the Albuquerque, Los Alamos and Santa*

Fe meetings, employees from LANL brought site-specific fact sheets addressing issues related to LANL. The LANL fact sheets were not used by NNSA in conducting its analysis .

2.F.1 A commentor stated that translation service should have been provided

Response: *NNSA did not receive any requests for translators prior to any meeting, but would have considered such a request if one had been received. A hearing interpreter was requested and provided for the hearings at Oak Ridge.*

2.G PUBLIC HEARING PROCESS

The following comments relative to the public hearing process were received:

- Similar hearings occurred in 2007. It appears that the comments voiced during those hearing were disregarded and now a new set of hearings is offered, perhaps with the hopes that the public opinion will be what NNSA wants to hear;
- The SPEIS hearings are the only forum available for the public to state their opposition to nuclear weapons, current national security policies, and other Administration policies with which they disagree;
- NNSA was thanked for listening even though their concerns went beyond the purpose of the hearing;
- In a given area, in view of the short time period available, people who had already provided comment at another session should not have the opportunity to comment until all new commentors had been heard.

Response: *The commentor is apparently referring to the scoping meetings for the Complex Transformation (originally called “Complex 2030”) SPEIS that were conducted in November and December 2006. Those scoping meetings were intended to gather issues and concerns that would shape the Complex Transformation SPEIS. NNSA considered the scoping comments that were provided, as noted in sections 1.6.1 and 1.6.2 of the Draft SPEIS. The purpose of the public hearings on the Draft SPEIS was to allow the public to comment on the document. The public scoping meetings and public hearings were conducted in compliance with both Council on Environmental Quality Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act (40 CFR Parts 1500–1508) and DOE NEPA Implementing Procedures (10 CFR Part 1021).*

Opposition to nuclear weapons and other Administration policy issues are noted. NNSA did not prohibit or discourage anyone from making such statements at the public hearings. Each public meeting was unique, but followed the same format and guidelines. It is true that some commentors made identical presentations at more than one session in several cities. Their participation at more than one hearing did not preclude anyone from speaking.

To deny someone the opportunity to present oral comments, based on participation at previous meetings, however, would have been arbitrary, potentially disruptive, and not within the spirit of the open forum in which the public meetings were held. See comment-response 2.A for related discussion.

2.H AVAILABILITY OF INFORMATION

The following comments relative to the availability of information were received:

- NNSA was complimented for making the SPEIS and its references available electronically via the world-wide web in a timely fashion;
- The SPEIS and the references were complicated and hard to understand;
- NNSA headquarters is unresponsive to information requests; and,
- NNSA should consider and include in the SPEIS any relevant information from the 2008 LLNL Site Plan (which the commentor is attempting to obtain).

Response: *NNSA is aware that the Complex Transformation SPEIS includes a substantial number of alternatives, at a substantial number of sites, and deals with complex subject matter. This is the nature of the nuclear weapons complex and the proposed actions and reasonable alternatives. To present this to the public required a substantial amount of complex information. NNSA made every effort to define terms, use text boxes and employ a number of other methods to make this information easier to read and understand by the public. NNSA has provides access via the web and in public reading rooms to all publicly available references that were relied upon in preparing the SPEIS. The NNSA sites, including LLNL, contributed to the preparation of the SPEIS and provided the latest available information, some of which could have been later information than would have been available to prepare the LLNL Site Plan. Information that is relevant to the LLNL Site Plan and the SPEIS is included in the SPEIS. See comment-response 2.H.1 for related discussion.*

2.H.1

One commentor stated that issuance of the SPEIS should be delayed until such time that NNSA has provided the documents requested by the 10 *Freedom of Information Act* requests made in November 2006. Comments suggested that very few people have the necessary knowledge or information to understand and analyze the ramifications of Complex Transformation.

Response: *NNSA has provided all publicly available references that were relied upon to prepare the SPEIS by internet and in public meeting rooms. The Freedom of Information Act process to obtain documents is independent from the NEPA process and there is no requirement to delay issuance of a NEPA document as the commentor requested. Documents that were not relied upon to prepare the SPEIS are not referenced in the SPEIS, are not part of the Administrative Record for the SPEIS, and have not been made available on the*

internet as part of this SPEIS process.

2.H.2

Commentors stated that the Draft SPEIS does not rigorously evaluate all reasonable alternatives adding that the two primary functions of EISs are to require that agencies take a “hard look” at environmental consequences, and provide for broad dissemination of relevant environmental information.

Response: *The alternatives addressed in this SPEIS cover the range of reasonable alternatives that meet national security requirements or requirements that could reasonably evolve from any changes to national policy. NNSA believes that this SPEIS takes the requisite “hard look” at potential environmental consequences and that NNSA has broadly disseminated or made relevant environmental information available on the internet, direct mailings to people expressing interest, and other methods including advertisements in local newspapers and publication of notices in the Federal Register.*

2.I

NEPA COMPLIANCE

Comments stated that the SPEIS does not comply with the NEPA process because it does not consider the direct, indirect and cumulative effects of the proposed project in conjunction with the policies and the reasonably foreseeable future actions of other agencies or persons. Another commentator stated that the SPEIS does not comply with the NEPA process because it doesn't adequately demonstrate the safety of the Complex Transformation plan.

Response: *NNSA addressed potential cumulative impacts resulting from Complex Transformation and ongoing and reasonably anticipated actions of NNSA and other agencies and private developments. The assessment of cumulative impacts is in Chapter 6 of Volume II of the SPEIS. Information related to compliance with NEPA is in comment-response 2.0, above. See comment-response 14.O for related discussion regarding environmental impact analysis.*

2.I.1

A commentator stated that plutonium disposal through mixed-oxide (MOX) fuel would result in substantial risks during transportation to workers and the public. Workers would be exposed during loading, unloading, and transportation. In addition, conversion of plutonium to MOX would create additional risks and exposures and environmental contamination. Thus, DOE should revisit and reconsider its Record of Decision regarding plutonium immobilization and/or vitrification as part of the plutonium consolidation process.

Response: *The decision to dispose of surplus plutonium by conversion to MOX for commercial reactor fuel was previously made by DOE in the ROD for the Surplus Plutonium Disposition PEIS (65 FR 1608, January 11, 2000). NNSA is not revisiting that decision in this SPEIS. See comment-response 20 for related discussion.*

2.I.2 In accordance with NEPA and Section 309 of the Clean Air Act, the Environmental Protection Agency (EPA) reviewed the Draft SPEIS. The EPA does not object to the proposed action and has rated the Draft SPEIS as Lack of Objections.

Response: *NNSA notes the EPA review and rating.*

2.J **SPECIFIC EDITORIAL COMMENTS ON THE SPEIS**

Commentors noted that there are many factual and typographical errors in the Draft SPEIS. Some commentors stated that 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. Commentors provided the following examples:

- Contrary to the statement (at page 2-5), President Clinton did not direct the nuclear testing moratorium in 1992. It was President George H.W. Bush.
- 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 LLNL, not Pantex. Table 3.7-3 relates to Pantex. 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.
- 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 43,167 cubic yards of legacy TRU waste (WSRC 2002a). In contrast, Page 5-313 states that the inventory is 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. The commentor 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. The TRU waste volume numbers are not credible.
- Section E.5.1, lines 37-45 states: the need for pumping groundwater would be substantially reduced to approximately 730,000 acre-feet per year by 2060. The figure 730,000 acre-feet per year is incorrect when

compared to the USGS projections. A telephone call made by Citizen Action to the City of Albuquerque water utility authority confirmed that the figure is incorrect by a very large margin of error. Also, the current aquifer usage for the City of Albuquerque is not provided by section E.5.1. The draw down on the aquifer for SNL should be provided. The volume of water that would be contaminated by radionuclides or hazardous waste from Complex related operations must be provided. The entire SPEIS is riddled with mistakes and must be redrafted and resubmitted to the public.

- The citation for Roybal (1991) is incomplete.

Response: *NNSA believes that the Draft SPEIS was adequate to provide for meaningful analysis and comment. The Final SPEIS includes corrections to these and other errors identified in the Draft SPEIS. NNSA notes that the SPEIS is a complex document of more than 1,000 pages which addresses the operations at many nuclear weapons sites. In preparing the SPEIS, NNSA utilized a multi-step quality assurance process to review the SPEIS and ensure the document would be as complete and accurate as possible. Changes to the SPEIS are identified by vertical bars in the margin. The Final SPEIS includes a comprehensive CRD that considers and responds to all comments received on the Draft SPEIS. This CRD presents the comments received by NNSA (oral comments provided at public hearings and those submitted in writing) and NNSA's responses to those comments. NNSA has revised the SPEIS to correct and update information in the document. For example, a substantial amount of site specific data has been revised to correct and update the information and all of the textual errors referred to in comments received have been corrected in the appropriate text. Where appropriate, changes have been made to the SPEIS. The reference for Roybal (1991) has been updated.*

2.K SPECIFIC COMMENTS—CHAPTERS 1 THROUGH 3

2.K.1

Addressing the discussion of the requirement to maintain the U.S. nuclear weapons stockpile found on page 1-1 of the Draft SPEIS, a commentor stated that “It is by no means obvious, inevitable, or reasonable to conclude that a requirement to ‘maintain the U.S. nuclear weapons stockpile’ and ‘core competencies in nuclear weapons’ can only be met by a program that ‘emphasizes development and application of greatly improved scientific and technical capabilities’ for assessing the ‘safety, security, and reliability of existing nuclear warheads’-much less the design of new weapons such as NNSA's proposed Reliable Replacement Warhead—‘without the use of nuclear testing.’”

Response: *As weapons continue to age beyond their expected design life, it is reasonable to anticipate that problems may be detected that will need to be fixed to maintain safety and reliability. Nuclear weapons contain many*

different types of organic materials that will deteriorate with time even without the effects of the intrinsic radiation present in the weapon. The goal of science-based stockpile stewardship is to understand and predict the effects of observed changes in the weapon due to aging or other causes. While much progress has been made in developing the computation and simulation tools to model and predict weapon behavior, much still needs to be done. Replication and remanufacture of parts is an oversimplification often mentioned as an alternative to improved scientific and technical capability; some limitations of sole reliance on this approach were discussed in the original SSM PEIS (DOE 1996d). Moreover, this line of reasoning ignores the fact that improved scientific and technical capability is needed to make the judgment that an observed defect does not need to be fixed, thus avoiding the cost and risk of fixing weapons unnecessarily.

2.K. 2

A commentor addressed the following statement on page 1-8 of the Draft SPEIS: "Since the inception of nuclear weapons, the United States has maintained a safe and reliable nuclear deterrent force."

The commentor asserts: "This statement is grossly oversimplified, historically inaccurate, and at variance with NNSA's own assertions about serious safety and reliability problems in the stockpile from the late 1950's through the early 1980's."

Response: *The statement was not intended to mean that there were never problems with the safety and reliability of individual weapon types in the stockpile. Quite the contrary; the SSM PEIS explained, in reasonable detail, the history and issues of stockpile defects (see Sections 2.3.3 and 2.3.4 of DOE 1996d). What this statement meant to convey is that when problems were discovered in the stockpile they were taken seriously and resolved using the technical capabilities and capacities present in the complex.*

2.K.3

A commentor stated that the following statement on page 1-9 of the Draft SPEIS is technically and historically incorrect: "In October 1993, President Clinton issued Presidential Decision Directive 15 (PDD-15), which directed DOE to establish the Stockpile Stewardship Program. PDD-15 significantly redirected the nuclear weapons program. Throughout the Cold War, the DoD and the nuclear weapons laboratories had based much of their confidence in the reliability of nuclear weapons on performance data from atmospheric and underground nuclear tests."

Response: *Chapter 2, Section 2.3.3 of DOE 1996d, contains a discussion on the role of nuclear testing. NNSA believes the statement is correct.*

2.K.4

A commentor stated the following sentence on page 1-9 of the Draft SPEIS is misleading: "However, since 1992, the U.S. has been observing a moratorium on nuclear testing."

Response: *NNSA does not believe there is anything wrong or misleading in the statement. The last such test was conducted on September 23, 1992.*

2.K.5

A commentator stated that the following statement on page 1-9 of the Draft SPEIS is “another egregious example of distorting the historical record”: “DOE deferred spending on the production complex because there were no new weapons production requirements and because of uncertainty about the future stockpile requirements.”

Response: *NNSA disagrees with the commentator; the statement in question is accurate.*

2.K.6

A commentator stated that the statement on page 1-10 of the Draft SPEIS that the Atlas Facility was constructed and is operational at LANL is erroneous.

Response: *The commentator is correct and the text has been changed. The Atlas Facility was constructed at LANL, but was subsequently moved to the NTS. Full-scale assembly of the Atlas Facility at LANL was completed in August 2000 and was scheduled to begin operation in June 2001. In May 2001, NNSA decided to relocate the Atlas facility to the NTS. The Atlas machine was disassembled and transported to the NTS, where it was installed in a new building and began operating. Experiments were conducted with Atlas at the NTS until it was placed in cold standby in 2006, pending funding to resume experiments.*

2.K.7

A commentator stated that the following statement, regarding the 1993 Non-Nuclear Consolidation Environmental Assessment (DOE/EA-0792) on page 1-11 of the Draft SPEIS, is not entirely true: “The Non-Nuclear Consolidation EA analyzed the proposed consolidation of the facilities within the Complex that manufactured non-nuclear components for nuclear weapons.” The commentator stated that some “nuclear” component manufacturing was included in that EA.

Response: *It is true that the Non-Nuclear Consolidation EA of 1993 considered tritium component surveillance activities at the Mound Plant and neutron tube target loading at the Pinellas Plant to be “non-nuclear” activities. The work scope covered by the 1993 EA was predominantly manufacturing activities involving non-radioactive materials (stainless steel, beryllium, high explosives, ceramics, electronic components, etc.) at the Mound, Pinellas, and Rocky Flats Plants.*

The limited amount of tritium work at Mound and Pinellas could have been analyzed in the 1996 Stockpile Stewardship and Management PEIS, which predominately focused on nuclear activities such as plutonium, enriched uranium, and weapons assembly/disassembly work, or it could have been

analyzed with non-nuclear manufacturing activities at the Mound, Pinellas, and non-nuclear portion of Rocky Flats Plant in the 1993 EA. Analysis of tritium activities in the SSM PEIS would have involved a delay of 2-3 years in the implementation of the cost saving activities due to closure of the three plants. In addition, because of the relative hazards involving the small quantities of tritium and the desire to avoid analyzing the work at Mound and Pinellas in separate NEPA documents, DOE decided that it was better to analyze the Mound and Pinellas tritium work in the Non-Nuclear Consolidation EA. DOE did not classify tritium as a non-nuclear material; rather it grouped activities in a reasonable manner based on location and hazards in order to perform effective NEPA analyses. The United States District Court in Washington, D.C., on August 8, 1998, found the 1996 SSM PEIS to be adequate.

2.K.8

With respect to the following statement on page 1-25 of the Draft SPEIS: "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)." A commentator stated: "The referenced Section does not exist, or perhaps exists somewhere else in the document in a differently numbered section."

Response: *The commentator is correct. This reference was to an earlier version of the Draft SPEIS that included this discussion. The text from that section was moved in Volume I of the SPEIS to Section 1.5.2.1. The SPEIS has been changed to correct this error. See comment-response 12.O for related discussion.*

2.K.9

A commentator addressed the following statements on page 2-5 of the Draft SPEIS: "The U.S. Senate has not ratified the CTBT; however, the U.S. has been observing a moratorium on nuclear testing that was first directed by President Clinton in 1992." This commentator stated that the sentence is factually incorrect.

"It has been almost 15 years since the last U.S. nuclear test and more than 15 years since the last new nuclear weapon entered the stockpile. While no issues have yet developed in maintaining legacy weapons that would require a return to nuclear testing in the reasonably foreseeable future, there is concern that the current weapon 'life extension' approach to maintaining a safe and reliable stockpile will not ultimately, over the longer term, allow a continued moratorium on testing as weapons continue to age." The commentator stated that this passage "is tendentious in the extreme and unsupported by any credible independent technical authority known to the commentator."

Response: *The SPEIS has been corrected to indicate that the President in office in 1992 was George H.W. Bush. NNSA does not believe the statement to be biased and believes its concern that the Stockpile Stewardship Program, including the Life Extension Program, may not allow a continued testing moratorium over the long-term to be technically well founded. Past experience*

with the stockpile further demonstrates the technical basis for that concern.

2.K.10

A commentor addressed the discussion on the *Treaty on the Non-proliferation of Nuclear Weapons* on page 2-5 of the Draft SPEIS asserting that “the draft SPEIS misstates the U.S. NPT obligation. There is nothing in NNSA's statutory obligations that bars it from conducting NEPA analysis that fully considers and meaningfully compares the environmental benefits to be realized from moving to dramatically smaller nuclear weapon stockpiles, different technical paradigms for stockpile stewardship than the present one, and successively higher degrees of complex consolidation. NNSA is simply exercising - indeed abusing -- its agency discretion and arbitrarily choosing not to consider such alternatives, and then hiding behind an egregious over-reading of certain of its statutory obligations while ignoring its legal obligation under NEPA to consider "all reasonable alternatives”.

Response: *The SPEIS considers a range of alternatives that includes a range of stockpile assumptions that include options that would not meet current or reasonably foreseeable national security requirements. In response to this and related comments, a new alternative, referred to as the No Net Production/Capability-Based Alternative has been included in the SPEIS (see Section 3.6.2 of Volume 1). See comment-response 1.F for related discussion.*

2.K.11

A commentor addressed the following statement from page 2-6 of the Draft SPEIS: "Weapon reliability is assessed annually based in part on laboratory and surveillance tests on a relatively small number of each weapon type. There can be no ‘end-to-end’ functional test of a complete nuclear weapon in its ‘stockpile-to-target’ environments. In lieu of this, laboratory and flight surveillance tests are conducted at the component and subsystem levels and the data are combined and analyzed to produce a reliability estimate for the weapon. While this methodology is adequate for estimating the current reliability of a weapon, it does not provide high-confidence predictions of the future behavior of an aging weapon. Because of these uncertainties, NNSA needs to plan some excess capacity beyond known requirements to be able to respond to unknown policy and technical issues that may arise over the next decades."

The commentor stated that “NNSA is inventing mandates for itself out of whole cloth and pretending that these are immutable realities that shape and limit its consideration of alternatives for the nuclear weapons complex. We are aware of no NNSA statutory obligation that requires NNSA to provide ‘high-confidence predictions’ of the future behavior of an aging weapon. NNSA's mission is to maintain a reliable weapons stockpile by conducting regular surveillance and sampling activities, detecting any signs of deterioration, and correcting these deficiencies in a cost-effective manner.”

Response: *NNSA is required by section 3141 of the National Defense Authorization Act for Fiscal Year 2003 (Pub. L. 107-314) to certify annually that the stockpile is safe and reliable. This requires that NNSA be able to make “high confidence predictions of future behavior of an aging weapon.” It is NNSA’s inability to predict the future with certainty that requires it to judiciously maintain its capabilities to fix problems that might arise in the future. This mission is fulfilled through a science-based stockpile stewardship program directed by Congress in section 3135 of the National Defense Authorization Act for Fiscal Year 1994 (Pub. L. 103-160). See Chapter 3 of Volume I of the SPEIS for a description of all alternatives considered. NNSA believes that improvement in technical capability (which includes computational, simulation and experimental tools) will help assure a safe and reliable stockpile. This is a matter of NNSA’s technical judgment.*

2.K.12

A commentator disagreed with NNSA’s statement from page 2-7 of the Draft SPEIS that the “2001 Nuclear Posture Review mandated a smaller U.S. nuclear weapons stockpile, but also a more robust and responsive infrastructure as part of the deterrence strategy.” The commentator stated that a more robust and responsive infrastructure, as part of a deterrence strategy, is not part of NNSA’s statutory mandate, and therefore it can not be relied upon to define the agency’s purpose and need for action, or truncate the range of reasonable alternatives.

Response: *The quoted text has been revised to reflect that the 2001 Nuclear Posture Review “provides for,” rather than “mandates a” smaller stockpile. NNSA is authorized to design and manufacture nuclear weapons under Section 91a (2) of the Atomic Energy Act of 1954, (42 USC §2121a (2)) as directed by the President. Such direction is required to be made annually. As long as this nation has nuclear weapons, it requires a nuclear weapons complex that is able to respond to the President’s direction. NNSA is also required to support the annual stockpile certification that the stockpile is safe, secure and reliable. In the judgment of NNSA, it is compelled to possess the “core competencies” to meet these statutorily derived requirements. The SPEIS examines alternatives that could support a range of nuclear weapons stockpiles that reasonably could be foreseen to be directed by the President, including several that represent a substantial reduction from the levels contemplated by the Moscow Treaty. See comment-response 1.C for a description of the process used by NNSA to define its programmatic requirements, including the requirement for a robust and responsive infrastructure. See also comment-responses 7K and 8.B for a related discussion.*

2.K.13

A commentator addressed the following statement from page 2-7 of the Draft SPEIS: "While this methodology is adequate for estimating the current reliability of a weapon, it does not provide high-confidence predictions of the future behavior of an aging weapon. Because of these uncertainties, NNSA needs to plan some excess capacity beyond known requirements to be able to

respond to unknown policy and technical issues that may arise over the next decades.”

Response: *NNSA is required by statute to certify annually that the stockpile is safe and reliable. This requires that NNSA be able to make "high confidence predictions of future behavior of an aging weapon". It is NNSA's inability to predict the future with certainty that requires it to judiciously plan its capacities to fix problems that might arise in the future. This mission is fulfilled through a science-based stockpile stewardship program. See comment-response 2.K.12 for related discussion.*

2.K.14

A commentor addressed the following statement from page 2-10: "A reliable and responsive infrastructure is a cornerstone of the new triad discussed in the 2001 Nuclear Posture Review (Figure 2-2) and in section 3111 of the National Defense Authorization Act for FY 2006 (Public Law 109-163). 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."

The commentor stated with regard to this: "This statement inaccurately and misleadingly conflates the hawkish theorizing of the 2001 Nuclear Posture Review Report to Congress with NNSA's statutory responsibilities as outlined in Section 3111 of Public Law 109-163. The latter does not discuss or reference a 'responsive infrastructure' as being the 'cornerstone' of a 'new triad' The offending paragraph should either be deleted, or in the alternative, amended to correct the misleading conflation of two disparate and unequal sources for NNSA policy guidance. If the paragraph stays, NNSA should explain what meaningful nuclear advantage a future adversary might plausibly seek over the United States, and how the 'responsive infrastructure' would be employed to quickly 'negate' this advantage."

Response: *NNSA disagrees; the statement is an expression of NNSA opinion and correctly describes NNSA's view. The role of the 2001 Nuclear Posture Review in the establishment of NNSA requirements is described in comment-response 1.C. See also comment-responses 8.B and 12.K.12 for related discussion.*

2.K.15

A commentor questioned NNSA's statement on page 2-10 of the Draft SPEIS that "A more responsive infrastructure is expected to permit further reductions in the weapons stockpile. In the context of the SSP, this responsiveness could permit deeper reductions in the total weapons stockpile that supports the deployed stockpile."

The commentor stated: "In what way would a more responsive infrastructure permit deeper reductions in the total weapons stockpile that supports the

deployed stockpile? Since when do inanimate facility capabilities dictate what may or may not be in the national and global security interest? If NNSA is going to assert this linkage, it needs to back it up with some serious numbers and analysis, so the environmental tradeoffs between a smaller stockpile with a responsive infrastructure and a larger stockpile without one can be assessed.”

Response: *A more responsive infrastructure would enhance the confidence of decision makers, including the President and Congress, that the nuclear weapons complex could respond in a timely manner to changing requirements resulting from changes in national policy or the status of existing weapons. The range of alternatives in the SPEIS includes analysis of a less responsive infrastructure -- the No Action Alternative -- as well as a number of alternatives that would provide an infrastructure with varying responsive capabilities. See Chapter 3 for a discussion of the alternatives evaluated. As NNSA continues to dismantle weapons to achieve the number necessary to support an operationally deployed stockpile based on the Moscow Treaty, the number of augmentation weapons as described in Chapter 2 of Volume I retained in the total stockpile will be a function of the responsiveness of the complex to fix stockpile problems in a timely way. This is not a calculated certainty because there is not sufficient technical capability to predict exactly what may go wrong in a stockpiled weapon. Further, the SPEIS includes a No Action Alternative and proposed actions to create a more responsive infrastructure which reasonably bound without undue speculation the environmental impacts of judgments in this regard.*

2.K.16

A commentor addressed the production capacity planning assumptions from page 2-12 of the Draft SPEIS, stating: “We note that nuclear production alternatives actually concern production of nuclear weapon *components*, not weapons. But the slip is revealing. The cited production rate for nuclear weapons also depends, somewhat ironically in this instance, on the capacity of non-nuclear component manufacturing alternatives that have been illegitimately excluded from this analysis, and on the sizing of final assembly facilities at Pantex. How does this alternative [50 pits per year] present a meaningfully different alternative, in terms of environmental impacts, from the base case of 50-125 weapons per year?”

Response: *Sections 2.1.6, 2.3.3, 2.3.3.1, 2.3.3.2, and 2.3.3.3 of Volume I of the SPEIS address issues associated with the production rates used for components and weapons. These sections explain planning assumptions that were considered to size the complex for the purpose of estimating the environmental impacts of operating at the production levels defined. As the range of planning assumptions for production rates gets smaller and smaller, so would some environmental impacts. In regard to the comment about nuclear component production compared to nuclear weapon production, production planning assumptions for nuclear components assume that they are produced to enter the stockpile via weapon assembly/disassembly operations at the Pantex Plant, the*

only location currently assembling weapons for the stockpile. See comment-response 12.0 for related discussion.

2.K.17

A commentor addressed concerns regarding the discussion on pit reuse from page 2-13 of the Draft SPEIS. Please explain why it is plausible to believe that a recycled pit could undergo undetected "undesirable changes" that would be sufficient to cause it to "fail." Please define "fail." What is meant by "intrinsic" safety and security features, and how do these differ from other "safety and security features?" What "new external features" of reused pits are being referenced here?

Response: *A detailed discussion of potential pit failure mechanisms or weapons safety and security features cannot be provided in an unclassified document. However, pit failure would prevent a weapon from producing a militarily effective yield. The Pit Lifetime study (JASON 2006) describes only one mechanism by which pits might fail and the conclusions of that study are often incorrectly generalized as relating to a singular concern about pit aging.*

Intrinsic safety and security features constitute component features of the weapon itself and how it will respond to certain stimuli. An example of an intrinsic feature could be where external features of a pit permit the use of insensitive high explosives (IHE) instead of conventional HE, permissive action links, coded switches, or the addition of fire resistant capability to improve the margin of safety in accident environments. This is only one aspect of a safety or security system. For example, the security system includes guns, guards and gates and how these external features respond to an attack. See also comment-response 5.C.1 for related discussion.

2.K.18

Commenting on NNSA's general approach in this SPEIS, as described on page 2-16 of the Draft SPEIS, one commentor stated: "Please explain why this cookie-cutter building block approach results in a meaningful comparison of complex-wide consolidation alternatives with greater or lesser degrees of environmental impacts? The plethora of acronyms and nested "alternatives-within-alternatives" make the analysis virtually incomprehensible, even to experienced analysts of the nuclear weapons complex. Out of the dozens of permutations generated, how many represent plausible candidates for implementation, and which of these are to be preferred based on a comparison of their environmental impacts? The 1996 SSM PEIS did not include any proposed actions to restructure the laboratory technical base other than adding new facilities for enhanced experimental capability. That PEIS concluded, 'The continued vitality of all three NNSA national security laboratories will be essential in addressing the challenges of maintaining a safe and reliable nuclear weapons stockpile without nuclear testing.' This statement leaves the false impression that 'restructuring the laboratory technical base' would have necessarily jeopardized the 'continuing vitality' of NNSA's national security

laboratories, and it is inconsistent with the R&D restructuring actions NNSA now proposes in this SPEIS. In fact, many of these actions were first proposed by DOE stakeholders contesting the conclusions of the 1996 SSM PEIS.

It appears NNSA has wasted billions of extra dollars getting to a place it could have been 12 years ago.”

Response: *The planning assumptions for production capacity and the technical processes by which components or weapons are produced are not site dependent. So the environmental impacts of normal operations do not significantly differentiate among sites. However, many other environmental consequences are different among the sites, such as the need for new construction or the impact of facility accidents on the public. The approach taken is a fair way to address the reasonable alternatives for consolidation of nuclear component production and weapon assembly/disassembly functions. It would be inappropriate to exclude one of these existing Category I/II special nuclear material sites without analysis. NNSA has endeavored to make the very complex matters in the SPEIS understandable and has made many changes in the SPEIS to eliminate confusion, including eliminating unnecessary acronym use and improving the organizational structure of the alternative analysis.*

The fact that NNSA is considering consolidation of R&D facilities now is not evidence that this decision would have been wise 12 years ago in the early stages of SSP development. Further, even if one now makes the judgment that it would have been wise then, hindsight is not foresight.

2.K.19

A commentator questioned NNSA’s statement on page 2-21 of the Summary that the Reliable Replacement Warhead (RRW) would have no effect on the proposed actions in this SPEIS and that the analysis would bound the impacts if the President and the Congress were to direct NNSA to produce the RRW, stating: “How is this possible, given that production of RRWs would presumably involve the fabrication of new nuclear components, generating nuclear waste streams that would not be characteristic of alternatives that rely on pit reuse, or on current Life Extension Programs? Because the environmental impacts are based on the maintenance of the legacy weapons that are currently in the stockpile, a conservative estimate of the environmental impacts is provided by this SPEIS. It does not seem credible that the environmental impacts of maintaining a (potentially quite small and unused) ‘capacity’ for pit and CSA production could bound the environmental impacts of *actually producing* hundreds or thousands of RRW weapons with newly fabricated nuclear components?”

Response: *The analyses in the SPEIS are based on the assumption that the production facilities in the transformed nuclear weapons complex would make those components that may be required, using the existing stockpile of weapons as the base case. If other, new-design weapons were developed, NNSA believes*

that the production of those components would not produce environmental impacts substantially greater or different than those identified for maintaining the existing stockpile. NNSA has analyzed the impacts of the maximum production rates that would occur under each alternative, recognizing that actual production rates would depend on national security requirements. See Section 2.5 of Volume I of the SPEIS for more information on the RRW.

2.K.20

A commentator stated that with respect to Table 3.2.8-1 - Current Major Mission at Savannah River Site: This Table identifies NNSA's Office of Defense Nuclear Non-proliferation as the 'sponsor' of SNM disposition facilities at SRS. Commentor asks what role, if any, does DOE's Office of Nuclear Energy play in funding overseeing the MOX facility project? Is this no longer an NNSA/NP program?

Response: *The Consolidated Appropriations Act, 2008 (Pub. L. 110-161), directed that the Pit Disassembly and Conversion Facility be transferred from the NNSA Office of Defense Nuclear Non-proliferation to the NNSA Office of Defense Programs. That transfer has been implemented. The Act also directed that the Mixed Oxide Fuel Fabrication Facility be transferred from NNSA's Office of Defense Nuclear Non-proliferation to DOE's Office of Nuclear Energy. As of August 1, 2008, that transfer has not occurred and the facility is being managed by the NNSA Office of Defense Nuclear Non-proliferation pursuant to an arrangement with the DOE Office of Nuclear Energy. Table 3.2.8-1 has been revised to identify NNSA as currently managing these two projects at SRS at this time.*

2.K.21

Addressing NNSA's statement that were a Consolidated Plutonium Center constructed at SRS, the Pit Disassembly and Conversion Facility (PDCF) could be modified in the future to "convert plutonium to a form suitable for producing new pits" on page 3-23 of the Draft SPEIS, a commentator presented the following questions:

- Please describe why it would be politically acceptable and consistent with our *Treaty on the Non-Proliferation of Nuclear Weapons* (NPT) obligations to use facilities intended for 'irreversible' nuclear weapons material disposition to produce new plutonium pits for new U.S. nuclear weapons?
- How does NNSA think this might appear to the rest of the world?
- Is the PDCF being proposed for construction pursuant to the analysis in this SPEIS? If so, why are this facility and its environmental impacts not described in greater detail, and analyzed at alternative locations, such as Pantex?
- Does this SPEIS analysis assume that this facility will only be located at SRS? What is the current status of NEPA coverage for this facility?

- Is the analysis in this SPEIS based on the assumption that it makes more sense to ship intact pits from Pantex to SRS rather than cans of plutonium oxide?

Response: *The Pit Disassembly and Conversion Facility (PDCF) is being designed for the sole purpose of converting plutonium pits to oxide form to provide feed for the Mixed Oxide Fuel Fabrication Facility (MFFF, or MOX) to further the United States' non-proliferation goals and meet treaty obligations. However, faced with increasing budgetary pressure, the Congress has repeatedly urged NNSA to make the plutonium disposition mission and the stockpile support mission more cost efficient. In response, NNSA is examining multiple uses for the disposition facilities and multiple or modified uses for existing facilities throughout the DOE complex. No decision has been made with regard to altering the current mission of the Pit Disassembly and Conversion Facility, or modifying the facility to accomplish other missions when the current mission is complete.*

The PDCF is not being proposed for construction pursuant to the analysis in the SPEIS. DOE evaluated the impacts of construction and operation of the PDCF at four locations (the Hanford Site, the Idaho National Laboratory, the Pantex Plant, and the SRS) in the Surplus Plutonium Disposition EIS (DOE/EIS-0283, November 1999 [DOE 1999b]). In a subsequent Record of Decision, DOE announced that the PDCF (as well as the MFFF and an immobilization facility) would be constructed at the SRS (65 FR 1608, January 11, 2000). Therefore, the analysis in this SPEIS is based on the assumption that the PDCF will be built and operated at the SRS and that surplus pits will eventually be transported to and processed in that facility. As a result of advances in the facility design and other changes in the plutonium disposition program, including the cancellation in 2002 of the immobilization program, DOE is currently preparing a Surplus Plutonium Disposition Supplemental EIS.

In September, 2007 DOE prepared a Supplement Analysis and issued an Amended Record of Decision (72 FR 51807, September 11, 2007) for the consolidated storage of surplus, non-pit plutonium at the SRS. Transfer of this material from Hanford, the Los Alamos National Laboratory, and the Lawrence Livermore National Laboratory is currently underway. See also comment-response 5.N.2 for a further discussion of pit storage and comment-responses 1.F and 1.J for additional information on the NPT and proliferation issues.

2.K.22

A commentator addressed the discussion of the 50/80 Alternative on page 3-37 of the Draft SPEIS, as follows:

- What is the time horizon (period evaluated) in this SPEIS?
- What are these 'current requirements' that LANL's interim small-scale pit production activities is currently meeting?

- How many W88 surveillance pits need to be accumulated before these activities could be ‘disrupted’ without harming the national security?
- Assuming the agency's Preferred 50/80 Alternative is selected, it is not clear what this pit production capacity would actually be used for, in the event that production of new RRW pits is not approved by the Congress?
- What pit production activities are proposed for this facility in the absence of an approved RRW production requirement?
- If the goal is to maintain a pit production capability by maintaining a cadre of skilled personnel who can build pits when called upon to do so, what is the minimal number of pits per year - and minimal waste stream - that would satisfy this training requirement? This analysis is unacceptably vague given that this is the agency's Preferred Alternative.
- Will the 50/80 Alternative require the expansion of the CMRR facility, or not? What modifications to existing facilities at TA-55 will be required to accommodate additional workers employed in pit manufacturing?
- Absent a requirement to produce RRW pits, what will these workers do?
- Table 3.4.1-9 on page 3-38 shows a figure for total employment under the ‘Los Alamos 50/80 Alternative Annual Operating Requirements’ of 680 workers. What number of pits/yr does this represent - 50 or 80?
- Why does it require this huge number of workers for such a relatively small output?
- How many workers would it require to produce 5 or 10 pits per year in this same facility?”

Response: *In general, programmatic NEPA documents seek to analyze the environmental effects of proposed actions for a particular program for the time period in which the impacts would occur. That is the case for the SPEIS, and was also the case for the 1996 SSM PEIS. Many programmatic decisions, e.g., a decision to construct a new plutonium or uranium facility, that NNSA might make in the next decade could take as long as 20 years to implement. Because of the long lead times of programmatic activities involving nuclear weapons and facilities, a longer time period is evaluated in the SPEIS in order to provide perspective to the decision makers. The interim small-scale pit production program has several major program objectives: to produce replacement pits for pits used in destructive surveillance testing, to maintain production competence for pits, to provide a small capacity to meet unforeseen production requirements, and to serve as a test bed for new production and process technologies that might be used in a new plutonium facility. The LANL facility is today capable of meeting all these major objectives. The W88 program objectives are expected to be met within the next few years. Other pit types could be produced thereafter or NNSA could switch to a maintenance mode or place the facility in a standby mode, as appropriate. Should work be “disrupted” for the other program objectives, the longer the disruption the*

greater the risk that important objectives could not be met and critical competencies could be lost.

To maintain capabilities for meeting future nuclear weapons requirements, (e.g., production of additional quantities of legacy plutonium pits to remedy problems found in the surveillance program or production of new design pits such as those required for the RRW), NNSA has concluded that the small interim production capacity currently at LANL may not be sufficient. Because of the 10-15 year lead time in establishing a larger pit production capacity, NNSA does not believe it is prudent or possible to wait until all uncertainties about future production requirements are resolved before making decisions about a larger capacity facility. NNSA cannot predict today with certainty how a larger capacity would be used. It could be used to either make or modify legacy stockpile pits because of life-limiting problems in the current stockpile, or it could be used to produce new design pits for an RRW. It is also possible that there would be extended time periods where a larger capacity would be maintained as a program capability without full production.

Retaining overall pit production competence is more than a matter of producing a certain quantity of pits each year. There are multiple complex technologies required for the production of plutonium pits. Competency must be maintained in each technology. Competence is measured in people (hands-on production workers and process engineers) and equipment (with associated maintenance and safety staff). It is not possible to maintain competency without exercising the essential elements of each process. Numerous studies and demonstrations are required to demonstrate that competency in individual process technologies is being maintained. The ultimate demonstration of success is the actual production of a complete pit. Over the past few years, LANL has been able to demonstrate overall competence through the production and assembly of pits at rates as high as 6-10 per year. An extended production outage is not desired because processes must be totally re-qualified if not exercised. For a larger production facility, capability maintenance could involve about one pit per week (thus, the 50 pit nominal capacity of the SPEIS capability-based capacity alternative). The waste streams associated with these levels of production are covered in the SPEIS in Section 5.1.14 in Volume II.

The CMRR facility is intended to support all of the programs at TA-55 as well as to provide space for material and programs from the LLNL Superblock facility. The size of the CMRR-NF would be established according to the entire set of program requirements during the final design phase. The 50/80 alternative for pit manufacturing is only one of the possible requirements and it alone would not determine whether additional space is required. In the Draft SPEIS, an additional 9,000 square feet were assessed as an alternative that would support consolidation of plutonium operations to LANL from LLNL, provide analytical chemistry support for increased production, and ensure sufficient nuclear space for other uses that might arise. Subsequent to this

assessment, NNSA determined that the 9,000 additional square feet would not be necessary to support the planned consolidation of plutonium activities and the increase in pit production capacity assumed for the Preferred Alternative. Therefore, the size of the CMRR-NF in the preferred alternative no longer includes this additional space. The Final SPEIS has been revised to reflect this change (See Section 3.4.1.6.2 of Volume I of the SPEIS).

It takes 3-5 years to hire, train, and qualify LANL staff for the various jobs associated with pit production. LANL would hire and train staff for its plutonium facilities based on anticipated production workload over the next 3-5 years. LANL would not hire additional workers for a 50-80 pit production workload unless a demand for that level of production output was to arise. Staffing levels and environmental impacts associated with the 50-80 production levels are analyzed in the SPEIS in order to show the maximum expected impact of full operations. In the absence of 50/80 production requirements, the plutonium workers would be trained and certified on manufacturing processes and execute these processes as needed to retain personnel and process qualification.

Table 3.4.1-9 contains the operating requirements for producing 80 pits per year. The number of personnel is determined by the amount of processing required to produce pits from raw material to finished product and the large number of support personnel required to maintain safe, secure operations. It takes fewer personnel to produce 5 to 10 pits per year in the same facility. This is analogous to a “fixed” and “variable” cost model. A “fixed” personnel base is necessary to produce any quantity of pits. As the number of pits produced increases, the variable number of personnel to staff additional equipment grows. The pit manufacturing program employed about 500 personnel during 2007 to produce about 10 pits in facilities with a relatively small amount of equipment.

2.K.23

A commentor stated that with respect to page 3-66 (Section 3.6.2, Further Stockpile Reductions): “The interesting but brief discussion in this section of the Draft SPEIS raises far more questions than it answers. NNSA acknowledges that it has based its analysis on ‘current national policy’ regarding stockpile size (1,700-2,200 operationally deployed ‘strategic nuclear warheads’). NNSA does not reveal the size of the current or projected ‘non-strategic’ and ‘war reserve’ stockpiles that its current SPEIS analysis is designed to protect. NNSA should disclose these numbers, so that decision makers across the government, members of the Congress, and the general public can judge for themselves whether these stockpile levels represent an objectively reasonable boundary for reasonably foreseeable changes to the stockpile until the year 2030. We see no legal or other valid reason that justifies NNSA's refusal to consider in detail in this SPEIS just such stockpile reduction and complex consolidation scenarios that go beyond ‘current national policy’ - after all, a central purpose of NEPA analysis is to force agencies to consider all ‘reasonably foreseeable impacts’ rather than merely the ones

suggested or acknowledged by ‘current policy.’ By including this brief discussion, NNSA has conceded in principle that there exist complex consolidation alternatives that would have lesser total, connected and cumulative environmental impacts than those of the ‘Capability Based Alternative,’ which constitutes the floor of the present analysis based on a presumption of facility throughputs sufficient to support production of about 50 weapons per year. It also has conceded that the agency has ‘current thinking’ on how the Complex could be optimally reconfigured to support a smaller stockpile and it even provides a sketch of one such possible configuration. Under NEPA, NNSA is obligated to share its thinking about such reasonable alternatives with the public, since it can no longer argue that they are not ‘reasonably foreseeable’ while the agency engages in ‘current thinking’ about them.”

Response: *Certain information concerning the total number of nuclear weapons in the U.S. stockpile has always been classified. All other nuclear-capable nations, except France, have also maintained this position. Decision makers including Members of the Congress have access to this classified information. It is the capacity requirements, not the overall size of the stockpile that determines waste generation and other environmental factors addressed by NEPA. NNSA has evaluated significantly smaller capacity alternatives, the capability-based alternatives, with significantly smaller required production capacities to allow for analysis of smaller sized nuclear weapons stockpiles. NNSA does not believe that the classified nature of the total size of the U.S. nuclear stockpile affects the analysis or outcome of its SPEIS analysis.*

NNSA added an alternative that would not meet current requirements and would result in no net additions to the stockpile (see comment-response 7.O). NNSA has considered stockpile levels and associated production capacities that go beyond current national policy. The capability-based alternatives were developed for that purpose. NNSA has not “shared its thinking” about scenarios that would result in denuclearization because it does not consider those alternatives to be reasonable at this time. NNSA has analyzed capability-based alternatives that reflect large reductions in production capacity and total stockpile levels. These capability-based alternatives do not support current national security requirements, and may not provide sufficient capacity to support stockpile levels which could come about after further reviews and international agreements over the coming decades. NNSA does not believe that additional alternatives that “do not meet national policy requirements” are reasonable at this time and would not provide useful information to decision makers.

2.K.24

Regarding the statement on page S-1 of the Draft SPEIS that NNSA proposes to further consolidate operations, which could result in the relocation of activities among sites, one commentor stated that: “The SPEIS should explain here why NNSA has limited its consideration of ‘consolidating operations’ to

‘relocation of activities among sites,’ rather than excluding from the analysis consolidation options that could result in the elimination, closure, conversion, or transfer (to other beneficial uses) of existing weapons complex sites. Such an approach would appear at the outset to exclude the options with potentially the greatest environmental benefits, which is a poor way to begin a NEPA analysis.”

Response: *The language quoted from the SPEIS correctly describes a portion of the process used to identify the proposed action and reasonable alternatives. Complex Transformation would result in a smaller, more responsive nuclear weapons complex that operates in a more cost effective, safe and secure manner. The purpose of the proposed action is not to achieve the maximum possible closure of sites or to convert those sites to other beneficial uses. To the extent that alternatives would result in closure of sites, as is possible for a number of sites including Y-12 and Pantex, decommissioning and decontamination of those sites are discussed in the SPEIS. See, for example, the CNPC alternative described in section 3.1.1 of Volume I of the SPEIS. Under this alternative, all nuclear production sites other than the one selected would close.*

**2.K.25
and
2.K.26**

A commentor stated that the Draft SPEIS failed to analyze reasonable alternatives and to analyze the alternatives it did consider in sufficient detail. The commentor went on to state: “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. 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. NNSA does not appear to have evaluated truly consolidating the nuclear weapons complex, which would mean closing down a number of sites.”

Response: *The purpose and need statement, while expansive, indicates that the need is to create a smaller, more efficient (cost effective) and responsive nuclear weapons complex than exists today. With the exception of Flight Testing Activities, no site outside of the current nuclear weapons complex is being considered as an alternative for the consolidation or relocation of nuclear weapons activities. This is largely because any site not currently in the complex would require substantial investment in infrastructure and human resources. These investments would include safeguards and security, utilities, and waste management activities. From a human resources standpoint, each site requires a cadre of highly trained workers who are familiar with the materials and processes needed for the nuclear weapons program. This support is currently available at each of the complex sites and would need to be recreated at any new site.*

The SPEIS presents the proposed actions and a range of alternatives that would transform the nuclear weapons complex and would give it the potential

to support a number of stockpile sizes. The alternatives described in Chapter 3 constitute a range of what NNSA believes encompasses all reasonably foreseeable stockpile sizes. As long as this nation has nuclear weapons, the nuclear weapons complex must ensure their safety, security and reliability. This necessarily involves the capability to manufacture or acquire any part that may be required to maintain the stockpile.

2.K.27

The following comments were received regarding terminology used in the SPEIS:

- NNSA’s proposal is disingenuous and deceitful and hides the true meaning of the actions by using terms such as “transformation,” “pits,” “best business practice,” centers of excellence, etc; and
- The SPEIS uses terms that camouflage the true meaning of NNSA’s actions. NNSA used “Animal Farm” terminology in preparing the SPEIS.

Response: *NNSA prepared the SPEIS in response to the requirements of NEPA and DOE and CEQ regulations. NNSA made a good faith effort to make the discussions and analyses readable and understandable. NNSA made additional changes in the Final SPEIS to make the SPEIS more comprehensible. Some of the terms the commentor refers to are terms in common usage in the English language. To further improve its understandability, NNSA provided a glossary in the SPEIS (Chapter 13 of Volume II) that defines important terms. Technical terms such as “pits” are defined and explained in the SPEIS. See, for example, the description of “pit” in the glossary.*

2.K.28

A commentor stated that the Draft SPEIS makes the incorrect legal assumption that the *Atomic Energy Act* (AEA) and the Nuclear Posture Review essentially compel NNSA to proceed with continuing the "core competencies to design, manufacture, and maintain nuclear weapons."

Response: *NNSA is authorized to design and manufacture nuclear weapons under Section 91a (2) of the Atomic Energy Act of 1954, (42 USC §2121a (2)) as directed by the President. Such direction is provided annually. As long as this nation has nuclear weapons, it requires a nuclear weapons complex that can respond to the President’s direction. NNSA is also required to make an annual stockpile certification that the stockpile is safe, secure and reliable. In the judgment of NNSA, it must possess the “core competencies” to meet these requirements. The SPEIS examines a range of alternatives that could be used to support a range of weapons stockpiles that are reasonably foreseeable including several that represent a substantial reduction from those levels contemplated by the Moscow Treaty. See comment-responses 1.C and 2.K.11 for related discussion.*

2.K.29 Regarding the text on page 2-10 which stated that "the ability to successfully meet national security requirements on schedule and react to new developments," a commentor asked what NNSA meant by "react to new developments?"

Response: *In this context, "new developments" means changes in United States national policies that result in revision of the requirements in the NWSP and PDDs. It also means the ability to respond to any issues identified by the weapons surveillance program.*

3.0 PURPOSE AND NEED

3.A and 3.C GENERAL

The following comments were received relating generally to the purpose and need:

- The SPEIS inadequately justifies the purpose and need for complex transformation;
- The entire proposal is premature and skews consideration of all reasonable alternatives;
- The SPEIS does not adequately define the purpose and need for NNSA's current Complex Transformation proposal;
- The United States has too many nuclear weapons and nuclear weapons are not needed;
- Modernization of the nuclear weapons complex is not needed;
- The United States should pursue peace;
- Many United States former policy makers, such as George Schultz, William Perry, Colin Powell, Henry Kissinger, and Sam Nunn, have recommend that nuclear weapons be abolished;
- Nuclear weapons are immoral and will lead to extinction of mankind and destruction of the world;
- Opposition to nuclear weapons was received based on grounds related to religion, economics, policy, or national security;
- The majority of Americans are against nuclear weapons;
- The Congress has not provided funding for Complex Transformation, but NNSA is proceeding with the program anyway;
- The true purpose and need ought to be how to achieve peace and not the construction of a new bomb manufacturing complex;
- NNSA should consider site consolidation; the lack of consideration of site consolidation pervades the entire proposal, both on the production and R&D sides;
- NNSA should consider it reasonable to propose closure of one or more of NNSA's national laboratories;

- The SPEIS does not consider physical consolidation of sites versus programmatic consolidation and therefore evades the Congressional direction; and
- The Complex Transformation must be to change the mission from "new nuclear weapons for national security" to research and development across the spectrum of energy resources and especially renewable energy resources, which would provide real national security.

Response: *The purpose and need for the continued transformation of the complex is described in Chapter 2 of the SPEIS. NNSA's proposed actions and alternatives are described in Chapter 3 of the SPEIS. The SPEIS examines a range of alternatives that could support a range of nuclear weapons stockpiles including several that represent a substantial reduction from those nuclear weapons contemplated by the Moscow Treaty. Consolidation, simply for the purpose of reducing the number of sites in the nuclear weapons complex, is not considered a reasonable alternative for the proposed actions. The alternatives address consolidation for the purposes of making the nuclear weapons complex more responsive and cost efficient. In some instances, consolidation could involve physical consolidation as is the case for the Consolidated Nuclear Production Center and for SNM consolidation. NNSA's national laboratories provide unique programmatic capabilities, including weapons design work performed at both LLNL and LANL. Having two competent design teams available to provide independent peer review of each other's work gives NNSA the necessary assurance for its annual stockpile certification, which is necessary if the United States is to avoid underground nuclear testing.*

NEPA and the SPEIS are not the appropriate forums for a debate on whether this nation should possess nuclear weapons. Decisions on whether it will, and the type and number of those weapons if it does, are decisions made by the President in the form of PDDs (which are classified) and the Congress. As long as this nation has nuclear weapons, a Complex must exist to ensure their safety, security and reliability. That complex is the nuclear weapons complex that NNSA is transforming to reflect current realities. See comment-response 3.A.1 for related discussion.

The morality of nuclear weapons and the efficacy of this nation's national security policies are beyond the scope of this SPEIS.

The implementation of any decisions announced in a ROD is subject to availability of funds appropriated by the Congress.

3.A.1

A commentor noted that there is no discussion of whether the weapons facilities and personnel could change their mission to renewable energy, environmental cleanup, non-proliferation, and other necessary programs and what the impacts would be, as is required by NEPA.

Response: *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:*

- *To enhance United States national security through the military application of nuclear energy;*
- *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;*
- *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 non-proliferation;*
- *To reduce global danger from weapons of mass destruction; and*
- *To support United States leadership in science and technology.*

Although NNSA currently conducts or supports work in all of the areas mentioned in the comment, it would be unreasonable for NNSA to consider abdicating its primary mission absent Congressional direction. Therefore, alternatives that exclude the agency’s national security missions are not evaluated in this SPEIS. See comment-response 3.A for related discussion.

3.B - 3.D NOT USED

3.E STOCKPILE QUESTIONS – GENERAL

3.E.1 A commentor requested a discussion of the impacts of moving Gas Transfer System and Tritium R&D from LANL to maintaining the reliability of the stockpile.

Response: *Section 3.1.2 of Volume 1 of the SPEIS discusses the process that NNSA used to identify reasonable alternatives for restructuring R&D and testing facilities. For tritium R&D activities, NNSA commissioned an Integrated Project Team (IPT) to evaluate these activities and determine whether there were alternatives that would improve operating efficiencies by consolidating, relocating, or eliminating facilities and programs. The IPT determined that consolidating activities at either SRS or LANL would be reasonable (Section 3.9). NNSA presents the environmental impacts of reasonable alternatives related to tritium R&D (see Section 5.14). One of the alternatives would consolidate tritium R&D activities from LANL at SRS (Section 5.14.1 of Volume II of the SPEIS). NNSA does not believe any of the alternatives for restructuring R&D and testing would adversely affect the reliability of the stockpile. See comment-response 6.B for related discussion.*

4.0 PROGRAMMATIC NO ACTION ALTERNATIVE

4.A The following comments were received regarding the No Action Alternative:

- The No Action Alternative in the SPEIS is a status-quo alternative and not a true no-action alternative. A true No Action Alternative would result in a complex that built no nuclear weapons and did not maintain or extend the life of the existing stockpile;
- The Complex should be shut down and decontaminated (cleaned-up);
- The No Action Alternative should include disarmament and dismantlement;
- The Complex Transformation proposal fails to consider the supercomputers at the nation's weapons labs;
- The EIS makes little mention of the new facilities that are finally coming online or approaching initial operating capability: the National Ignition Facility is scheduled to finish construction in the next year, while the Dual-Axis Radiographic Hydrodynamic Test Facility will soon achieve its intended, two-axis design capability. Both of these facilities have long-been described as critical to stockpile stewardship; and
- 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. Summarily writing off such past aggregate effects as simply being subsumed in the No Action Alternative does not meet the mandates of NEPA.

Response: *NNSA believes that the SPEIS appropriately addresses the role of existing facilities. They are described as part of the No Action Alternative, in broad terms in Section 3.2 and in more detail in Chapter 4 and again in Appendix A. This approach to the No Action Alternative (i.e., maintaining the status quo) is consistent with guidance issued by the CEQ Forty Most Asked Questions (46 FR 18026, March 23, 1981). The guidance provides that “where ongoing programs, initiated under existing legislation and regulations, will continue, even as new plans are developed, ‘no action’ is ‘no change’ from the current status. Therefore, the ‘no action’ alternative may be thought of in terms of continuing with the present course of action until that action is changed.” The environmental impacts of continuing the existing activities at each of the sites associated with the Complex are described throughout Chapter 5, along with the impacts of the proposed actions. NNSA believes that in this way the SPEIS allows the reader to compare the various proposed alternatives to each other using the No Action Alternative as the reference point. Tables 3.16-1 through 3.16-8 are provided to assist the reader in this regard. Comment-response 7.0 discusses a new alternative analyzed in Section 3 of Volume I of the SPEIS that would result in no net additions to the stockpile. The supercomputers at the national laboratories, National Ignition Facility and*

the Dual-Axis Radiographic Hydrodynamic Test Facility are all included in the no action alternative. There are no proposed changes in their status.

4.A.1

The environmental impacts of a resumption of nuclear weapons testing at the Nevada Test Site needs to be 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.

Response: *The environmental impacts of underground nuclear testing were addressed in two DOE EISs: Environmental Impact Statement for the Nevada Test Site and Off-Site Locations in the State of Nevada (DOE 1996b) and Programmatic Environmental Impact Statement for Stockpile Stewardship and Management (DOE 1996d). Resumption of nuclear testing is not evaluated in the SPEIS because that activity is not a part of the Proposed Action and is not a reasonably foreseeable consequence of the selection of any alternative. See comment-response 1.J for related discussion.*

4.A.2

The following comments were received relative to the No Action Alternative for pit production at LANL:

- There are inconsistent and contradictory statements in the Draft SPEIS regarding the No Action Alternative and the 2006 Draft LANL SWEIS;
- On pages 1-13 and 1-14 the Draft SPEIS indicates that the ROD 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. However, in other portions of the document, 50 pits per year is used as the No Action Alternative;
- The document contains a number of contradictory statements about the 2006 LANL Draft 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. 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*”; and
- Throughout the document, it appears that DOE already considers 50 pits to be the minimum capability in contravention of the NEPA process still underway. 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.

Response: *Commentor is correct that several places in the Draft SPEIS*

erroneously stated or implied that NNSA has already decided to produce 50 pits per year at LANL. NNSA has carefully reviewed the Final SPEIS to ensure that the document consistently states that nominally 20 pits per year is the number of pits that could be produced at LANL under the No Action Alternative, consistent with the ROD for the 1999 LANL SWEIS.

5.0 PROGRAMMATIC ALTERNATIVES

5.A OTHER PROGRAMMATIC ALTERNATIVES

The following comments were received related to other programmatic alternatives:

- Political leaders should take immediate and deliberate steps toward multilateral disarmament, which would involve the DOE with such actions as increased weapons dismantlement;
- Tritium production activities should be included in the SPEIS in order to represent the impacts of the entire nuclear weapons complex;
- The Watts Bar reactors are part of the nuclear weapons complex;
- The laboratories should be used for life-affirming research; one should be dedicated to green energy research; and
- The Preferred Alternative should be to not build a weapons plant.

Response: *Maintenance of a safe and reliable stockpile is not inconsistent with working toward an ultimate goal of eliminating nuclear weapons worldwide in the future. However, denuclearization is not a reasonable alternative for this SPEIS because it is not feasible based on current national security policy. See comment-response 1.F for additional information related to disarmament and comment-response 1.C for related discussion.*

In response to public comments, NNSA added a summary of the environmental impacts of producing tritium in TVA reactors (see Section 5.19 of Volume II of the SPEIS). NNSA also added a No Net Production Alternative/Capability-Based Alternative (see comment-response 7.O). The Complex Transformation SPEIS includes alternatives that would result in construction of new weapons production facilities, as described in Chapter 3 of Volume I of this SPEIS.

For information regarding research conducted at the National Laboratories, see response to comment 5.H.1.

5.B DEVELOPMENT OF PROGRAMMATIC ALTERNATIVES

The following comments were received regarding the development of programmatic alternatives:

- NNSA should create a new planning process and environmental review for a new Programmatic Alternative to stop nuclear weapons research and production. The No Action Alternative of disarmament should be

- considered;
- Support was made for any alternative that consolidates the complex to be more efficient and generate less waste;
 - The need for weapons design activities will shift and some will be needed to be maintained, while others will be reduced, i.e., plutonium operations; and
 - Uranium operations would be located at Y-12, while weapons assembly operations would cease and resources would transition to disassembly and the need for HE and tritium production would no longer exist.

Response: *NNSA notes support for alternatives that would make the complex more efficient and generate less waste. NNSA has added a No Net Production/Capability-Based Alternative (see Section 3.6.2 of Volume I) that would provide significantly less capability than the Capability-Based Alternative. However, the foundation that NNSA must use to define its programmatic requirements is a combination of the current PDDs and Nuclear Weapons Stockpile Plans which establish the current stockpile weapon types and numbers; Congressional direction contained in authorization and appropriation acts; as well as the judgment of NNSA in consultation with the DoD and experts within NNSA's national laboratories. Using this information, NNSA makes reasonable assumptions as to the configuration and capacity for the nuclear weapons complex for approximately the next decade or so. NNSA has no basis to assume that nuclear weapons will not be a part of the nation's defense over the time period covered in this SPEIS. The range of alternatives analyzed in this SPEIS covers the range that NNSA believes could reasonably evolve from any changes to national policy with regard to the size, number and design of nuclear weapons in the foreseeable future. This SPEIS includes alternatives to maintain uranium operations at Y-12.*

5.C

DISTRIBUTED CENTERS OF EXCELLENCE

The following comments were received relative to the Distributed Centers of Excellence Alternative:

- Support for the Distributed Centers of Excellence at Pantex and Y-12;
- Support for the Uranium Center of Excellence and a Uranium Processing Facility at Y-12;
- Support for a Center of Excellence at LLNL; and
- Distributed Centers of Excellence are not needed because the current arsenal is not aging in light of the study certifying that the current arsenal has a pit lifetime of between 85 and 100 years.

Response: *NNSA notes both the general support for as well as opposition to various alternatives described in the SPEIS and appreciates the time and effort taken to participate in the NEPA process. With regard to the comment*

concerning the need for pit production capacity, please see comment-response 5.C.1 for additional information. Please see comment-response 5.C.2 for more information on uranium operations at Y-12. See comment-response section 10 for related discussion of particular sites and comment-response sections 15 for general comments in support of complex transformation and 16 for general comments opposing complex transformation.

5.C.1

The following comments were received relative to pit production:

- New pits are not needed;
- The JASON study indicates that pits may have lifetimes as long as 100 years. There are more than enough pits at Pantex to satisfy any requirements;
- 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 is a routine operation. The SPEIS completely omits this reliability enhancement alternative;
- Pits are only needed for new weapons, such as the RRW;
- The only reason more pits are needed is to build weapons not now in the stockpile;
- There is no need to increase the capacity to produce pits. The current capacity at LANL is all that is needed to produce the few pits required as a result of the stockpile surveillance program;
- There are over 10,000 pits now at Pantex and those pits could be expected to last a long time (75-100 years);
- Expanded production should be the preferred alternative;
- 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; and
- There are technical issues such as the proportion of deuterium and lithium, or spoilage, with the pit which required disassembly and assembly.

Response: *It is true that the JASON group has in the past advocated the addition of extra tritium gas to weapons as a method to increase overall weapon reliability. Although this approach could possibly help alleviate performance problems for specific aging issues, it does not address all of the potential issues associated with pit aging. In addition, this approach would not contribute to NNSA's goals of improving weapons safety and security. NNSA, for classification reasons, does not divulge the exact nature of changes made to weapons in order to maintain or improve weapon safety or reliability, but the addition of tritium gas is not an all purpose solution.*

It is important to understand that while pits may have extremely long lifetimes

and there may ultimately be no need to produce additional ones, prudence requires that the complex have the capability to produce pits should the need arise. NNSA is not proposing to manufacture any pits unless they are required to meet national security requirements. The need to produce pits could arise due to aging or changes to our existing national security policies that could require pit manufacturing beyond the few pits currently being manufactured for stockpile surveillance. Further, the CMR facility, a facility necessary for the production of pits does not provide and cannot be modified to be a safe, secure and reliable facility for the future.

NNSA has made no decision with regard to the capacity for pit production. That decision will be announced in a ROD based on this SPEIS. No matter what capacity the Complex possesses, actual production rates would be determined based on the requirements of national security. See comment-responses 1.F and 1.J for a discussion of proliferation issues.

5.C.2

The following comments were received regarding the uranium fabrication mission:

- Support for a UPF at Y-12 and continuing the uranium mission at Y-12.
- The SPEIS cannot be used to make a decision siting the UPF at Y-12.
- While the SPEIS may consider locating a UPF at Y-12 as a Preferred Alternative, a decision to site a UPF at Y-12 can only be made based on a site-specific EIS at Y-12.
- The design of modified or new uranium processing facilities should have transparency built in to facilitate international inspections of all stages of uranium operations and eventually international possession of HEU.
- Upgrading existing facilities at Y-12 should be analyzed for suitability for uranium processing as an alternative to UPF.
- The only mission of Y-12 should be disassembly of uranium components and the storage of the HEU until a disposition path is identified, and there is no need to produce nuclear weapons or their components.
- The SPEIS must also consider the reasonable alternative of using the excess capacity of the HEUMF, now under construction at Y-12, to house a version of the UPF.
- Canned sub-assemblies (CSAs) are not needed.
- The SPEIS should specify the "multiple existing EU and other processing facilities" that the UPF would replace.
- What would be the proposed maximum and nominal annual CSA production capacities for the proposed UPF?
- The HEUMF at Y-12 may have excess square footage to allocate to the UPF mission.
- The HEUMF is a very large facility, on the order of 8 acres, and it is

difficult to believe that all that space would be required to store HEU and EU removed from weapons, given ongoing disposition activities involving conversion of inventories to navy fuel and dilution to low enriched uranium for civil reactors. What annual level of CSA and HEU component fabrication operations could be accommodated within the new HEUMF at Y-12 under various assumptions about future storage and uranium disposition requirements, and various projected levels for CSA production?

- If Y-12 activities were conducted at Pantex or LANL, transportation would be reduced and that NNSA should analyze this as a discrete case.
- Where will enriched lithium-deuteride components be stored and/or processed? Could this be in a facility separate from either the HEUMF or the UPF?

Response: *As explained in Section 1.5.2.2. of Volume 1 of the SPEIS, a UPF is analyzed in both the Y-12 SWEIS (currently being prepared) and this SPEIS. NNSA will not make any decisions related to the UPF prior to completion of this SPEIS.*

If pursued, the UPF would consolidate existing enriched uranium processing capabilities from Buildings 9212, 9204-2E, and 9215 at Y-12. The maximum CSA production capacity analyzed in the SPEIS is 125 per year on a single shift and 200 per year on multiple shifts. The detailed rationale for capacity requirements is classified but, in general, is determined based on the future stockpile size and composition and life extension programs. Differences between pit and CSA capacities are based on differences in the expected lifetimes of the components.

The HEUMF has been sized (approximately 110,000 square feet or 2.5 acres) for the storage mission of the facility taking into consideration the ongoing disposition activities involving conversion of inventories to navy fuel and dilution to LEU for civil reactors. The total land area for HEUMF (7 acres) and UPF (8 acres) includes facilities, roads, parking lots, utilities, security features, etc. The HEUMF provides interim and long term storage of Categories I and II HEU. The HEUMF is appropriately sized for the storage mission of the facility based on current and projected HEU inventories including shipments to customers, returns from Pantex and other facilities, dismantlement, etc. Construction of HEUMF has been completed and there is no excess capacity that could be used for enriched uranium processing. The UPF requires approximately 400,000 square feet for the manufacturing mission of the facility. Operations in HEUMF include loading and unloading of secured trailers (SSTs/SGTs), non destructive assay, item tracking and accountability, re-containerization, and internal building transportation. In contrast, operations in UPF include assembly, disassembly, dismantlement, surveillance, casting, machining, inspection, and recovery, etc. to perform

assigned NNSA missions. Storage space in UPF is limited to in process inventories associated with manufacturing. Lithium components are processed and stored in other Y-12 facilities. Finished components would be transferred to UPF as needed.

5.C.3 A commentator asked 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.

Response: *The numbers and types of weapons that are deployed in the stockpile are determined by the President in the NWSP. Whether more warheads of a particular type, such as W88s, should be reduced is a decision that can only be made by the President and the Congress.*

5.C.4 A commentator noted that it “smacks of speculative grasping at straws to justify 100's of billions of dollars for Complex Transformation” regarding the following statement from the Draft SPEIS, “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.”

Response: *NNSA acknowledges that decisions regarding new plutonium pit production are complex and that considerable disagreement exists about the appropriate approach for dealing with this complex subject. NNSA is, however, charged with making judgments about production capacity based on the best scientific information and the expected range of future stockpile scenarios. NNSA has implemented long-term scientific and engineering programs to study the effects of plutonium aging on current and future nuclear weapons performance, including studies relating to potential hermetic seal failure. In addition, NNSA has entered into numerous reviews and deliberations with the DoD regarding possible future nuclear weapons stockpile scenarios. NNSA acknowledges that additional reviews and deliberations will occur in the future, e.g., following the Nuclear Posture Reviews and Congressionally-mandated reviews. However, based on current knowledge and the expected range of future possibilities, NNSA has judged that the plutonium pit production capabilities and capacities alternatives considered for the SPEIS are appropriate.*

5.C.5 The specific 50/80 Alternative is not mentioned in all of the environmental impact categories.

Response: *NNSA has reviewed the Draft SPEIS and found the 50/80 Alternative addressed for every environmental impact category (resource area): land use, visual impacts, site infrastructure, air quality and noise, water*

resources, geology and soils, biological, cultural and archeological, socioeconomic, environmental justice, health and safety, accidents, and waste management. (See Section 5.1 of the SPEIS) See also comment-response 14 for related discussion of resource issues.

5.C.6

The following comments were received relative to pit production at LANL:

- 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 the footprint of the CMRR-NF would be over 200,000 ft², the Complex Transformation SPEIS must conduct adequate NEPA analysis for additional square footage over that analyzed in the CMRR EIS;
- NNSA would need to specify whether additional facility-specific NEPA analysis might be necessary;
- NNSA needs to explain the additional 9,000 ft² needed for the CMRR for the preferred 50/80 plutonium pit production alternative; and
- The SPEIS is confusing as to whether an additional 9,000 ft² for CMRR is needed.

Response: *No footprint additions are planned beyond that already analyzed within the CMRR EIS; therefore, because there will be no change to what has already been analyzed, no further facility NEPA analysis is planned. An additional 9,000 square feet was assessed as a means to support consolidation of plutonium operations at LANL from LLNL, provide increased analytical chemistry support for increased pit production capacity, and ensure sufficient nuclear space as a contingency. Subsequent to the issuance of the Draft SPEIS, NNSA has concluded that the 9,000 additional square feet is unnecessary to support the proposed consolidation of plutonium activities and the increase in pit production capacity to 50/80 pits per year as assumed for the Preferred Alternative. Therefore, an addition of 9,000 square feet to the CMRR-NF is not being pursued. The Final SPEIS has been revised to reflect this.*

5.D

CONSOLIDATED NUCLEAR PRODUCTION CENTER

The following comments were received relative to a Consolidated Nuclear Production Center (CNPC):

- Support for the CNPC at Pantex or Y-12;
- Opposition to the CNPC at either Pantex, Y-12, or both; and
- Support for facility consolidation where appropriate.

Response: *NNSA notes the support as well as the opposition for a CNPC at Pantex and Y-12, and the support for consolidation where appropriate. See also comment-response sections 15 and 16 for related discussion.*

5.D.1 A/D/HE CENTER

Comments expressed support for Pantex remaining as the A/D/HE production center. Comments opposed Pantex for remaining as the A/D/HE production center.

Response: *NNSA notes the support as well as the opposition for the A/D/HE mission at Pantex.*

5.D.2 CPC

With regard to the need for pit production capacity, commentors stated that the JASON study showed that pits last almost 100 years.

Response: *With regard to the JASON study, please see comment-response 5.C.1.*

5.D.3 CUC

Comments expressed support for the CNPC and CUC at Y-12 because some facilities are already at the site that could be used. Comments opposed CNPC and CUC at Y-12 or any other site.

Response: *NNSA notes both the support as well as the opposition for a CNPC and a CUC at Y-12, and appreciates the commentors' participation in the SPEIS process.*

5.E ALTERNATIVE FOR A SMALLER CNPC

A commentor stated that DOE did not really evaluate a smaller CNPC or consider viable alternatives for consolidation of the complex.

Response: *The SPEIS evaluates production facility alternatives that would be appropriately sized for the two Capability-Based options, the smallest production capacity options. The SPEIS includes alternatives that could eliminate NNSA missions at two major sites (Y-12 and Pantex), and includes consolidation actions for the research, development, and testing missions at many of the sites. For more information on consideration of consolidation of the Complex, please see comment-responses 2.K.24 through 2.K.26.*

5.F PROGRAMMATIC ALTERNATIVE 3: CAPABILITY-BASED

Some commentors expressed support for the alternative to make the Complex more responsive by reducing and consolidating operations per the Capability-Based Alternative while some opposed the Capability-Based Alternative.

Response: *NNSA notes the support and opposition to NNSA's plans to make the Complex more responsive. Additionally, specific support as well as opposition for the Capability-Based Alternative is noted. More information can*

be found in comment-response 3.A. See also comment-response section 15 for related discussion.

5.G DOWNSIZING-IN-PLACE

Some commentors expressed support for the Downsizing-in-Place Alternative because it exhibits the lowest nuclear warhead production rate while some commentors expressed opposition to the Downsizing-in-Place Alternative. A commentor supports stockpile renovation with the simultaneous retiring of existing weapons.

Response: *NNSA notes the support as well as the opposition for the Downsizing-in-Place Alternative and appreciates the commentors' participation in the SPEIS process. All of the consolidation alternatives consider the potential benefits that could make the Complex more responsive and cost effective by downsizing in place. See also comment-responses 15 and 16 for related discussion.*

5.H ALTERNATIVES DISCUSSED, BUT NOT ANALYZED IN DETAIL

A commentor criticized the lack of detail in the discussion of alternatives, and criticized the production of special nuclear material for weapons (tritium) in civilian power reactors (Watts Bar, Tennessee).

Response: *Please see comment-response 2.0 for a discussion of the NEPA process including the discussion of alternatives. With regard to the comment concerning the production of tritium in civilian power reactors, a new section has been added to the SPEIS (Section 5.19) that discusses tritium production in Tennessee Valley Authority reactors. Also, the environmental impacts of producing tritium in commercial reactors is analyzed in the Programmatic EIS for Tritium Supply and Recycling (DOE/EIS-0161, 1995) and the EIS for Tritium Production in a Commercial Light Water Reactor (DOE/EIS-0288, 1999). Please note that tritium is not special nuclear material and that the United States does not use commercial nuclear reactors to produce special nuclear material.*

5.H.1 A commentor stated that the national weapons laboratories should eliminate the weapons activities they now conduct and pursue other activities beneficial to mankind.

Response: *As discussed in Section 3.15, one of the alternatives considered but eliminated from detailed study was an alternative that would consolidate the three nuclear weapons laboratories (LANL, LLNL, and SNL/NM). The purpose of the continued operation of the national laboratories is to support NNSA's core mission as directed by the Congress and the President, which includes maintaining a safe and reliable nuclear weapon stockpile. A cessation of these*

activities would be counter to national security policy as established by the Congress and the President and would not meet the purpose and need for agency action. For this reason, this alternative was eliminated from detailed study in this SPEIS. The national laboratories do support non-weapons research and development in a wide range of areas. Some of those areas include renewable energy, environmental technology, global climate change, anti-terrorism and non-proliferation, and biological and biomedical research.

5.H.2

The following comments were received regarding a “Curatorship” alternative:

- NNSA 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 *Treaty on the Non-proliferation of Nuclear Weapons* (NPT).
- 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, and would extend the life of the warhead without improving its performance.
- 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. 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.
- 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. Under Curatorship, most of NNSA's research and experimentation programs would cease and numerous facilities would be closed.
- 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.

- 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.
- Under a Curatorship alternative, LLNL could serve as a premier civilian science laboratory.

Response: *The suggested Curatorship Alternative does not meet the purpose and need for the agency action. The requirements that NNSA uses to base or define its programmatic requirements are a combination of the current Nuclear Weapons Stockpile Plan and PDDs, including those issued under the Atomic Energy Act of 1954, which establish the current and projected stockpile weapon types and numbers; the Congressional direction contained in authorization and appropriation acts; as well as the best judgment of NNSA in consultation with the Department of Defense and experts from NNSA's national laboratories. Using this information, NNSA makes reasonable assumptions as to the configuration and capacity for the nuclear weapons complex for the next decade or so. NNSA has no basis to assume that nuclear weapons will not be a part of this nation's defense over the time period covered in this SPEIS.*

The range of alternatives analyzed in this SPEIS covers the range that NNSA believes could reasonably evolve from any changes to national policy with regard to the size, number and design of nuclear weapons in the foreseeable future. In response to public comments, NNSA added an alternative to the SPEIS, a variant of the Capability-Based Alternative, which would provide no net additions to the stockpile. It would only manufacture pits for the stockpile to replace pits otherwise unavailable that are destroyed in the Surveillance Program. While pits may have extremely long lifetimes and there may ultimately be no need to produce additional ones, prudence requires that the Complex have the capability to produce pits should the need arise. NNSA is not proposing to manufacture any pits unless they are required to meet national security requirements. The need to produce pits could arise due to changes to existing national security policies that could require pit manufacturing beyond the few pits manufactured for stockpile surveillance.

5.I

PROCESSING OR HANDLING OF PLUTONIUM

The following comments were received regarding processing or handling of plutonium:

- Support for the removal of plutonium and other SNM from sites;
- There is no reason for SNM and the production of new plutonium pits;
- Consolidating and securing plutonium is a good idea; but NNSA does

- not have to build new nuclear weapons to consolidate and secure;
- Transporting plutonium is an environmental hazard;
 - In processing and handling plutonium, NNSA has not historically done an adequate job of protecting the health, safety and the environment;
 - NNSA has adequately protected health, safety and environment; and
 - NNSA and LANL should create a reporting process with the City of Española regarding environmental impacts from plutonium production and operations at LANL.

Response: *The handling and transportation of nuclear materials including plutonium, enriched uranium and tritium by NNSA is subject to DOE Orders and regulations designed to protect the environment, health and safety. All NNSA's sites possessing plutonium have processes in place to protect the environment and worker health and safety and have robust safeguards and security programs in place to provide protection for that material. With regard to the comment on need for pit production capacity, please see comment-response 5.C.1. With regard to the comment requesting a reporting process with the city of Española, see comment-response 14.D.6 for examples of information provided to the public regarding the impacts resulting from plutonium production, however, the establishment of a new reporting process with the city of Española is outside the scope of the SPEIS. NNSA notes the support for special nuclear material removal and consolidation proposal.*

5.J

PROCESSING OR HANDLING OF URANIUM

The following comments were received regarding processing or handling of uranium:

- Tailings from uranium mining are harmful to health;
- Mining uranium has negative effects;
- Concerns were expressed over uranium handling/transportation operations; and,
- The Navajos at Window Rock have come to the conclusion and stood by each other at the expense of good-paying jobs, no more mining of uranium.

Response: *NNSA notes the comments concerning the tailings resulting from mining uranium and the negative health effects of uranium mining. These matters are beyond the scope of the SPEIS. See comment-response 5.I for a discussion of protection of the environment and worker health and safety in the handling and transportation of enriched uranium.*

5.K

NOT USED

5.L PROCESSING OR HANDLING OF RADIOACTIVE ISOTOPES

Comments were received regarding concern over how well NNSA processes or handles radioactive isotopes, especially tritium.

Response: *See comment-response 5.I for a discussion of the protection of the environment and worker health and safety in the handling and transportation of plutonium. With respect to tritium, NNSA conducts all process and handling of tritium in accordance with all applicable laws and regulations.*

5.M and 5N SNM CONSOLIDATION AND DISPOSAL OF SPECIAL NUCLEAR MATERIAL

Comments were received stating that:

- Concentrating and storing our entire stockpile of SNM in one single geographic location as well as making that location public knowledge is not in the best strategic interests of the Nation; and,
- Commentors expressed concern about disposal of SNM.

Response: *NNSA notes the comment opposing the concentrating and storing of all SNM in one single geographic location (which would occur if a CNPC were implemented). Chapter 3 of Volume I of the SPEIS discusses the alternatives being considered. Only one alternative, the CNPC, would result in all production and storage at one location. NNSA has no basis to classify the location where SNM is stored.*

Disposal of excess SNM is addressed in the Material Disposition Program (See: Storage and Disposition of Weapons-Useable Fissile Materials Programmatic Environmental Impact Statement, DOE/EIS-0229) and is not addressed in this SPEIS.

5.N.1 LLNL

Some commentors expressed opposition to transferring SNM to other sites, including the transfer of LLNL's SNM to other sites. Commentors expressed concern that NNSA should first resolve not to create additional waste.

Response: *The Complex Transformation SPEIS includes alternatives that would reduce the number of sites and locations within sites that store Category I/II SNM. These alternatives seek to improve security and reduce the security costs associated with storage. Specific responses to comments related to Pantex, SNL/NM, and LLNL are contained in comment-responses 5.N.2 through 5.N.6. Waste Management issues are addressed in comment-response 14M.*

5.N.2 The following comments were received regarding SNM issues at Pantex:

- 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 the "60 metric tons" of plutonium pits. 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 no 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.
- NNSA should revisit and reconsider plutonium immobilization and/or vitrification as part of the plutonium consolidation process.
- Any use of plutonium for nuclear power by utility companies increases the accessibility of nuclear sources to terrorists.
- Is the proposed pit storage facility to be constructed underground? If not, how will the new storage facility address safety and security issues? These concerns have not been addressed.

Response: *The Zone 4 Staging Area, a Material Access Area (MAA), is not in close proximity to the Zone 12 MAA. Weapons and weapon components have to be transported between these areas in approved trailers. Transporting weapons and weapon components through limited and protected areas provide some inherent security risk. Providing a storage consolidation facility in Zone 12 to stage weapons and weapon components would reduce the security risk of transporting these items as they would remain in the same MAA until being shipped off plant site.*

There is also a safety risk associated with staging weapons and weapon components in an area other than the Zone 12 MAA. Additional loading and unloading operations, as well as transporting these items over roads, are required while moving the weapons and weapon components between the Zone 12 MAA and the Zone 4 Staging Area. Reducing the amount of handling would enhance safety over the long term.

The remote location of the current staging area also creates operational inefficiencies. Multiple trips occur each day from Zone 4 Staging Area and Zone 12. Because of the remote location of the Zone 4, activities such as loading, unloading, transporting, and escorting of weapons and weapon SNM components are required between the Zone 4 Staging Area to the Zone 12 MAA. These activities would not need to be performed if the staging facilities were located in the Zone 12 MAA. Loading weapons and components takes several hours. Inclement weather situations can cause production delays when weapons cannot be transported.

Integration of the Storage Consolidation Facility within Zone 12 would allow for reduced operational costs, more efficient use of security forces, increased security, increased safety and facilitate assembly and disassembly of weapons and test units. The facility would also provide a modern design to contemporary nuclear safety standards and configured to better resist the possible threats with the flexibility to respond to possible increases in the potential threats with engineered security features. Additional benefits include reduced operating costs and manufacturing cycle times.

Deforming pits, while making them unusable in weapons, would not reduce either the security risk or costs associated with the storage or transportation of the material. They would remain Category I/II SNM and, therefore, would not be an alternative to transferring material from Zone 4 to Zone 12.

All pits which are not designated for the plutonium Strategic Reserve or retained for other national defense needs are expected to be declared “surplus plutonium.” In the Records of Decision for the Storage and Disposition PEIS (62 FR 3014) and the Surplus Plutonium Disposition EIS (65 FR 1608, January 11, 2000), DOE established a disposition program for surplus plutonium which would make surplus weapons-usable plutonium inaccessible and unattractive for weapons use. The purpose of the program is to ensure that plutonium produced for nuclear weapons and declared excess to national security needs (now and in the future) is never again used for nuclear weapons. Specifically, the Department has decided to disposition 34 metric tons of surplus plutonium. Surplus pits would be transported from Pantex to the Savannah River Site’s Pit Disassembly & Conversion Facility (PDCF). Pits would then be disassembled and the plutonium will be then processed through the MOX facility. DOE currently is preparing the Surplus Plutonium Disposition Supplemental EIS to evaluate alternatives for the disposition of additional surplus plutonium.

5.N.3 NOT USED

5.N.4 One commentor noted NNSA recognizes that consolidating weapons-usable fissile material reduces security costs, and reduces the danger of theft, accident, and radiological exposure. However, while its proposed plans are a step in the right direction, these efforts should be sped up and their scope expanded.

Response: *NNSA has already removed Category I/II Special Nuclear Material (SNM) from Sandia National Laboratories/New Mexico (SNL/NM). Also, NNSA has begun the removal of Category I/II SNM from LLNL, which is to be completed by 2012. NNSA will continue to give this action the high priority requested by the commentor. Safety, security, and logistical issues associated with preparing SNM for shipment; shipping the materials, and storage at the receiving site, however, affect the schedule to implement consolidation plans. Additional information concerning the proposed actions for the consolidation of Category I/II SNM may be found in Section 3.7 of Volume I of the SPEIS.*

5.N.5 The following comments were received regarding SNM issues at SNL/NM:

- Although the SPEIS claims that SNM will be removed from Sandia it is clear that NNSA intends to continue transporting and providing SNM to Sandia for experiments and testing;
- The SPEIS has not described the reasons for and the environmental impacts that will be associated with continued use of SNM for testing and experiments at Sandia; and
- The potential for human exposure and environmental accidents, waste disposal and terrorist activities associated with continued use of SNM at Sandia must be described.

Response: *As discussed in Section 3.7 of Volume I, Category I/II SNM has been removed from SNL/NM. There are no proposals in the SPEIS that would require continuous Category I/II SNM use at SNL/NM. The use of SNM at the Ariel Cable Facility is analyzed in the SNL/NM SWEIS. SNL/NM may continue testing in this facility using SNM in campaign mode as they are today. (See Section 3.3.5.1 of the SNL/NM SWEIS). If use of Category I/II SNM on a continuous basis is proposed in the future for work at SNL/NM, such a proposal could require a project-specific NEPA review.*

5.N.6 The following comments were received regarding SNM issues at LLNL:

- A study of potential storage sites should be prepared. 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 DoD has excess underground secure storage at a large site that is not an NNSA site analyzed in the SPEIS.
- The DoD may have excess secure storage facilities suitable for the job.
- Make the study of potential storage sites as transparent as possible. Bring in independent analysts, community members, affected tribes and other stakeholders.
- 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.
- Good procedures and a reasonable allocation of time and money will be required to package the plutonium for shipment.
- Ship LLNL SNM 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.”

Response: *Section 3.7 of Volume I of the SPEIS describes NNSA’s objective of removing all Category I/II SNM from LLNL by 2012. As described in Section 3.7, it may be necessary to provide interim storage of this material in order to meet the objective of removing all of the material by 2012. The potential environmental impacts of shipping this material are described in this SPEIS as well as the LLNL SWEIS (DOE 2005a). NNSA is only considering alternative sites that would consolidate Category I/II SNM to NNSA sites that already store Category I/II SNM. The safety and security needed for Category I/II SNM is regulated by the DOE Order System under the Atomic Energy Act and provides a high level of assurance that the material is transported and stored in a safe and secure manner. This system includes personnel security requirements, including, for example, the human reliability program applicable to employees with access to Category I/II SNM, that are not readily transferable to another federal agency or its employees. These requirements are very different than similar requirements for the storage of nuclear weapons that would be in place for the DoD sites referred to by the commentor. The commentor should note that while NNSA is able to allocate some funding on a priority basis, it can only provide funding as provided in appropriations acts. NNSA fully intends to keep stakeholders informed on these matters to the extent possible recognizing that some regulatory elements for the storage of Category I/II SNM are classified. Accordingly NNSA has not studied sites such as those suggested by the commentor.*

5.N.7 A commentor stated that the SPEIS should consider moving all plutonium from LLNL, not just Category I/II plutonium.

Response: *The removal of Category I and II quantities of SNM including plutonium from LLNL reflects a significant reduction in the quantity of plutonium at LLNL and would be a significant accomplishment by 2012. The effort will result in a significant reduction in security costs at LLNL, and supports the mission consolidation focus of Complex Transformation. The ongoing need for the remaining quantity of plutonium will continue to be assessed. Current plans are for LLNL to maintain a capability to conduct R&D on small samples of plutonium and other actinides.*

5.N.8 A commentor stated that the SPEIS should only consider alternatives that move plutonium once from LLNL, not two moves (which would be required if NTS is used as an interim storage option before moving the plutonium to LANL).

Response: *The current plan path for implementation of the proposal to move LLNL’s plutonium would not include interim storage. While the interim storage option remains available, the current plan is that the material would be moved directly to LANL and material in excess of program needs would be*

moved directly to the SRS. NTS has been identified as a possible contingency, in the event shipments to SRS or LANL are halted or delayed. Also, certain programmatic materials could be shipped to LANL or NTS for continued use. Additional NEPA analysis may be required for use of NTS as an interim storage facility for this material.

6.0 PROJECT ALTERNATIVES

A commentor requested that High Explosives R&D continue at TTR. A commentor stated that the alternatives do not include disarmament and that this is not democratic.

Response: *NNSA does not conduct HE R&D at TTR, therefore, it is not considered as an alternative under Complex Transformation. For information regarding disarmament, see comment-response 1.J.*

6.A HIGH EXPLOSIVES R&D

The following comments were received regarding high explosives (HE) R&D:

- Clarify the following statement in the Preferred Alternative Section (Section S.3.17): "LANL would produce HE detonators and conduct contained HE R&D". Does this mean an increase or decrease in HE activity?;
- Sandia National Lab is committed to lead the science and engineering for high explosives research and development; and
- The assembly/disassembly of high explosives should be done at both Pantex and the Nevada Test Site.

Response: *Generally, implementation of the Preferred Alternative would involve no change in terms of the type of HE R&D activities that are planned at LANL. With regard to the amount of work, some types are expected to grow and others to decrease. For example, while NNSA can expect "right sizing" to match its mission needs in the future (which should result in a slight reduction in HE R&D activities), "work for others" is expected to grow. Thus NNSA expects a balance in amount of these activities, and little overall change in activity. Table 3-8 (High Explosives Processing Facilities Capabilities and Activity Levels) and Table 3-9 (High Explosives Testing Facilities Capabilities and Activity Levels) in the Final LANL SWEIS (May, 2008) provide information on the HE R&D activities expected at LANL.*

NNSA notes the comment that Sandia National Laboratories is committed to lead the science and engineering for HE R&D. With respect to conducting assembly/disassembly of HE at both Pantex and the NTS, the SPEIS evaluates the assembly/disassembly mission at each site. A non-consolidation alternative (such as using both sites) would not meet the purpose and need for agency

action to make the Complex smaller and more efficient as described in Chapter 2 of Volume I, and is, therefore, not further analyzed.

6.B TRITIUM R&D

The following comments were received regarding tritium R&D:

- General concern was expressed about the proposed tritium gas transfer R&D (gas transfer occurs during detonation of some nuclear weapons), as well as all aspects of tritium use during nuclear weapons production;
- Tritium research is unnecessary;
- LLNL will keep tritium research and development under the Preferred Alternative;
- Support for tritium R&D consolidation at the SRS;
- Tritium is a particularly dangerous substance because it can cross the placenta and it causes birth defects;
- Two accidents that occurred in 1965 and 1970 released tritium;
- Opposition to moving gas transfer systems from LANL was expressed because the GTS facilities at LANL are modern and functional and it is not cost effective to move;
- The increase in production of neutron generator and tubes and the increased potential for tritium releases for production for the various alternatives to air and water at Sandia; and
- Disagreement was expressed with the fact that the DOE is going to perform more open-air tests or tritium research and development.

Response: *The alternatives related to tritium R&D activities are described in Section 3.9 of Volume I of the SPEIS, and the alternative to move tritium R&D activities from LANL to SRS is described in Section 3.9.2 of Volume I of the SPEIS. The environmental impacts of the alternatives are presented in Section 5.14 of Volume II of the SPEIS. Commentor's opposition to the alternative that would consolidate tritium R&D activities from LANL to SRS is noted. Costs and technical issues will be considered in deciding among alternatives. Currently, no decision has been made regarding the tritium R&D activities.*

NNSA has not identified any new programmatic alternatives that would change tritium-related production activities for SNL/NM in the SPEIS. Therefore, impacts to the air and water at SNL/NM would result from continuing current operations (i.e. the No Action Alternative), which is the basis for the impacts to the existing environment at SNL/NM, as described in Section 4.6 of Volume II of the SPEIS.

6.B.1 The following comments were received regarding tritium activities at LLNL:

- The Draft SPEIS mentions but does not analyze the impacts associated

with the manufacture and filling of tritium targets for the National Ignition Facility 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, the National Ignition Facility is an "integral part" of the Complex. 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.
- The Draft SPEIS fails 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.
- The Draft SPEIS dismisses the amount of tritium at LLNL as a "small quantity", and if this is DOE's basis for not analyzing the potential impact on LLNL workers and the public, it is an improper one.
- The SPEIS describes neither a "Target Fabrication Facility" at LLNL nor the aforementioned Tritium Facility Modernization Project. What is the relationship between the facilities and to the Complex Transformation plan? Why are these relationships absent from the SPEIS?

Response: *The Target Fabrication Facility at LLNL is not mentioned in the SPEIS other than to indicate that related decisions are based on existing NEPA analysis and will not be reconsidered. The targets used in the National Ignition Facility have time constraints between the loading of tritium and their use as targets. These technical constraints do not allow for target loading at an alternate site.*

The Tritium Facility Modernization Project was a project at the Savannah River Site (SRS). The project was completed in approximately 2000 and has no relationship to the Target Fabrication Facility at LLNL. In addition to overall Complex transformation efforts, a study is being conducted on the relocation of existing processes from older facilities at SRS into modern facilities, thereby reducing facility footprint and gaining efficiency from grouping process functions. Re-configuration of space at SRS to support the processing of tritium and ensure that reservoir loading and unloading supports stockpile needs is an ongoing activity. The extent to which tritium R&D operations can be consolidated within the Complex has been addressed in this SPEIS.

The impacts of continued tritium operations at LLNL related to the National Ignition Facility are included in the No Action Alternative. Those impacts were analyzed in the LLNL SWEIS, which contains more details regarding the operations and impacts at LLNL from existing operations.

6.B.2

Commentors stated that SNL/CA at Livermore sits directly to the south of LLNL. Because of the proximity of the encroaching population center toward

these two laboratories, all tritium activities at SNL/CA have been phased out. A phase out of all tritium activity at LLNL was advocated, stating that this is a viable option that should be analyzed in the SPEIS.

Response: *The LLNL tritium facility is located within the Superblock at the main Livermore site. The primary tritium mission of the tritium facility is National Ignition Facility (NIF) target R & D and filling. Under all alternatives, these activities would remain at LLNL. Additional information on tritium activities at LLNL may be found in Section 3.9.1.1 of Volume I of the SPEIS.*

6.C

NNSA FLIGHT TEST OPERATIONS

6.C.1 and 6.C.2

The following comments were received regarding flight test operations:

- Opposition to removing the Flight Test Operations out of the Tonopah Test Range.
- The loss of jobs and the devastating impact this would have on the community of Tonopah and the other, surrounding communities which rely on the hospitals, stores and infrastructure of Tonopah.
- The socioeconomic impact analysis for Flight Test Alternatives, other than continued testing at TTR, were insufficient and did not take into account the loss of volunteer jobs supporting the fire department, EMS activities, P.T.A. and teaching volunteers, and spouse-owned business jobs, all of which would be lost in addition to the 135 direct jobs associated with moving flight test activities from TTR.
- The majority of the jobs at TTR are contractor jobs, and, although the SPEIS says jobs may move to another facility, contractor jobs, in fact, would not move. Existing workers would be laid off, and new employees would be hired by a new firm at the new facility.
- An earlier NNSA study performed by NNSA's Office of Defense Programs, indicated that high-tech mobile at TTR was at least 20 million dollars less than high-tech mobile at White Sands Missile Range.
- DOE's own business case report states that TTR is the most favorable alternative.
- TTR is a small price when one considers what a mediocre baseball player is paid and to move flight test operations for a small cost, giving up national security interests, is a bad move.
- Moving flight test operations could imperil national security interests.
- If DOE were to relocate flight testing to another site, the town of Tonopah would collapse and the hospital would fold. This hospital serves more than Tonopah and would have a much larger impact than is analyzed in the SPEIS.
- The 135 direct and 256 total job loss associated with the closure of TTR was not the only factor which should be considered. Tonopah serves a larger area than just the community of Tonopah.

- Closure of TTR would close a hospital, gas stations, and stores that service a broad area of central Nevada.
- Support for moving the Flight Test Operations from TTR to NTS.
- Concern about the lack of data from WSMR to NNSA in reference to the cost to conduct the flight tests at WSMR if relocated from TTR.
- TTR already has the capabilities and has performed more analyses and provided more data than has been provided by WSMR in reference to the potential relocation of flight testing from TTR to WSMR.
- Concerns whether the future site of flight testing operations will be capable of performing at the same level as TTR. For example, testing at White Sands would cost more and could exhibit high levels of technical risk, since White Sands does not have the experience of TTR and cannot perform all aspects of testing currently performed at TTR
- Concern about the validity of the analysis conducted at WSMR pertaining to their capability to perform flight testing operations.
- Scheduling operations at WSMR are much more difficult, and flight testing operations for NNSA would be less of a priority at WSMR than if conducted at TTR.
- The comparison of TTR to White Sands was using real data for TTR and not using real data for White Sands.

Response: *NNSA has not made a decision as to the location of flight test operations. The Preferred Alternative for the location of flight test operations is described in Section 3.17 of Volume I of the SPEIS. Once the Complex Transformation SPEIS has been completed, the environmental impacts of the various flight test operations alternatives will be considered along with other cost, technical and programmatic risk analyses in deciding the location of future flight test operations. NNSA is developing a business case analysis that will be considered in making this decision but is not part of the SPEIS. Section 5.15.4.2 of Volume II of the SPEIS has been updated in part to include data provided by Nye County and addresses the economic impacts to Nye County and specifically the Tonopah area of relocating the flight test operations from TTR to White Sands or another DoD or DOE facility. This decision, along with others, will be announced in a Record of Decision. See also comment-response section 14.I for related socioeconomic discussion.*

As a response to comments NNSA has expanded the Flight Test Alternatives in Section 3.10 of Volume I. The alternatives include No Action, Upgrade, Campaign Mode Operation (three options), Transfer to WSMR, and Transfer to NTS. The environmental impacts are described in Section 5.15. NNSA is evaluating these alternatives with respect to the anticipated workload and is looking at ways to reduce costs. This includes potential work for others in moderate hazard experimentation at TTR in one of the TTR alternatives. The socioeconomic impact analysis (Section 5.15.4.2 of Volume II) has been revised and includes information on the potential impacts to community assets such as schools and hospitals.

It is true that WSMR has many customers and is an active range; scheduling would pose more of a risk to NNSA than at TTR. NNSA would have to compete with other WSMR customers. WSMR is experienced at tracking much faster test articles than the gravity weapons tested by NNSA. There is some level of risk in getting WSMR to track the test aircraft and gravity weapon from release at very high altitudes to impact and there is some risk of capturing essential end event data for one of NNSA's telemetered flight test configurations in certain terrain. Tonopah has more experience at tracking gravity weapons since they have been doing it for many years and this is their fundamental line of business. These are some of the risks that NNSA is presently assessing and will consider along with the environmental impacts prior to making a decision.

6.C.3

A commentor expressed concern that there was groundwater contamination at TTR and that it might not be cleaned up should TTR be closed. A commentor stated that the SPEIS estimates of the environmental impacts resulting from the clean up of TTR if flight tests were to be moved to another facility are too low and do not account for all test drops conducted over the entire life of TTR. The commentor goes on to state that if all past tests were factored into the cost of closing TTR, the cost would be too high.

Response: *The commentor's concern regarding the clean-up of groundwater contamination at TTR, should the site be closed, is noted. However, as discussed in Section 3.10 of Volume I, any remediation of TTR is independent of decisions based on this SPEIS.*

6.C.4

A commentor indicated that use of Tonopah Test Range requires the permission of the Western Shoshone Nation, which, to date, NNSA has not requested. The commentor went on to indicate that because of this, use of TTR is a trespass.

Response: *The Western Shoshone have long claimed about 24 million acres of land in Nevada based on alleged violations of the Ruby Valley Treaty. In the early 1950's, the Western Shoshone filed a claim concerning these lands under the Indian Claims Commission Act of 1946 (ICCA). Under the ICCA only monetary compensation could be made to a tribe for unkept treaty promises; land or other remuneration were not available remedies. In 1962, the Commission ruled that all Western Shoshone land titles had been extinguished. In order to establish valuation for a monetary award, the Commission set July 1, 1872, as the date the land was taken. In 1976, the Commission awarded the Western Shoshone \$26 million as payment for the land. This payment was refused by the Western Shoshone who argued that rejection of the money meant that they had not been compensated and their claim to the land was still valid.*

This issue has been litigated on several occasions. In 1985 the U.S. Supreme Court held that the payment had been made in accordance with the ICCA,

which constituted full and final settlement for the land claim. Whether the Western Shoshone accept the payment had no effect on the ruling and the land was determined to belong to the United States. In a subsequent challenge the U.S. Court of Appeals for the Ninth Circuit followed the Supreme Court's decision. In response to a subsequent appeal, the U.S. Supreme Court refused to hear the case, letting the appellate court decision stand (DOE 1996b).

6.C.5

A commentator stated that although there was sympathy for the 135 people at TTR that could lose their jobs, what about the 135 people downwind of the nuclear test site that have gotten cancer because of the nuclear testing?

Response: *On October 5, 1990, the Congress passed the Radiation Exposure Compensation Act ("RECA" or "the Act"), 42 U.S.C. § 2210 note, providing for compassionate payments to individuals who contracted certain cancers and other diseases as a result of their exposure to radiation released by above-ground nuclear weapons tests or during employment in underground uranium mines. The U.S. Department of Justice developed implementing regulations, which have been published in the Federal Register. The regulations establish procedures to resolve claims in a reliable, objective, and non-adversarial manner, with little administrative cost to the United States or to the person filing the claim. As of May 21, 2008, 12,083 "Downwinder" claims had been approved and a total of \$604,120,000 paid in settlement. A total of 3,405 claims had been denied and 429 were pending. More detailed information regarding this program may be found at the U.S. Department of Justice, Radiation Exposure Compensation Program website: <http://www.usdoj.gov/civil/torts/const/reca/>.*

See also comment-response section 1.F for related discussion.

6.C.6

A commentator stated that the Joint Test Assemblies program (a program used to flight test gravity weapons) should be abandoned and the weapons simply dismantled without playing with them further at the TTR. The commentator indicated that it is not clear that this activity would continue if TTR is moved to White Sands. No analysis is provided by NNSA for the cost savings of the "dismantlement of weapons only" option. No analysis of how this continued operation aids the pursuit of non-proliferation.

Response: *As long as NNSA has the responsibility to maintain the nation's nuclear weapons stockpile, it must assure that the stockpile remains safe and reliable. One of the ways that NNSA can assure that it remains safe and reliable is through the Joint Flight Test Program with the military services. NNSA must continue the Joint Flight Test Program and it would be conducted at TTR, NTS, or the WSMR. The "dismantlement of weapons only" alternative is not within the national security missions assigned to NNSA by the Congress (The NNSA Act (Title XXXII of the National Defense Authorization Act for*

Fiscal Year 2000, Public Law 106-65)). That act also mandates that NNSA promote international nuclear safety and non-proliferation. NNSA vigorously pursues its non-proliferation mission; however, the scope of Complex Transformation is reflective of NNSA's mission to produce, 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.

6.D MAJOR HYDRODYNAMIC TEST FACILITIES

A commentor stated that the Preferred Alternative should be a single new facility that would replace the capabilities of both DARHT and CFF.

Response: *The commentor's opinion is noted. However, as indicated in Section 3.11 of Volume I of the SPEIS, NNSA considers any replacement of the DARHT to be a next generation alternative that is not being considered at this time.*

6.D.1 and 6.D.2

A commentor stated his opposition to the closing of the Contained Firing Facility (CFF) at Site 300 at Lawrence Livermore National Laboratory. The commentor stated that this facility was constructed recently at a great expense and that the facility still had many years of useful life. To close this facility and build another replacement at another site is an unjustifiable expense. Another commentor was opposed to the closing of Site 300 at LLNL because it would jeopardize the safety of the nuclear weapons stockpile

Response: *NNSA is aware of the importance of the CFF and the cost and effort that went into its design and construction. The CFF, however, is only one of a large number of facilities which support the hydrodynamic Testing Program. In addition, the logistics of dispersed facilities and the cost of maintaining the separate security requirements also come into consideration. NNSA is preparing a separate business case analysis that analyzes the factors of concern to the commentor. Results from this study will be evaluated by NNSA along with the environmental impacts identified in the SPEIS, as well as other cost information prior to making a decision.*

The opposition to the closing of Site 300 at LLNL is noted. NNSA will consider the technical risks of implementing any of the SPEIS alternatives in making its decision and will not make any decisions that would jeopardize the safety of the nuclear weapons stockpile.

6.D.3

The following comments were received regarding hydrodynamic testing at LLNL:

- The impacts of ongoing and increased hydrodynamic tests at LLNL Site 300 were improperly excluded from the Draft SPEIS.

- The Draft Complex Transformation SPEIS must consider an alternative that specifically involves the closure of Site 300 and/or transition to other environmentally-benign activities.
- The closure of Site 300 is a reasonable alternative, which should be thoroughly analyzed in the Draft Complex Transformation SPEIS.
- 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. 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.”

Response: *NNSA agrees that NEPA requires a rigorous exploration and evaluation of all reasonable alternatives to the Agency's proposed action. Indeed, Chapter 3 of Volume I of the SPEIS describes alternatives that could result in closure of all or portions of NNSA's Defense Program activities at Site 300 (e.g. Volume I Sections 3.8.2.2.1, 3.8.2.2.3, 3.8.2.2.8, 3.11.2.2, and 3.12.3). Section 3.16.3 states that if Site 300 were to close, 115 buildings containing approximately 340,000 square feet of floor space would be closed or transferred. At this time, NNSA has not identified future uses or users of facilities that may or may not be closed or transferred, and analysis of such actions are at this time premature. In other words, any future proposals for the use of Site 300, should its closure result from decisions made based on this SPEIS, would be properly addressed under NEPA at the time such proposals are identified.*

6.E

MAJOR ENVIRONMENTAL TEST FACILITIES

A commentator inquired if some or all of the proposed environmental testing for new sites are potentially more damaging to the environment than the environmental testing that has been conducted previously at other sites.

Response: *The three Environmental Testing Facility Alternatives are: No Action, Downsize-in-place, and Consolidate to One Site (NTS or SNL/NM). Under the No Action Alternative, it is expected that the environmental impacts would be similar to present impacts. Under downsize in place alternative, it is expected that fewer tests would be conducted and therefore environmental impacts would be less at those sites. The “consolidate at one site alternative” could result in a greater number of tests being conducted at that site and accordingly there could be an increase in the environmental impacts at that site. Under the latter two alternatives, if selected, facilities would be closed and employees laid off. Both of these latter alternatives entail the closing of a substantial number of facilities. Accordingly, there would be an initial period of additional environmental impacts associated with the decontamination and demolition and cleanup of these facilities.*

7.0 OTHER COMMENT CONCERNING ALTERNATIVES OR NNSA PROGRAM FUNCTIONS

Commentors raised the following major issues related to the alternatives considered by the SPEIS and NNSA program functions:

- There is no need for a complex to build any nuclear weapons and NNSA has failed to consider an alternative that would provide a nuclear weapons complex that does not manufacture nuclear weapons and only operates those facilities needed for the safe, secure, efficient disassembly and dismantlement of nuclear weapons and the disposition/disposal of their constituent parts.
- NNSA should include a No Production Alternative in the SPEIS that would pursue dismantlement and refrain from further nuclear weapons design and production. Under this No Production Alternative, NNSA would continue to operate only those facilities required to achieve the dismantlement of nuclear weapons and the disposition of the nuclear and non-nuclear components. One commentor provided a detailed description of the facilities and capabilities that NNSA should include in a No Production alternative.
- NNSA was wrong in initially rejecting the No Production Alternative.
- NNSA should cease the capability to design new nuclear weapons as well as the capability to design fixes to nuclear weapons to remedy safety, security and reliability problems uncovered in the weapons surveillance program.
- NNSA should adopt a no production alternative and under that alternative since flight test, hydrodynamic, and major environmental test facilities would be closed, the surveillance program would also cease. Such a No Production Alternative would result in a nuclear weapons stockpile decreasing each year at prescribed dismantlement rates with a discontinuation of capabilities that could stabilize and maintain the stockpile at a steady state level. This alternative would differ from current policy direction in that the capability to maintain the stockpile at directive levels would be lost, and the capability to replace legacy weapons with new design weapons would be abandoned. As part of this alternative, tritium production should cease, as would the life extension program and the production of any plutonium or uranium parts.
- A No Production alternative would lead the way to addressing the horrendous environmental legacy of nuclear weapons production; that it would enhance the economic status of communities in which these facilities have been located; and that it is the only viable way to comply with the NPT, show leadership in disarmament efforts, and stopping proliferation.

Response: *A dismantlement-only alternative was not analyzed because it would not meet NNSA's purpose and need for action. It would not enable NNSA to meet its statutory mission. NNSA has, however, added an analysis of a "No Net Production/Capability-Based Alternative" to the SPEIS (see Section 3.6.2 of Volume I of the SPEIS). As described in that Section, under the No Net Production/Capability-Based Alternative, NNSA would maintain the capability to produce a limited number of components and to assemble/re-assemble weapons for the legacy stockpile. This alternative would also include the capability with sufficient capacity for continued surveillance, limited life component (LLC) production, and weapon (and component) dismantlement. Surveillance at the production facilities would include the capabilities to disassemble weapons, conduct evaluations and component testing, and re-assemble weapons that have not had nuclear components destructively tested, or to re-assemble weapons with on-hand replacement components. At the laboratories, surveillance would include the capability to address anomalies detected by surveillance. Capabilities such as weapon design and certification with supporting R&D, Hydrotesting, flight testing, environmental testing, and HE R&D would be needed in order to assess, understand, and recommend corrective actions for problems detected during surveillance.*

A No Net Production/Capability-Based Alternative would require the production of a limited number of components and the assembly of weapons beyond those associated with supporting surveillance, but would not involve adding new types or increased numbers of weapons to the stockpile. Additionally, a life extension/replacement workload at no more than ten units per year would be supported under the No Net Production/Capability-Based Alternative.

Because the No Net Production/Capability-Based Alternative would still need a nuclear weapons complex to support the current surveillance program, limited life components production, dismantlement, and retain the capability for all required weapons functions, a minimum throughput of the equivalent of 10 weapons per year was assumed.

- *Based on zero addition of weapons to the stockpile, NNSA assumes a minimum production (production of 10 sets of components or possibly assembly of 10 weapons per year) to maintain capability and to support a limited life-extension program (LEP) workload.*
- *Two teams (a Livermore Valley team of LLNL and SNL/CA and a Rio Grande Valley team of LANL and SNL/NM) would be maintained with the capability to perform weapons design/certification missions and support the Stockpile Stewardship Program.*
- *A CMRR-NF would be built based on the need to replace the existing CMR because of safety and seismic concerns with the present facility.*
- *A minimum UPF would be built.*
- *Over time, a No Net Production/Capability-Based Alternative could result in a declining stockpile due to accelerated consumption of*

components for re-assembly of surveillance units and possibly due to problems identified in an aging stockpile.

See also comment-response section 5.H for related discussion of alternatives discussed but not analyzed in detail.

7.A OTHER ALTERNATIVES - GENERAL

Many commentors stated that a variety of other alternatives should be examined in the SPEIS. These proposed alternatives include:

- Peace-keeping and non-violent strategies and methods for resolving conflicts;
- Converting existing facilities for use as centers for the manufacture of components for renewable energy alternatives;
- Immediate end of nuclear weapons research, production, and the elimination of the nuclear arsenal;
- Green science laboratories over nuclear laboratories.
- Peaceful uses for nuclear power
- Locating pit production at SRS
- Other sections of the CRD discuss additional suggested alternatives including 1.F, 3.A, 3.A.1, 5.H.1, 5.E, 5.N.2, 5.N.6, 5.N.7, 6.A and 6.D.

Response: *NNSA believes that the Draft SPEIS analyzes a range that includes all reasonable alternatives that could accomplish the purpose and need stated in Chapter 2. The alternatives proposed by the commentors are noted. With respect to eliminating nuclear weapons work at any of the national laboratories, please see comment-response 7.A.2. See also comment-responses relating to other suggested alternatives in comment responses 1.F, 3.A, 3.A.1, 5.E, 5.H.1, 5.N.2, 5.N.6, 5.N.7, 6.A and 6.D.*

7.A.1 A commentor stated that SRS should be utilized as a nano-solar power sheet.

Response: *The Complex Transformation SPEIS analyzes the potential environmental impacts of reasonable alternatives to continue transformation of the nuclear weapons complex to be smaller, more responsive, efficient, and secure in order to meet national security requirements. Other actions, such as renewable energy research, are the programmatic concerns of other DOE programs and are not within the scope of this document.*

7.A.2 NOT USED

7.A.3 One commentor stated that the SPEIS needs to consider an alternative that would locate the nuclear weapons facilities in a southwest triangle configuration consisting of Pantex, LANL, and SNL/NM. The commentor contended this would result in a smaller, more compact and efficient nuclear weapons complex

largely contained within the southwestern triangle defined by Amarillo, Texas, and Albuquerque and Los Alamos, New Mexico, supported by occasional flight testing at White Sands Missile Range and maintenance of a small annual pit production capacity-not actual pit production-at LANL, which capacity requires no further enlargement to meet sensible national security requirements. The commentor stated that the potential synergy of this Southwest Triangle Option with a further consolidation of uranium operations to a site within this triangle, thereby eliminating weapons program operations and facilities at Y-12, must also be examined.

Response: *The SPEIS includes two alternatives that would locate the nuclear weapons facilities in the area which the commentor refers to as the “southwest triangle configuration:”*

- *The CNPC alternative, if selected and located at the Pantex site, would consolidate essentially all nuclear production and weapons assembly and disassembly activities in the area suggested by the commentor. If a CNPC alternative were selected at Pantex, pit manufacturing at LANL would be discontinued and uranium weapons program activities at Y-12 would cease.*
- *The CNC alternative, if selected and located at LANL would locate pit production and uranium operations at LANL while maintaining the assembly and disassembly activities at Pantex.*

There are also alternatives for maintaining a very small pit manufacturing capability at LANL including the No Action Alternative and the Capability-Based Alternatives. The alternative for flight testing at the White Sands Missile Range is one of the alternatives being considered for continued Flight Testing activities. Accordingly, NNSA could decide to configure the Complex as the commentor suggested within the framework of the existing alternatives considered in the SPEIS. While the commentor did not directly suggest that NNSA consolidate or transfer LLNL’s nuclear weapons functions of LLNL to another location, see comment-response 7.A.7 for an explanation of NNSA’s reasons for not proposing to transfer LLNL’s nuclear weapons functions. With respect to potentially relocating the KCP non-nuclear operations within the “southwest triangle”, see comment-response 12.

7.A.4

A commentor stated that the SPEIS is grossly deficient and is not forthcoming about future accelerated dismantlement rates. Accelerated dismantlement could become a major national security priority. That commentor went on to state that most of all, it would be a steep stockpile reduction, a focus on strongly accelerated rates of dismantlement, and a radical shrinking of the nuclear weapons complex that would most directly enhance U.S. nuclear weapons safety and security, none of which Complex Transformation assumes as a reasonable course of action, much less seriously considers. Related comments suggested that both Pantex and NTS could be used to accelerate dismantlements if that

becomes a national priority.

Response: *Section 3.6.3 in the SPEIS discusses the effects of significantly reduced stockpile sizes, including the long-term impact on assembly and disassembly activities. NNSA does not foresee a requirement to physically expand capacity at an assembly or disassembly facility. If the only activity being conducted at that facility is assumed to be disassembly, its rate of disassembly could be increased as the number of assembly operations is reduced. If, as suggested by the comments, a new national priority is established to accelerate dismantlement, NNSA would formulate a proposal to implement that policy and prepare NEPA documentation, accordingly, prior to taking any action. Such proposed action could include using both Pantex and NTS (if available) or whatever facilities were available at that time to perform the mission.*

Whether the United States further reduces or eliminates its nuclear weapons stockpile is a decision that can be made only by the President and the Congress. It is not a decision that can be made by NNSA. NNSA has no basis to predict that nuclear weapons will not be a part of this Nation's national security arsenal over the time period covered in this SPEIS. The range of alternatives analyzed in this SPEIS encompasses the range that NNSA believes could reasonably evolve from any changes to National policy with regard to the size, number and design of nuclear weapons in the foreseeable future. All of the alternatives being considered would provide a robust dismantlement capability.

7.A.5

A number of commentors stated that the Draft SPEIS arbitrarily excludes analysis of reasonable alternatives for significant consolidation. In particular, the Draft SPEIS arbitrarily excludes examination of consolidation options that would eliminate one or more geographically distinct sites that are no longer necessary. Some commentors indicated that the range of alternatives considered in the Draft SPEIS is insufficiently broad in light of the stated purpose and need for Complex Transformation. They state that for instance, NNSA does not appear to have evaluated truly consolidating the nuclear weapons complex, which would mean closing down a number of sites, including LLNL, its Site 300 high explosives testing range, and the Kansas City Plant.

Response: *Consolidation, for the purpose of consolidation is not within the Agency's purpose and need. The SPEIS analyzes alternatives that will make the Complex more efficient and responsive than is the case under the no action alternative. Consolidation alternatives were formulated with the purpose and need in mind. The SPEIS assesses a range of reasonable alternatives for the future weapons complex that includes alternatives that if selected, would eliminate one or more nuclear weapons complex sites. Elimination of one or more geographically distinct sites that are no longer necessary could result from the analysis in the SPEIS. For example, if a CNPC or CNC were selected and located at Pantex, uranium weapons activities would cease at Y-12. If a CNPC were selected and sited at NTS, weapons activities at Pantex would cease.*

Accordingly, NNSA could decide to consolidate the Complex in a way that would eliminate one or more geographically distinct sites that are no longer necessary within the framework of the existing alternatives considered in the SPEIS. The SPEIS does not exclude examination of consolidation options that would eliminate one or more geographically distinct sites. See also comment-responses 7.A.6 and 7.A.7, which address why NTS and LLNL were not considered for closure. See comment-response 12 for information concerning KCP.

7.A.6

A commentor stated that under a NEPA alternative that presumes good faith United States compliance with the Nuclear Non-proliferation and Comprehensive Test Ban treaties, NNSA must examine the closure of its underground nuclear weapons testing grounds at NTS, while consolidating nuclear warhead stockpile support functions at Los Alamos National Laboratory, and non-nuclear component production at Sandia National Laboratory.

Response: *NNSA is required by U.S. law to maintain the capability to conduct underground nuclear testing at the NTS, if directed by the President (50 USC §2528a). The continuation of the ability to conduct tests at the NTS was assessed in the NTS SWEIS (DOE 1996b) and in the SSM PEIS (DOE 1996d). There are no proposals or alternatives in the SPEIS that involve, or potentially involve decisions relating to either continuation or discontinuation of the NTS's capability to conduct tests. The ability to conduct underground nuclear tests is an essential existing and ongoing element of NNSA's science based Stockpile Stewardship and Management Program. The NTS's ability to conduct underground tests is unique and cannot be reasonably consolidated or relocated to another site. Accordingly, closure of the NTS is not a reasonable alternative to the proposed action.*

The SPEIS assesses a CNPC Alternative that would consolidate all weapons production operations at LANL. The foundation that NNSA must use to define its programmatic requirements is a combination of the current Presidential Decision Directives and Nuclear Weapon Stockpile Plans which establish the current stockpile weapon types and numbers; the Congressional direction contained in authorization and appropriation acts; as well as the experience and judgment of NNSA in consultation with the DoD and the experts from NNSA's national laboratories.

The KCP EA (DOE/EA-1592) analyzes alternatives including consolidation of most of the non-nuclear component production to SNL. The Finding of No Significant Impact issued by both GSA and NNSA did not select either option in the alternative that would have consolidated the KCP activities at SNL (73 FR 23244, April 29, 2008). Additional information regarding non-nuclear production may be found in comment-response 12, Kansas City Plant, and in the KCP EA.

7.A.7

A commentator proposed another alternative that is asserted to be in line with health, environmental, and security concerns that 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. One commentator stated that in light of the multiple problems at LANL and the fact that LLNL was given the role of new pit design, one alternative without a LANL in Complex Transformation, in which the existing pit production at LANL is terminated, should be considered. Also cited as support for elimination of LANL as a nuclear weapons laboratory was LANL's record of poor plutonium accounting as it relates to waste and the flash drive security issue. Other reasons cited by commentators for eliminating LANL include the fact that plutonium, strontium, and other radionuclides have found their way into groundwater near the facility.

Response: *NNSA is considering transformation of the nuclear weapons complex to make it more responsive and cost effective by eliminating unnecessary and duplicative facilities and activities. Each of NNSA's national laboratories provides unique programmatic capabilities, including nuclear weapons design work performed at both LLNL and LANL. Having two competent design teams available to provide independent peer review of each others work, among other advantages of having laboratories with weapons design capability, the multiple laboratory model, provides NNSA with the necessary assurance for its annual stockpile "certification" required to avoid future underground nuclear testing. The foundation that NNSA must use to define its programmatic requirements is a combination of the current Presidential Decision Directives and Nuclear Weapons Stockpile Plans which establish the current stockpile weapon types and numbers; the Congressional direction contained in authorization and appropriation acts; as well as the judgment of NNSA in consultation with the DoD and the experts from NNSA's national laboratories. Using this information, NNSA makes reasonable assumptions as to the configuration and capacity for the nuclear weapons complex for the next decade or so. NNSA has no basis to assume that nuclear weapons will not be a part of this Nation's defense over the time period covered in this SPEIS. The range of alternatives analyzed in this SPEIS covers the range that NNSA believes could reasonably evolve from any changes to National policy with regard to the size, number and design of nuclear weapons in the foreseeable future.*

In October 2006, a police search of a LANL subcontractor's home in Los Alamos recovered classified information taken from the laboratory. The subcontractor, who possessed a security clearance, had removed the information from a highly classified facility at the laboratory. In response to this incident NNSA issued a preliminary notice of violation to the University of California with a proposed civil penalty in the amount of \$3 million and, a separate preliminary notice of violation to Los Alamos National Security (LANS) with a proposed civil penalty in the amount of \$300,000. In addition, the Secretary of

Energy issued a Compliance Order to LANS requiring it to address a number of issues regarding the protection of classified information. In response to this Order, LANS implemented a number of measures to strengthen controls including destroying an estimated 1.4 million “legacy” classified documents, reducing the number of accountable electronic classified items from 87,000 to 4,472, reducing the number of vaults and vault-type rooms holding classified data from 142 to 114, and consolidating classified material and classified processing operations into a “Super Vault Type Room” (GAO 2008).

Comment-response 10.B.1 provides information regarding the alleged problems with plutonium accountability at Los Alamos.

Information regarding surface and groundwater quality at LANL may be found in Section 4.1.5 of Volume I of the SPEIS.

The SPEIS analyzes alternatives that would discontinue the pit production mission at LANL. For example, as discussed in Section 3.5 of Volume I, Programmatic Alternative 2, Consolidated Centers of Excellence, a Consolidated Nuclear Production Center, if constructed at NTS, Pantex, SRS, or Y-12, would transfer the pit manufacturing mission to these facilities and result in the discontinuation of the pit manufacturing mission at LANL. Additionally, if a CPC were located at a site other than LANL, pit production at LANL would be discontinued.

7.B and 7.B.1

TRANSPORTATION OF NUCLEAR MATERIALS

A number of commentors stated their concerns that the transportation of nuclear materials is extremely dangerous and hazardous to health. Among their concerns were:

- Transporting nuclear material is hazardous and will “create death”.
- Plans for radioactive waste transportation are unacceptable.
- The transportation of nuclear material from LLNL is dangerous.
- The SPEIS should be revised to decrease the amount of plutonium transport.
- Nuclear materials should be taken to the most safe and secure location to decrease the chance of an accident or attack.
- The Preferred Alternative would reduce that amount of shipping throughout the Complex which would result in lesser potential environmental impacts.
- The transportation activities were at significant risk from potential terrorist activities.
- The option of consolidating all plutonium at one site without multiple transportation routes from LLNL should be considered.
- The SPEIS must consider the environmental impacts and security risks of

transporting SNM and nuclear weapons and components via highway across the U.S. to the proposed sites.

- The weakest link in the nuclear weapons program is the transportation of nuclear materials between sites.

Response: *As described in Section 5.10 of Volume II of the SPEIS, the environmental impacts associated with transporting nuclear materials that would be necessary to implement any of the alternatives is very small. NNSA's record of transporting nuclear materials demonstrates that the activity is safe. Special transport vehicles and procedures are used in the transportation of TRU wastes and Category I/II special nuclear material to decrease the likelihood of release of radioactive material in the event of an accident or attack. Section 5.10 of Volume II of the SPEIS includes a detailed discussion of potential impacts from transportation activities. NNSA seeks to minimize transportation of radioactive materials when implementing its programs. Cumulative transportation impacts are addressed in Chapter 6 and Appendix C, Section C.7, provides additional information regarding transportation radiological accidents.*

As noted in Section 3.16.6 of Volume I of the SPEIS, this SPEIS contains a classified appendix that analyzes intentional destructive acts, which, if successfully completed at locations considered in the intentional destructive acts analysis, could result in impacts on workers and surrounding populations that are as or more severe than accident scenarios analyzed in Chapter 5 of the SPEIS. See also comment-response 13.D for related discussion.

7.C-7.D NOT USED

7.E SECURITY CONCERNS

Commentors were appreciative of proposed alternatives which would make security better but were also concerned about specific security issues. Specific comments are as follows:

- The Preferred Alternative would enhance safety and security as it combines the nuclear materials making it easier to protect these materials. Commentor stated that day-to-day security functions cost too much at the existing Complex.
- One commentor stated that they look forward to continuing their work with the Congress and the next administration to make a safer and more secure stockpile.
- The effects to the environment and public health if a terrorist attack was targeted (and successful) at a nuclear weapons facility.
- The security at specific locations, including LANL and LLNL.
- Other commentors expressed support and confidence in security at Y-12.
- The ability of WSMR to maintain the security of the stockpile.
-

Response: *The alternatives in the Complex Transformation SPEIS would improve the security of the nation’s nuclear weapons complex by consolidating SNM and operations. The sites in NNSA’s nuclear weapons complex are some of the most secure facilities in the world, because NNSA uses modern security technology, deploys sophisticated assets and has a well-trained protective force. To ensure security, NNSA employs three primary strategies:*

- *Use of integrated program management to define priorities and performance objectives and evaluate contractor performance;*
- *Implementation of a human capital management plan to improve the quality and training of safeguards and security professionals with an intern program to attract high-quality college graduates; and,*
- *Focus on technology to offset the reliance on costly and manpower-intensive protection strategies.*

No alternative under Complex Transformation would involve the storage or use of nuclear weapons at WSMR.

Information related to terrorism is contained in comment-response 13.

7.F SAFETY CONCERNS

Commentors expressed general concerns about the safety of NNSA operations. Some commentors expressed specific concern for safety at LANL, Pantex, and Y-12. Some commentors commended NNSA on its safety record. Commentors were also supportive of Y-12’s worker skills and safety record.

Response: *The proposed action and alternatives focus on making the complex more responsive and cost effective while maintaining the ability to ensure the safety and reliability of the stockpile. NNSA and its contractors are subject to DOE Orders and regulations designed to protect the environment and worker health and safety. Nuclear facility safety is also subject to independent oversight by the Defense Nuclear Facilities Safety Board. NNSA tries to minimize both the possibility and consequence of accidents through a system that consists of both engineering and administrative controls. NNSA also tries to identify the causes of accidents and apply the lessons learned to avoid and mitigate accidents in the future. However, no system can totally prevent accidents. That is why the SPEIS analyzes the consequences of postulated accidents for all of the alternatives. NNSA notes the comments supporting the worker’s skill and safety record at Y-12.*

7.G-7.I NOT USED

7.J SITE CLEANUP

Commentors were concerned about the clean-up of existing problems at the

NNSA sites. Specific comments are as follows:

- NNSA should not assign new missions or functions to sites until those sites have been fully cleaned-up from the pollution resulting from past weapons activities.
- “Pollution Prohibits New Missions.”
- NNSA priorities should be to clean-up existing pollution at the weapons complex sites and convert the facilities to “Green” missions.
- Funds not used to produce nuclear weapons should be used to clean-up the sites.
- NNSA needs to continue with the clean-up efforts at the sites whether or not Complex Transformation occurs.
- More needs to be done to protect air and water resources at the NNSA sites.
- NNSA sites are not in compliance with environmental requirements contained in Consent Orders, Compliance Agreements, or other legal requirements.
- In view of NNSA’s poor environmental record, NNSA cannot be trusted to provide adequate protection of the environment.

Response: *The Complex Transformation SPEIS analyzes the potential environmental impacts of reasonable alternatives to continue transformation of the nuclear weapons complex to be smaller, more responsive, efficient, and secure in order to meet national security requirements. Other actions, such as remediation of DOE sites are not within the scope of this document. Remediation is analyzed in other NEPA, CERCLA and RCRA documents. The impacts of remediation are included within the cumulative impacts at each analyzed site.*

DOE has a large remediation program and is aggressively addressing past contamination issues at each of its sites. These programs are being conducted in accordance with Federal and state regulatory requirements and include implementation of administrative and engineered controls to minimize additional releases, as well as surveillance monitoring of the environment and reporting of exposure assessments. These remediation activities involve Federal, state and local regulators, have their own schedule and funding, and are separate from actions being proposed in the SPEIS.

7.J.1 NOT USED

7.J.2 DECONTAMINATION AND DECOMMISSIONING

A commentor stated that decontamination and demolition (D&D) must be further analyzed in more depth than what is included in the Draft SPEIS. Specifically, the commentor stated that the D&D of some of the buildings is mentioned, but the environmental impacts are not analyzed in depth. The commentor requested:

- Please list all the buildings that will undergo D&D for the Preferred Alternative. The cost of D&D of the CMR, at LANL, 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.
- 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 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.

Response: *Impacts from the D&D of a facility are evaluated in detail when a site-specific D&D plan is developed for that specific facility. Such a plan requires the in-depth characterization of the existing structure and surrounding soils and involves monitoring, sampling, and a detailed assessment. Until such time as decisions are made regarding which buildings are not needed, these plans are unwarranted. The SPEIS does, however, estimate, for each alternative, at each location, the general D&D effort that would be required for each alternative using existing data in compliance with NEPA guidelines. Throughout Chapter 5, as appropriate, the SPEIS includes projections of the square footage of the building footprints that would be eliminated, and estimates the amount of concrete, steel, low-level waste, TRU waste, contaminated soil and hazardous wastes that would be generated (see, for example, Sections 5.12.3.4, 5.15.4.3, and 5.16.2.1-5.16.2.5). This analysis is based on average D&D data, and knowledge of what activities (and associated chemicals and materials) were conducted in the specific structures. The analysis further discusses, in qualitative terms, how such quantities of waste would be managed for the project-specific alternatives, such as SNM Consolidation, Tritium R&D, Flight Test Operations, Hydrodynamic Testing, and Environmental Testing. In addition, the SPEIS addresses the D&D that would be involved with programmatic decisions that could result in the closure of Pantex, as discussed in Section 5.5.15, and Y-12, which is discussed in Section 5.9.15 of Volume II. Health and environmental impacts are discussed in the SPEIS. See also comment-response section 14 for related discussion.*

7.J.3 A commentor stated that D&D of the CMR must be included in this SPEIS and requested 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.

Response: *The construction of the CMRR-NF is considered as part of the impacts at LANL for both the 50/80 alternative and the Capability-based alternatives. The environmental impacts of actions related to the CMR and CMR-R are also evaluated in the Chemical and Metallurgy Research Replacement Facility EIS (DOE 2003f). The Final SPEIS includes a discussion of the impacts of CMR D&D in Section 5.1.14.6 of Volume II.*

7.K NEW TRIAD

A commentor questioned when and where NNSA was given permission to design the New Triad which defines the delivery of our weapons systems.

Response: *The “New Triad” was not designed by NNSA. As described in Chapter 2 of the SPEIS, a reliable and responsive infrastructure is a cornerstone of the New Triad discussed in the 2001 Nuclear Posture Review, a DoD document.*

7.L NOT USED

7.M PROPOSED FUTURE OF THE NUCLEAR WEAPONS COMPLEX

A commentor expressed concern about who should be responsible for determining the future policy on nuclear weapons. Other commentors expressed concern about a potential nuclear incident or nuclear warfare in the future and the impacts from potential use or the testing of nuclear weapons. A commentor stated opposition to plans to modify nuclear facilities across the county.

Response: *The nuclear weapons policy is set by the President and the Congress. The SPEIS addresses potential accidents in Chapter 5 of Volume II, for each site. Appendix C contains a more detailed discussion of potential accidents. Testing of nuclear weapons is not a proposed action, as stated in Chapter 2 of Volume I of the SPEIS.*

7.M.1 A commentor stated that the Draft SPEIS does not adequately analyze the environmental impacts of the alternatives that are discussed. The commentor elaborated, stating that 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. The commentor went on to state that there is no such analysis in the Draft SPEIS, even though commentors

specifically stated in scoping comments that such an analysis is required.

Response: *NNSA is responsible for maintaining the safety, security, and reliability of the United States' nuclear weapons stockpile. The Complex Transformation SPEIS analyzes the potential environmental impacts of reasonable alternatives to continue transformation of the nuclear weapons complex to one that is smaller, more responsive, efficient, and secure. The President is responsible for decisions regarding the use of nuclear weapons. Accordingly, the use of nuclear weapons is not under the purview of NNSA and therefore not within the scope of this SPEIS.*

7.N **PREFERRED ALTERNATIVE**

Commentors expressed support for the Preferred Alternative. Other commentors indicated their support for the Preferred Alternative, Distributed Centers of Excellence, specifically, uranium at Y-12, stating that Y-12 is the most secure site available for the Uranium Processing Facility. Other commentors were opposed to the Preferred Alternative at LANL. One commentor stated that the Preferred Alternative does not make sense, that it is not consistent with the stated purpose and need, and that it has the worst environmental impacts.

Response: *NNSA notes the comments supporting and opposing Complex Transformation and specific aspects of the Preferred Alternative. See comment-response 7.N.2 for more information on the Preferred Alternative.*

7.N.1

Commentors expressed their dissatisfaction with the presentation of the environmental impacts for the Preferred Alternative, stating that:

- The presentation of the environmental impacts for the Preferred Alternative is confusing.
- They must be written in plain language, and prominently displayed in the summary.
- The Draft SPEIS fails one of the basic threshold tests of adequacy for an EIS in that the analysis of reasonable alternatives for the Draft SPEIS does not present a meaningful comparison of alternatives such that the impacts can be meaningfully compared.
- The analysis of the environmental impacts for the Preferred Alternative is presented piecemeal out of various program and project options.
- The “mix and match” smorgasbord approach, in which building blocks are indiscriminately stacked, in the end is unacceptable.

Response: *The SPEIS has been revised to provide a better presentation of the environmental impacts for the Preferred Alternative and to simplify comparison of NNSA's Preferred Alternative with other alternatives in the document. More specifically, the environmental impacts of the Preferred Alternative are described in a new Section 5.20 in Volume II of the SPEIS, and Tables 3.16-2 through 3.16-8 in Volume I of the SPEIS have been amended to allow for a*

better comparison of the environmental impacts of the alternatives.

7.N.2

A commentor stated that the Preferred Alternative in the Draft SPEIS is arguably the worst in many ways because it:

- 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; and,
- 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.

Response: *NNSA has presented the environmental impacts for the proposed action and reasonable alternatives in the Draft SPEIS. Besides considering these impacts a number of other factors, including engineering, security, and costs, will be considered before making any decisions regarding Complex Transformation. Although NNSA's Preferred Alternative is described in Section 3.17 of the SPEIS, it is possible that consideration of all of the factors involved could lead the agency to decisions different from those now designated as the Preferred Alternative. Environmental impacts associated with each alternative are described in Chapter 5 of Volume II of the SPEIS.*

7.O

NO PRODUCTION ALTERNATIVE

Commentors stated that there was no need for a complex 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. Commentors stated that DOE should consider a No Production Alternative and that:

- Under this alternative, NNSA would, "operate only those facilities needed for the safe, secure, efficient disassembly and dismantlement of nuclear weapons and the disposition/disposal of their constituent parts."
- NNSA should include a No Production Alternative in the SPEIS that would pursue dismantlement and refrain from further nuclear weapons design and production, and that NNSA was wrong in initially rejecting the No Production Alternative.
- NNSA should include in a "No Production" alternative in which it would continue to operate only those facilities required to achieve the dismantlement of nuclear weapons and the disposition of the nuclear and non-nuclear components. Such a program would cease the capability to design new nuclear weapons as well as the capability to design fixes to

nuclear weapons to remedy safety, security and reliability problems uncovered in the weapons surveillance program. In fact, since flight test, hydrodynamic, and major environmental test facilities would be closed, the surveillance program would also cease. Such a No Production Alternative would result in a nuclear weapons stockpile decreasing each year at prescribed dismantlement rates with a discontinuation of capabilities that could stabilize and maintain the stockpile at a steady state level. This alternative would differ from current policy direction in that the capability to maintain the stockpile at Presidential directive levels would be lost, and the capability to replace legacy weapons with new design weapons would be abandoned. As part of this alternative, tritium production should cease, as would the life extension program and the production of any plutonium or uranium parts.

Response: *NNSA has added an analysis of a “No Net Production/Capability-Based Alternative” to the SPEIS (see Section 3.6.2 of Volume I). As described in that Section, under the No Net Production/Capability-Based Alternative, NNSA would maintain the capability to produce a limited number of components and to assemble/re-assemble weapons for the legacy stockpile. This alternative would also include the capability with sufficient capacity for continued surveillance, limited life component production, and weapon (and component) dismantlement. Surveillance at the production facilities would include the capabilities to disassemble weapons, conduct evaluations and component testing, and re-assemble weapons that have not had nuclear components destructively tested, or to re-assemble weapons with on-hand replacement components. At the laboratories, surveillance would include the capability to address anomalies detected by surveillance. Capabilities such as weapon design and certification with supporting R&D, Hydrotesting, flight testing, environmental testing, and HE R&D would be needed in order to assess, understand, and recommend corrective actions for problems detected during surveillance.*

A No Net Production/Capability-Based Alternative would require the production of a limited number of components and the assembly of weapons beyond those associated with supporting surveillance, but would not involve adding new types or increased numbers of weapons to the total stockpile. Additionally, a life extension/replacement workload at no more than ten units per year would be supported under the No Net Production/Capability-Based Alternative.

Because the No Net Production/Capability-Based Alternative would still need a nuclear weapons complex to support the current surveillance program, limited life component production, dismantlement, and retain the capability for all required weapons functions, a minimum throughput of the equivalent of 10 weapons per year was assumed.

- *Based on zero addition of weapons to the stockpile, NNSA assumes a minimum production (production of 10 sets of components or possibly*

assembly of 10 weapons per year) to maintain capability and to support a limited LEP workload.

- *Two teams (a Livermore Valley team of LLNL and SNL/CA and a Rio Grande Valley team of LANL and SNL/NM) would be maintained with the capability to perform weapons design/certification missions and support the Stockpile Stewardship Program.*
- *A CMRR-NF would be built based on the need to replace the existing CMR because of safety and seismic concerns with the present facility.*
- *A minimum sized UPF would be built as a smaller facility that contains all processes but less equipment; however, the facility will not be significantly smaller than the current UPF design and will not scale proportionally with capacity.*

Over time, a No Net Production/Capability-Based Alternative could result in a declining stockpile due to accelerated consumption of components for re-assembly of surveillance units and possibly due to problems identified in an aging stockpile.

8.0 RELIABLE REPLACEMENT WARHEAD

Many commentors expressed opposition to RRW.

Response: *As stated in Section 2.5 of the SPEIS, Complex Transformation is not dependent upon or a precursor an RRW. As it is stated in Chapter 2, it is the view of NNSA that the Nuclear Weapons Complex requires transformational changes to improve its responsiveness and cost effectiveness without regard to RRW. Complex Transformation is designed to increase the efficiency, effectiveness, and responsiveness of the nuclear weapons complex. Complex Transformation must take place with or without RRW and the facilities proposed in the SPEIS are required for either outcome. NNSA will be hard pressed to meet LEP commitments without successfully implementing Complex Transformation. If an RRW were authorized by the next Administration and Congress, its concepts could enhance the efficiency and responsiveness of the Complex compared to an LEP-only approach. As described in Chapter 2 of Volume I, the RRW concept increases intrinsic security in the weapons themselves, employs fewer exotic and hazardous materials, uses more environmentally benign materials, and could mean eventual lower lifecycle costs by eliminating some processes needed to support today's weapons, such as the need to machine and handle conventional high explosives. Additionally, if RRW meets the promise of allowing a smaller nuclear stockpile, additional savings could be achieved.*

8.A RELIABLE REPLACEMENT WARHEAD -- GENERAL

Some commentors expressed concern that the SPEIS refers to a goal of creating 120-125 new warheads annually despite the Congress' recent rejection of the

RRW program. Commentors also expressed concern that development of the RRW would be pursued despite the Congress' rejection of the proposal. Some commentors stated that the Congress had rebuked the RRW program.

Response: *As noted in Section 2.5 of the SPEIS and comment-response 8.B.1, Complex Transformation is not dependent upon or preparatory to an RRW. Further, as also noted in comment-response 8.B.1, NNSA may not proceed with RRW without direction from the Congress and the President. The Congress has declined to provide continued funding for it at this time.*

The U.S. nuclear weapons stockpile is aging, with some warheads designed and constructed over 40 years ago. NNSA has increasing concerns about the ability in the long-term to certify the safety and reliability of these warheads without nuclear testing. That is the impetus for NNSA's consideration of an RRW approach which could introduce significant safety and security enhancements and allow the best opportunity for a smaller stockpile. Alternatively, and absent congressional support for RRW, NNSA will continue to rely on a LEP) approach to the legacy stockpile. Neither approach would introduce new military capabilities to the stockpile, although an LEP approach because of the already beyond design life of our current stockpile, may prove too costly and may ultimately not be viable in the long run should we require our deterrent through this century. Some of the technologies and capabilities in the Complex, required for either the LEPs or RRWs, have atrophied or will atrophy and may have to be completely reconstituted if NNSA does not take action soon. NNSA must ensure that essential nuclear capabilities are maintained.

8.B and 8.B.1

OPPOSITION TO RELIABLE REPLACEMENT WARHEAD

Commentors indicated their opposition to RRW and stated that:

- The United States does not need an RRW.
 - The United States already has far more nuclear weapons than could or would ever be used.
 - The existing stockpile is safe, secure and reliable and, with a potential pit lifetime off an additional 75-100 years, will remain that way for decades to come, thus obviating any need for an RRW.
 - Congress has rejected the idea of an RRW but NNSA improperly continues with the program anyway.
 - Complex Transformation is only an excuse to create a Complex that is capable of producing the RRW - which is unneeded.
-
- The RRW would send the wrong message to the world and create a new arms race with the current nuclear powers and encourage others to develop nuclear weapons.

- The development of RRW would necessitate a return to underground testing.
- The RRW is a program to build first strike weapons which would destabilize the current political environment in the world.
- The design of new weapons is critical to ensure that the next generation of weapons designers is capable of designing safe, secure and reliable weapons.
- The potential connections between the RRW program, the proposed new pit production facility at LANL and the Complex Transformation plan, as a whole, must be detailed in the SPEIS.
- It was imperative that the Complex Transformation and RRW be separately considered.

Response: *The Reliable Replacement Program was established by the Congress in Section 3111 of the National Defense Authorization Act for FY2006 (Public Law 109-163), with the following objectives:*

(1) To increase the reliability, safety, and security of the United States nuclear weapons stockpile.

(2) To further reduce the likelihood of the resumption of underground nuclear weapons testing.

(3) To remain consistent with basic design parameters by including, to the maximum extent feasible and consistent with the objective specified in paragraph (2), components that are well understood or are certifiable without the need to resume underground nuclear weapons testing.

(4) To ensure that the nuclear weapons infrastructure can respond to unforeseen problems, to include the ability to produce replacement warheads that are safer to manufacture, more cost-effective to produce, and less costly to maintain than existing warheads.

(5) To achieve reductions in the future size of the nuclear weapons stockpile based on increased reliability of the reliable replacement warheads.

(6) To use the design, certification, and production expertise resident in the nuclear complex to develop reliable replacement components to fulfill current mission requirements of the existing stockpile.

(7) To serve as a complement to, and potentially a more cost-effective and reliable long-term replacement for, the current Stockpile Life Extension Programs.

Section 3111 mandates the study of a different technical approach to the production and maintenance of the safety, security and reliability of the nuclear weapons stockpile without nuclear testing. See also comment-response 8.E for related discussion on RRW and Complex Transformation.

The RRW program thus began as a direction from the Congress. Whether NNSA is directed to continue this program will be decided by the President and the Congress. It is the view of NNSA, as described in the SPEIS, that the nuclear

weapons complex requires transformational changes to improve the responsiveness and cost effectiveness of the Complex without regard to RRW. One statutory objective of the RRW program, as shown above, is to “further reduce the likelihood of underground nuclear weapons testing.” See comment-responses 1.F and 1.J regarding proliferation issues.

8.B.2 One commentor stated that the SPEIS must consider the environmental impacts of the RRW that will be caused by reprocessing, proliferation and terrorist acts using the nuclear materials either as bombs or dirty bombs

Response: *As noted in Section 2.0 of Volume I of the SPEIS, NNSA will not use this SPEIS to inform decisions on whether to proceed with an RRW. NNSA conducted an assessment of the potential environmental impacts of intentional destructive acts, e.g., terrorism on the complex. That assessment is contained in a classified appendix to the SPEIS.*

8.C – 8.D NOT USED

8.E RELATIONSHIP BETWEEN THE RELIABLE REPLACEMENT WARHEAD AND COMPLEX TRANSFORMATION

Commentors stated that the SPEIS failed to adequately consider the RRW and its relationship to the Complex, and that:

- The SPEIS fails to adequately analyze the totality of environmental impacts associated with the RRW program. For example, LLNL was chosen to develop the first RRW design. If that goes forward (and NNSA is pushing the Congress to get it funded in 2009 even after the Congress cut it last year), what are the impacts on LLNL and the surrounding communities.
- The RRW analysis must be fully transparent and included in the SPEIS.
- In exchange for giving up a number of outdated buildings, the department no longer wants or needs, the DOE will get a number of new facilities that will pave the way for the development of new nuclear weapons through the RRW program.

Response: *LLNL's role in developing the first RRW design is in line with the mission that LLNL has been conducting for many years. The environmental impacts associated with this work are described in the SPEIS and included within the environmental impacts associated with the No Action Alternative. The RRW program, a program to potentially design and produce a new generation of replacement warheads, began as a direction from the Congress (Section 3111 of the National Defense Authorization Act for FY2006 (Public Law 109-163)). Whether NNSA is directed to continue with the program will be based on decisions made by the President and the Congress. Section 2.5 of Volume I of this SPEIS describes the status and potential impacts of RRW on the Complex*

Transformation SPEIS. NNSA believes the nuclear weapons complex requires the proposed transformational changes to cost-effectively maintain the stockpile.

8.F NEED FOR RELIABLE REPLACEMENT WARHEAD

A commentor stated that RRW is unnecessary as it is an ineffective deterrent. A commentor stated that it would be hypocritical to proceed with RRW.

Response: *See comment-responses 1.J, 8.0, 8.A, 8.B.1, 8.B.2, and 8.E.*

9.0 COST AND SCHEDULE

Commentors expressed concern about the cost and schedule of the Complex Transformation Project.

Response: *Please see comment-response 9.E.1.*

9.A COST-EFFECTIVENESS OF EXISTING NUCLEAR WEAPONS COMPLEX

Commentors were opposed to spending money to modernize the existing Complex and expressed concern that:

- \$40 billion annually is appropriated to the nuclear weapons complex.
- It would cost less to not make nuclear weapons.
- Consolidating all the aspects of the current complex into one location would be expensive and not a good idea.
- Spending money to duplicate the functions of Y-12 elsewhere is wasteful and not a good idea because the human resources at Y-12 are highly skilled, unique, and irreplaceable, Y-12 is a cost-effective, safe workplace, and is supported by local educational infrastructure which cannot be duplicated elsewhere.
- It would be senseless to relocate storage facilities and SNM to some other place.

Other commentors were supportive of spending money to modernize the Complex and stated that:

- Modernization of the Complex would save money while improving safety and security at the complex.
- It is more cost effective to downsize in place.
- The running of TTR is very cost effective.

- The modernization of the Complex will preserve institutional knowledge while enhancing productivity, reducing cost, and improving safety and security.
- Spending money to modernize the existing Complex at Y-12 is a good

idea because the skills already exist at Y-12, and nowhere else.

Response: *The United States possession of nuclear weapons and the budget necessary to support the stockpile is a matter of national policy set by the President and the Congress. Complex Transformation is NNSA’s vision for the most effective means of fulfilling the missions assigned to it by the Congress and the President. Decisions as to funding will ultimately be decided upon by the Congress. NNSA has commissioned an independent business case analysis to provide cost information on Complex Transformation. NNSA will use this cost information, the analysis in the SPEIS, and other information to make decisions regarding transforming the complex. The independent business case analyses are available to the public on the Complex Transformation website: www.complextransformationspeis.com.*

9.B BETTER USE OF RESOURCES

9.B and 9.B.1 Commentors expressed general concern for the use of resources to modernize the Complex and stated that:

- Resources could be better spent.
- Resources could be better used for other purposes such as to research energy alternatives or to correct the nation's economy.
- \$150 billion could be better spent on clean-up, education, health care, etc.
- There is no need for nuclear weapons and the country would be better off if the money would be spent on other things.
- Complex Transformation is, in essence, a welfare program for the Military Industrial Complex and would provide no benefit to the nation.
- The cost of nuclear weapons is excessive and does not buy this nation any additional security - indeed, the existence of nuclear weapons makes us less secure.

Response: *The United States possession of nuclear weapons and the budget necessary to support the stockpile is a matter of national policy set by the President and funded by the Congress. Complex Transformation is NNSA’s vision for the most effective means of fulfilling the missions assigned to it by the Congress and the President. The \$150 billion referred to by the commentor is an estimate of the total NNSA weapons activities program budget over the next 25 years, including implementation of decisions made on Complex Transformation and is consistent with current and planned programmatic funding levels. Decisions as to funding will ultimately be decided upon by the Congress.*

9.C FACTORS THAT COULD INCREASE PROPOSED COSTS

One commentor stated that DOE purposely delays maintenance to increase

projected cost savings. This delay could increase costs in the future.

Response: *Like most Federal programs, NNSA's nuclear weapons programs have experienced shrinking budgets in recent years. In response, NNSA has sought to improve its operations and lower its costs in order to meet its mission requirements. NNSA is keenly aware of its responsibility to the taxpayers and endeavors to make the most effective use of the resources provided to it by the Congress. See comment-response 9.D for related discussion on maintenance backlogs. Between 2003 and 2009, NNSA reduced the deferred maintenance backlog by approximately \$900 million.*

9.D COSTS OF CLEANUP

A commentor expressed concern regarding the ultimate costs of cleanup that could result from the Complex Transformation Alternatives. The commentor stated that insufficient budgeting is an important factor resulting in a lack of funding for cleanup at LANL and other DOE national laboratories. Another commentor stated that the DOE's budget in 2009 for cleanup is more than what's being proposed for Complex Transformation.

Response: *As noted in comment-response 7.J.2, precise costs for environmental remediation (cleanup) are very uncertain until a specific plan is developed. Such a plan requires in-depth characterization of the existing structure and surrounding soils and involves monitoring, sampling, and assessment. Until such time as decisions are made regarding which buildings are not needed, these activities are unwarranted. The SPEIS does, however, estimate, for each alternative, at each location, the general D&D effort that would be required for each alternative using existing data in compliance with NEPA guidelines. Throughout Chapter 5, as appropriate, the SPEIS includes projections of the square footage of the building footprints that would be eliminated, and estimates the amount of concrete, steel, low-level waste, TRU waste, contaminated soil and hazardous wastes that would be generated (see, for example, Sections 5.12.3.4, 5.15.4.3, and 5.16.2.1-5.16.2.5 of Volume II of the SPEIS). This analysis is based on average D&D data and knowledge of what activities were conducted in the specific structures. The analysis further discusses, in qualitative terms, how such quantities of waste would be managed for the project-specific alternatives, such as SNM Consolidation, Tritium R&D, Flight Test Operations, Hydrodynamic Testing, and Environmental Testing. In addition, the SPEIS addresses the D&D that would be involved with programmatic decisions that could result in the closure of Pantex, as discussed in Section 5.5.15, and Y-12, which is discussed in Section 5.9.15 of Volume II. NNSA has a current maintenance backlog due to budget issues that does cause less critical maintenance to be deferred until funding becomes available.*

9.E and 9.E.1 COSTS OF ALTERNATIVES

The following comments were received relative to costs of the alternatives:

- Requests for additional information on costs associated with Complex Transformation, including analysis of costs for the various alternatives, specifically, whether the Preferred Alternative provides an unclassified cost ratio such as two times or 20 percent extra for the use of raw versus cast processes and the cost of alternatives to comply with treaty enforcement.
- The cost of concrete would increase if the CMRR is built.
- The SPEIS must give projected costs of 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. This is significant given that SNM consolidation is likely to be by far the most expensive element of proposed Complex Transformation.
- 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. This is counter to NNSA claims that Complex Transformation can take place within its existing projected budgets.
- NNSA has actually chosen the most expensive alternative as its Preferred Alternative for plutonium pit production (the Consolidated Plutonium Center (CPC)).
- NNSA must calculate and state projected cost for Complex Transformation in this SPEIS.”

Response: *Detailed cost estimates are not provided in the SPEIS. A separate business case analysis has been developed and will be considered in making decisions on Complex Transformation. The business case analysis demonstrated that the optimum funding and scheduling profiles for transformation of the SNM would require more funds than have been devoted to that part of the enterprise in the past. However, these SNM activities have historically consumed about 30 percent of the defense programs portion of NNSA’s budget. This leaves significant room for reprioritizing within a flat budget to achieve the transformation goals within the timeframe analyzed in the SPEIS. In addition, NNSA is implementing many related activities as part of transformation that are expected to generate savings that will offset some, or all, of the increases needed during the early years of transformation:*

- *Reductions in square footage throughout the complex of about 9 million square feet of space are proposed. This will reduce the maintenance*

portion of the budget significantly.

- *Improved contracting and business practices are expected to generate additional savings and permit workforce reductions that result in additional savings.*
- *With these measures and the efficiencies that result over the long term from the consolidation, there is likely to be little impact on other defense programs areas. The Preferred Alternative for plutonium is not the most costly alternative (TechSource 2007a).*

9.F COST-BENEFIT STUDY

Commentors stated concern about Complex Transformation cost-benefit studies and stated that:

- Simple raw data and cost savings can not be the only basis for a decision to move the Flight Test Operations out of the Tonopah Test Range.
- It is improper to look at cost-benefit analysis for just one portion of Complex Transformation. If this type of criteria is to be used, it should be used across the board and look at all costs and all benefits of all proposals.
- NNSA is incorrect in their cost-benefit analysis that relocation operations from TTR to WSMR and that it will not result in the cost savings that the analysis is representing.
- DOE should calculate the reduction in overhead costs if LLNL had no nuclear research but instead focused on green energy research.
- The United States is only considering the benefits to economic development, but should also consider the costs of possible weapons use.
- The amount of taxpayer money required to support Complex Transformation is excessive.
- A Cost-Benefit Study should be prepared prior to proceeding with this proposal.
- The SPEIS must compare the cost of total disarmament by 2030 to rebuilding the complex by 2030.
- The costs associated with closing plants could be large and it is requested additional information associated with these costs and with the efficiency of the existing plants vs. the new plants be provided.

Response: *NNSA has not made a decision as to the location of flight test operations or other alternatives considered in the SPEIS. The Preferred Alternative is described in Section 3.17 of Volume I of the SPEIS. Once the Complex Transformation SPEIS has been completed, the environmental impacts of the various flight test operations alternatives will be considered along with other cost, technical and risk analyses in deciding the location of future flight test operations. This decision, along with others, will be announced in a Record of Decision.*

In regard to calculating the reduction in overhead costs if LANL had no nuclear research, there is no alternative in which it does not maintain some level of nuclear research. Furthermore, this SPEIS is the document which is prepared to present to NNSA the environmental impacts of the proposed action and reasonable alternatives to that action. Costs and technical considerations are the focus of other studies. These studies are being prepared separately and will be considered as part of reaching any decisions in the Record of Decision.

As noted in comment-response 7.M.1, NNSA is responsible for maintaining the safety, security, and reliability of the United States' nuclear weapons stockpile. The Complex Transformation SPEIS analyzes the potential environmental impacts of reasonable alternatives to continue transformation of the nuclear weapons complex to one that is smaller, more responsive, efficient, and secure. Only the President can authorize the use of nuclear weapons. Accordingly, the use of nuclear weapons is not within the scope of this SPEIS. See comment-response 9.H for related discussion on funding to support Complex Transformation.

9.G **TIMELINE**

Commentors requested additional information related to the timeline for Complex Transformation and others questioned the timeframe for analysis. One commentor expressed concern that support for LLNL will require steady and long-term funding.

Response: *In general, programmatic NEPA documents seek to analyze the environmental effects of proposed actions for a particular program for the time period in which the impacts would occur. That is the case for the SPEIS, and was also the case for the 1996 SSM PEIS. Many programmatic decisions, e.g., a decision to construct a major new facility, such as a plutonium or uranium facility, could take as long as 20 years to implement of the time period evaluated in this SPEIS is consistent with the long lead times of programmatic activities involving nuclear weapons and facilities. Comments related to funding are noted, but are issues which will be decided by the Congress and are beyond the scope of the SPEIS. See also comment- responses 9.E and 9.E.1 for related discussion.*

9.H **TAXPAYER MONEY**

Comments were received regarding concern about the use of taxpayer money and opposition to:

- The funding of the maintenance and improvement of the nuclear weapons complex.
- The spending of taxpayer money until a new administration has issued its own Nuclear Posture Review.

- Funding Complex transformation at locations other than Y-12 when taxpayer dollars to support Y-12 had already been spent.
- Moving facilities/production capabilities from Y-12 to another site which would result in more unnecessary expense to the taxpayer.

Response: *As noted in comment-response 9.B.1, the budget necessary to support the stockpile is a matter determined by the Congress and approved by the President. Complex Transformation is NNSA's vision for the most effective means of fulfilling the missions assigned to it by the Congress and the President. The Constitution requires that decisions on prioritization of federal expenditures be established by the Congress.*

The Nuclear Posture Reviews do not establish requirements for NNSA. The basis for the requirements that NNSA uses to establish its programmatic requirements is a combination of the current PDD and the Nuclear Weapons Stockpile Plan, which establish the current stockpile weapon types and numbers; the Congressional direction contained in authorization and appropriation acts; as well as the judgment of NNSA in consultation with the DoD and the experts at NNSA's national laboratories. For additional information regarding the Nuclear Posture Review, please see comment-response 1.C.

NNSA appreciates the concern expressed by the commentors regarding retention of nuclear weapons work at Y-12; however, it should be noted that the budget used to support the nuclear weapons stockpile is determined by the Congress and is funded by the taxes paid by U.S. citizens from all regions of the United States.

9.I

COSTS NOT INCLUDED IN THE SPEIS

A commentor stated that 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. The Draft Complex Transformation SPEIS lacks adequate information to allow the NNSA and the public to evaluate the cost-effectiveness of each of the alternatives under consideration. In addition, 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).

Response: *The purpose and need for Complex transformation is partly driven by a need to operate the nuclear weapons complex in a cost-effective manner. NNSA has commissioned an independent business case analysis to provide cost information on Complex Transformation. NNSA will use this cost information, the analysis in the SPEIS, and other information to make decisions regarding*

transforming the complex. The independent business case analyses are available to the public on the Complex Transformation website: www.complextransformationspeis.com.

10.0 CANDIDATE SITES

Commentors expressed concern about the selection and limiting of the specific sites considered for the various alternatives and questioned the process used to determine the site alternatives.

Response: *Section 3.1 of Volume I of the SPEIS discusses the process that NNSA employed to identify reasonable alternatives for restructuring SNM facilities and R&D and testing facilities. For SNM facilities, site alternatives were identified based on the principle of consolidating SNM at fewer sites and locations within sites. For the R&D and testing facilities, NNSA was guided by the principle of improving operating efficiencies by consolidating, relocating, or eliminating facilities.*

10.A NOT USED

10.B LANL

Comments with specific reference to actions related to LANL were:

- DOE has an obligation to clean up and reclaim all contaminated property, soil, and equipment at LANL.
- Opposition to the expansion of plutonium pit production at LANL.
- Opposition to the retooling the LANL complex.
- LANL is inherently more attractive to terrorist attacks
- Concerns about the safety of activities conducted at LANL.
- Concerns about building nuclear weapons at LANL.
- Instead of building yet another weapon installation at Los Alamos the United States should restore the site to the peaceful grandeur that it had when it was first inhabited by the Anasazi.
- Los Alamos ranks among the wealthiest communities in the United States, and yet the state of New Mexico has ranked among the 10 poorest states for decades.
- LANL could be very useful for other purposes.
- LANL is too close to local population centers to safely continue plutonium pit production or storage.
- LANL should be redesigned to be a Distributed Center of Excellence for Nuclear Decontamination and Cleanup.
- Support for the proposal to make LANL the Center of Excellence for Nuclear Design and Engineering.
- Support for the Preferred Alternative because it validates that LANL will

- continue to be a national security laboratory.
- A limited production capacity for LANL is not incompatible with state of the art science.
- Appreciation for economic and community activities at LANL.
- Support for continued HE experiments and research at LANL.
- NNSA must examine closure of LANL because there is no need to maintain two nuclear weapon design laboratories.
- More than 60 percent of voters who voted in the previous New Mexico elections and are likely to vote in the next election have positive feelings for the work carried out at LANL.

Response: *These comments related to LANL are noted. This CRD includes specific responses to comments related to land use (comment-response 14.A), clean-up (comment-response 7.J), terrorism (comment-response 13), and other uses of LANL (comment-response 7.A.7, safety (comment response 7.F), environmental justice (comment-response 14.J), pit production (comment-response 5.C.1), and socioeconomics (comment-response 14.I)).*

10.B.1

Some commentors stated that LANL currently has 300 kilograms of plutonium missing from inventory records and that NNSA should account for where that plutonium has gone. One commentor stated that NNSA lacks competence even for a bean counting function and must take that into account in the SPEIS.

Response: *LANL materials control and accountability procedures are in compliance with DOE Orders. In a letter to the president of the Institute for Energy and Environmental Research dated February 28, 2006, NNSA's Administrator replied to allegations of the accounting discrepancy of plutonium at LANL (NNSA 2006). This apparent discrepancy is a result of the different tracking and reporting procedures for site security and waste management organizations. Comparison of the information contained in the two systems cannot be used to draw conclusions about the control and accountability for SNM.*

10.C

LLNL

Comments with specific reference to actions related to LLNL were:

- The impacts of the closure or transfer of Site 300 should be included in the SPEIS.
- When would LLNL Site 300 be closed?
- Opposition to the closing of LLNL.
- Opposition to any testing at LLNL.
- LLNL Site 300 is a redundant facility inappropriately located for such hazardous activities and all activities should cease and future efforts should focus on remediating its toxic legacy.

Response: *NNSA notes the comments supporting nuclear weapons missions at LLNL as well as those in opposition. Chapter 3 of Volume I of the SPEIS describes alternatives that could result in closure of all or portions of NNSA's Defense Program activities at Site 300 (e.g. Sections 3.8.2.1.2, 3.12.3, 3.8.2.1.5, and 3.11.1.1, and 3.12.3 of Volume I of the SPEIS). Section 3.1.6.3 states that if Site 300 were to close, 115 buildings containing approximately 340,000 square feet of floor space would be closed or transferred. This SPEIS does not identify future uses or users of facilities that may or may not be closed or transferred. Any such actions are at this time premature and would be more appropriately addressed if and when facilities become excess to the Nuclear Weapons Complex. In other words, any future proposals for the use of Site 300, should its closure result from actions taken pursuant to this SPEIS or otherwise, would be properly addressed under NEPA at the time such proposals are made. See also comment-responses 6.D.3 and 7.A.5 for related discussion.*

10.D NTS

Comments with specific reference to actions related to NTS were:

- Opposition to any facility at NTS because the land that the NTS resides on is actually owned by the Shoshone Nation.
- Using Nevada as a location for Complex Transformation is a bad idea. .
- Data collection at the DARHT, at LANL, is limited, so consolidation of hydrotesting facilities and the construction of a new CFF at NTS would be a good thing and offer better scientific assistance to the Complex

Response: *Information related to relocation of NNSA Flight Operations from Tonopah Test Range, including the question of Western Shoshone ownership of the land is included in comment-response 6.C.1 through 6.C.5.*

Comments related to the opposition of NTS for Complex Transformation are noted. With respect to the DARHT, a hydrotesting facility located at TA-15 at LANL, as compared to the CFF, a hydrotesting facility located at LLNL Site 300, the SPEIS assesses the environmental impacts of construction and operation of facilities as well as the D&D of retired facilities, for conducting hydrodynamic testing. Technical judgments regarding the usefulness of one facility in relation to another facility are beyond the scope of this SPEIS. Such technical judgments are the topic of other documents being prepared to assist NNSA in making the ultimate decisions. NNSA will consider such technical judgments along with the environmental impacts analyzed in this SPEIS prior to making decisions. Hydrotesting consolidation at NTS would be considered in the future.

10.D.1

A commentor stated that the Draft SPEIS fails to address the issue of authorized land uses at NTS and whether consolidated SNM facilities there would be consistent with the mission of the NTS as authorized in the existing land withdrawal legislation for the site.

Response: *DOE does consult with the U.S. Department of the Interior regarding land withdrawals as provided in the April 15, 1997, settlement agreement in the case of Nevada v. Pena, CV-S-9400576-PMP-(RLH). That consultation process was initiated in 1997 and is continuing. See also comment-response section 14 for related discussion.*

10.E TTR

A number of commentors expressed opposition to relocating Flight Test Operations from TTR and closing TTR. Some of these commentors stated that TTR has a direct beneficial impact on the local economy of Nye County. A number of commentors supported upgrading NNSA Flight Test Operations at TTR.

Response: *NNSA has not made a decision as to the future location of flight test operations. Once the Complex SPEIS has been completed, the environmental impacts of the various flight test operations alternatives will be evaluated along with other cost, technical and risk analyses in reaching a decision as to the location of future flight test operations. This decision, along with other decisions will be announced in a Record of Decision.*

The socioeconomic impact analysis (Section 5.15.4.2 of Volume II) has been revised to include data provided by Nye County (UN 2007). This will more accurately reflect potential impacts on Nye County of the various flight test alternatives. In addition, a modified alternative for maintaining Flight Test Operations at TTR, with a reduced staffing level, reduced footprint, and a renegotiated lease with the U.S. Air Force has been added to Section 3.10 of Volume I of the SPEIS, and the environmental impacts of this new alternative are presented in Section 5.15 of Volume II. Additional information regarding TTR may be found in comment-responses 6.C.1 through 6.C.6.

10.F PANTEX

10.F.1

A commentor stated that the neighbors of Pantex care about the issues of security, safety, environmental responsibility and integrity, and have lived with what Pantex has done. The commentor went on to state that the Pantex neighbors had put up with enough and did not need additional facilities and missions there.

Response: *NNSA appreciates the support of the neighboring communities of Pantex and notes the opposition to additional facilities and missions at Pantex. NNSA also cares about security, safety, environmental responsibility, and integrity. NNSA seeks to improve its ability and performance in the areas of security, protection of worker and public health and safety, and protection of the environment.*

10.F.2 A commentator states that 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 (i.e., Environmental Impact Statement for the Continued Operation of the Pantex Plant and Associated Storage of Nuclear Weapons Components (DOE/EIS-0225, November 1996) (Pantex SWEIS). The commentator goes on to state that the Pantex SWEIS does not reflect the current footprint of the operational area of the Plant, provide accurate boundaries of the Plant, allow for current access and adjacent land purchase activities underway by Pantex, and states that the existing facilities on-site are unaccounted for given that buildings have been decommissioned and demolished and others constructed. The commentator further stated that technologies have come into existence in the past approximately 13-years and the nature of security in a post-9/11 world has changed.

Response: *NNSA used the most recent information available in developing the Complex Transformation SPEIS. This included information updated by the Pantex Site Office and the management and operating contractor for this final SPEIS.*

10.G SNL/NM

A commentator expressed support and appreciation for SNL/NM.

Response: *NNSA notes this comment. See also comment-response section 15 for related discussion.*

10.G.1 The following specific comments related to SNL/NM were received:

- What is the level of wafer production at SNL/NM and the associated contamination?
- What will be the increase in explosive components testing and the release of toxic contaminants to air and water?

- Epidemiologic studies must be implemented along with air monitoring and a RCRA approved well monitoring system at Sandia to provide for knowledge of increased public exposure to contaminants in the air and water from increased activities at Sandia.
- Name each facility and describe what will be the increased level of radioactive and hazardous waste releases from each facility at Sandia that will be involved in the new Complex transformation?
- What risk to the public?
- Will the current Hazardous Waste Management Facility be able to handle the increased quantities of RCRA hazardous waste up from 53,123 Kilos and infrastructure related wastes of up to 175, 000 kilos per year?
- How much additional RCRA and radioactive waste will be generated above current levels by the Transformed Complex?"

Response: *The SPEIS evaluates specific alternatives and environmental impacts related to NNSA’s nuclear weapons complex. The information requested by the commentor is more appropriate to the analysis contained in a site-wide EIS or a RCRA analysis. For more detail regarding SNL/NM facilities and activities and their impacts, the commentor is referred to the SNL/NM SWEIS (DOE 1999c) and the Final Supplement Analysis for the Final Site-Wide Environmental Impact Statement for Sandia National Laboratories, New Mexico (DOE 2006a). Section 3.2.6 of Volume I of this SPEIS provides a brief overview of existing missions at SNL/NM. The SNL/NM SWEIS and Supplement Analysis provide detailed descriptions of SNL missions and activities. There are no new missions proposed for SNL/NM under the Programmatic Alternatives in the Complex Transformation SPEIS. SNL/NM is considered in the Project-Specific Alternatives:*

- *Consolidation of Category I/II SNM at SNL/NM to other NNSA sites has been completed and is discussed in Section 3.7.1.4 of Volume I of this SPEIS.*
- *Current high explosive (HE) R&D facilities at SNL/NM are evaluated in Section 3.8.1.4 of Volume I (No Action) and the HE R&D alternatives associated with Complex Transformation are addressed in Section 3.8.2 of Volume I (HE R&D SPEIS Alternatives).*
- *SNL/NM was not considered for any changes to its tritium missions under Complex Transformation.*
- *Current Hydrotesting capabilities at SNL are addressed in Section 3.11.1.3 of Volume I of the SPEIS. Except for the No Action Alternative, SNL/NM is not considered under any of the Hydrotesting action alternatives.*
- *The existing major Environmental Test Facilities (ETF) at SNL/NM are described in Section 3.12.1.3 of Volume I of the SPEIS under No Action. Under the ETF action alternatives, SNL/NM is being considered for 1) closure in place of certain duplicative, outdated, and unused facilities, 2) for consolidation of ETF from other NNSA sites, and 3) for transferring its ETF-related facilities and work to the NTS.*
- *The final Project Specific Alternative that affects SNL/NM is the potential consolidation of SNL/California (CA) Weapons Support Functions to SNL/NM.*

The impacts of the HE R&D alternatives on SNL/NM are found in Section 5.13. Hydrodynamic facility impacts are addressed in Section 5.16. The impacts related to major ETFs are described in Section 5.17. Consolidation of SNL/CA Weapons Support Functions to SNL/NM is addressed in Section 5.18.2.

10.H SRS

A commentor expressed support for SRS as a candidate site.

Response: *NNSA notes this comment. See also comment-response section 15 for related discussion.*

10.H.1

A commentor stated that the storage of 22 metric tons of plutonium at the SRS K-Area is not appropriately analyzed for its potential environmental consequences. The commentor further stated: When will the plutonium be moved and how will it be utilized? To put this information in a footnote rather than full sized print is another evasion by NNSA. The option of consolidating all plutonium at one site without multiple transportation routes from LLNL should be considered.

Response: *In 2007, DOE prepared a Supplement Analysis (SA), which determined that the potential environmental impacts of consolidated storage at SRS of surplus, non-pit, weapons-usable plutonium from Hanford, LLNL and LANL would not be a significant change from potential environmental impacts of the alternatives analyzed in previous NEPA reviews, which included the impacts of transportation to and consolidated storage at the SRS. (DOE 2007b). Based on the analysis in the SA, NNSA determined that no additional NEPA review is required prior to transferring surplus non-pit weapons-usable plutonium materials from LLNL to SRS for consolidated storage. Nonetheless, for completeness, this SPEIS includes an analysis of the transportation risk associated with disposition of all surplus plutonium from LLNL to SRS.*

10.H.2

One commentor could not support construction of either the proposed DCE or CCE facilities at the Savannah River Site. The commentor stated: “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. Additional major construction projects and associated facility operations could adversely affect the significant ecological, research, and educational values of SRS.”

Response: *The SRS Environmental Management System (EMS) reduces the impacts of site activities and increases operating efficiencies. The EMS (which includes the NEPA process) will ensure that appropriate best management practices and technologies would be utilized during the construction and operation of major new projects to prevent or mitigate significant environmental impacts (incremental or cumulative) to the human environment. In addition, studies of the effects of man’s use of the environment was the fundamental purpose of establishing the SRS as a National Environmental Research Park in*

1972; NNSA believes that, if approved, new facilities, constructed and operated using methods and environmental controls previously unavailable, would add to the value of and provide new opportunities for environmental research at SRS.

10.I OAK RIDGE – Y-12

Several commentors expressed their support for siting Complex Transformation facilities at Y-12. Commentors stated that Y-12 is well on its way to becoming a transformed Uranium Center of Excellence that will, in a timely manner, reach NNSA goals of smaller, safer, less expensive, more cost effective and secure uranium facilities. Commentors also stated that Y-12 has an outstanding past history and experience in the mission, and also has a trained and experienced workforce.

Response:

NNSA notes this comment. See also comment-response section 15 for related discussion.

11.0 REQUESTS FOR ADDITIONAL ANALYSIS

A commentor requested additional analysis regarding the long-lasting consequences of Complex Transformation.

Response: *NNSA has conducted a thorough assessment of the potential impacts of Complex Transformation in this SPEIS for the appropriate period. Impacts are assessed for both construction and operations. For operations, the SPEIS focuses on the steady-state impacts of operations. Those annual operational impacts are assumed to occur year-after-year. It should be noted that for the programmatic alternatives addressed in this SPEIS, the level of analysis may not be as specific as it would be for a site-specific analysis. Once decisions are made regarding programmatic alternatives, additional NEPA analyses may be prepared as necessary, using a site or facility level of detail. See also comment-response section 14 for related discussion.*

11.A ADDITIONAL ANALYSIS - GENERAL

Commentors stated that the SPEIS was deficient in its analysis and that:

- The Draft SPEIS lacks comprehensiveness and credibility.
- Additional analysis of safety and security, specifically in reference to disarmament, is required.
- Further analysis is required to determine if additional weapons are needed.
- An upgrade in nuclear weapons capability needs a more careful study.
- Additional analysis on the role of nuclear weapons as an instrument of security policy is needed.
- A justification as to why alternatives selected were superior to other

alternatives is needed.

- To evaluate the alternatives adequately, the maximum rates of plutonium processing waste must be estimated based on maximum rates of production and included in the Final analysis.
- The co-location of storage facilities for some or all Cat I and II SNM under international administrative control should be analyzed in the No Production Alternative.
- The Draft SPEIS lacks an analysis of moving flight testing operations comparative to an independent analysis on the same issue which found the option to retain the mission at TTR more economically beneficial than relocating the operations somewhere else.
- The SPEIS should recognize that the reason why flight testing should remain at TTR is because the operations have been conducted at TTR successfully and other sites do not have as much experience.
- The City of Española's review of the environmental and economic impacts from LANL should be included in LANL's ASER.
- The analysis omits the practical goal of providing a smaller site to store weapons and this should be considered to be a significant oversight for political reasons.

Response: *The Complex Transformation SPEIS is, in large part, a programmatic level analysis of potential environmental impacts of transforming the nation's nuclear weapons complex. It also evaluates a number of project level alternatives. NNSA has conducted a thorough assessment of the potential impacts of Complex Transformation in this SPEIS. Based on comments received on the Draft SPEIS and its own initiative, NNSA conducted additional analyses to ensure an adequate assessment of potential impacts in the SPEIS.*

The number of nuclear weapons in the U.S. stockpile and their role in national security are not matters that will be decided as part of Complex Transformation. Those are decisions made by the President and the Congress.

The waste management analyses used in the SPEIS assumed maximum rates of plutonium waste processing based on maximum component production rates.

The SPEIS addresses the reasonable alternatives for storage of Category I/II special nuclear material. For SNM at Pantex (see Section 3.7.3 of Volume I), NNSA has added an analysis of a smaller storage facility than the size analyzed in the Draft SPEIS. One of the difficulties in placing surplus nuclear materials under IAEA safeguards is that the facilities storing the surplus material are also the facilities storing national security materials and international inspection of these facilities would be inconsistent with national security. DOE has had facilities storing some surplus SNM under IAEA inspection during the 1990's. DOE has stated that it intends to apply IAEA safeguards to its facilities that store or manage surplus plutonium "as soon as practicable" (65 FR 1608, January 11, 2000). This SPEIS will not be used to inform decisions on the

construction of storage facilities for surplus plutonium or enriched uranium where IAEA safeguards applicability might be appropriate. More information on this issue may be found in comment-response I.P.

The socioeconomic impact analysis of the SPEIS (Section 5.15.4.2 of Volume II) has been revised to include data provided by Nye County (UN 2007). This will more accurately reflect potential impacts on Nye County of the various flight test alternatives.

The request to include the City of Española comments in LANL's Environmental Report, while it is outside the scope of this SPEIS, was passed on to DOE officials at LASO.

11.B NUCLEAR WEAPONS ACTIVITIES

Some commentors requested a comprehensive analysis and re-evaluation of the role of nuclear weapons.

Response: *The number of nuclear weapons in the U.S. stockpile and their role in national security are not matters that will be decided as part of Complex Transformation. Those are decisions made by the President and the Congress. See also comment-response section I for related discussions.*

11.C SPECIAL NUCLEAR MATERIAL

Some commentors requested additional analysis on consolidation of special nuclear material.

Response: *The SPEIS addresses the reasonable alternatives for consolidating SNM at fewer sites and locations within sites (see Sections 3.7 of Volume I and Sections 5.10, and 5.12 of Volume II of the SPEIS).*

11.D ENVIRONMENTAL ANALYSIS

A commentor stated that the environmental testing performed by the DOE is really testing of the weapons and the components to determine if they are safe yet accomplish their goals of destruction. Commentors requested a more

comprehensive environmental analysis. Specifically, commentors stated that the SPEIS should contain a thorough analysis of:

- the alternative's impacts to agriculture;
- the impact to the environment when operations requiring controlled burns are discontinued;
- the impacts of using a nuclear weapon;
- seismicity;
- the potential for wildfires; and
- radioactive contamination in the Sangre de Cristo Mountains.

Commentors suggested that a summary view chart with the potential environmental impacts, including information pertaining to radionuclides in the water supply be added to the SPEIS.

Response: *The commentor is correct in stating that environmental testing within the context of the nuclear weapons complex entails ascertaining the effects of the weapons' environment on the safety and reliability of the weapons. This activity, however, does not constitute nuclear testing in the sense that it does not entail a nuclear detonation. Such tests expose weapons and weapons components to harsh environmental conditions to ascertain performance used to assist in developing better safety, security and performance information.*

NNSA has conducted a thorough assessment of the potential impacts of Complex Transformation in this SPEIS for the appropriate period. Based on comments received on the Draft SPEIS and its own initiative, NNSA conducted additional analyses to ensure an adequate assessment of potential impacts in the Final SPEIS. It should be noted that for the programmatic alternatives addressed in this SPEIS, the level of analysis may not be as specific as it would be for a site-specific analysis. Once proposals are made based on decisions regarding the programmatic alternatives, additional NEPA analyses will be prepared as necessary, using a site or facility level of detail.

As noted in the response to comment 14.A.1, Complex Transformation would not result in the expansion beyond existing boundaries of any NNSA nuclear weapon facility. Since those NNSA sites are already non-agricultural lands (the Pantex site has agricultural lands on-site, however, no expansion into agricultural lands at that site are proposed), no agricultural lands would be removed from production. See comment-response section 14 for related discussion of potential effects on resources.

Only the President can authorize the use of nuclear weapons. Accordingly, the use of nuclear weapons is outside the scope of Complex Transformation, see comment-responses 11.E and 20 for related discussion.

Information related to seismicity at NNSA facilities appears in Volume I of the SPEIS in Sections 4.1.6 for LANL, 4.2.6 for LLNL, 4.3.6 for the NTS, 4.4.6 for TTR, 4.5.6 for Pantex, 4.6.6 for SNL/NM, 4.7.6 for White Sands Missile Range (an alternative location for Flight Testing), 4.8.6 for Savannah River Site, and 4.9.6 for Y-12. In addition, please see comment-responses 14.F.1, 14.F.2, and 14.F.4 for more information related to seismic risks at NNSA facilities.

There is a risk for wildfires at most NNSA nuclear weapons sites. The actual occurrence of a wildfire is unpredictable and the impacts depend on a number of factors, including location, amount and type of fuel, area burned, wind speed and direction, etc. Pursuant to DOE Order 151.1C, Comprehensive Emergency Management System, NNSA sites conduct regular fire assessments to determine the potential for such a fire and identify mitigation measures to reduce the

potential for a fire. NNSA sites must have trained emergency response personnel and equipment to deal with potential emergency situations and have agreements with off-site emergency response organizations for mutual support.

With respect to contamination in the Sangre de Cristo Mountains, these levels were caused by the shape of the terrain and fallout. For the Trampas Lake data, the conditions are unusual in two respects: the high altitude; and the shape of the terrain. These conditions contribute to high concentrations of cesium-137, strontium-90, and plutonium-239, as follows.

Global fallout is brought to earth by rain and snowfall and, therefore, is concentrated on mountains where the precipitation is greater. Furthermore, snowfall is more effective than rainfall in holding onto radioactive dust material. Accordingly, the concentrations at higher altitudes are expected to be higher than lower altitudes. For example, cesium-137 data are reported in reference 1 for alpine sites (elevation 11,200 feet) and mountain sites (10,800 feet) in Colorado. The average cesium-137 concentration was 7 pCi/g for 38 alpine sites, and 4 pCi/g for 16 mountain sites. The highest concentration was 20 pCi/g at an Alpine site. These data show that the concentration of 5 pCi/g at Trampas Lake (11,415 feet) is not unusual at these high altitudes. The shape of the terrain further concentrates global fallout. Rain and snow fall on the relatively impermeable slopes surrounding the lake and wash the radionuclides into the basin surrounding the lake. Trampas Lake is in a basin surrounded by relatively impermeable terrain, so the concentration is expected to be higher where it accumulates than on the surrounding slopes where runoff occurs. The radionuclides in global fallout, ¹³⁷Cs, ⁹⁰Sr, and ²³⁹Pu, are all expected to be elevated at Trampas Lake. In summary, the Trampas Lake data agree with expectations for global fallout at this location and should not be compared with levels near LANL.

Current onsite and off-site radiological contamination related to NNSA sites is addressed in Chapter 4 of the SPEIS. Health impacts associated with potential Complex Transformation facilities and activities are addressed in Chapter 5.

Tables 3.16-1 through 3.16-8 in the SPEIS provide summary impacts for Complex Transformation.

11.E USE OF NUCLEAR WEAPONS

Commentors objected to the use of nuclear weapons.

Response: *Only the President can authorize the use of nuclear weapons. Use of nuclear weapons is not an action under the purview of NNSA and therefore not within the scope of this SPEIS. See comment-response 20 for related discussion.*

12.0 KANSAS CITY PLANT

The following comments were received related to the Kansas City Plant (KCP):

- 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.
- Decisions NNSA may make regarding other activities in the nuclear weapons complex (such as the production levels for plutonium pits) could have a direct effect on KCP's operations.
- Excluding KCP from the SPEIS constitutes improper segmentation under NEPA, pointing out that the 1996 SSM PEIS, to which the SPEIS is a supplement, considered alternatives for KCP operations.
- The refusal of NNSA to include the Sandia consolidation option within the scope of the present analysis is an arbitrary and capricious action that has no legal standing under NEPA and is clearly motivated by the desire to protect NNSA's scheme to shift its KCP operations to a new privately owned, third-party financed, GAO procured manufacturing facility in the Kansas City area without consideration of consolidation alternatives.
- One commentor attached comments that were provided on the *Environmental Assessment for Modernization of Facilities and Infrastructure for the Non-Nuclear Production Activities Conducted at the National Nuclear Security Administration's Kansas City Plant* (DOE/EA 1592).

Response: *This SPEIS evaluates programmatic alternatives for restructuring facilities that use or store special nuclear materials as defined in 11aa. (42 U.S.C. 2014aa) of the Atomic Energy Act of 1954, (42 U.S.C. 2210 et seq.), e.g. plutonium or enriched uranium. It also analyzes project-specific alternatives for restructuring research, development and testing facilities (these facilities do not use or contain significant quantities of special nuclear materials; most do not contain any such materials). As the SPEIS states, the decisions NNSA will make regarding these project-specific alternatives are independent of those it will make regarding programmatic alternatives for restructuring nuclear facilities.*

The 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 or project-specific alternatives analyzed in the SPEIS, or the decisions NNSA makes regarding these alternatives. Neither the Environmental Assessment for Modernization of Facilities and Infrastructure for the Non-Nuclear Production Activities Conducted at the National Security Administration's Kansas City Plant (GSA 2008) (KCP) (KCP 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). In other words, NNSA is not considering programmatic alternatives for its non-nuclear production activities

and the facilities it uses for them. The proposed action in the KCP EA is limited to the activities currently conducted at the KCP the production of electrical and mechanical non-nuclear components.

One reason NNSA is not proposing broad restructuring actions for non-nuclear activities is because DOE has been consolidating these activities for the past 15 years, and evaluated programmatic and project-specific alternatives for these activities in two separate NEPA analyses in 1993 and 1996. These prior NEPA analyses, an EA in 1993 and the SSM PEIS in 1996 (which is the predecessor of the current SPEIS), are described in greater detail in the comment-response 4 in the KCP EA. The 1993 EA examined broad programmatic alternatives for consolidating non-nuclear activities (then performed at eight sites), while the 1996 PEIS only looked at alternatives regarding the activities performed at the KCP. That is, the scope of the 1996 PEIS as to non-nuclear activities was much narrower than the 1993 EA because the Department by that time had started to consolidate non-nuclear activities as a result of programmatic decisions based on the 1993 EA.

Because decisions regarding modernization and consolidation of KCP's activities will not have an impact on programmatic decisions regarding nuclear facilities that will be made on the basis of the SPEIS, and because NNSA needed to make decisions regarding the activities performed at the KCP before it would be able to make any decisions based on the SPEIS, NNSA decided to perform a separate NEPA analysis for KCP's non-nuclear production activities. Under the Council of Environmental Quality's NEPA regulations, federal agencies are not required to analyze a project "such as the consolidation and modernization of KCP's activities" that bears some relationship to a larger undertaking "such as the transformation of NNSA's nuclear facilities" in the same NEPA document unless they are "connected actions" as defined in 40 CFR 1508.25(a)(1). Actions are considered connected only if they:

- (i) Automatically trigger other actions which require environmental impact statements.*
- (ii) Cannot or will not proceed unless other actions are taken previously or simultaneously.*
- (iii) Are interdependent parts of a larger action and depend on the larger action for their justification.*

The consolidation and modernization of KCP's activities meet none of these criteria when compared to the programmatic and project-specific alternatives analyzed in the SPEIS. Consolidation of KCP's non-nuclear production and procurement work does not automatically trigger changes in NNSA's nuclear facilities, or changes regarding any of the project-specific alternatives. NNSA will consolidate and modernize KCP's activities regardless of whether it implements any of the alternatives in the SPEIS. And, decisions NNSA may make regarding KCP's work do not depend on transformation of other aspects

of the nuclear weapons complex for their justification. Accordingly, NNSA's determination to proceed with a separate EA for KCP's activities does not constitute impermissible segmentation of a NEPA analysis because proceeding did not have a direct and substantial probability of influencing decisions on the consolidation of NNSA's nuclear activities or the weapons complex as a whole, or decisions regarding the project-specific alternatives. That is, consolidating and modernizing activities now performed at the KCP have independent utility and significance in relationship to the alternatives in the SPEIS and decisions that NNSA may make regarding those programmatic and project-specific alternatives.

With respect to comments submitted on the KCP EA, the commentor is directed to that EA for a response to those comments.

13.0 SECURITY, SABOTAGE AND TERRORISM - GENERAL

13.A Commentors expressed concerns regarding terrorism and sabotage, stating:

- The EIS should consider the increased threat of other countries getting and using nuclear weapons as a direct result of our resuming pit production.
- The EIS must compare the environmental benefits of reducing the size of the U.S. nuclear arsenal with the risks of manufacturing and using nuclear weapons, both by the U.S. and other countries which seek to terrorize or attack the U.S. because of our nuclear posture
- The EIS must analyze the environmental impacts and security risks of a terrorist attack on a plutonium or highly enriched uranium (HEU) processing facility at any of the proposed sites.
- The costs of increased security must be considered
- There is concern regarding Complex Transformation affecting national security policy and it's leading to increased terrorist activities at NNSA facilities. Another commentor added that this is especially troubling since terrorists are elusive and typically work in small groups
- If LLNL is shutdown, unemployed personnel would be forced into a financial hardship which could entice them to offer for sale knowledge gained through their former employment which could undermine U.S. security.
- Nuclear technology is vulnerable to terrorism.
- Until the time comes, we must live with our weapons as responsibly as quietly as we can.
- The proposed facilities will make us targets rather than making us safer.
- Complex Transformation will substantially reduce terrorist threats against the United States.
- Consolidation of the national labs would make them more vulnerable to terrorist attacks.
- Security at Y-12 could be lessened as a result of Complex

Transformation.

- The possession of nuclear weapons makes our country more secure and nuclear weapons serve as part of a defense shield.
- Terrorists would target nuclear material shipments.
- The security of Los Alamos and Livermore National Laboratories, including threats from terrorist attacks could be affected by Complex Transformation.
- It is imperative that the United States appropriately handle the issue of dismantling weapons while maintaining a viable deterrent through renovating the current stockpile without diminishing the credibility of the dismantlement process.
- TTR has been recognized as one of the most secure NNSA sites and the closing of TTR would be a detriment to national security. This fact should be included/noted in the analysis.
- LANL can meet the nation's security needs.
- The number one threat that we all are dealing with is nuclear terrorism.

Response: *Complex Transformation seeks to change the existing nuclear weapons complex in order to improve its efficiency and effectiveness in ensuring the safety and reliability of the Nation's nuclear weapons stockpile. Activities that are currently taking place in the complex, including production, would by and large continue under transformation; however, the location of some activities may change and the intensity of some activities may decrease or increase at some facilities. NNSA provides a comprehensive assessment of potential environmental impacts of the alternatives considered. Use of nuclear weapons by the United States and any other country or group is not within the scope of Complex Transformation. The potential environmental impacts of an intentional destructive act, such as terrorism or sabotage, are addressed in a classified appendix to this SPEIS. NNSA prepared business case analyses of the various alternatives, which will be considered in making decisions, along with information from the SPEIS and other sources. The potential for a disgruntled employee to use his or her knowledge against the United States is outside the scope of this SPEIS, however, the impacts that might result are considered. See also comment-response sections 1 and 6 for related discussion.*

13.A.1

The following additional comments were received related to terrorism:

- Nuclear weapons do not provide deterrence against the current threats in the world;
- Nuclear weapons did not prevent the events of 9/11 and will not prevent future terrorist attacks.
- Possession of nuclear weapons makes our country less secure and the end of the Cold War has not meaningfully reduced the threat.
- Complex Transformation will make the United States an even bigger target for terrorist activities because the United States will be seen as a

- key player in developing nuclear weapons.
- Complex Transformation will goad other countries into pursuit of nuclear weapons.
 - The current system of alert is an accident waiting to happen.
 - Nuclear weapons undermine international security, perpetuating violence throughout our cultures, and crippling nuclear disarmament efforts.
 - Nuclear weapons are required to maintain a credible defense.
 - Rogue states do not care whether the United States has nuclear weapons to counteract their actions or not.
 - True security comes from renewable energy and learning how to live with others.

Response: *Nuclear weapons are not meant to serve as the nation's only line of defense. They are one of several types of weapons available to the President and the DoD for use against varying types of threats. Terrorist threats are real and require new strategies but other, persistent threats, which have been in existence for many years continue and at the present time, still require the maintenance of a safe, secure and operable nuclear weapons arsenal.*

13.B

EVALUATION OF SABOTAGE AND TERRORISM

13.B.1

Commentors stated that the presence of nuclear weapon activities at NNSA's sites would make those sites and the surrounding populations vulnerable to a terrorist attack or the acts of disgruntled employees. Commentors stated that the impacts of terrorist attacks be included in the SPEIS and that an unclassified summary of the classified appendix for intentional destructive acts must be released, asserting that a failure to do so circumvents two court decisions and DOE guidance. Another commentor stated this SPEIS fails to prioritize safety and security by ignoring terrorist attacks and considering the environmental impacts.

Response: *Regarding a terrorist threat, NNSA gives high priority to the safety and security of all its facilities. Security and potential acts of sabotage are integral considerations in the designs and operating procedures for NNSA sites. The existing facilities at those sites were designed to protect against attacks by outsiders and sabotage by disgruntled employees or other insiders. NNSA would construct new facilities in a similar manner, incorporating modern design features that provide even more robust protection against intentional destructive acts. NNSA considers the threat of terrorist attack to be real and has an established safeguards and security process it undertakes to assess facility vulnerabilities to various threats, including those from intentional destructive acts. NNSA does not agree that the proposed actions would increase the threat of terrorism. In fact, reducing the risk of a successful terrorist attack is one of the purposes of Complex Transformation. New facilities and the consolidation of special nuclear materials at fewer sites would provide a greater degree of security at a lower cost.*

The classified appendix to this Complex Transformation SPEIS addresses the environmental impacts that would be expected to occur in the event that a credible terrorist attack were successful at specific current and proposed facilities. The appendix is classified both because the scenarios considered contain classified information and because there is a risk that the discussion presented in the appendix of these scenarios and their potential outcomes could be exploited by terrorists or others contemplating harmful acts. Therefore, the SPEIS can provide only limited information about these acts and their potential impacts. Information about this classified appendix is found in Section 3.16.6 of the SPEIS.

13.C and 13.C.1 **EXISTING SECURITY**

Commentors stated that there were two recent very serious failures by the DoD, 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).

Response: *Although NNSA participates with the military services in Nuclear Weapons System Safety Group studies of the adequacy of military service operational procedures for nuclear weapons, it does not direct DoD nuclear weapons safety or security. In general, DoD is responsible for the physical security of nuclear weapons in its custody, while NNSA is responsible for the internal weapon features that contribute to nuclear weapons security. NNSA focuses considerable resources on the development of new approaches and technologies to improve nuclear weapons safety and security during all aspects of nuclear weapons logistical operations. When new approaches or technologies show promise to improve nuclear weapons safety or security while the weapons are in DoD custody, these approaches and technologies are shared with the appropriate military service through established coordination processes. Also see comment-response 13.E.3.*

13.D **INTENTIONAL DESTRUCTIVE ACTS APPENDIX**

13.D.1 A commentor stated: “The draft SPEIS merely lists the 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. 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.”

Response: *The commentor is correct as to the discrepancies in the two lists. The sites identified as being included in the analysis discussed in the classified appendix on Intentional Destructive Acts on page S-64 of the Summary and on page B-18 are slightly different in that LLNL is included on page S-64 and omitted on page B-18. This has been corrected in the Final SPEIS. The sites considered in the classified appendix are: NTS, LANL, LLNL, Pantex, SRS and Y-12.*

The classified appendix on Intentional Destructive Acts that NNSA prepared for this Complex Transformation SPEIS does not analyze the adequacy of security at NNSA sites or security vulnerabilities at NNSA facilities. These subjects are beyond the scope for a NEPA analysis; however, they are an important aspect of NNSA's ongoing security program.

This SPEIS contains a classified appendix that analyzes intentional destructive acts, which could result in impacts on LLNL workers and surrounding populations that are as or more severe than accident scenarios analyzed in Chapter 5 of the SPEIS. This is also true for the other locations considered in the intentional destructive acts analysis.

NNSA devotes considerable resources to understanding and preventing terrorism in the nuclear weapons complex. DOE Orders 470.3A and 470.4, describe activities conducted under the Safeguards and Security Program aimed at preventing unauthorized access, theft, diversion or sabotage (including unauthorized detonation or destruction) of nuclear weapons, nuclear weapons components, and SNM. In accordance with the requirements set forth in these Orders, NNSA conducts vulnerability assessments and risk analyses to evaluate the effectiveness of existing safeguards in reducing the likelihood of terrorist acts, such as those analyzed in the classified appendix, of being successful and assisting in the development of new safeguards to further reduce these risks.

13.E COMMAND AND CONTROL

13.E.1

One commentor stated that NNSA has failed in the SPEIS to consider its own incompetence to manage the Complex changes in preventing security breaches that could allow nuclear secrets to fall into enemy hands or provide sensitive information about its employees that could provide further defeat of security. Another commentor said that the SPEIS must consider Command and Control breakdowns against a lack of safeguards for U.S. politicians or military officials illegally ordering use of nuclear weapons against foreign nations and/or against segments of the U.S. population.

Response: *NNSA has the responsibility for maintaining the safety, security, and reliability of the United States' nuclear weapons stockpile. The Complex Transformation SPEIS analyzes the potential environmental impacts of reasonable alternatives to continue transformation of the nuclear weapons complex to one that is smaller, more responsive, efficient, and secure in order to*

meet national security requirements. A classified appendix to this SPEIS has been prepared that evaluates the potential impacts of intentional destructive acts. Substantive details of weapons security, weapons safing devices, security countermeasures, and potential impacts, although well thought out and planned for, are not released to the public because disclosure of this information could be exploited by terrorists to plan attacks. Additional information on this classified appendix may be found in Section 3.16.6 of Volume 1 of the SPEIS.

13.E.2

One commentor asked what would be the environmental and human health effects of a direct unauthorized attack or crash by a maximally armed fighter airplane with a rogue pilot from Kirtland Air Force Base or a large commercial airliner upon the nuclear weapons stockpile maintained at Kirtland Air Force Base or any and all other critical facilities at Sandia or other facilities within the Complex?

Response: *The environmental and human health effects of civilian and military airplane crash scenarios would be largely the same whether the crash occurred intentionally or accidentally. Airplane crash scenarios for critical facilities within the NNSA's nuclear weapons complex are described and analyzed as part of the Environmental Effects discussions of the various Environmental Impact Statements and SWEISs prepared for these facilities. With respect to SNL/NM, in particular, the environmental and human health effects that might be expected to result in the event of an airplane crash are discussed in the SNL/NM SWEIS (DOE 1999c), and in the Final SNL/NM SWEIS SA (DOE 2006a). Both of these documents are publicly available on DOE's NEPA website: <http://www.gc.energy.gov/NEPA>. Additionally, airplane crash scenarios for critical facilities within NNSA's nuclear weapons Complex were examined for the SSM PEIS (DOE 1996d), and also for the present SPEIS (Chapter 5 and Appendix C).*

The postulated rogue pilot scenario has an extremely low degree of credibility because, as a general case, fighter aircraft are not routinely flown over the continental United States in a maximally armed configuration. Thus it is not generally considered within NEPA analyses. To the extent nuclear weapons in the custody of the DoD might be located at a DoD location, potential impacts of an aircraft crash or terrorist attack on those weapons would be outside the scope of this SPEIS.

13.E.3

One commentor stated that NNSA failed to consider the environmental consequences of the inability to maintain the necessary control of domestic or foreign nuclear weapons. The commentor cited an incident at a DoD facility where four secret nuclear missile parts were mistakenly sent to Taiwan, an error that went unnoticed for more than 18 months.

Response: *The shipment of "parts" not owned or controlled by NNSA is beyond the scope of this SPEIS. DoD conducted an investigation of the referenced*

incident. The leader of the DoD Investigation into the Barksdale/Minot incidents was Admiral Kirkland H. Donald, Director of Naval Propulsion, the most senior military leader of the NNSA Naval Reactor Program. The two month investigation was limited to the Department of Defense; therefore, it did not make any NNSA specific recommendations. NNSA has reviewed the investigation and evaluated the "Lessons Learned" for possible modifications to NNSA procedures where they may be applicable. For more information related to this comment, see comment- response 13. C. 1

13.E.4 A commentor expressed concern that nuclear weapons are not treated with the proper care as evidenced by the recent incident of several warheads being accidentally flown by the Air Force.

Response: *The safety and security of nuclear weapons in the custody of DoD is the responsibility of DoD and is outside the scope of this SPEIS. However, NNSA is concerned with the safety and security of nuclear weapons and goes to great lengths to minimize the risk of accidents involving nuclear weapons under its control. Through its Office of Emergency Operations, NNSA ensures that capabilities are in place to respond to any NNSA and Department of Energy facility emergency. It is also the nation's premier responder to any nuclear or radiological incident within the United States or abroad and provides operational planning and training to counter both domestic and international nuclear terrorism. NNSA conducts oversight of nuclear weapons operations and continually seeks to improve the safety of those operations.*

14.0 RESOURCES

Some commentors expressed concern about the environmental impacts and hazards created by the development of new nuclear weapons.

Response: *Development of new nuclear weapons is not part of Complex Transformation. NNSA conducted a thorough assessment of the potential impacts of Complex Transformation in this SPEIS. Based on comments received on the Draft SPEIS and its own initiative, NNSA conducted additional analyses to ensure an adequate assessment of potential impacts in the Final SPEIS.*

**14.A and
14.A.1 LAND USE**

Commentor expressed concern about the land use surrounding LANL and stated that:

- There was support for continued use of land for food and not cash crops.
- The SPEIS must analyze the impacts to farmlands in Northern New Mexico.
- 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.

Response: *The Farmland Protection Policy Act defines prime farmland as land that has the best combination of physical and chemical characteristics for producing food, feed, fiber, forage, oilseed, and other agricultural crops with minimum inputs of fuel, fertilizer, pesticides, and labor, and without intolerable soil erosion, as determined by the Secretary of Agriculture. Prime farmland includes land that possesses the above characteristics but is being used currently to produce livestock and timber. It does not include land already in or committed to urban development or water storage (7 U.S.C. §4201(c)(1)(A)). NNSA has used these definitions in the SPEIS. Section 4201(b) provides: “The purpose of this chapter is to minimize the extent to which Federal programs contribute to the unnecessary and irreversible conversion of farmland to nonagricultural uses, and to assure that Federal programs are administered in a manner that, to the extent practicable, will be compatible with State, unit of local government, and private programs and policies to protect farmland.”*

Complex Transformation would not result in the expansion beyond LANL’s existing boundary. Since those lands within the LANL boundary are already non-agricultural lands, no prime farmland at LANL would be converted to any other use by implementation of any of the proposed actions or alternatives in Complex Transformation.

14.A.2 Some commentors asked whether there is any intent to return to the San Ildefonso Pueblo the land taken from them over the years and whether land transfer impacts were evaluated in the SPEIS and opportunities for additional land transfer identified.

Response: *LANL’s conveyances of land to Los Alamos County and to the Department of the Interior in trust for the Pueblo of San Ildefonso (under Public Law 105-119, Section 632, 42 USC 2391) are addressed in Chapter 4, Section 4.1.1, of the LANL SWEIS. Should the conveyance of additional tracts not previously analyzed be proposed, the action would be subject to future NEPA analysis. Parcels transferred to these entities are remediated to protect human health in light of the anticipated use of the land. The 2007 Defense Authorization Act provides an additional 5 years to complete the conveyance and transfer of land to Los Alamos County and the Department of Interior. This legislation extends the completion date through November 2012.*

14.A.3 Some commentors were concerned that land outside Indian reservation

boundaries may be damaged by testing and radiation dispersal at NTS. Commentors also expressed concern in regard to potential impacts to sustainable tribal economic development, future economic development opportunities, reservation expansion contemplated by Article VII of the *Treaty of Ruby Valley*, grazing rights from accidental radioactive release, and impacts on tribal self-governance that might result from migration of reservation population away from potential radioactive releases resulting in a lower population base to justify acquiring required services.

Response: *There are no activities proposed under Complex Transformation that would result in dispersal of radiation outside the boundaries of the NTS. NNSA monitors air both onsite and in the region surrounding the NTS. Since the cessation of nuclear testing in 1992, there has been no indication of radioactive dispersal from the NTS to offsite areas in excess of standards established by the U.S. Environmental Protection Agency (40 CFR Part 61 Subpart H). Therefore, no impacts to the tribal economic development are expected.*

14.A.4 A commentor was concerned that land within the NTS may be removed from use and access as a result of NNSA occupancy or NNSA may impose access restrictions at the NTS would result in impact to the extant American Indian existing cultural relationship to land.

Response: *NNSA acknowledges that access to the lands of the NTS is restricted; only authorized individuals may enter the site. NNSA has for many years extended to American Indians with a cultural affinity to the NTS, the opportunity to visit culturally important areas on the NTS, provided those visits do not interfere with NTS activities and the participants are appropriately cleared, badged, or escorted.*

14.A.5 Some commentors were concerned with potential damage that could be caused by radiation exposure to resources used by tribal members such as wood, grasses, piñon nuts, and plants used for food and medicinal uses.

Response: *DOE Order 5400.5, Radiation Protection of the Public and the Environment, requires that all DOE sites monitor radioactivity in the environment to ensure that the public does not receive a radiological dose greater than 100 millirems per year (mrem/yr) from all pathways of exposure, including the ingestion of contaminated plants and animals. In compliance with this Order, NNSA annually samples game animals and plants from sites on the NTS to estimate potential doses to humans (i.e., the public), measure the potential for radionuclide transfer through the food chain, and determine if NTS plants and animals themselves are exposed to radiation levels harmful to their populations. The doses are considered potential because hunting and gathering plant material (i.e., piñon nuts and wolf berries) are not authorized on the NTS. The most recent results from this sampling are that the highest estimated*

committed effective dose equivalent from consuming 20 jackrabbits was 0.12 mrem, which is only 0.12 percent of the annual dose limit for members of the public (Wills 2007). This hypothetical dose is less than one-fourth of the CEDE that would be received during a one-hour airplane flight at 39,000 feet, which is estimated as 0.5 mrem.

14.B NOT USED

14.C SITE INFRASTRUCTURE

A commentor expressed concern that the about air quality and noise impacts at the NNSA sites resulting from Complex Transformation could be excessive.

Response: *Impacts to air quality are addressed in Sections 5.1.4 for LANL, 5.3.4 for NTS, 5.5.4 for Pantex, 5.8.4 for Savannah River, and 5.9.4 for Y12 in Volume II of the SPEIS. In addition, see comment-response 14.D for other information on air quality.*

14.D AIR QUALITY

Commentors expressed concern about the air quality as a result of Complex Transformation and are concerned that:

- Open-air bomb tests (open detonation) and their impact on Air Quality and Noise should be stopped all together and not just transferred to another community.
- The NNSA is exploding depleted uranium into our lungs.
- NNSA is spreading radiation through the air.
- At a higher level of pit production, LANL could increase airborne pollutants by 28 percent.

Response: *Radiological air emissions are addressed in the Air and Noise Sections of Chapters 4 and 5 of Volume II and Appendix C of the SPEIS. Additional information of radiological air emissions is included in comment-response 14.D.1 and 14.D.4. Additional information regarding open burning and open detonation is in comment-responses 14.D.2 and 14.D.3.*

14.D.1 Commentors are concerned about Complex Transformation and its potential effect on the dispersal of radioactive material through the air. Commentors are specifically concerned that:

- Radiological air emissions must be accurately addressed.
- The LANL radiological air-sampling network (referred to as AIRNET), which measures the environmental levels of airborne radionuclides, such as plutonium, americium, uranium, tritium, and activation products that could be released from LANL operations, are routinely turned off due to

- lack of funding and other reasons.
- Percentages of radionuclides released and a comparison of those percentages to the activation products produced by the Los Alamos Neutron Science Center (LANSCE) should be released to the public.
 - LANL has dangerous and hazardous air releases including intentional releases of tritium gas out the back door to avoid paperwork and monitoring alerts.

Response: *All LANL operations, regardless of when they began, comply with the applicable state (New Mexico Air Quality Control Act) and Federal (Clean Air Act, Toxic Substances Control Act) laws and regulations and have valid permits, as described in Chapter 10 of the SPEIS. The LANL contractor complies with its Clean Air Act, Title V, operating permit, including requirements for monitoring air pollutant emissions from sources at LANL and associated recordkeeping. Current air sampling programs at LANL include ambient non-radiological air monitoring, an ambient radiological air sampling network called AIRNET, and stack sampling for radionuclides, as described in Chapter 4, Section 4.1.4.1.3. NNSA believes that its air sampling network operates in compliance with all applicable requirements and is not “routinely turned off” due to lack of funding. LANL continually evaluates its air sampling programs and monitors downwind communities.*

The AIRNET samplers are LANL’s largest sampling network. This network currently includes about 57 samplers located on LANL property, around the perimeter of the laboratory in Los Alamos County, and in more distant northern New Mexico communities such as San Ildefonso Pueblo, Española, Santa Fe, Jemez Pueblo, El Rancho and Picuris Pueblo. The AIRNET particulate matter samples are analyzed for gross alpha and gross beta radioactivity, plutonium-238, plutonium-239, americium-241, uranium-234, 235, 238 as well as gamma emitting isotopes including arsenic-73 and 74, beryllium-7, cadmium-109, cobalt-60, cesium-134 and 137, manganese-54, sodium-22, rubidium-83 and 86, ruthenium-103, zinc-65 and lead-210. Samples from some sampling locations are also analyzed for beryllium, aluminum, and calcium. Other radionuclide and elemental analyses are conducted on an as needed basis. Water vapor is also collected at AIRNET samplers and analyzed for tritium.

Contamination from LANL has been found at only a few off-site locations within Los Alamos County. These locations continue to be monitored. Tritium, depleted uranium, americium, and plutonium have been measured at off-site sampler locations within several miles of the LANL boundary. Virtually all off-site detections are less than one percent of the EPA public exposure standard, with the highest concentrations less than five percent. This network has been independently audited multiple times over the past decade, including audits overseen by the Concerned Citizens for Nuclear Safety. It should also be noted that AIRNET sampling has been approved by the EPA to measure diffuse sources of radionuclides at LANL.

Finally, Los Alamos has conducted a variety of special air monitoring studies to address toxic and hazardous air contaminants in the ambient air. All of these studies indicate that the concentrations of non-radioactive air contaminants are at background levels and comparable to concentration levels at other rural locations in the United States.

LANSCE does have the highest potential for radionuclide air emissions at the site. If necessary, operational controls at LANSCE would limit the dose to the maximally exposed offsite individual from air emissions to 7.5 mrem per year to ensure compliance with the 40 CFR Part 61 (National Emission Standards for Hazardous Air Pollutants) limit of 10 mrem per year.

14.D.2

Commentors stated that NNSA must stop all open burning and open detonation, which generate air emissions. 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 NNSA should not be allowed to do open burning of hazardous, explosive, and radioactive materials. NNSA must monitor and implement 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. NNSA must expand air monitoring in downwind communities and should no longer hide under the grandfather clause for air emissions from its old facilities at LANL.

Response: *To conduct its missions, NNSA must conduct a number of activities that provide confidence in the nation's stockpile and enable NNSA to respond to global threats. One of the many activities required is research and development in high explosives (HE). These activities, conducted at a number of sites including Los Alamos (LANL), Sandia (SNL) and Livermore (LLNL), are thoroughly monitored. Inactive HE firing sites are remediated, as appropriate.*

NNSA is actively investigating the use of alternative methods to open burn (OB) and open detonation (OD) in support of its R&D programs. Los Alamos, for example, conducts both OB and OD to deal with detonation of energetic materials including high explosives (HE). OB activities are conducted to mitigate explosives hazards associated with HE waste. No radioactive material is burned. Generally, the types of waste treated by burning include: insensitive types of excess bulk HE, wet HE machining chips, and HE contaminated combustibles. OB waste treatment operations are permitted by regulatory agencies and all OB activities are regulated by the Resource Conservation and Recovery Act (RCRA).

DOE, in collaboration with external sponsors, has pursued the research and development of other alternatives for disposal and sanitization of energetic materials no longer required to meet our National Security mission(s). These

techniques include: Super-Critical Water Oxidation, Molten-Salt Reactor disposal, Base Hydrolysis disposal, and Incineration. At LANL, for example, alternative techniques were noted in the SPEIS, in particular in Section 3.8.2.1.5 Alternative 2d, “Consolidate unconfined firing to one site or eliminate it.” The LANL sub-section included the following language: “LANL currently operates an Emergency Management and Response (EM&R) site that includes open detonation of suspect/terrorist threat devices for the Laboratory and the County of Los Alamos. This site is a destruct site that will always require some outdoor capability (for example destruction of a "car bomb"; this could be characterized as an emergency).

The Clean Air Act, Title V operating permits at sites include requirements for monitoring emissions from sources and keeping records concerning those sources. Monitoring of the environment in and around NNSA sites generally includes air, water, soil, and foodstuffs, and monitoring results are reported in annual environmental surveillance reports. Chapter 10 of Volume II of the SPEIS describes permits issued by regulatory authorities for NNSA facilities and operations.

14.D.3

A commentor stated that there is inadequate air and groundwater monitoring for the open burning and open detonation at LANL.

Response: *All LANL operations comply with the New Mexico Air Quality Control Act and Federal (e.g., Clean Air Act, Toxic Substances Control Act) laws and regulations and have valid permits as described in Chapter 10. The LANL contractor complies with its Clean Air Act, Title V operating permit which includes requirements for monitoring air pollutant emissions from sources at LANL and includes recordkeeping for these sources. Current air sampling programs at LANL include ambient non-radiological air monitoring, an ambient radiological air sampling network called AIRNET, and stack sampling for radionuclides, as described in Chapter 4, Section 4.1.4.1.3 of Volume I of the SPEIS. The LANL contractor evaluates the results from these programs and makes changes in the sampling locations and constituents as appropriate. Effluents from LANL facilities are discharged in accordance with a National Pollutant Discharge Elimination System permit that establishes limits on the volume and quality of the discharge.*

LANL has a very good record of complying with permit conditions, which are set to protect health and safety. Under all alternatives analyzed in the SPEIS, NNSA would continue to meet permit conditions designed to protect water resources at LANL. In addition, NNSA operates a monitoring program (see Chapter 4, Section 4.1.5) to detect contamination that has resulted from past practices. In accordance with applicable regulations and agreements, LANL staff evaluates and takes corrective action for occurrences of contamination in groundwater and surface waters at LANL.

14.D.4 The following comments were received regarding NTS and radiological emissions:

- Page 4-128 of the Draft SPEIS 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 mrem per year dose limit (NTS 2007)." The commentator goes on to state: "The data that this result is based upon are presumably presented in Table 4.3.4-2 (this should be clarified), but the Draft SPEIS does not present the dose calculation. Appendix C discusses radiation dose and the latent cancer fatality as a measure of risk, but does not present even an 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 Draft SPEIS 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 year was reported in "National Emissions Standards for Hazardous Air Pollutants." 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 SPEIS again needs to reflect this level of uncertainty."

Response: *Table 4.3.4-2 of Volume I of the SPEIS presents radiological atmospheric releases from the NTS for 2006. Current operations produce the dose estimates presented in Section 5.3.11 of Volume II. These doses are from the NTS Annual Site Environmental Report (ASER), which calculated the dose from existing operations. The methodology for those dose calculations are presented in the NTS ASER. With respect to tritium emissions, those emissions are based on existing operations. It is not uncommon to have large differences in emissions from year to year as quite frequently measurable releases can be tied to specific activities. It is noteworthy that the dose to the MEI from NTS operations is very small. Even if tritium emissions were to increase from 170 curie (Ci) per year to 560 Ci/yr (which is not expected), the MEI dose would still be well below the 10 mrem/yr limit.*

The NTS ASER includes maps illustrating the location of monitoring stations. The NTS ASER is available on the NNSA Nevada Site Office webpage at <http://www.nv.doe.gov/library/publicat>.

14.D.5 A commentator stated that the SRS Environmental Report for 2006 (SRS 2007) shows significant increases in air emissions of sulfur dioxide, total particulate matter, particulate matter <10 microns, and nitrogen dioxide in 2005 versus 2004, and requested that Table 4-1 (page 47) from this report be included in the

SPEIS. The commentor also requested that NNSA add that plutonium 238 was emitted in 2005 at concentration levels above the Derived Concentration Guidelines (DCGs) at the 319-F main stack. Finally, the commentor stated that inclusion of Figure 4-1 from the 2006 Environmental Report referenced above would show the 10-year history of SRS annual atmospheric tritium releases.

Response: *The information identified by the commentor has been added to Section 4.8.4.1.2 of Volume I of the SPEIS.*

14.D.6

The following comments were received regarding SNL/NM and radiological emissions:

- Emissions data from SNL/NM facilities generate airborne releases of radiation and that accurate monitoring of radioactivity emitted from facilities handling radionuclides is fundamental to accurate assessment of worker and public doses from those facilities.
- SNL/NM fails to conduct monitoring of actual releases from many of its facilities and instead relies on calculated emission rates, rather than sampled and analyzed emission rates as shown in Robinson 2006. As shown in that report, in 2005 SNL/NM calculated, rather than monitored, radioactive emissions from 9 of 16 reported sources, including the Neutron Generator Facility, SNL/NM's largest projected source of tritium emissions and a "Complex Transformation" facility. To address this defect in the SNL/NM monitoring of its radioactive emissions, the commentor stated that the SPEIS should include an analysis of the history of airborne radiation emissions and emission monitoring at SNL/NM, identify and address consequences of the failure to accurately monitor past activities - including potential for spills and leaks at facilities for which emission data were calculated not sampled, and provide for conduct of comprehensive monitoring of all sources of future airborne radiation releases from facilities at SNL/NM.
- The distribution and accuracy of ambient air monitoring in and around SNL/NM is significantly poorer than the ambient air monitoring programs at other DOE sites monitored at only four locations as compared to 46 locations at LANL, even though SNL/NM reported larger releases of alpha activity than LANL.
- The SPEIS should analyze the history of ambient airborne monitoring of radioactivity in the SNL/NM area, compare and contrast that history with the programs at other NNSA facilities - including the NNSA facilities evaluated in the SPEIS, and provide for an expanded scope of ambient airborne radioactivity monitoring at SNL/NM to ensure that people living near SNL/NM benefit from a monitoring program that is similar in both the number of sampling sites and range of radioactive characteristics sampled to those at other DOE facilities.

Response: *SNL/NM reports emissions on a calendar year basis to EPA in accordance with EPA regulations (40 CFR Part 61, Subpart H, “National Emissions Standards for Emissions of Radionuclides Other Than Radon from Department of Energy Facilities”). These emissions are also reported in the Annual Site Environmental Report. SNL/NM has established a monitoring and reporting system compliant with EPA regulations, and DOE Orders and guidance. SNL/NM also maintains a meteorological monitoring program onsite to provide site-specific representative data. Continuous monitoring of emissions is only required for point sources with the potential to discharge radionuclides in quantities which could result in an effective dose equivalent in excess of 1 percent of the standard (0.1 mrem). There are no emission sources at SNL/NM that meet this criterion. SNL/NM currently has 15 potential NESHAP facilities that may be defined as either point or diffuse emissions sources. Of the 15 sources, 14 were point sources, and one was diffuse (the Mixed Waste Landfill). Four of the 15 sources reported no emissions in 2007.*

Although not required by law, SNL/NM voluntarily uses continuous monitors at two facilities as a best management practice, the Neutron Generator Facility (NGF), and the Radioactive Mixed Waste Management Facility (RMWMF). Periodic confirmatory monitoring is performed at four other facilities. The remaining facilities have emissions so small that they can only be estimated by engineering calculations. All isotopes which may be potentially emitted and are long-lived enough to reach receptors are either monitored directly or calculated. For the annual dose calculations, SNL/NM models the annual dose at 35 different locations to determine the onsite and offsite locations with the highest dose. In 2007, the highest emissions were from tritium and Argon-41, and the Maximally Exposed Individual (MEI) onsite would have potentially received a dose of approximately 0.001 mrem/year. The offsite MEI was located at the Eubank Gate area, and the dose was approximately 0.0007 mrem/year. These quantities are far below regulatory levels of concern. SNL/NM's radiological air emissions monitoring program meets or exceeds all requirements; providing increased levels of monitoring, or expending resources to assess SNL/NM's program versus other DOE/NNSA sites is not justified.

14.D.7 NOT USED

14.D.8 A commentor stated that increased emissions, as they relate specifically to Santa Clara Pueblo, were not analyzed in the Draft SPEIS. Monitoring indicates contaminant transport from LANL to the Pueblo via particulate emissions. Radioactive particulates appear 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. 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 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.

Response: *The SPEIS addresses emissions for each of the alternatives and the potential health effects related to these emissions. The analysis assumes very conservative assumptions regarding the maximally exposed individual (MEI) (see comment-response 14.J.1 regarding the conservative assumptions for the MEI), such that no person could be expected to receive a dose comparable to the MEI dose. At LANL, the MEI dose was calculated to be 0.077 mrem, which is more than 100 times less than the regulatory limit of 10 mrem. Consequently, the dose to any member of the Santa Clara Pueblo would be less than the MEI dose, and more than 100 times below regulatory limits.*

Current air sampling programs at LANL include ambient non-radiological air monitoring, an ambient radiological air sampling network called AIRNET, and stack sampling for radionuclides, as described in Chapter 4, Section 4.1.4.1.3, of Volume I of the SPEIS.

The Clean Air Act, Title V, operating permit includes requirements for monitoring emissions from sources at LANL and recordkeeping concerning those sources. Although toxic and radioactive air emissions can potentially have detrimental impacts, the past emission levels analyzed and those projected for

LANL would not be expected to cause unacceptable impacts on human health or the environment.

A study in the LANL SWEIS (LANL 2008) provides a more detailed examination of the potential health impacts to persons whose traditional living habits and diets could cause greater exposures to environmental contaminants than would be experienced by the hypothetical offsite resident whose diet would not consist of home-grown foods. Please refer to comment-response 14.J.1 for information related to the dose to the special pathways receptor.

14.D.9

One commentator stated that the SPEIS should include information concerning the effects a release of non-radiological air pollutants would have on the surrounding area, specifically within traditional Native American religious, cultural and gathering areas of the Western Shoshone around the NTS. The commentator added that the SPEIS should include the effects of non-radiological pollutants on sensitive groups such as elders and children.

Response: *Impacts to air quality, including at NTS, are addressed in Section 5.3.4 of Volume II of the SPEIS. NNSA operates the NTS in compliance with an Air Quality Operating Permit from the Nevada Bureau of Air Pollution Control. As noted in the 2006 NTS Site Environmental Report, non-radiological air*

emissions from the NTS are well within the limits imposed by the Air Quality Operating Permit. See response to comment-response 14.K.1 for information regarding impacts to sensitive receptors and 14. J.1 regarding impacts to the MEI and surrounding population.

14.E WATER RESOURCES

Commentors expressed concern about water resources, including existing and potential future contamination of the public water supply. Specifically, commentors were concerned that:

- The water quality near Oak Ridge and contamination of the water supply in a karst terrain (regions that are underlain by limestone and dolomite bedrock) such as in the Oak Ridge area could be adversely effected by Complex Transformation.
- The contamination of the Albuquerque water supply, the Rio Grande River, and local groundwater could be contaminated due to activities at LANL, including nuclear weapons production.
- The groundwater quality and the ineffectiveness of current state and federal oversight might lead to groundwater contamination.
- The contamination of the perched aquifers near Pantex might be made worse.
- Plutonium is or could get into the drinking water at the Buchman Wells, near LANL.

- The levels of contaminants in the water supply at LANL, Oak Ridge Y-12, SRS and Pantex as stated in the SPEIS could be elevated as a result of Complex Transformation.
- Existing and potential future contamination of aquifers could be elevated due to the mining of uranium.
- The waste disposal facility at Yucca Flats could contaminate groundwater.

Response: *Section 4.9.5.2.1 of Volume I of the SPEIS addresses groundwater quality at Y-12 and Section 4.9.6.1 describes karst formations in the area. The level of analysis presented in the SPEIS is appropriate for a programmatic NEPA document. Detailed discussion of groundwater monitoring and contamination at the Oak Ridge Reservation may be found in Annual Site Environmental Reports, available on the internet at: http://www.ornl.gov/sci/env_rpt/.*

Water quality and use at LANL are addressed in the SPEIS at Section 4.1.5 of Volume I. Impacts of Complex Transformation on water resources at LANL are addressed in Section 5.1.5 of Volume II. There is no indication that contamination from LANL is affecting Albuquerque's drinking water supply. According to the 2007 Albuquerque Bernilillo County Water Utility Authority

Water Quality Report, Gross Alpha Particle Activity, Radium 228, Radium 226, and Uranium were among regulated substances that were monitored but not detected (ABCWUA 2007). The 2007 water quality report may be accessed at <http://www.abcwua.org/content/view/280/484/>.

Information regarding the Ogallala Aquifer and the perched aquifer at Pantex is contained in Sections 4.5.5.2 and 4.5.5.2.1 of Volume I of the SPEIS. Impacts to groundwater at Pantex are addressed in Section 5.5.5 (Volume II). Response to comment 14.E.1 also addresses the Ogallala Aquifer. Water quality and use at SRS are addressed in the SPEIS at Section 4.8.5.

State and Federal oversight of groundwater quality is not within the scope of Complex Transformation. This concern should be expressed to state and Federal agencies with jurisdiction over the resource and to state and Federal legislators. The effectiveness of waste disposal at the Yucca Mountain Facility and any impacts this facility could have on groundwater is not within the scope of the SPEIS. The potential cumulative impacts of the Yucca Mountain Facility and the alternatives in the SPEIS are evaluated. Likewise, the effect of uranium mining on groundwater quality is not within the scope of this SPEIS.

14.E.1

The following comments were received regarding water issues at Pantex:

- Groundwater is a finite regional resource that is currently being mined from the Ogallala Aquifer in the Texas Panhandle region.
- Even though 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, agricultural uses could respond rapidly to groundwater declines and rising energy costs.
- NNSA operations at Pantex Plant lack 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. Thus, the water resources required for this project are unreliable in the long-term.
- 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 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.
- A document titled Pantex Plant FY 2006-2015 Ten-Year Comprehensive Site Plan discloses NNSA estimates for Pantex future environmental liabilities. This information should be included in the SPEIS.

Response: *Analysis of groundwater resources is conducted in the same process used to assess potential impacts. Potential impacts of Complex Transformation construction and operations at Pantex would result in less than 1 percent change in the current resource. The water resource would not be compromised beyond its capacity. The Panhandle Water Conservation District No. 3, the governing agency for the Ogallala Aquifer, does not presently limit the quantity of water pumped from the aquifer. Pantex is in compliance with areas laws, regulations, and permits for groundwater use. Pantex has no regulatory authority to change the management and terms of use for the Ogallala Aquifer. NNSA continues to operate and manage Pantex in compliance with Federal, State and local regulations, and adjusts management and operations as necessary to continue to facilitate compliance with applicable regulations and permits.*

The Texas Commission on Environmental Quality establishes NPDES permit limitations that are protective of in-stream water quality standards. Pantex discharges (wastewater and stormwater) are consistently in compliance with their respective permit requirements. Complex Transformation construction and operations at Pantex would be in compliance with Federal, State, and local permits and regulations.

The Pantex site is currently undergoing remediation activities. Potential CERCLA liabilities for the site are uncertain and beyond the scope of the SPEIS. The cost estimates for Pantex future environmental liabilities for past activities are not within the scope of the SPEIS because they would not affect or be affected by any decisions that will be informed by this SPEIS.

14.E.2

The following comments were received regarding water availability at and around LANL:

- Concern about the adequacy of the water supply to meet future demands and stated that only one percent of the water on the planet is potable and is currently being contaminated by plutonium operations.
- Concern about the adequacy of the water supply in the area surrounding LANL if a significant amount of the water supply will be used for the Complex Transformation at LANL.
- The natural water supply isn't enough to support the public and the national labs after Complex Transformation.
- Concern about water quality and water volume of the southwestern and southeastern United States.

Response: *A description of existing water availability and supply may be found under the Water Resources subsection for each site in Chapter 4 of Volume I of the SPEIS. Impacts of Complex Transformation on water resources supply and quality are addressed for each site in Chapter 5. Additional discussion bearing on water availability may be found in responses to other comments in this Section 14.E. Further, NNSA is committed to decreasing or eliminating all*

discharges that have a potential to release contaminants to the environment and is in compliance with all applicable water quality regulations and permit requirements. Pursuant to DOE Order 450.1, Environmental Protection Program, NNSA sites are pursuing pollution prevention programs and groundwater protection programs. NNSA also follows the guidance contained in DOE G 450.1-5, Implementation Guide for Integrating Pollution Prevention into Environmental Management Systems; DOE G 450.1-6, Groundwater Surveillance Monitoring Implementation Guide for Use with DOE O 450.1, Environmental Protection Program; DOE G 450.1-9, Groundwater Protection Programs Implementation Guide for Use with DOE O 450.1, Environmental Protection Program.

14.E.3

The following comments were received regarding groundwater contamination at LANL:

- Past operations at LANL have resulted in groundwater contamination in the region.
- In most of the alternatives, LANL would use more water and the SPEIS should address how that might or might not cause additional contamination and perhaps migration of existing contamination.
- Stormwater from LANL contains 38,000 times the clean water standard for certain pollutants.
- The Buckman diversion project (Santa Fe water supply) depends on wells that are radioactively contaminated.

- Have hazardous radioactive materials from LANL have entered the groundwater?
- DOE self-regulates contaminants in groundwater.
- EPA safe drinking water standards for radionuclides do not provide adequate reproductive protection.
- 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 includes tritium, perchlorate and dioxane [1-4].

Response: *NNSA notes the commentors' concerns regarding possible contamination of groundwater in the region. The LANL contractor operates a monitoring program to detect contamination in area waters, both surface water and groundwater. The results of this monitoring program are published annually in LANL environmental surveillance reports (available at: www.LANL.gov/environment/all/esr.shtml). In accordance with applicable regulations and agreements, NNSA evaluates occurrences of contamination in surface waters and groundwater at LANL and takes corrective actions. NNSA is also committed to decreasing or eliminating all discharges that have a potential*

to release contaminants to the environment. NNSA is in compliance with all EPA regulations.

Sections 4.1.5.1, Surface Water, and 4.1.5.1.1 Surface Water Quality of Volume I address the concerns regarding storm-water and the Buckman diversion project. Section 4.1.5.2.1, Groundwater Quality, discusses any radioactive materials that may have entered the groundwater in the Los Alamos region. That Section has been updated to reflect the best available information regarding contamination in the regional aquifer.

The LANL Environmental Surveillance Report for 2005 evaluated groundwater radioactivity and stated: “In 2005, no regional aquifer radioactivity analyte activity or concentration values exceeded the 4-millirem DOE DCGs [derived concentration guides] applicable to drinking water in groundwater samples, other than naturally occurring radionuclides (for example, radium-226 and uranium-234). The main radioactive element detected in the regional aquifer is naturally occurring uranium, found in springs and wells throughout the Rio Grande Valley. The large gross alpha values found in samples from springs and wells in the Rio Grande Valley result from the decay of naturally occurring uranium in the water” (LANL 2006b).

Sediment contamination from LANL activities is reflected in the water quality of the receiving streams. Current water quality monitoring indicates that the State of New Mexico’s water quality standards are not exceeded in downstream reaches of the Rio Grande, and existing water quality is expected to improve over time. Additionally, NNSA manages stormwater runoff from both industrial and construction activities under various Stormwater Pollution Prevention Plans. NNSA requires cleanup of any spills or leaks, monitoring of surface water runoff, and implementation of best management practices for the control of stormwater runoff quality and quantity.

Previous contamination from past LANL activities is being addressed with a Consent Order issued by NMED. Since 2005, LANL has been complying with this Order which requires LANL to monitor the groundwater in the area surrounding Los Alamos. This Order is aimed at ensuring quality drinking water by meeting water quality standards, as well as establishing a time table for environmental cleanup of hazardous constituents released by LANL. There is no new contamination from LANL and future operations will not alter that. NNSA is required to follow the Consent Order, which stipulates applicable groundwater cleanup levels. NNSA is committed to protecting drinking water sources. The comment regarding the adequacy of the EPA standard is outside the scope of this SPEIS.

For more detailed information regarding groundwater quality in the vicinity of LANL, please see Chapter 4, Section 4.3.2, of the LANL SWEIS (LANL 2008). Additional details on stormwater management at LANL are also included in that

document, in Chapter 4, Section 4.3.1.3, Stormwater Runoff. Movement of groundwater contamination is discussed in Chapter 5, Section 5.13 That document also includes a special pathways analysis that was added to Appendix C, Section C.1.4.2, to address concerns about contamination of the Rio Grande. The analysis shows that drinking Rio Grande water that could be impacted by past LANL activities is comparable to drinking water from the Jemez River, which is not downstream of LANL. The monitoring data and the drinking water analysis do not indicate a need to extend impacts analysis well beyond the vicinity of LANL (LANL 2008).

14.E.4 A commentor asked about water metering at LANL, and questioned whether it is being done to conserve water or to monitor for contamination.

Response: *Los Alamos County has been working to lessen its dependence on regional groundwater and is currently studying the possible use of its San Juan-Chama surface water allotment. The use of this allotment would likely reduce groundwater withdrawals, which could stabilize water levels in the regional aquifer. Los Alamos County recently completed the conversion of its water contract with the Bureau of Reclamation to access San Juan-Chama water, which would enable the county to move forward with this water diversion project. This project, coupled with the implementation of the measures outlined in the Los Alamos County August 2006 Long-Range Water Supply Plan, should enable it to meet regional water demands for the next 40 years (LANL 2008). Furthermore, measures to monitor groundwater quality have been implemented by the NMED's Consent Order, which stipulates LANL's need to monitor the groundwater in the area surrounding Los Alamos. This Order is aimed at ensuring quality drinking water by meeting water quality standards, as well as establishing a time table for environmental cleanup of all hazardous constituents produced by the Lab. This Order is set to be completed by 2015.*

NNSA has actively implemented water use management and conservation measures at LANL that will be integral to any new construction in the future. In addition, NNSA operates a monitoring program to detect contamination that has resulted from past practices. NNSA evaluates and takes corrective action for occurrences of contamination in groundwater and surface waters at LANL, in accordance with applicable regulations and agreements.

14.E.5 The following comments were received regarding LANL water rights:

- The groundwater resources available to LANL are not correctly represented.
- LANL is not limited to the water right as it is referred to in the SPEIS.
- The Department of Public Utilities can provide the amount of water that LANL will require for the Preferred Alternative or other chosen mission.
- 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 NNSA's Preferred Alternative, NNSA 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.

Response: *LANL does not have a ceiling for its water rights. However, NNSA has an estimated target ceiling for LANL's water usage of 1,662 acre-feet, (542 million gallons [2,050 million liters] per year), 30 percent of the water that it is able to purchase from Los Alamos County. NNSA is now a county water customer; and as such, NNSA is billed and pays for the water it uses in accordance with a water service contract.*

Water demands for the Complex Transformation alternatives at LANL were updated. As discussed in Chapter 5, operations for some alternatives would exceed the water currently available to LANL. These estimates are based on trend analysis and projections that include calendar year 2005 water usage data for LANL and other Los Alamos County users. Should any of those alternatives that exceed current water availability be selected, NNSA would need to coordinate with Los Alamos County to develop a means to meet those needs to support the selected alternative.

NNSA continues to work with Los Alamos County in implementing measures to conserve water and in planning for future water demands. NNSA has attempted to document current water supply conditions while characterizing planning efforts and proposals related to the future availability of water as they are currently known. The commentor is incorrect in asserting that NEPA prohibits irretrievable and irreversible resource commitments. NEPA does however require their disclosure and assessment.

14.E.6

A commentor questioned whether the water use projections include water use by operations such as supercomputing at LANL. The commentor noted that the Draft SPEIS did not mention or assess the impact of the supercomputing operations proposed for LANL as part of the Complex Transformation. The LANL SWEIS indicates that supercomputing could use up to 51,000,000 gallons of water per year.

Response: *Supercomputing operations are part of the No Action Alternative at LANL. The Strategic Computing Complex EA (DOE 1998) was completed in 1998 and evaluates the projected impacts of construction and operation of the facility now referred to as the Nicholas C. Metropolis Center for Modeling and Simulation (Metropolis Center). The EA conservatively estimated that operation of the facility would require approximately 7.1 megawatts of electricity, and 63 million gallons of recycled water per year. At present, the Metropolis Center requires approximately 5 megawatts of electricity, and 19 million gallons of*

water per year primarily derived from groundwater. Actual operation of the Metropolis Center has shown that significant increases in computational capability (measured in teraflops, or trillion floating point operations per second) have correlated to only moderate increases in electricity and cooling requirements, and would be expected to remain within the levels evaluated in the SPEIS No Action Alternative for LANL.

14.E.7 A commentor stated that SRS does not have enough water to support nuclear weapons activities.

Response: Domestic water supplies at SRS come from a system composed of several wells and water treatment plants. The Savannah River is a major source of this water and has been classified as suitable for drinking after proper treatment. As such, the SRS has been using and is expected to continue using approximately 3.5 billion gallons of water per year. SRS has sufficient water availability to support nuclear weapons activities. The SRS has absolute ownership of the groundwater resource underlying SRS land and has no legal restrictions on the amount of groundwater which can be withdrawn annually.

14.E.8 A commentor requested an explanation of the water conservation programs to be used in Complex Transformation at LANL.

Response: As for the commentor's concerns about water use for new facilities, new facility construction is forecast to have a minor impact on the overall trend in site-wide water and other utility demands. Operationally, a number of the new and more resource efficient facilities would replace older facilities resulting in a net decrease in utility demands over time, as discussed in Chapter 5, Section 5.8.2.3, of the LANL SWEIS (LANL 2008). Such is the case with the new Chemistry and Metallurgy Research Replacement Facility, which would replace the existing Chemistry and Metallurgy Research Building. Operation of the Chemistry and Metallurgy Research Replacement Facility was analyzed in the Final Environmental Impact Statement for the Chemistry and Metallurgy Research Building Replacement Project at Los Alamos National Laboratory, Los Alamos, New Mexico (CMRR EIS) (DOE 2003f) and was the subject of a subsequent ROD (69 FR 6967).

14.E.9 The following comments were received related to LANL water issues:

- LANL has water rights to approximately 1,662 acre-feet per year and expanded operations would result in LANL pumping 10 percent 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 percent, which could use approximately 2,672 acre-feet per year.
- Contaminants have been found in the regional aquifer, including fast-

moving hexavalent chromium, a cancer-causing carcinogen, and perchlorate, a chlorine-based chemical that interferes with thyroid function.

- 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.
- A commentor who is the plaintiff to a Clean Water Act lawsuit against DOE for violations at LANL, incorporated the amended complaint to their comments.
- The Española Basin was recently designated a sole source aquifer by the Environmental Protection Agency, which requires additional protections. DOE must meet the requirements of the Española Basin Sole Source Aquifer and incorporate those requirements, impacts and effects into the supplemental Draft SPEIS.
- DOE must prioritize protecting water quality and quantity at LANL.

Response: *Water use at LANL has actually decreased since 1999, in part due to conservation efforts. NNSA transferred 70 percent of its water rights for LANL to Los Alamos County and leases the remaining 30 percent to the county. NNSA is now a county water customer; as such, NNSA is billed and pays for the water it uses in accordance with a water service contract. For water use planning purposes, NNSA has established a target ceiling quantity for water use equal to the water rights it still owns (542 million gallons per year). Los Alamos County recently completed the conversion of its water contract with the Bureau of Reclamation to access San Juan-Chama project water, which will enable the county to move forward with this water diversion project. This project, coupled with the implementation of the measures outlined in the Los Alamos County August 2006 Long-Range Water Supply Plan, should enable it to meet regional water demands for the next 40 years (LANL 2008). Water demands for the Complex Transformation alternatives at LANL were updated. As discussed in Chapter 5, some operations management scenarios exceed the water currently available to LANL. These estimates are based on trend analysis and projections that include calendar year 2005 water usage data for LANL and other Los Alamos County users. Should any of those alternatives that exceed the current water availability be selected, NNSA would need to coordinate with Los Alamos County water utility to develop a means to meet the future operational water needs to support the selected alternative.*

Appendix F of the Final LANL SWEIS (LANL 2008) describes the results of monitoring for contamination of environmental media around LANL. Contamination detected in these samples reflects worldwide fallout of radioactive particles from nuclear weapons testing; nuclear accidents, such as Chernobyl; releases from industrial, commercial, medical, and household uses of chemicals and radionuclides; and releases from decades of activities at

LANL. It is true that some contaminants are present onsite at levels above applicable standards and guidelines. Elevated levels are investigated to confirm the validity of the results, determine the source and extent of the contamination, and evaluate the needed control and cleanup technologies. As described in Chapter 4 of the Final LANL SWEIS, in 2005, chromium concentrations between 375 and 404 parts per billion were detected in well R-28 in the regional aquifer below Mortandad Canyon. Additional sampling in 2006 indicates that chromium contamination is present in the regional aquifer in a limited area beneath Sandia and Mortandad Canyons and in perched groundwater beneath Mortandad Canyon. Chromium contamination was not detected in water supply wells. In response to such sampling results, LANL prepared an Interim Measures Work Plan for Chromium Contamination in Groundwater, the goals of which are to evaluate the extent of the chromium contamination, identify the source and provide a process to evaluate appropriate remediation solutions.

Impacts on surface water can be caused by industrial outfalls, stormwater runoff, dredge and fill activities, or sediment transport. LANL has one sanitary outfall and 20 industrial outfalls; effluents from LANL facilities are discharged in accordance with a National Pollutant Discharge Elimination System permit that establishes limits on the volume and quality of the discharge.

LANL is performing monitoring of all wells required by the New Mexico Environment Department Consent Order. This monitoring is conducted in accordance with a New Mexico Environment Department-approved monitoring plan (Interim Facility-Wide Groundwater Monitoring Plan). As periodic watershed monitoring continues, LANL, in consultation with the New Mexico Environment Department, will continue a phased approach to determining which wells are needed and in what locations to satisfy the long-term monitoring needs. The process is established by and in compliance with the Consent Order.

14.E.10 In addition to the comments received and categorized in comment-response 14.E.3, the following additional comments were received related to water quality at LANL:

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

- There are many factors which prevent characterization wells from providing reliable water samples.

Response: *Text in Section 4.1.5.2.1 of Volume I of the SPEIS has been updated with revised information regarding new contaminant levels. LANL is monitoring the quality of its groundwater in accordance with the New Mexico Environment Department Consent Order. Under this Order, actions are being taken to ensure quality drinking water for Los Alamos County by implementing Interim Work Plans to research sources of contamination, history of the site and methods to reduce contamination to a level that complies with state and Federal regulations.*

The wells with high hexavalent chromium concentrations are being reassessed due to potential residual drilling fluid effects. The results of this assessment published in the Well Screen Analysis Report indicate that 52 percent of the wells evaluated have not been significantly impacted by the residual fluid. For those wells that may have been impacted, LANL has initiated a program to evaluate and rehabilitate them to ensure quality drinking water. See also

comment-response 14.E.3 for additional information regarding LANL groundwater contamination issues.

14.E.11

Commentors stated that NNSA has not analyzed the additional amount of water resources that it will use for future Complex-related activities at LANL and the diversion and/or contamination of the water from availability and quality for agricultural activities into the future.

Response: *Water use at LANL has actually decreased since 1999, in part due to conservation efforts. NNSA transferred 70 percent of its water rights for LANL to Los Alamos County and leases the remaining 30 percent to the county. NNSA is now a county water customer; as such, NNSA is billed and pays for the water it uses in accordance with a water service contract. For water use planning purposes, NNSA has established a target ceiling quantity for water use equal to the water rights it still owns (542 million gallons per year). Los Alamos County recently completed the conversion of its water contract with the Bureau of Reclamation to access San Juan-Chama project water, which will enable the county to move forward with this water diversion project. This project, coupled with the implementation of the measures outlined in the Los Alamos County August 2006 Long-Range Water Supply Plan, should enable it to meet regional water demands for the next 40 years (LANL 2008). Water demands for the Complex Transformation alternatives at LANL were updated. As discussed in*

Chapter 5, some operations management scenarios exceed the water currently available to LANL. These estimates are based on trend analysis and projections that include calendar year 2005 water usage data for LANL and other Los Alamos County users. Should any of those alternatives that exceed the current water availability be selected, NNSA would need to coordinate with Los Alamos County water utility to develop a means to meet the future operational water needs to support the selected alternative. Furthermore, due to concern expressed for the quality of agriculture in the LANL region, NMED collects and analyzes foodstuff samples as part of its surveillance program to ensure quality standards are met.

14.E.12 The following comments were received related water issues at SNL/NM:

- NNSA failed to address the growing and widespread contamination of groundwater from the legacy wastes of SNL/NM and Kirtland Air Force Base. Section E.4 in Appendix E of the Draft SPEIS addressing SNL/NM, takes credit for data from surface water monitoring and groundwater monitoring that are in fact based on groundwater monitoring wells that do not monitor the ‘groundwater’ (as defined either by the Consent Order of April 29, 2004 or 40 CFR 260.10).
- The SPEIS fails to consider the risk of the total amount of contaminants at SNL/NM because SNL/NM itself cannot identify the amount of total contamination it has dumped.
- Groundwater contamination currently exceeds regulatory limits. (Table E.4-1). Many of the monitoring wells at SNL/NM have corroded well screens and must be replaced. The corrosion of the stainless steel well screens hides knowledge of contamination. Some 30 of 50 wells at SNL/NM are defective and need replacement or to be plugged and abandoned. Drilling fluids were used to install many of the monitoring wells and that further prevents detection of contamination of the groundwater at SNL/NM.
- SNL/NM has failed to analyze the water in drinking water wells for the City of Albuquerque for the contaminants of concern that have been dumped at SNL/NM from 50 years of operations of laboratories waste streams.“

Response: *Table E.4-1 in Appendix E has been updated with the best information available. SNL/NM is in compliance with all New Mexico Environment Department and City of Albuquerque permit and Compliance Order on Consent (effective 2004) monitoring requirements. Installation of wells was completed in compliance with standard drilling practices. See comment-response 14.E for related discussion.*

14.E.13 A commentor stated that LANL already is contaminating drinking water wells in Los Alamos and Santa Fe, along with contaminating the entire Rio Grande River

system with radionuclides. LANL has spread radionuclides and would continue to accelerate the spread of hazardous contamination to a 57,000 person low income and minority populace in violation of all principles of Environmental Justice.

Response: *This specific topic is addressed in Appendix E, Section E.3. Additionally, Appendix F of the Final LANL SWEIS (LANL 2008) describes the results of monitoring for contamination of environmental media around LANL. Contamination detected in these samples reflects worldwide fallout of radioactive particles from nuclear weapons testing; nuclear accidents, such as Chernobyl; releases from industrial, commercial, medical, and household uses of chemicals and radionuclides; and releases from decades of activities at LANL. It is true that some contaminants are present onsite at levels above applicable standards and guidelines. Elevated levels are investigated to confirm the validity of the results, determine the source and extent of the contamination, and evaluate the needed control and cleanup technologies.*

Impacts on surface water can be caused by industrial outfalls, stormwater runoff, dredge and fill activities, or sediment transport. LANL has one sanitary outfall and 20 industrial outfalls; effluents from LANL facilities are discharged in accordance with a National Pollutant Discharge Elimination System permit that establishes limits on the volume and quality of the discharge.

LANL is performing monitoring of all wells required by the New Mexico Environment Department Consent Order. This monitoring is conducted in accordance with a New Mexico Environment Department-approved monitoring plan (Interim Facility-Wide Groundwater Monitoring Plan). As periodic watershed monitoring continues, LANL, in consultation with the New Mexico Environment Department, will continue a phased approach to determining which wells are needed and in what locations to satisfy the long-term monitoring needs. The process is established by and in compliance with the Consent Order.

14.E.14

A commentor asked where LANL will obtain the additional water allotment necessary for its activities and what will be the environmental effects on the surrounding low income minority communities for traditional agricultural and domestic water usage? What is the amount of residential development that cannot take place due to future expanded laboratory taking of water resources?

Response: *LANL does not have a ceiling for its water rights. However, NNSA has an estimated ceiling for LANL's water usage of 1,662 acre-feet, (542 million gallons [2,050 million liters] per year), as this is the amount of water NNSA owns and leases to Los Alamos County. NNSA is now a county water customer; and as such, NNSA is billed and pays for the water it uses in accordance with a water service contract.*

Water demands for the Complex Transformation alternatives at LANL were updated. As discussed in Chapter 5 of Volume II of the SPEIS, operations for some alternatives would exceed the water currently available to LANL. These estimates are based on trend analysis and projections that include calendar year 2005 water usage data for LANL and other Los Alamos County users. Should any of those alternatives that exceed current water availability be selected, NNSA would need to coordinate with Los Alamos County to develop a means to meet those needs to support the selected alternative.

In regards to agricultural and domestic water usage, Los Alamos County has been working to lessen its dependence on the regional groundwater aquifer and recently completed the conversion of its water contract with the Bureau of Reclamation to access San Juan-Chama project water, which will enable the county to move forward with this water diversion project. This project, coupled with the implementation of the measures outlined in the Los Alamos County August 2006 Long-Range Water Supply Plan, should enable it to meet regional water demands for the next 40 years (LANL 2008)

14.E.15 The following comments were received regarding contamination at NTS:

- The Draft SPEIS indicates insignificant radiological contamination at NTS 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."
- There is no presentation of data, and no map showing where the monitoring is occurring.
- 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.
- The "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: The SPEIS must detail the contamination of the groundwater with physical data, and show whether these statements are 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".
- The SPEIS must address impacts to lands held in trust for tribes that may be damaged or made uninhabitable by groundwater contamination.

Response: *The assessment of impacts to groundwater resulting from actions at the NTS considered in this SPEIS are adequate for a programmatic NEPA document (see Section 5.3.5 of Volume II). DOE and NNSA conduct extensive groundwater monitoring both on the NTS and in surrounding areas. The results*

of that monitoring are reported in annual environmental reports. The latest Nevada Test Site Environmental Report 2006 (NTS 2007) (Wills 2007) provides data, including the locations of groundwater and surface water sampling points for the three DOE and NNSA monitoring programs: 1) Routine Radiological Environmental Monitoring Program, 2) water quality assessments of permitted water systems, and 3) the Underground Test Area Project. The total number of groundwater sampling locations that are monitored at specified intervals are 33 offsite wells, 10 onsite water supply wells, and 29 onsite monitoring wells. Surface water monitoring locations include 7 offsite springs, 1 NTS containment pond system, and 2 onsite sewage lagoons. In addition, Desert Research Institute, under NNSA's Community Environmental Monitoring Program, conducts independent monitoring of off-site springs and water systems. The locations of DRI's sampling sites and results are also provided in the 2006 Nevada Test Site Environmental Report and previous annual reports. Various environmental monitoring reports for the NTS, back to 1964, may be found on the NNSA Nevada Site Office website, www.nv.doe.gov, under "Environmental Programs." The results of all monitoring have demonstrated that radiological contamination resulting from underground nuclear testing has not migrated to offsite water sources.

14.E.16 A commentor stated that data continued to be collected at the USGS streamflow gauging station on Salt Creek near Tularosa, NM, (station no. 08480595) at WSMR about 120 miles south of SNL 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.

Response: *NNSA has replaced the previous sentence in Section 4.8.5 with the following text: "Stream flow measured (since 1995) at the USGS gauging station on Salt Creek, located at RR316, showed a monthly mean high of 2.7 cubic feet per second and a low of 0.67 cubic feet per second (USGS 2008a). Daily flows fluctuate relative to the precipitation received. The mean daily flows for the same period of record show highs of 13 cubic feet per second and lows of 0.25 cubic feet per second (USGS 2008a)."*

14.E.17 A commentor noted that Section 4.8.5, of the SPEIS states that data from the river's monitoring locations generally indicate that South Carolina's freshwater water quality standards are being met. However, Fourmile Branch (FMB) is listed on South Carolina's 2008 303(d) List of Impaired Waters due to pH levels. Further, Savannah River above, adjacent to, and below the SRS is on the impaired waters list due to mercury contaminations 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 (UTRC) and Fourmile Branch exceed the state water quality criterion by three

and four orders of magnitude, respectively, and tritium concentrations in Fourmile Branch exceed criterion by an order of magnitude. Base on this data the commentor recommended revising this Section.

Response: *Fourmile Branch is a poorly buffered blackwater stream which has naturally occurring low pH. The low pH observed in Fourmile Branch is not attributable to SRS activities. The comment regarding mercury concentrations in Upper Three Runs Creek and Fourmile Branch is incorrect. South Carolina mercury water quality criteria for (a) human health water and organism consumption and (b) chronic aquatic life are 0.05 ug/l and 0.91 ug/l, respectively. Review of water quality monitoring data in Fourmile Branch and Upper Three Runs Creek for 2006 (SRS 2007) indicates that neither of these criteria were exceeded in either Upper Three Runs Creek or Fourmile Branch. Although some trophic level 4 fish within both Fourmile Branch and Upper Three Runs Creek exceed EPA's fish tissue criterion of 0.3 mg/kg, this is not unexpected for blackwater streams.*

NNSA made corrections to Section 4.8.5 of Volume I of the SPEIS to state: Monitoring data collected in 2006 indicate that SRS discharges are not adversely affecting the water quality of onsite streams or the Savannah River (SRS 2007).

14.E.18 A commentor indicated that “multiple US Geological Survey (USGS) streamflow gaging stations exist on Upper Three Runs Creek at SRS 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 Creek 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. 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.”

Response: *The text in Section 4.8.5 of Volume I of the SPEIS has been updated.*

14.E.19 A commentor stated that “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 exceeded 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 (SRS 2007) 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). 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.”

Response: *The text in Section 4.8.3.3 of Volume I of the SPEIS has been updated. The comment regarding NPDES compliance rates and subsequent impact(s) on water quality is incorrect. The South Carolina Department of Health and Environmental Control establishes NPDES permit limitations that are protective of instream water quality standards. SRS discharges (wastewater and stormwater) are consistently in compliance with their respective permit requirements.*

14.E.20

A commentor stated that “the Environmental Report for 2006 (WSRC-TR-2008-00008 [SPEIS reference “SRS 2007”]) 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, Fourmile 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.”

Response: *The proposed and alternative actions considered in the SPEIS would use groundwater for construction and operation purposes. However, the quantities involved would not be significant and there are no potential significant impacts to groundwater quality or quantity. Additionally, SRS does not pump its potable or process waters from contaminated groundwater plumes and no surface waters would be used for the proposed action. Expanding the discussion on groundwater quality, while further defining the site's affected environment, would add little value to the identification and analysis of potential impacts associated with complex transformation.*

14.E.21

A commentor wanted to emphasize that the SRS includes an extensive system of

wetlands, including more than 370 Carolina Bays and wetland depressions.

Response: *NNSA has updated the text in Section 4.8.7.2 of Volume I of the SPEIS to emphasize the commentor's point.*

14.E.22

The following comments were received regarding 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) at SRS:

- 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 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."

Response: *The commentor's objections to the alternatives are noted. The*

purpose of the SPEIS is to present the environmental impacts. Information used to support the conclusions of impacts for each alternative has not changed. Impacts to water resources are adequately presented in the text. Further, the SPEIS presents the amount of waste projected to result from construction and operations. The SRS has absolute ownership of the groundwater resources underlying SRS land and therefore has no restrictions on the amount of groundwater it can withdraw annually. However, SRS withdrawal routinely exceeds 100,120 gallons of water per day, and therefore the withdrawal rate is reported to the South Carolina Water Resource Commission. Potable and process water at SRS is pumped from deep, not shallow, aquifers. Utilization of these deep aquifers does not directly impact the hydrology or assimilative capacity of surface streams or the integrity or productivity of wetlands. The South Carolina Department of Health and Environmental Control establishes NPDES permit limitations that protect in-stream water quality (addressing flow volume and contaminant/pollutant loading capacities). SRS discharges for wastewater and stormwater are consistently within their respective permit requirements. Implementation of best management practices, as directed in NPDES permit requirements, are intended to reduce the contaminant/pollutant loading of the receiving State waters.

14.E.23

A commentor stated that the groundwater resources available to LANL from the water production system in Los Alamos County are not correctly represented in the SPEIS. LANL is not limited to the water right as is referred to in the SPEIS. The Department of Public Utilities can provide the amount of water that LANL will require for the Preferred Alternative or other chosen mission.

Response: *The text in Section 4.1.3.4 of Volume I of the SPEIS has been clarified to state that, “LANL does not have a ceiling on its water rights. However, NNSA has implemented a target ceiling of 1,662 acre-feet (542 million gallons [2,050 million liters] per year), or 30 percent of the quantity allowed under the contract with the utility.”*

14.E.24

A commentor stated that in June 2007, the City of Santa Fe reported plutonium in the Buckman wells, which provide about 40 percent of the drinking water to City and County residents. Buffalo are being raised at Picuris Pueblo: what is the level of contamination, if any, on the grass these animals graze?

Response: *The LANL Environmental Surveillance and Compliance Program oversees the monitoring of LANL and surrounding region foodstuffs, air, water, and soil for radiation, radioactive materials, and hazardous chemicals. NNSA also operates an ambient-air-sampling network, AIRNET, which measures environmental levels of airborne radionuclides that may be released from LANL operations. Information regarding these monitoring efforts is published annually in the LANL environmental surveillance report. Over the years, LANL staff has collected a variety of foodstuff samples (fruits, vegetables, grains, fish,*

milk, eggs, honey, herbal teas, mushrooms, piñon nuts, domestic animals, and large and small game animals) from the surrounding area and communities to determine the impacts of LANL operations on human health via the human food chain. These samples are used to compare the levels of radioactive and non-radioactive contaminants in foodstuffs at onsite and perimeter locations to regional levels, to determine trends over time, and to estimate the radiation doses and chemical exposures to individuals who consume them within a fifty-mile radius Region of Influence of LANL. The level of contamination, if any, present on the grass grazed by buffalo at Picuris Pueblo has not been determined by the LANL Environmental Surveillance and Compliance Program sampling process; however, the contaminant dose to a hypothetical offsite resident whose diet consists entirely of foodstuffs and game harvested around LANL is about 2.7 mrem per year in addition to the dose from ambient airborne contaminants received. LANL operational air emissions are maintained at levels below 10 millirems per year. Given the approximate location of Picuris Pueblo about 30 miles distant from LANL in air miles, NNSA believes that there would not be a detectable level of contamination attributable to LANL operations on grazing pastures on pueblo lands.

14.E.25

A commentor stated that “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.’ 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.’ Even more distressing is the fact that the Draft SPEIS contains no analysis of how this actually impacts Santa Clara Pueblo.”

Response: *The fact that stormwater runoff events are “sporadic” is a mitigating factor in radionuclide contamination impacts. The calculation of dose to the maximum exposed individual (MEI) assumes constant year-round residence at the point the dose is calculated. For a sporadic event, such as stormwater runoff, the actual dose that an individual (either human or animal) would receive would be much lower than the calculated dose to the MEI.*

As discussed in comment-response 14.J.1, NNSA evaluated a “special pathways analysis” for assessing how impacts would change compared to nominal modeling results. Based on that analysis, NNSA determined that the average annual dose to those individuals subsisting on all of the special pathways would increase by between approximately 1.1 to 2.7 percent due to these special pathways. A change of up to 2.7 percent would not change any of the conclusions in this SPEIS related to high and adverse impacts.

The following information provides more detail related to the expressed concerns for PCB and gross alpha contamination in stormwater runoff (Environmental Surveillance at Los Alamos During 2005 (LANL 2008): Approximately one-fourth of the storm runoff samples in 2005 contained concentrations of PCBs (Aroclors 1254 and 1260) above human health and wildlife habitat standards. The PCBs are likely laboratory-derived. These PCB concentrations reflect the large sediment load in a storm water runoff event and are due to the chemical affinity of PCBs for the suspended sediment in the runoff. Frequent PCB concentrations above the standards were observed in Los Alamos and Sandia Canyons and at least one PCB detection was observed in nearly all sampled watersheds. Storm runoff concentrations of PCBs were higher than the effective human health standard by a maximum of approximately four times. Sampling by NMED confirmed the presence of PCBs on LANL property.

It should be noted that the New Mexico stream standards for PCBs for aquatic life is 0.014 mg/L and for human health is 0.00064 mg/L (0.64 nanograms/L). The human health standards are levels where ingesting contamination through aquatic life consumption would harm people's health. Although there are no fish on laboratory land, a concern is the transport of PCBs into the Rio Grande by storm runoff events. In 2005, snowmelt sustained streamflow for four consecutive months in Los Alamos Canyon from the Laboratory to the confluence with the Rio Grande.

Despite the detection of PCBs in runoff within the laboratory, available data show no detectable impacts on PCB concentrations in the Rio Grande. Biological monitoring of reservoirs along the Rio Grande drainage does not indicate measurable increases in PCB concentrations due to laboratory operations. Mean total PCB concentrations in fish from Abiquiu reservoir were statistically similar to mean total PCB concentrations in fish from Cochiti reservoir. The statistical similarity in PCBs upstream and downstream of LANL has also been shown for dissolved water concentrations using samples taken with semi-permeable membranes. Additionally, sampling by NMED and LANL of the Rio Grande surface water shows whole water concentrations of PCBs are similar upstream and downstream of LANL (Mullen and Koch 2004). These results indicate there are other sources for PCBs in the Rio Grande.

The NMWQCC livestock watering standard includes a numeric criterion for adjusted gross alpha. Adjusted gross alpha means the total alpha radioactivity, excluding that arising from radon-222, uranium, and (as defined by the Atomic Energy Act) source, special nuclear, and by-product material (NMWQCC 2005). Monitoring results of storm runoff after the Cerro Grande fire have shown widespread gross alpha activities greater than the 15 pCi/L livestock watering criterion. In response to these findings, NMED designated several Los Alamos area drainages as water-quality impaired and added them to the federal Clean Water Act §303(d) list (NMWQCC 2005). The affected drainages with

heightened gross alpha activities are Guaje Canyon, Pueblo Canyon, Los Alamos Canyon, Mortandad Canyon, Pajarito Canyon, and Water Canyon. The 2002 and 2003 surveillance reports showed that the gross alpha activities generally correspond to the suspended sediment concentrations, and upstream gross alpha activities were comparable to on-site gross alpha activities and largely were due to the natural radioactivity in the surface sediments. This natural alpha radioactivity arises from the presence in the sediment material of naturally occurring uranium, thorium, and members of their decay chains. The 2005 gross alpha activities also correspond to sediment concentrations. The upstream gross alpha activities have declined substantially as stream flows are reduced with recovery in the burned areas, which has resulted in reduced concentrations of suspended solids. Although gross alpha activities have progressively declined since the Cerro Grande fire, about 60 percent of the surface water samples collected in 2005 contained adjusted gross alpha activities greater than the 15 pCi/L livestock watering criterion. Gross alpha radioactivity is a general screening measurement of limited value in assessing radiological hazards because specific alpha emitters in the water cannot be identified or quantified.

- 14.E.26** A commentor expressed concern that contaminants originating from the NTS would pollute surface and groundwater resulting in impacts to flora and fauna that utilize the water. The commentor was also concerned that contamination in groundwater from the NTS could adversely affect the Amargosa Desert and Ash Meadows alluvia aquifers.

Response: *Impacts to surface and groundwater at and in the vicinity of the NTS are addressed in Section 5.3.5 of Volume II of this SPEIS. Comment-response 14.A.5 provides information relevant to impacts on flora and fauna. Comment-response 14.E.15 provides information related to monitoring of surface water and groundwater and the impacts from NTS.*

- 14.E.27** A commentor stated that SNL/NM has plans for a thermal treatment unit to burn, in the open air, wastes that contain barium, beryllium, uranium, and depleted uranium that would contaminate the air.

Response: *The Thermal Treatment Facility burns small quantities of waste that are not stable enough to transport offsite for disposal. The facility has an open burn permit from the City of Albuquerque Air Quality Division and is permitted under an existing RCRA Part B Permit. The Thermal Treatment Facility is in full compliance with its permits. The hazardous components treated by this facility are organic solvents and silver.*

- 14.E.28** One commentor stated that SRS is violating its NPDES permit.

Response: *The SRS NPDES permit was modified to remove the mercury limit on March 3, 2005. SRS has not discharged a significant amount of mercury from*

the F-08 outfall. The permit also included a "mercury reopener" clause that would allow SRS to monitor mercury using a SCDHEC-certified method when it became available, submit the data to SCDHEC, and have the mercury limits removed if there was "no reasonable potential" to exceed an instream water quality standard.

Once a DHEC-certified lab for low level mercury analyses became available, SRS submitted samples from the F-08 outfall that showed the concentration of mercury was negligible and presented "no reasonable potential" to exceed an instream flow standard.

14.F GEOLOGY AND SOILS

A commentor stated that the DOE has not fully addressed the new information about a 50 percent increase in the probability that an earthquake will occur at LANL and must do so.

Response: *Seismicity is addressed in the Geology and Soils Sections of Chapters 4 and 5 of Volumes I and II respectfully of the SPEIS. Please refer to comment-responses 14.F.1, 14.F.2, and 14.F.3 for additional detailed information regarding seismicity.*

14.F.1 The following comments were received regarding seismic issues at LANL:

- The May 2007 Probabilistic Seismic Hazard Analysis report estimates a 50 percent increase in the g force of a possible earthquake at LANL. The Draft 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. DOE must assess the new seismic information in the SPEIS. DOE must release a supplemental Draft SPEIS for public review and comment. 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:
- 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.
- 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.
- 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.

- 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.
- Conduct Vs (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.
- 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.”
- The SPEIS must analyze total failure of the existing CMR and CMRR, now under construction, in the event of earthquakes. Fires and explosions along with the building breach and release of all radioactive and hazardous materials must be considered.
- From an environmental perspective the "other issues" that NNSA fails to address with respect to continuing pit production is that the Los Alamos National Laboratory (LANL) facilities slated for the continued production are in a known earthquake zone with at least three earthquakes that have occurred during the Holocene period.

Response: *The data on seismic activity in Chapter 4, Section 4.1.6.3, of Volume I of the SPEIS has been updated with new data from the Final LANL SWEIS (LANL 2008). The estimated human health impacts from postulated facility accidents at LANL, including earthquakes, are described in Chapter 5, Section 5.12 and Appendix D, Section D.4 of Volume II of the SPEIS. These Sections also include a discussion of the significance of the new understanding of seismic hazard based on the 2007 report. The new geological information in the 2007 report indicates that the seismic hazard at LANL is greater than previously understood. The new seismic hazard information will be used to determine what changes are needed for new and existing facilities. In the interim, the LANL contractor developed and NNSA accepted a justification for continued operation which addresses controls on operations of certain nuclear and high hazard operations that mitigate the risks from seismic events (LANL 2008).*

Following NNSA’s decisions on transformation and prior to the design and operation of new facilities, NNSA would prepare safety studies in the form of Hazard Assessment Documents and Safety Analysis Reports that take into account the most current seismic information. The results of these safety studies would be incorporated into facility design and operations to ensure protection of the health and safety of workers and the public. The potential impacts of facility accidents are contained in Chapter 5 of the SPEIS.

14.F.2 A commentor stated that SRS is located in an earthquake fault line.

Response: *Section 4.8.6.3 of Volume I of the SPEIS describes the baseline seismic conditions at the SRS. As described in that Section, there are no active faults on SRS, but several fault systems exist offsite. Additionally, none of the faults discussed in that Section are considered “capable,” as defined by the Nuclear Regulatory Commission in 10 CFR 100.23. The capability of a fault is determined by several criteria, one of which is whether the fault has moved at or near the ground surface within the past 35,000 years. In recent years, three minor earthquakes have occurred inside the SRS boundary. In 1985, an earthquake occurred with a local Richter scale magnitude of 2.6. Another occurred in 1988 with a local Richter scale magnitude of 2.0. The most recent earthquake inside the SRS boundary was in 1997 with a Richter scale magnitude of 2.3.*

14.F.3 The following issues related to soil contamination at NTS were received:

- The analysis of soil contamination at the Nevada Test Site in the NTS SWEIS is “insufficient, as has been made clear in the 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. This is necessary to understand impacts to people, especially indigenous, who either eat or handle various flora and fauna of the region.”

Response: *A discussion on the radiological contamination in soils at the NTS is in Section 4.3.6.2.1 of Volume I of this SPEIS and the assessment of impacts to*

soils is in Section 5.3.6. The level of assessment of impacts resulting from actions at the NTS considered in this SPEIS are considered adequate for a programmatic document. Areas of soil contamination at the NTS are well known and have been delineated and marked, as appropriate. These areas could be easily avoided by any activities proposed under Complex Transformation.

Although the Divine Strake experiment was cancelled by the project proponent, Defense Threat Reduction Agency, the analyses of soils that would have been impacted and the resulting downwind radiological doses clearly demonstrated that the soils at that location did not contain radiological contamination that exceeded what would be expected in “uncontaminated” sites in the southwestern United States.

In compliance with regulations at 40 CFR Part 61, Subpart H, National Emission Standards for Emissions of Radionuclides Other than Radon from Department of Energy Facilities, NNSA monitors and provides annual reports of emissions of radionuclides from the NTS to the Nevada Bureau of Air Pollution Control and the U.S. Environmental Protection Agency. Those emissions are consistently well below the emission standard of 10 mrem/year.

See comment-response 14.A.5 for information on monitoring of plants and animals at the NTS.

14.F.4

A commentor stated that the NTS is an unsuitable site for plutonium or SNM. Another commentor stated that 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 Draft SPEIS 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.”

Response: As noted in Section 4.3.6.3 of Volume I of this SPEIS, NTS is located in a region with relatively high seismicity. Section 5.3.6.2.1 (Volume II) states that all new facilities and building expansions would be designed to withstand the maximum expected earthquake-generated ground acceleration in accordance with DOE Order 420.1B, Facility Safety, and accompanying safety guidelines. Thus, site geologic conditions would not likely affect the facilities.

Section 5.3.5 of Volume II of this SPEIS addresses potential impacts to surface and groundwater. The level of analysis in this SPEIS is considered appropriate for a programmatic document. If a plutonium processing and storage facility were established at the NTS, modern engineering and administrative controls would preclude release of radiological or other hazardous material to the

environment, including from most foreseeable accidents. At the NTS it is highly unlikely that even if there were a release to the environment that any contamination would reach the groundwater. Two factors mitigate against such a result: 1) The distance between the ground surface and groundwater ranges from 79 meters (260 feet) in the extreme northwest part of the NTS to about 160 meters (525 feet) beneath Frenchman Flat and Yucca Flat, to more than 610 meters (2,000 feet) under the upland portions of Pahute Mesa; and 2) the evaporation rate is so great that surface moisture, and any contaminants it may be carrying, infiltrates only a few inches below the soil surface.

14.G BIOLOGY

A commentor expressed concern that open air burning will be detrimental to natural biological resources and systems.

Response: *Air emissions from NNSA sites are regulated under permits from the various states. NNSA conducts air monitoring and recordkeeping to ensure compliance with provisions of the air permits. As noted in comment-response 14.D.2, NNSA is striving to reduce or eliminate open burning at its sites.*

14.G.1 A commentor stated that the bald eagle has been removed from the Federal list and Table 4.8.7-1 should show it as "Not Listed."

Response: *The comment is correct. The U.S. Fish and Wildlife Service announced the delisting of the bald eagle (*Haliaeetus leucocephalus*) in the July 9, 2007 Federal Register (FR 72 37346). The texts in Section 4.8.7.4 and Table 4.8-1 in Volume I have been corrected.*

14.G.2 With regard to Section 4.8.7.5, Biological Monitoring and Abatement Programs, a commentor stated that survey results referenced here should be summarized for the SPEIS. The reference given, (SRS 2007), is not listed in the References Section (Chapter 12).

Response: *Survey results summaries have been added as requested. The commentor is correct, and the cited document has been added to Chapter 12, References.*

14.H CULTURAL RESOURCES

The following comments were received relative to cultural resources:

- The proposed action would not impact any Navajo traditional cultural properties, lands, or historical properties.
- Impacts to cultural resources must be evaluated.
- The rights of Native Americans (specifically the Pueblo of San Ildefonso) and their ancient and sacred spaces should be granted the same

protection as national monuments, parks, etc. and not subject to construction of facilities for mass destruction.

Response: *NNSA notes that Complex Transformation will not impact any Navajo traditional cultural properties or historical properties.*

The Complex Transformation SPEIS provides an appropriate level of analysis of cultural resources at a programmatic level. Prior to implementation of any decisions regarding the programmatic alternatives, NNSA would conduct any needed site or project specific analyses, including cultural resources surveys and consultations with potentially affected American Indian Tribes and State Historic Preservation Officers pursuant to Section 106 of the National Historic Preservation Act and regulations at 36 CFR 800, Protection of Historic Properties; Executive Order (EO) 13175 Consultation and Coordination with Indian Tribal Governments; EO 13007 Indian Sacred Sites; EO 11593 Protection and Enhancement of the Cultural Environment, and DOE American Indian and Alaska Native Tribal Government Policy.

14.H.1

A commentor noted that impact results when culturally appropriate mitigation is not taken or positive benefit not made to Western Shoshone victims to offset adverse impacts. Another commentor questioned what would be done if an archaeological resource was discovered during construction.

Response: *NNSA has implemented a comprehensive Cultural Resources Management Program (CRMP) for the NTS. Under that program, significant cultural resources (including sites that may be considered Traditional Cultural Properties because of their significance to American Indian tribes) are identified and protected. If adverse impact to a significant cultural resource cannot be avoided by an activity at the NTS, NNSA follows the consultation process prescribed under Section 106 of the National Historic Preservation Act. In addition, NNSA implements government-to-government consultation with American Indian tribes with cultural affiliation to the NTS through the Consolidated Group of Tribes and Organizations, including four tribes of the Western Shoshone. That consultation includes use of American Indian participation in any activity that may be necessary to mitigate adverse effects to significant prehistoric cultural resources or traditional cultural properties.*

14.H.2

A commentor stated that the SPEIS did not include information regarding indigenous peoples' perspectives of radiation in general and what irradiation (exposure) to plants, game, and minerals means to them.

Response: *As part of the NTS SWEIS (DOE 1996b), DOE invited participation of the Consolidated Group of Tribes and Organizations (CGTO) in development of the document. The CGTO consists of 16 American Indian tribes with a demonstrated cultural affiliation with the NTS, including several Shoshone and Southern Paiute tribes. The American Indian perspective is reflected in the NTS*

SWEIS, particularly in Appendix I. Excerpts from that appendix provide a brief overview of the Indian perspective on radioactivity.

“Radioactivity was interpreted as being the angry action of a powerful rock that had been quarried without its permission and had its power used for purposes it did not agree to. Now the remains of the rock (radioactive waste) are angry and it is taking its anger out on things around it. Plants, animals, people, water, and even the air itself can be hurt or even killed by the radiation from the angry rock. Indian people express the belief that past radiation releases have contaminated plants and animals traditionally used for foods and medicines. Spiritual people believe that they can see and feel radiation, that it has unique colors. This is why they can neither eat nor collect some plants, animals, and minerals in some areas. It is now impossible for Indian people to go to certain places, do certain ceremonies, and eat certain foods because radiation from the angry rock has been released.”

“[A]ir can be destroyed by radiation that has been released by the angry rock, thus causing pockets of dead air. There is only so much alive air which surrounds the world. If you kill the living air, it is gone forever and cannot be restored. Dead air lacks the spirituality and life necessary to support other life forms. Airplanes crash when they hit dead air. One member of the CGTO compared this Indian view of killing air with what happens when a jet flies through the air and consumes all of the oxygen, producing a condition where another jet cannot fly through the air. The atomic blast consumes the oxygen like the jet, killing the air. While this comparison of the Western science view of dead air from burning seems close to the Indian perspective, the latter has a ‘life force’ component that makes killing air more significant than just consuming its natural components.

“Some Indian people who were present during the aboveground atomic blasts believe that the sickness they have today came from the radiation. To some of these people, the effects of the radiation were in addition to what happened when the air itself was killed. Some elders today say that even when the plants survive the effects of radiation, the dead air killed them or made them lose their power, their spiritual power to heal things.”

14.I SOCIOECONOMICS

Commentors expressed concerns about socioeconomic analysis of the SPEIS. Specifically, they were concerned that:

- The workers at Y-12 need and deserve security as well as jobs that pay well, support the well-being of the community, and do not threaten their health or environment.
- There is a need to offer comparable jobs to workers in the nuclear weapons industry if they are laid off.

- There could be severe negative effects on the regional and local economy if facilities are closed.
- LANL is an integral part of the regional economy including its important role as a source of employment.
- Complex Transformation would provide employment but jobs are not as important as the continued existence of the globe.
- Funding for Complex Transformation could be used for socioeconomic improvements within the United States.
- Socioeconomic justice for the native people in New Mexico should be an over-riding concern for the SPEIS analysis.
- Socioeconomic impacts associated with relocation of NNSA flight testing operations from Tonopah Test Range could affect the economy and impact the Central Nevada area, as a whole.
- The loss of jobs at Tonopah would result in a subsequent loss of community services as some workers at TTR are also volunteers in the community, and that relocating the flight testing mission from TTR or operating the range in campaign mode would result in significant negative socioeconomic consequences.
- There is no socioeconomic in death.
- Nye County needs the jobs provided by Complex Transformation.
- A commentor stated that the future of the community is heavily dependent upon the future of LANL.
- Socioeconomic is of major importance to the Y-12 region.
- The disparity between the supposed positive economic impacts from the DOE sites in NM and the actual negative socioeconomic status that many counties in the state are experiencing is a large problem.
- Most supporters believe that economic growth will occur as a result of Complex Transformation but the opposite is more likely.
- The mitigation of job losses through investing in city infrastructure as well as encouraging and facilitating start-up companies is a factor that should be included in the SPEIS analysis.
- A disarmament alternative would not end work at Y-12 and, in fact, workers could be used to dismantle the nuclear weapons backlog and safely clean up past environmental contamination.
- The Pueblo people were not adequately compensated for the land the DOE seized from them.

Response: *As stated in the SPEIS, Complex Transformation is expected to result in a reduction in the number of workers involved in the nuclear weapons complex over time. However, in general it is expected that this reduction will occur over a long period of time as missions and facilities are readjusted within the Complex. Most reductions will be able to be accommodated by attrition of the workforce through retirements and other voluntary means. NNSA seeks to avoid involuntary reductions among its federal and contractor workforces if possible.*

Because the total number of jobs adversely affected by Complex Transformation is expected to be small, the effect on most local and regional economies would be minor. A notable exception would be the socioeconomic impact of relocating NNSA Flight Operations from TTR to another site. Section 5.15 of Volume II of the SPEIS addresses the potential socioeconomic impacts of moving flight operations from TTR. This Section has been updated with information provided by Nye County to ensure a more accurate estimate of the impacts. As a response to comments NNSA has added another Flight Test Alternative to the SPEIS which slightly reduces the existing workforce, reduces the footprint at TTR, and entails a new lease with the U.S. Air Force. This Alternative is described in Section 3.10 and the expected environmental impacts are described in Section 5.15. In addition, a substantial additional amount of socioeconomic analysis was added to Section 5.15 of Volume II of the SPEIS.

The United States' possession of nuclear weapons and the budget necessary to support the stockpile is a matter of national policy set by the President and the Congress. Complex Transformation is NNSA's vision for the most effective means of fulfilling the missions assigned to it by the Congress and the President. The Constitution requires that decisions on prioritization of federal expenditures be established by the Congress.

The adequacy of compensation for any land the government acquired from the Pueblo is beyond the scope of the SPEIS. See also the discussion in comment-response 14.J.5 for a related discussion.

14.I.1 One commentor stated that engaging in the development of new nuclear weapons mere miles from Las Vegas, Nevada, the center of commerce in Nevada threatens the economy of the entire state. Commentors stated that if the number of jobs fall as a result of consolidation or transfer of functions, more socioeconomic analysis of community disruption, housing, schools and services is needed.

Response: *The SPEIS analyzes the socioeconomic impacts of jobs lost for all alternatives throughout Chapter 5, as applicable to each alternative. An assessment of impacts to housing, schools, and services is presented in situations where there is the potential for significant impacts. For example, at TTR, where the transfer of the Flight Test mission could have significant socioeconomic impacts, the analysis includes a more detailed analysis of community disruption, housing, schools, and services. The city of Las Vegas is beyond the region of influence analyzed in the SPEIS.*

14.I.2 Commentors stated that other lab work, including work on non-proliferation,

would be adversely affected if there were no weapons work at LANL.

Response: *The weapons work at LANL accounts for most of the lab employment, and this comment is noted. However, there are no proposals or alternatives in the SPEIS that would eliminate all weapons work at LANL. Even if a CNPC were located at a different site, some of the laboratories nuclear weapons work, e.g., design activities, would continue.*

14.I.3 A commentor stated that the total impact, in dollars, on the LANL region of influence (ROI) for the plutonium phase-out is not provided.

Response: *Additional discussion was added to Section 5.1.9.5 in Chapter 5 of Volume II of the SPEIS to address the total impact in dollars on the ROI.*

14.I.4 A commentor stated that the socioeconomic analysis for LANL seems to be missing an analysis of the overall downsizing of the DOE complex and possible impacts of uncertainty regarding the LANL mission on the ROI.

Response: *An analysis of the potential effects on LANL's mission and economy of the surrounding region was not conducted as the size, timing and probability of any potential downsizing are uncertain. An analysis of these factors would have been highly speculative at this time. Because of the speculative nature of any such analysis, the information derived from such an analysis would not have been useful in the assessment of impacts to the ROI.*

14.I.5 A commentor stated that the socioeconomic impact analysis does not address the impact on the LANL ROI of additional security measures. Another commentor added that additional security access control implemented at LANL has restricted access to tourist and recreational activities and adversely effected Los Alamos County's economic development plans.

Response: *An analysis of additional security measures on the ROI (including but not limited to the tourism industry and recreational activities) was not conducted as the correlation between the additional security measures and numerous economic variables associated with the ROI are indirect and unclear. An analysis of this magnitude would have been qualitative and therefore highly speculative. The information derived from such an analysis would not have been useful in the assessment of impacts to the ROI as the analysis itself would be unable to provide an adequate portrayal of the potential impacts to the regional economy and laboratory mission as determined by the implementation of additional security measures at LANL. NNSA understands that the public has concerns about changes in the site's security plans that could impact the public's ability to travel across the site to attractions such as Bandelier National Monument or the ski area. These concerns are noted and NNSA has been working with Los Alamos County and others to address such issues and will continue to weigh these impacts against site security concerns. Local*

transportation is discussed in Chapter 5, Section 5.10, Transportation, and Section 5.13, Cumulative Impacts, of the LANL SWEIS.

14.J ENVIRONMENTAL JUSTICE

Commentors expressed environmental justice concerns in regard to the proposed actions at TTR including:

- The adverse effect on the environment that resulted from use of nuclear weapons;
- The citizens of Nye County are dependent upon the jobs provided by the DOE and taking away those jobs could be considered an environmental justice issue; and
- Environmental justice issues related to Native Americans near TTR.

Response: *The impacts of the use of nuclear weapons are outside the scope of Complex Transformation. NNSA has no role in decisions involving the use of nuclear weapons; only the President can decide to use nuclear weapons. In addition, NNSA is not aware of any plans to utilize nuclear weapons at TTR.*

NNSA has not made a decision as to the future location of flight test operations. Once the Complex SPEIS has been completed, the environmental impacts of the various flight test operations alternatives will be evaluated along with other cost, technical and risk analyses prior to reaching a decision as to the location of these operations. This decision, along with other decisions will be issued in a Record of Decision.

The socioeconomic impact analysis (Section 5.15.4.2 of Volume II of the SPEIS) has been revised to include relevant data from a report provided by Nye County (UN 2007). This will more accurately reflect potential impacts on Nye County of the various flight test alternatives.

Additional information regarding TTR may be found in the comment-responses 6.C.1 through 6 and 14 J 5 and in the SPEIS Sections 3.10, 4.4 (Volume I), 5.4, and 5.15 (Volume II).

14.J.1 The following comments were received relating to environmental justice:

- Native Americans have borne many of the highest costs of U.S. nuclear dominance and are disproportionately affected by NNSA's radioactive contamination because of their lifestyle.
- The environmental justice analysis is paltry.
- The SPEIS underestimates the impacts of its proposed actions on the Santa Clara Pueblo, including multiple exposures and cumulative impacts, in contravention of NEPA.
- Redevelopment of the nuclear weapons complex would adversely affect the environment and lives of Native Americans whose lands are widely

used for radioactive storage, uranium mining, and for testing of ICBMs, despite their protest.

- An impact of a severe accident could well be the extinction of the way of life for Native Americans (particularly the Santa Clara Pueblo).
- If the land becomes contaminated, indigenous peoples' way of life will come to an end.
- Damage to the health of tribal members would result from possible exposure to radiation through exposure pathways unique to tribal lifestyle from an accidental or planned venting or other release of radiation or toxic materials.

Response: *As discussed in Appendix C, Section C.1.3, the public health consequences of radionuclides released to the atmosphere from NNSA sites for the SPEIS analysis use the maximally exposed individual (MEI) and the entire population residing within 50 miles. Calculations were made using scientific models for radiological releases associated with both normal operations and accidents. The models implement a steady-state Gaussian plume atmospheric dispersion model to calculate concentrations of radionuclides in the air and on the ground and uses Regulatory Guide 1.109 (NRC 1977) food-chain models to calculate radionuclide concentrations in foodstuffs, and subsequent intakes by humans.*

As a result of those analyses, while the consequences of accidents could be severe on surrounding population, NNSA did not conclude that any high and adverse impacts to the MEI or the surrounding populations for normal operations and accidents would occur, given consideration of accident probabilities. Moreover, because of the conservative assumptions that were used to define the dose to the MEI (for example, the analysis assumes the MEI would live 24 hours a day, 7 days at week, and 52 weeks a year at the place outside of the facility with the highest dose from normal operations), NNSA does not think any actual person could receive a dose comparable to the MEI dose.

Based on the conclusions that no high and adverse impacts would occur, NNSA determined that no additional analyses is needed related specifically to environmental justice. This was based on the conclusion that if there were no high and adverse impacts to any populations, then there would not be any disproportionately high and adverse human health and environmental impacts on minority or low-income populations. NNSA notes that the LANL SWEIS (LANL 2008) prepared a "special pathways analysis" for operations at LANL, for the purpose of assessing how much impacts would change compared to nominal modeling results. Based on that analysis, NNSA determined that the average annual dose to those individuals subsisting on all of the special pathways would increase by between approximately 1.1 to 2.7 percent due to these special pathways. A change of up to 2.7 percent would not change any of the conclusions in the NNSA related to the lack of disproportionate high and adverse impacts. For example, at LANL, the highest doses to the MEI and 50-

mile population from any facility operations were 0.23 person-rem and 0.77 mrem, respectively. If these doses were increased by 1.1 to 2.7 percent, these doses would be 0.23-0.24 person-rem (for the 50-mile population) and 0.78-0.79 mrem (for the MEI).

- 14.J.2** A commentor stated that the environmental justice methodology used is flawed. A commentor specifically stated that the definitions of minorities and low-income were not accurate.

Response: *Under Executive Order 12898, DOE is responsible for identifying and addressing potential disproportionately high and adverse human health and environmental impacts on minority or low-income populations. Minority persons are those who identify themselves as Hispanic or Latino, Asian, Black or African American, American Indian or Alaska Native, Native Hawaiian or Other Pacific Islander, or multi-racial. Persons whose income is below the Federal poverty threshold are designated as low income.*

As discussed in Chapter 4 (Volume II), the demographic profile of the potentially affected counties surrounding specific sites shows that LANL, SNL/NM, WSMR, and TTR had the highest percentage (5.6, 6.0, 2.1, and 1.5 percent respectively) of Native American populations of the nine sites analyzed in the Draft Complex Transformation SPEIS.

In response to comments on the Draft SPEIS, additional analysis was added to Chapter 6, Cumulative Impacts, to address the potential for environmental justice impacts with respect to native people at LANL, SNL/NM, WSMR, and WIPP. DOE defines low-income populations in terms of the Census Bureau's statistical poverty levels. This approach is consistent with EPA's, as discussed in the Agency's "Final Guidance for Incorporating Environmental Justice Concerns in EPA's NEPA Compliance Analysis" (EPA 1998). DOE's definition of "low-income" has been added to the Glossary of the Final SPEIS.

- 14.J.3** A commentor stated that increased pit production at TA-55 would increase the potential for contamination releases which could drain into the tribe's Sacred Area, which could have disproportionate negative impacts on the tribal members and resources.

Response: *Section 5.1 of Volume II of the SPEIS presents the potential impacts at LANL from increased pit production. As shown in Table 5.1.11-2, the impacts to the MEI and 50-mile population would be essentially zero compared to the normal background radiation exposures. With respect to potential accidents, as shown in Table 5.1.12-2, accident risks to the MEI and the 50-mile population would be less than 1 latent cancer fatality for all accidents analyzed.*

- 14.J.4** A commentor stated that NNSA omitted assessing the environmental justice

impacts of the Complex Transformation SPEIS proposal for operations at its three sites in New Mexico, especially where the Regions of Influence overlap. DOE must assess the environmental justice and cumulative impacts of the three DOE facilities located along the Rio Grande Corridor in a supplemental Draft Complex Transformation SPEIS. The public must have the opportunity to provide comments before the Complex Transformation SPEIS is finalized.

Response: *Use of a 50-mile radius for analyzing radiological impacts via the air pathway is consistent with other analyses performed by DOE and NRC. Nonetheless, in response to comments on the Draft Complex Transformation SPEIS, additional discussion was added to Chapter 6 (Volume II), Cumulative Impacts, to address the potential for cumulative environmental impacts with respect to people in New Mexico from operations at LANL, SNL/NM, WSMR, and WIPP. Additionally, NNSA performed an analysis with an extended region of influence of 100 mile. It found that the change in population dose amounted to only a few percent. A description of this analysis was added to Appendix C for normal operations and to Appendix D for accidents. Effects beyond 50 miles are expected to be small compared to those within 50 miles and would not be expected to pose a significant risk to any person regardless of their affluence or ethnicity. Transportation and disposal of wastes from the alternatives are analyzed in Chapter 5, Section 5.10 (Volume II).*

Adding a figure that shows the overlap of minority and low-income populations would not change the environmental justice analysis presented in the SPEIS. It is understood that such an overlap does exist (that many of the people with low incomes are also members of a minority), but this overlap would not change the analysis with respect to whether these populations are disproportionately affected by the impacts associated with the different alternatives analyzed in the SPEIS.

14.J.5

Commentors stated that the SPEIS must include an explanation of how the NNSA can ignore an agreement between the U.S. government and the Western Shoshone, which is a treaty between nations and the highest law of the land. The commentors stated that 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 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. Commentors cited specific concerns, including:

- Violations of Western Shoshone territorial sovereignty from trespass by the US in development of NTS for nuclear testing, hydrodynamic testing, high-explosive testing, flight testing and other major environmental testing;
- Violation of Western Shoshone territorial sovereignty and peace treaty

- through trespass by the DOE and the US Air Force at the NTS and TTR;
- Disruption of foreign relations between Newe Sogobia (Western Shoshone) results when peace treaty is violated by US; Violation of the Western Shoshone National Council (WSNC) Nuclear Free Zone Resolution 01-WSNC-95;

Response: *The Western Shoshone have long claimed about 24 million acres of land in Nevada based on alleged violations of the Ruby Valley Treaty. In the early 1950's, the Western Shoshone filed a claim concerning these lands under the Indian Claims Commission Act of 1946 (ICCA). Under the ICCA only monetary compensation could be made to a tribe for unkept treaty promises; land or other remuneration were not available remedies. In 1962, the Commission ruled that all Western Shoshone land titles had been extinguished. In order to establish valuation for a monetary award, the Commission set July 1, 1872, as the date the land was taken. In 1976, the Commission awarded the Western Shoshone \$26 million as payment for the land. This payment was refused by the Western Shoshone who argued that rejection of the money meant that they had not been compensated and their claim to the land was still valid.*

This issue has been litigated on several occasions. In 1985 the U.S. Supreme Court held that the payment had been made in accordance with the ICCA, which constituted full and final settlement for the land claim. Whether the Western Shoshone accept the payment had no effect on the ruling and the land was determined to belong to the United States. In a subsequent challenge the U.S. Court of Appeals for the Ninth Circuit followed the Supreme Court's decision. In response to a subsequent appeal, the U.S. Supreme Court refused to hear the case, letting the appellate court decision stand (DOE 1996b).

Neither of the bodies mentioned in the comment have any jurisdiction or authority over the United States, its agencies or citizens. The U.S. Supreme Court ruled on the claims of the Western Shoshone. NNSA is aware of significant disagreement with the rulings of the U.S. Supreme Court, particularly by the Western Shoshone.

- 14.J.6** Commentors stated that LANL has spread radionuclides and would continue to accelerate the spread of hazardous contamination to a 57,000 person low income and minority populace in violation of all principles of Environmental Justice.

Response: *Impacts at LANL associated with the existing operations are presented in Section 4.1 (Volume I); impacts of the alternatives are presented in Chapter 5 (Volume II), Sections 5.1, 5.10, 5.11, 5.12, 5.13, 5.14, 5.16, and 5.17. Based on the analyses in those Sections, NNSA does not believe that LANL has caused disproportionate high and adverse impacts to any population group.*

- 14.J.7** A commentor stated that environmental racism results by the effort of the United

States to bring commercial nuclear reactor waste to Newe Sogobia, targeting the Western Shoshone people's land.

Response: *The commentor is referring to the Yucca Mountain Repository Project, which is not a part of this transformation proposal. This SPEIS, in Section 6.3.2 of Volume II, addresses cumulative impacts that could result from complex transformation activities proposed for the Nevada Test Site and with operation of the Yucca Mountain Repository.*

14.J.8

Some commentors stated that cumulative impacts result from additional burdens created when Western Shoshone land use is further reduced, plant resources are diminished, non-Native American presence increases and additional cultural resources are disturbed or removed. The commentors stated that the ethnic identity of the Western Shoshone people in land is diminished.

Response: *Complex Transformation would not impact the use of Western Shoshone lands or diminish plant resources on those lands. All construction and operations that would occur at the NTS under Complex Transformation would be confined to the site. Lands under the ownership or jurisdiction of other agencies, organizations, or individuals would not be used for Complex Transformation.*

14.K

HEALTH AND SAFETY

Commentors expressed concern about health and safety issues associated with Complex Transformation, including:

- The standard method of assessing radiation risk is inadequate and based on the wrong models.
- NNSA needs to reveal the full extent and health consequences of human exposure to depleted uranium, tritium and other toxic releases from LLNL Site 300.
- Site 300 is not an acceptable location for open-air tests involving tritium due to the location of Tracy, CA.
- Due to the Shoshone's unique lifestyle they are exposed to more radiation than the average American citizen living near the TTR and the Nevada Test Site.
- U.S. military personnel are being exposed to radiation and should receive medical treatment at no cost to them.
- The public health issues related to Complex Transformation should be more fully addressed.
- Those suffering from health issues as a result of Complex Transformation should be compensated.
- The No-production Alternative would speed the improvement of

environmental public health conditions.

- There is a general disregard by DOE for the health and safety of the 7 million people in the 50-mile radius at LLNL.
- Many Americans have died from radioactive fallout, downwind or downstream of not only nuclear weapons testing but also the mining and processing of uranium, as well as indigenous people at Bikini Atoll.
- There are serious health impacts associated with radioactive materials at LLNL.
- If the government “fails to serve your constitutional actions and does not stop this very real threat to the health and well-being of the people of New Mexico then the citizens “shall not hesitate to file criminal charges and bring civil action against you personally in your professional capacity for the crimes against the people of New Mexico and the world.”

Response: *Uranium mining is not within the scope of Complex Transformation. NNSA possesses sufficient uranium to meet its needs for many years. NNSA notes the concerns for human health and safety of many commentors. Complex Transformation facilities would be designed and operated to minimize risk to both workers and the general public during normal operations and in the event of an accident. Benefiting from decades of experience, NNSA employs modern processes and manufacturing technologies and utilizes an oversight structure for safety, environmental protection, and management oversight. Appendix C, Section C.1.3 discusses the methodology that NNSA employed to estimate potential radiological impacts for normal operations, and Section C.3.3 discusses the methodology for accidents. The methodologies used are consistent with generally-accepted methods, as well as the CEQ and DOE guidance related to estimating potential impacts to health. The comment regarding the inadequacy of estimating risk from radioactivity is noted. See also comment-responses 14.K.1 through 14.K.20.*

Nuclear weapon testing is not evaluated as part of Complex Transformation. Potential impacts to surface water and groundwater at the Savannah River Site are addressed in Section 5.8.5 of Volume II of the SPEIS. Impacts to human health and safety are addressed in Section 5.8.11 of Volume II of the SPEIS.

NNSA understands the concerns of some American Indians living in the areas relatively close to the NTS. The lifestyle of these indigenous people is such that they may consume more wildlife and natural plant material, both as food and medicine, than non-Indian residents of the region. However, based on the best available data, the levels of radioactivity in these natural food and medicine sources at the NTS are well within all health and environmental standards. Please see comment-responses 14.A.3 and 14.A.5 for more detailed information regarding this issue.

DoD is responsible for health and safety of members of the U.S. military. NNSA

is responsible for the health and safety of its workers and the public. For additional information regarding compensation for health impacts due to exposure to radioactivity, please see comment-responses 6.C.5 and 14.K.2.

As noted in Section 4.1.11.1 of Volume I of the SPEIS, the total annual dose to an average resident living near LANL from all pathways is less than 0.1 mrem. This includes doses from inhalation, ingestion of food and water, and direct exposure. No observable health effects are expected from these doses. Radiological impacts to the maximally exposed individual living offsite from operation of the alternative with the greatest impact would be less than 1 percent of background radiation, as noted in Section 5.1.11 of Volume II of the SPEIS.

14.K.1

The following comments were received regarding human health:

- The risks to human health are not worth the national security benefits.
- Nuclear wastes and radiation are not safe.
- The SPEIS should consider impacts to more sensitive radiological receptors/most vulnerable population. In particular, infants, children, pregnant women, immune-compromised and chronically ill persons must be considered as they would be affected differently by radiation exposure.
- In the context of clean up and storage of nuclear waste at Department of Energy sites, the risk to a pregnant woman farmer, the fetus, and her children should be evaluated, rather than Reference Man.
- The SPEIS fails to consider E.O. 13045 for the Protection of Children. Numerous landfills with hazardous and radioactive waste are used at LANL and Sandia National Laboratories, without regard to the safety of the children in surrounding communities.

Response: *The SPEIS presents the environmental impacts of the reasonable alternatives, including the impacts to human health. The ROD will discuss the various factors that NNSA considered in its decision-making process. The comment that nuclear wastes and radiation are not safe is noted.*

Appendix C, Section C.1.3 discusses the methodology that NNSA employed to estimate potential radiological impacts from normal operations, and Appendix C, Section C.3.3 discusses the methodology for accident analyses. The methodologies used are consistent with generally-accepted methods, as well as the CEQ and DOE guidance related to estimating potential impacts to health (see also comment-response 14.K.4 for more information). Although the methodology employed does not consider the impacts to more vulnerable populations, conservative assumptions have been made to ensure that potential radiological impacts are not underestimated. For example, to calculate the radiological dose to the maximally exposed individual (MEI), the SPEIS methodology assumes that the MEI resides at the site boundary 24 hours a day,

7 days a week, 365 days per year. This conservative assumption would exceed the dose and impact to sensitive radiological receptors/most vulnerable population including infants, children, and pregnant women, immune-compromised and chronically ill persons.

14.K.2

Commentors stated that workers and those living in communities around nuclear facilities with illnesses associated with nuclear weapons work should be compensated for contamination they have received over the years.

Response: *The DOE Former Worker Medical Surveillance Program, otherwise known as the Former Worker Program (FWP), provides for the conduct of medical screenings for former employees to identify adverse health conditions that may have resulted from working at DOE facilities (see “The U.S. Department of Energy Former Worker Medical Surveillance Program, January 2008, available at: http://www.hss.energy.gov/healthsafety/fwsp/formerworkermed/fwp_report.pdf). Mandated by the Congress, the FWP conducts preliminary site assessments to identify groups of former at-risk Federal and contractor workers and DOE site-specific exposures. It also provides medical screening, including examinations, to check for adverse health effects that could be related to occupational exposures to radiation, noise, beryllium, asbestos, silica, lead, cadmium, chromium, and solvents.*

The program, managed by the DOE Office of Health Safety and Security, uses independent health experts through cooperative agreements held by consortia of universities, labor unions, and commercial organizations throughout the United States with expertise in administration of medical programs. Initiated in 1996, the FWP now provides medical screening services at all DOE sites for the more than 600,000 former construction and production workers who were involved in the nuclear weapons program. As of November 2007, over 455,000 former workers have been contacted, and over 51,000 comprehensive medical screening examinations have been provided to those who volunteer to participate in the program. In addition, follow-up re-screening exams have been provided to over 5,700 former workers.

In 2000, the Congress passed the Energy Employees Occupational Illness Compensation Program Act (EEOICPA), administered by the Department of Labor (DOL), to compensate current and former workers for illness and injuries that resulted from their work at DOE facilities. The DOE FWP complements EEOICPA, as it provides DOE workers with medical evaluations conducted by expert occupational medicine physicians and laboratories that provide both claimants and the claims evaluators with defensible information for decision-making about the appropriateness of compensation. With respect to compensating persons living in communities around nuclear facilities with illnesses associated with nuclear weapons work, on October 5, 1990, the Congress passed the Radiation Exposure Compensation Act (“RECA” or “the Act”), 42 U.S.C. §2210 note, providing for compassionate payments to individuals who contracted certain cancers and other serious diseases as a

result of their exposure to radiation released during above-ground nuclear weapons tests or as a result of their exposure to radiation during employment in underground uranium mines. The 1990 Act provided fixed payments in the following amounts: \$50,000 to individuals residing or working "downwind" of the Nevada Test Site; \$75,000 for workers participating in above-ground nuclear weapons tests; and \$100,000 for uranium miners. Since that time, the United States Department of Justice has developed implementing regulations to resolve claims in a reliable, objective, and non-adversarial manner, with little administrative cost to the United States or to the person filing the claim.

14.K.3 The following comments were received regarding the human health analysis in the Draft SPEIS:

- The SPEIS underestimates radiological impacts and should address all potential exposures, including both air and liquid releases. The cumulative doses of radiation must be included, including radiation exposures from locally grown food.
- Several problems in the analysis that give a false impression that Complex Transformation would have limited impact: Risk estimates are calculated for each alternative at each site for each potential exposure separately (waste exposure, water exposure, air emissions). It is clear that a person receives a cumulative dose of radiation from all sources concurrently and that to handle each exposure risk separately in the final risk estimate for cancer results in a much lower risk calculation. While a collective risk is calculated for the general population this is a risk estimate that reflects the risk from radiation exposures through locally produced food. Again this is dealing with risks attributed to various exposure media separately. Ultimately this inappropriate methodology leads to the final risk estimates for latent cancers to appear much more trivial than the true risk.”

Response: *As discussed in Appendix C, Section C.1.3, the computer model that was used to calculate radiological impacts (CAP 88) implements a steady-state dispersion model to calculate concentrations of radionuclides in the air and on the ground and uses Regulatory Guide 1.109 (NRC 1977) food-chain models to calculate radionuclide concentrations in foodstuffs (vegetables, meat, and milk) and subsequent intakes by humans. In addition, the assumed intake of food, water, soil and sediment represent exposures to a maximally exposed individual (MEI) who lives full-time in a location with the highest soil and sediment contamination and eats only foods with the highest calculated concentrations of each contaminant. These assumptions provide a conservative estimate of dose to ensure that a real person would necessarily have a lower contaminant intake and health risk than the hypothetical MEI represented by the analysis.*

14.K.4 The following comments were received regarding radiation exposure:

- DOE tolerates an unacceptable level of radiation exposure for both workers and the public and that the SPEIS should address more recent info on health effects from low radiation doses which shows higher impacts.
- Recent reports (BEIR VII) indicate that one cancer could result from 100 people that are exposed to a one-time dose of 0.1 Sievert (10 rem) of low-level radiation above background.
- The Draft SPEIS states that acceptable and safe amount of radiation exposure to neighboring communities is 0.05 Sievert (5 rem) per year.
- Results of the largest cohort study of cancer risk among radiation workers that used exposure and health data from 15 countries that included over 5.2 million person years of follow-up found that the excess relative risk for all cancers excluding leukemia were statistically compatible with but higher than the BEIR VII risk estimate used to set the assumptions of cancer risk for the SPEIS.
- Radiation exposure can also cause nonfatal cancers and genetic disorders, yet the SPEIS only estimates potential fatal cancers and that omitting nonfatal cancers and/or genetic disorders is a serious matter.

Response: *The National Research Council (NRC) prepared a series of reports to advise the U.S. Government on the health consequences of radiation exposures. The most recent of these, Health Effects from Exposure to Low Levels of Ionizing Radiation, BEIR VII-Phase 2 (NRC 2005), provides current estimates for excess mortality from leukemia and other cancers that are expected to result from exposure to ionizing radiation. Biological Effects of Ionizing Radiation (BEIR) VII provides estimates that are not significantly different from those in its predecessor, BEIR V, and recent United Nations Scientific Committee on the Effects of Atomic Radiation and International Commission on Radiological Protection reports. The report, however, concludes that recent data and analyses have reduced the uncertainties associated with the risk estimates. BEIR V developed models in which the excess relative risk was expressed as a function of age at exposure, time after exposure, and sex for each of several cancer categories. The models were based on the assumption that the relative risks are comparable between the atomic bomb survivors and the U.S. population. The models and risk coefficients in BEIR VII are derived through review of the most current information on the biological mechanisms of radiation tumorigenesis as well as analyses of relevant epidemiologic data that includes the Japanese atomic bomb survivors, medically exposed persons, and large-scale occupational radiation studies.*

The BEIR VII Committee concluded that the balance of evidence tends to support a simple proportionate relationship at low doses between radiation dose and risk. This conclusion essentially affirms the Linear-No-Threshold model that has long been the basis for the regulation and control of occupational and environmental radiation exposure in the United States. This SPEIS uses a linear, non-threshold relationship to assess radiation risks. A single radiation

risk estimator value (0.0006 lifetime probability of fatal cancer per person-rem) is applied to all of the calculated individual and population radiation doses regardless of how small those doses may be.

The National Council on Radiation Protection and Measurements (NCRP 1993), based on the radiation risk estimates provided in BEIR V and the International Commission on Radiological Protection (ICRP 1991), estimates the total detriment resulting from low dose¹ or low dose rate exposure to ionizing radiation to be 0.00076 per rem for the working population and 0.00083 per rem for the general population. The total detriment includes fatal and nonfatal cancers as well as severe hereditary (genetic) effects. The major contribution to the total detriment is from fatal cancer, estimated to be 0.0006 per rem for both radiation workers and the general population.

For comparison, the BEIR VII Committee's preferred estimates of lifetime attributable risk of mortality for all solid cancers and leukemia are 0.00048 for males and 0.00066 for females. The breakdowns of the risk estimator for both workers and the general population are given in EPA, in coordination with other Federal agencies involved in radiation protection, issued Federal Radiation Guidance Report No. 13, Cancer Risk Coefficients for Environmental Exposure to Radionuclides, in September 1999 (EPA 1999). This document is a compilation of risk factors for doses from external gamma radiation and internal intakes of radionuclides. Federal Radiation Guidance Report No. 13 is the basis for the radionuclide risk coefficients used in the EPA Health Effects Assessment Summary Tables (EPA 2001) and in computer dose codes. The Interagency Steering Committee on Radiation Standards (ISCORS) issued a technical report entitled, A Method for Estimating Radiation Risk from TEDE (DOE 2003a). ISCORS technical reports are guidance to Federal agencies to assist them in preparing and reporting the results of analyses and implementing radiation protection standards in a consistent and uniform manner.

Because fatal cancer is the most 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. Non-fatal cancers and genetic effects, which are less probable consequences of radiation exposure, can be estimated by comparing them with the LCF estimates. The following Table has been added to Appendix C in order to assist with those non-fatal estimates.

Table C.1.4-1—Nominal Health Risk Estimators Associated With Exposure to 1 Rem of Ionizing Radiation

Exposed Individual	Fatal Cancer	Non-fatal Cancer
Worker	0.0006	0.0008
Public	0.0006	0.0008

Source: DOE 2002.

- 14.K.5** Some commentors requested that the SPEIS include a human health risk assessment of proposed nuclear weapons production activities, future nuclear weapons testing, environmental clean-up of the legacy nuclear weapons complex, and the future use of nuclear weapons.

Response: *The impacts to human health from nuclear weapons production activities are presented in Chapter 5 of Volume II of the SPEIS. Because there are no plans to conduct underground nuclear weapons testing in the future, there would be no impacts from that activity. However, the NTS SWEIS (DOE 1996b) includes a discussion of the impacts of underground nuclear weapons testing, including any human health impacts. The environmental clean-up of the legacy contaminants is an on-going program conducted at the nuclear weapons sites. Chapter 4 of Volume II of the SPEIS presents the current human health impacts from such activities, as part of the existing environment for each site. The analysis of the No Action Alternative in Chapter 5 of Volume II provides the human health impacts from clean-up activities in the future. With respect to the use of nuclear weapons, this is not within the scope of the SPEIS.*

- 14.K.6** Commentors stated that DOE needs to compile and disseminate the results of epidemiological studies for the 60 years of nuclear history.

Response: *In 2005, the National Academies convened an expert committee to conduct a review of the Worker and Public Health Activities Program, which is operated by the Department of Health and Human Services (HHS) at DOE nuclear facilities under a Memorandum of Understanding (MOU) with DOE. This committee was constituted in 2005 at the request of the DOE to review the Worker and Public Health Activities Program operated by the HHS at DOE nuclear facilities from 1990 to 2004. The program responsibilities were defined in three MOUs signed by the Secretaries of HSS and DOE in 1990, 1996 and 2000. The National Institute for Occupational Safety and Health (NIOSH), which carried out a portion of this program, called it the Occupational Energy Research Program (OERP). Other HHS organizations that were involved in carrying out parts of this program during this period were the National Center for Environmental Health (NCEH) and the Agency for Toxic Substances and Disease Registry (ATSDR) (beginning with the 1996 MOU).*

Funded at approximately \$10-20 million annually for more than 20 years,

DOE's Worker and Public Health Activities Program was established to study the consequences of exposures to ionizing radiation and other hazardous materials used in DOE operations on workers and the general public in surrounding communities. Initially, the program was managed solely by DOE.

Many of the workers at approximately 20 major DOE sites have been studied epidemiologically, some of them for decades. NIOSH continues to update these studies as warranted by public health and scientific considerations. As these cohorts age, and as more powerful epidemiologic study designs become available, new studies of these workers should provide better information about health risks associated with radiation exposure.

For many of the DOE facilities, NCEH conducted dose reconstruction studies of historical exposures of the public independent of DOE. NCEH has established a scientifically sound public record of the doses received by members of the communities surrounding these facilities that is of benefit to DOE. The NCEH dose reconstruction methods that have been developed, applied, and refined in the NCEH studies have been accepted widely and are being used in epidemiological studies worldwide. NCEH has made dose reconstruction project findings available on-line via the Radiation Studies Branch web site.

The Los Alamos Historic Document Retrieval and Assessment project at Los Alamos is the sole remaining dose reconstruction activity of NCEH and the public would benefit from the information derived from this activity.

14.K.7

A commentor stated that the CMRR is being built in a defective manner and will not comply with DOE safety requirements. The commentor added that NNSA needs to install necessary seismic fasteners and ties to the CMRR.

Response: *The portion of the CMRR project that is currently under construction, the Radiological Laboratory, Utility, and Office Building (RLUOB), is being built to the highest quality assurance standards. Even though the structure is rated only as a radiological laboratory, and would not normally be constructed to the same standards as a high hazard nuclear facility, it is nevertheless, being constructed to those higher standards (10 CFR 830.120, DOE O 414.1, and NQA-1). See comment-response 14.N.7 for related discussion.*

14.K.8

One commentor stated that DOE needs to examine the source of cesium-137 found at high elevations in the Sangre de Cristo Mountains; the levels are almost at action levels.

Response: *Regional statistical reference levels (RSRL) represent a 99.9 percent upper limit only if the conditions for the sample are the same as for the data set from which the RSRL is calculated. For the Trampas Lake data, the conditions*

are unusual in two respects: the high altitude; and the shape of the terrain. These conditions contribute to high concentrations of radionuclides.

The shape of the terrain further concentrates global fallout. Rain and snow fall on the relatively impermeable slopes surrounding the lake and wash the radionuclides into the basin surrounding the lake. Trampas Lake is in a basin surrounded by relatively impermeable terrain, so the concentration is expected to be higher than on the surrounding slopes. The radionuclides in global fallout, cesium-137, strontium-90, and plutonium-239, are all expected to be elevated at Trampas Lake. In summary, the Trampas Lake data agree with expectations for global fallout at this location and should not be compared with RSRLs near LANL.

- 14.K.9** Some commentors stated that the cancer rates (melanoma, non-Hodgkins lymphoma, ovary cancer, prostate cancer, testes cancer and breast cancer) in Los Alamos are higher than the rest of the state of New Mexico.

Response: Section 4.6.1, of Chapter 4 of the LANL SWEIS (LANL 2008) provides information on current cancer mortality and incidence rates in New Mexico and counties surrounding LANL. Table 4–26 in the LANL SWEIS shows that some cancer rates in Los Alamos vicinity are lower than the national average and some are higher, which is typical of many areas. This Section also presents information from the final LANL Public Health Assessment, issued on August 31, 2006, by the U.S. Department of Health and Human Services, Agency for Toxic Substances and Disease Registry, which determined that, “there is no evidence of contamination from LANL that might be expected to result in ill health to the community,” and “overall, cancer rates in the Los Alamos area are similar to cancer rates found in other communities” (ATSDR 2006).

- 14.K.10** Commentors stated that new research from Argonne National Laboratory indicates that plutonium nanoclusters can travel more readily through soil and into groundwater. The Draft SPEIS did not assess the potential for the plutonium waste from past activities, ongoing or future pit production to contaminate soil, air or groundwater from nanoclusters. The commentor concluded that the risk analysis for plutonium exposure of the public and the environment is defective and requested that the SPEIS include an analysis of the health impacts of plutonium nanoclusters.

Response: The SPEIS uses the best available information to assess the potential environmental impacts of the alternatives. As discussed in comment-response 14.K.1, the methodologies used are consistent with generally-accepted methods, as well as the CEQ and DOE guidance related to estimating potential impacts to health. NNSA realizes that future research and discoveries could result in changes to the generally-accepted methods and guidance, but has not speculated on those changes. Due to their recent discovery, there is not enough information

currently available related to plutonium nanoclusters to change the SPEIS analysis. Based on the best available information, NNSA believes that conservative assumptions have been made to ensure that potential radiological impacts are not underestimated.

- 14.K.11** Commentors stated that NNSA has grossly under-reported historic radiation emissions at LANL by nearly 60-fold as documented by the Centers for Disease Control and Prevention.

Response: *Chapter 4, Section 4.6.1, of the LANL SWEIS (LANL 2008) shows the radiation doses received over the past 10 years from LANL operations by the surrounding population and hypothetical MEI. The annual dose to the hypothetical MEI has consistently been smaller than the annual 10-millirem radiation dose limit established for airborne emissions by the U.S. Environmental Protection Agency. The final LANL Public Health Assessment, by the Agency for Toxic Substances and Disease Registry, reports that, “there is no evidence of contamination from LANL that might be expected to result in ill health to the community,” and that “overall, cancer rates in the Los Alamos area are similar to cancer rates found in other communities” (ATSDR 2006). NNSA is unaware of any published CDC study with findings as described by the commentor.*

- 14.K.12** Commentors stated that LANL needs to be up-to-date and in full compliance with all DOE and DNFSB safety regulations and recommendations.

Response: *The Defense Nuclear Facilities Safety Board (DNFSB) does not regulate or authorize operations but does independently oversee activities affecting nuclear safety at defense nuclear facilities. DNFSB reviews safety issues and formally reports its findings and recommendations regarding the safety of nuclear weapons complex facilities to the highest levels of NNSA. NNSA and the LANL contractor have reviewed DNFSB reports and responded with commitments to update and improve safety basis documentation.*

NNSA and its operating contractors are dedicated to safe operation of its nuclear facilities. DOE has issued regulations, standards, and guidance for nuclear operation, including requirements for performance of the safety evaluations and risk assessments that become the basis for development of facility operating parameters. Safety documentation for some LANL facilities does not meet current standards and the LANL contractor and NNSA are in the process of revising these documents to achieve compliance. Nonetheless, LANL nuclear facility operations are authorized and approved by NNSA based on its evaluation of the acceptability of existing relevant safety documentation. NNSA recently revised its oversight practices at LANL to focus more specifically on nuclear safety and security.

14.K.13 Commentors stated that 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 Facility. “Instead, the draft SPEIS describes the ongoing manufacturing at the unsafe LANL facility. 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.”

Response: *NNSA completed the CMRR EIS in 2003. That EIS provides a quantitative comparison of calculated accident risks for the existing Chemistry and Metallurgy Research Building and the Chemistry and Metallurgy Research Replacement Facility (DOE 2003f). The accident risks from the existing building are significantly more than those of the planned replacement facility.*

Accident risks are a function of the source term released and the frequency of an accident, as discussed in Appendix D of the SWEIS. The Chemistry and Metallurgy Research Replacement Facility incorporates design safety features and methods such as the leak path factor and damage ratio would reduce the amount of radioactive materials that would be released to the environment in the event of an accident and thereby reduce the source term. Any specific accident source term depends only on the portion of the facility material at risk that is subject to accident conditions and existing design safety features. Therefore, a larger amount of material at risk at the Chemistry and Metallurgy Research Replacement Facility would not produce a larger source term because of mitigating safety features incorporated in the facility design.

14.K.14 The following comments were received relative to worker doses:

- 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.
- 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.”

Response: *For the major nuclear weapons production facilities such as a CPC, CUC, and A/D/HE Center, the analysis in the SPEIS is “programmatic.” This means that only site selection decisions would be supported by the analysis. In order to support such decisions, representative locations were assumed and assessed. Performing the analysis using representative locations is intended to provide NNSA with enough information to make site selection, while deferring a more detailed analysis to project-specific NEPA documents or SWEISs. Those documents would use site-specific design information that considers facility layouts and specific distances to other facilities. Section 5.6.3 of the LANL SWEIS (LANL 2008) analyzes worker exposures for three specific production levels for specific buildings at LANL. The location of any non-involved workers would depend upon the specific location of facilities, which is beyond the scope of this SPEIS.*

With respect to the comment that the Draft SPEIS also does not provide estimates of how many involved workers would die of cancer or direct injuries as a result of such accidents, the NNSA acknowledges that, “Workers in the facility where the accident occurs would be particularly vulnerable to the effects of the accident because of their location. However, prediction of potential health effects becomes increasingly difficult to quantify for facility workers as the distance between the accident location and the worker decreases. This is because the individual worker exposure cannot be adequately defined with respect to the presence of shielding and other protective features. The worker also may be injured or killed by physical effects of the accident.” Accident impacts to involved workers would not be a discriminator for site selection, because involved workers would not vary among site alternatives.

14.K.15

Commentors stated that the Defense Nuclear Facilities Safety Board, (an independent oversight organization within the Executive Branch charged with providing advice and recommendations to the Secretary of Energy "to ensure adequate protection of public health and safety" at DOE's defense nuclear facilities) found in report of March 18, 2005, that Sandia did not have adequate safety bases in place for managing SNM.

Response: *At no time was Sandia operating in an unsafe fashion or in a less than safe condition. NNSA and the SNL contractor reviewed the Defense Nuclear Facilities Safety Board’s reports and responded with commitments to update and improve safety basis documentation. The SNL Safety Authorization Basis Team assures the development and approval of adequate controls in support of safe operations at SNL. All SNL facility operations are based on authorization and approval by NNSA following NNSA’s evaluation of the*

acceptability of existing relevant safety documentation.

14.K.16 NOT USED

14.K.17 Commentor stated that DOE 5400.5 requires DOE to protect the public from radiation exposure. The SPEIS should state the collective dose equivalent within 80 km (50 miles) radius of each alternative site expressed in terms of person-rem to the maximally exposed individual, and should include comparisons to limits and derived concentration guides.

Response: *Chapter 5 of Volume II of the SPEIS provides the information requested by the commentor.*

14.K.18 A commentor stated that 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 NNSA proposes to ensure that releases do not occur in the future. 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.

Response: *Tritium releases from LLNL are discussed in Section 4.2.4.1.4 (Volume I) (air emissions) and Section 4.2.5.1.1 (water effluents). Impacts of tritium on groundwater are discussed in Section 4.2.5.2.1. A discussion has been added to Section 4.2.6.2 regarding tritium concentrations in soils. The impacts of tritium releases on human health are presented in Section 4.2.11.1.1. As shown in Section 4.2.11.1.1, doses from LLNL operations are well below regulatory limits. More details regarding tritium releases at LLNL are presented in the LLNL ASERs and the LLNL SWEIS (DOE 2005a).*

14.K.19 One commentor stated that DOE 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 references that calculations performed for the analysis used EPA’s 1992 version of the CAP-88-PC model (Revision 1.0.). The commentor also stated that 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 environmental justice impacts.

Response: *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. Please note that, as with most models, version*

3 has been modified to eliminate errors discovered by the user community. This process is expected to continue.” For more information, please see: <http://www.epa.gov/radiation/assessment/CAP88/index.html>. In the Final SPEIS, 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. With respect to additional consideration given to modeling additional exposure pathways utilized by the Santa Clara Pueblo, please see comment-response 14.J.1.

14.K.20

Commentors stated that “DOE disregarded past cumulative impacts and focused 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. It appears that DOE simply assumes past impacts 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.”

Response: Chapter 5 of Volume II of the SPEIS presents the impacts of the alternatives on human health for all potentially affected sites. The analysis includes a comparison of the impacts of the alternatives against natural background radiation (see, for example, Table 5.1.11-2). As seen in that Table, doses from the alternatives will be a very small fraction of the natural background radiation. Chapter 6 of Volume II of the SPEIS includes a discussion of the cumulative impacts of the alternatives in conjunction with other reasonably foreseeable projects.

14.K.21

A commentor stated that past atomic weapons production has had a negative effect on human health in the Central Savannah River Area, and that congenital malformations are the number one cause of infant mortality in Aiken County.

Response: The commentor's observation that “past atomic weapons production has had a negative effect on human health in the Central Savannah River Area” is not supported by available epidemiological data. In a joint study (Cancer Incidence Report 1991-1995) the Medical University of South Carolina and Emory University found that the overall rates of cancer in a 22-county area surrounding the Savannah River Site (SRS) are similar to or lower than rates reported in the National Cancer Institute's Surveillance, Epidemiology and End Results Program, and for metropolitan Atlanta, Kentucky, and Louisiana. Although some cancers did occur at elevated rates (i.e., cervical cancer in black females and esophageal cancer in black males), there was no indication that the increased incidence was related to SRS operations (MUSC and Emory University 1999). In addition, the SRS Dose Reconstruction Project (CDC 2006) a study by the Centers for Disease Control and Prevention which examined radiological releases from SRS over a 39-year period (1954 through 1992), created representative exposure scenarios based on the SRS release data. The

studies authors concluded that calculated doses and risks to the hypothetical receptors summed over the 39-year period studied appear to be small. The largest point estimate dose was 0.94 rem for the Outdoor Family Child born in 1955; the corresponding risk of cancer incidence is 0.10 percent and the corresponding risk of cancer fatality is 0.024 percent. By way of comparison, the annual average radiation exposure for a member of the U.S. population is about 360 mrem, mainly from naturally occurring sources of radiation and medical sources (e.g., x rays). An annual background dose of 360 mrem over a period of 39 years would produce a dose of 14 rem... Although estimated doses (and the risks of cancer incidence) could be higher or lower when uncertainties in variables were considered, these differences are not sufficient to change this conclusion.

With respect to the comment regarding congenital malformations being the number one cause of infant mortality in Aiken County, it should be noted that birth defects are now the leading cause of infant mortality in the United States. Congenital malformations can occur for many reasons, including inherited (genetic) conditions, toxic exposure of the fetus (e.g., to alcohol or drugs), birth injury, lack of or insufficient prenatal care, or other reasons. Congenital malformations are present in one of every three babies that die in the United States (www.medterms.com). A review of South Carolina Department of Health and Environmental Control data on infant mortality rates in Aiken County finds that in 2005, the death rate attributable to congenital malformations was second to “disorders related to short gestation and low birth weight” (4 vs. 5, respectively). Over the period 2001 – 2005, the frequency of infant death attributable to both of these mortality variables was equal (21 each). There are no epidemiological data that support the inference that there is a causal relationship between infant death rates in Aiken County and SRS-related activities. For more information on potential health impacts associated with radiation exposure, see comment-response 14.K.4.

14.K.22

A commentor noted that “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.

Response: *During the period from July, 1945 to November, 1962, the United States conducted atmospheric (open air) testing of nuclear weapons at the NTS and elsewhere. Following the signing of the Nuclear Test Ban Treaty in August 1963, all U.S. nuclear tests were conducted underground until September 1992 when the United States conducted its last test. During the period of atmospheric testing, radioactive fallout from the detonations occurred in downwind areas. Some members of the Western Shoshone may have been exposed to that fallout. On October 5, 1990, the Congress passed the Radiation Exposure Compensation Act ("RECA" or "the Act"), 42 U.S.C. § 2210 note, providing for compassionate payments to individuals who contracted certain cancers and other serious*

diseases as a result of their exposure to radiation released during above-ground nuclear weapons tests or as a result of their exposure to radiation during employment in underground uranium mines. More information on RECA may be found in comment-response 6.C.5.

14.L TRANSPORTATION

A commentor expressed concern about transportation. A commentor expressed concern and is opposed to the use of local roads in the vicinity of LANL for the transportation of nuclear materials. Another commentor stated that the selection of Pantex would also avoid significant transportation costs and risks.

Response: *The potential transportation impacts associated with Complex Transformation for the area around LANL are addressed in Section 5.1.13 and radiological transportation impacts are addressed in Section 5.10 of this SPEIS. NNSA notes the opposition to the use of local roads in the vicinity of LANL.*

14.L.1

One commentor stated: The Draft SPEIS “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, shipments of SNM would impact the heavily populated and congested Las Vegas Valley. The impacts of such shipments are not addressed” in the Draft SPEIS.

Response: *The level of analysis used in the Complex Transformation SPEIS is considered appropriate for a programmatic document. Section 5.10 of the SPEIS is a Complex-wide assessment of impacts that may be expected from transportation of nuclear materials and radiological wastes. Section 5.10 of the SPEIS includes a detailed discussion of potential impacts from transportation activities.*

The NTS SWEIS (DOE 1996b) included a Transportation Study (Volume 1, Appendix I) that assessed the potential impacts to human health and safety of shipping nuclear weapons and related materials to the NTS. The parameters used in this study included shipments of nuclear test devices, high explosives, and pits from Pantex, LANL, and LLNL. The number of shipments assessed over a 10-year period for the Expanded Use Alternative included 140 shipments of nuclear test devices, 1,587 shipments of nuclear explosives, and 366 shipments of pits. The transportation risks were calculated as follows: Incident-free radiological LCFs: 2.1×10^{-3} ; Incident-free non-radiological deaths: 4.0×10^{-3} ; Traffic fatalities 10.6×10^{-2} ; Accident-initiated radiological LCFs: 1×10^{-6} ; and Maximum exposed individual LCFs: 3.3×10^{-6} . Transportation impacts resulting from implementation of Complex Transformation alternatives are addressed generally for the NTS in Section 5.3.13.

14.L.2 Commentors stated concerns about the ability of Santa Clara Pueblo members to be able to cross the road from their homes to their 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 cumulatively exacerbate pollution problems.”

Response: *Only two major roads, NM 502 and NM 4, access Los Alamos County. Traffic volume on these two segments of highway is primarily associated with LANL activities. Most commuter traffic originates from Los Alamos County or east of the county in the Rio Grande Valley or Santa Fe as a result of the large number of LANL employees that live in these areas. The concern regarding traffic near the Santa Clara pueblo is valid; however, as the majority of the traffic does not interfere with this region, decisions made regarding which alternative is chosen will have little to no impact on the traffic near the Santa Clara Pueblo.*

14.M WASTE MANAGEMENT

Comments were received on the subject of waste management in the complex both under no action and for all of the action alternatives. Some of the comments related to specific sites and some related to larger complex-wide waste management issues. Site specific comments included:

- Concern about the storage/management of TRU and low level radioactive wastes from the Preferred Alternative in LANL Area G which is proposed to be closed in 2015.
- Concern about the contamination at Rocky Flats and Los Alamos.
- The significant amounts of nuclear waste currently in storage (approximately 35 million gallons of high level nuclear waste in underground tanks) that has been in the same condition for the past 20 years without any change.

General waste management comments included:

- Concern about issues with waste storage and management in the Complex.
- National security relies on waste management of nuclear material.
- Support for an alternative that would provide adequate waste remediation.
- Concern about the amount of nuclear waste that GNEP and Complex Transformation will create.
- With regard to the management, storage, and disposal of plutonium pits by the U.S. and Russian governments, stated that the NNSA should consider shipping Russian plutonium to France for use in their reactors.
- Nuclear waste is dangerous.

- Complex Transformation would improve waste management practices of radioactive material.

Response: *The SPEIS addresses these issues. Please see the Waste Management Sections of this SPEIS (Sections 4.1.13, 4.2.13, 4.3.13, 4.4.13, 4.5.13, 4.6.13, 4.7.13, 4.8.13, 4.9.13 (Volume I), and 5.1.14, 5.3.14, 5.5.14, 5.8.14, 5.9.14, 5.10.5, 6.3.1.1, 6.3.4.7, 6.3.5.1, and 6.4.2.5 of Volume II). The health effects from management of radioactive waste are included in the health and safety Sections of the SPEIS (Sections 5.1.11, 5.3.11, 5.5.11, 5.8.11, 5.9.11, 5.10, 6.3.1.1, 6.3.2.2, 6.3.4.6, 6.3.5.1, and 6.4.2.3 of Volume II). Additional information regarding LANL Area G is in comment-responses 14.M.2 and 14.M.7. See also the LANL SWEIS (LANL 2008) for more information on Area G.*

Information regarding the cumulative impacts of Complex Transformation and Global Nuclear Energy Partnership are addressed in Sections 6.2.1 and 6.3.2.3 of Volume II of this SPEIS.

The disposition of Russian plutonium is not within the scope of Complex Transformation.

Radioactive materials and wastes, if not handled correctly, are hazardous. For this reason, DOE has developed extensive and strictly enforced processes for dealing with radioactive materials and wastes. The most effective means to avoid harm from these materials and wastes is to avoid contact. All DOE radiological and waste management facilities are located in areas that with controlled access and operated in strict compliance with all applicable laws, regulations, and orders.

14.M.1

Some commentors stated that the Rocky Flats Plant had not been cleaned up as is claimed by DOE and asserted that the Rocky Flats Plant site was still contaminated. One commentor was concerned about environmental degradation resulting from nuclear waste storage at current NNSA sites similar to what exists at Rocky Flats. Another commentor stated that the NNSA should spend more energy investigating what went wrong at Rocky Flats than trying to resurrect a new Rocky Flats. A commentor stated that LANL isn't any different from Rocky Flats; therefore, if Rocky Flats was closed, why hasn't LANL been closed.

Response: *In 2005, DOE certified the environmental cleanup work at the former Rocky Flats site complete. The Rocky Flats site encompasses approximately 6,200 acres of high prairie that has been closed to the public for more than 50 years. During production and cleanup, a 5,800-acre buffer zone surrounded the 400-acre industrial area where the trigger mechanisms for nearly every nuclear weapon in the nation's arsenal were manufactured.*

“With the transfer of nearly 4,000 acres from the Department of Energy, the

U.S. Fish and Wildlife Service (FWS) will establish the Rocky Flats National Wildlife Refuge in order to conserve the rare and unique tallgrass prairie found along Colorado's Front Range, U.S. Department of Interior's Director of the Fish and Wildlife Service H. Dale Hall said in May of 2007. "As intended by Congress, the refuge will preserve a lasting wildlife and habitat legacy for future generations."

Since 2005, DOE has worked to complete regulatory requirements and prepare to transfer the site to FWS. In May 2007, the U.S. Environmental Protection Agency completed regulatory certification and released the lands for unrestricted use as a National Wildlife Refuge. DOE will retain approximately 1,300 acres in the center of the site for long-term surveillance and maintenance. This area is protected by physical and institutional controls and contains surface and groundwater monitoring equipment, four groundwater treatment systems, and two closed landfills.

While not complete at any currently used NNSA site, environmental remediation efforts are underway in compliance with all applicable federal, state and local laws.

14.M.2

The following comments were received regarding LANL waste management issues:

- DOE and LANL have missed several important deadlines and milestones and failed to comply with technical requirements in the 2005 fence-to-fence cleanup order, and that 60 years of legacy contamination remains unaddressed.
- The LANL budget continues to increase but the cleanup budget continues to fall further behind.
- The 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 additional LLW waste should be added to Area G until the legacy waste impacts are known and mitigated.
- Concern about contamination of the Rio Grande from wastes at LANL.

Response: *As stated in the LANL SWEIS, NNSA intends to implement actions necessary to comply with the Consent Order regardless of decisions made on other activities. Refer to Section 2.9, Compliance Order on Consent (Consent Order) and Environmental Restoration Activities, of the LANL SWEIS Comment Response Document for more information (LANL 2008).*

On May 2, 2002, the New Mexico Environmental Improvement Division (now New Mexico Environment Department (NMED)) issued a Determination of

Imminent and Substantial Endangerment to Health and the Environment and a draft order compelling investigation and cleanup of environmental contamination at LANL. After receiving public comments, NMED revised its Determination and issued a final Compliance Order on November 26, 2002. After negotiations among the University of California, DOE and NMED a Consent Order was reached. On September 1, 2004 NMED issued a revised Consent Order and on March 1, 2005 the final Consent Order was entered into by NMED, the State of New Mexico Attorney General, DOE, and the University of California (NMED 2005).

Section 2.2.6 of Chapter 2 of the LANL SWEIS describes the progress that NNSA has made in conducting its environmental restoration program at LANL. Appendix I of the LANL SWEIS (LANL 2008) presents options and environmental analyses for the conduct of future remediation activities at LANL, primarily related to the Consent Order that was entered into in March 2005.

The LANL Area G issue was addressed in the final LANL SWEIS (LANL 2008). In that document, 11 different data sets for groundwater were presented and only one of those data sets comes from wells that are subject to the analysis of drilling fluids. Further, some of the groundwater data at LANL are being reassessed due to potential residual drilling fluid effects. Drilling fluid effects are quantitatively assessed in the Well-Screen Analysis Report (LANL 2005c). Fifty-two percent of the well screens evaluated in that report produce water quality samples that are not significantly impacted by drilling fluids. LANL has initiated a program to better evaluate the wells and to rehabilitate wells that may be producing suspect groundwater monitoring results (LANL 2006e). LANL is using the results of a pilot study to develop a proposed course of action for approval by the New Mexico Environment Department (LANL 2008).

14.M.3 The following comments were received regarding waste management:

- All true alternatives for safe storage of waste must be identified and analyzed. Concern about the storage of nuclear waste and potential health effects.
- Concern about the reason why LANL continues to bury waste in unlined pits, trenches, and shafts in the volcanic tuff while municipalities have been required for years to build landfills with double liners and leachate collection systems.

Response: *All waste storage and disposal facilities required for the various alternatives evaluated in the SPEIS would be designed and operated in compliance with applicable Federal, state and DOE requirements concerning the storage of wastes. As indicated in Sections 5.1.14, 5.3.14, 5.5.14, 5.8.14, and 5.9.14 (Volume II), NNSA analyzed the waste categories and volumes that could be generated by the various programmatic alternatives. These sections provide information on how these wastes would be managed. Other Sections,*

such as Sections 5.12.3.4, 5.15.4.3, and 5.16.2.1-5.16.2.5 (Volume II), describe the volumes, waste categories and management paths for wastes resulting from the D&D of structures that would result from the consolidation alternatives associated with the project specific alternatives, such as SNM Consolidation, Tritium R&D, Flight Test Operations, Hydrodynamic Testing, and Environmental Testing.

14.M.4 The following comments related to transuranic (TRU) waste were received:

- There would be no place to dispose of TRU waste from the nuclear weapons complex in the near future.
- NNSA should not produce waste that does not have a clear path to disposal.
- The SPEIS must analyze where all radioactive and hazardous wastes from continuing weapons R&D and production will be permanently disposed.
- The WIPP disposal capacity is already spoken for by clean-up activities for existing waste and that 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 after WIPP closes.
- NNSA should define "WIPP-like facility, a term that was used in the Draft SPEIS.
- If future Complex Transformation TRU wastes are generated in time to be disposed at WIPP, potential existing TRU wastes at other sites, including environmental restoration wastes, could get bumped out of WIPP and the SPEIS must analyze the impacts of a possible TRU waste "shell game" that continues indefinitely on into the future.
- NNSA should include in the SPEIS reference documents, "ANNUAL TRANSURANIC WASTE INVENTORY REPORT - 2007, DOE/TRU-2008-3379."
- Previously touted "Quick-to-WIPP" initiatives at LANL were anything but quick, and that above-ground storage of TRU wastes at LANL remains a serious environmental, public safety, and Intentional Destructive Acts threat.
- If storage of future Complex Transformation TRU wastes is required "hardened on-site storage" (HOSS) facilities must be used.

Response: Waste management, including the management of TRU wastes, is discussed in Chapter 5 of Volume II for each site. Most TRU wastes will be produced at the Pit manufacturing facility and (in much smaller quantities) at plutonium research and development facilities. The quantities of TRU waste that would be generated in each facility are an extremely small percentage of the total amount of TRU wastes that NNSA must safely dispose of. The text in Chapter 5 has been revised to include a reference to "ANNUAL TRANSURANIC WASTE INVENTORY REPORT" "2007, DOE/TRU-2008-3379" to support the

statements concerning the quantities of TRU that could be produced for each alternative and how those quantities relate to the total TRU waste inventories requiring safe disposition.

Alternatives analyzed in this Complex Transformation SPEIS could generate TRU waste after WIPP's scheduled closure date of 2035. At this time, DOE is not proposing to seek any legislative change to extend WIPP's operation or to develop a second repository for TRU waste. Any TRU waste that is generated without a disposal pathway would be safely stored until disposal capacity becomes available.

WIPP has sufficient capacity available to meet the TRU waste disposal requirements of NNSA's Stockpile Stewardship Program for several years into the future. This SPEIS assumed WIPP as the disposal location for TRU waste generated under each alternative. (Waste disposal is addressed in the SPEIS for the purposes of performing transportation analysis only.) The term "WIPP-like" was used in the Draft SPEIS to define a future facility that would be authorized to dispose of defense transuranic waste. Such a facility would be comparable to the Waste Isolation Pilot Plant. In the final SPEIS, NNSA has eliminated the use of this term.

DOE's 1997 WIPP Supplemental EIS II (WIPP SEIS II) acknowledged, and DOE recognizes that the amount of TRU waste generated during the lifetimes of the programs served by WIPP could eventually exceed the total disposal capacity limit set for the repository under the WIPP Land Withdrawal Act. DOE also acknowledges that several of NNSA's sites and their facilities may operate beyond WIPP's currently planned operating period.

The scope and data analysis available within the current SPEIS should not be interpreted as providing firm evidence of an impending need for expanding the Department's TRU waste disposal capacity. The programmatic alternatives analyzed in this SPEIS examine a broad range of potential production capacities for current and proposed SNM facilities in order to ensure that NNSA maintains its capability to meet its national security obligations by planning for and providing a complex that is able to produce what is likely to be required. A precise prediction of the future production capacity needed to work on or replace aging weapons cannot be made. Further, a capacity to produce components does not mean that those quantities of components would actually be produced (see Chapter 2 of this SPEIS). National security requirements would determine actual production levels and the associated amounts of waste generated.

DOE has made no plans to date regarding the location or design of a waste disposal facility for TRU waste after WIPP's closure. In the future, if inventory projections show a need for additional disposal capacity for TRU waste, DOE will develop strategies for expanding the Department's capacity. This would be

subject to NEPA analyses.

If, in the future, additional disposal capacity were found to be needed but not readily available storage of waste would be needed until that additional capacity became available. The WIPP SEIS II examined the impacts of storage and disposal of 11,018,000 ft³ of TRU waste under its Action Alternative 1. This alternative included lag storage for a period of up to 160 years at all of the sites evaluated in the SPEIS. The WIPP SEIS II analyses indicated that potential impacts to the public, involved workers, and non-involved workers from lag storage would be small. The LCFs would be one or less than one for radiation exposures and no cancers from potential exposure to hazardous chemical would be expected. HOSS facilities are addressed in comment-response 14.M.5.

14.M.5

The following specific comments related to hardened on-site storage (HOSS) were received:

- HOSS must be considered as an alternative and that radioactive wastes should be safely stored as close to the site of generation as possible and be safeguarded in HOSS 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.
- Explain why HOSS was not posed as an alternative in this SPEIS.
- If HOSS is not analyzed in the SPEIS, please provide detailed reasons for its rejection.”

Response: *WIPP has sufficient capacity available to meet the TRU waste disposal requirements of NNSA’s Stockpile Stewardship Program for several years into the future. This SPEIS assumed WIPP as the disposal location for TRU waste generated under each alternative. (Waste disposal is addressed in the SPEIS for the purposes of performing transportation analysis only.) NNSA agrees, however, that Hardened On-Site Storage facilities may present an attractive alternative for temporary storage of radioactive wastes should the need for onsite storage become apparent in the future. At this time, since the need for on-site storage is not known, it would be premature to proceed with environmental impact analyses in this area for the current SPEIS. Further, the specific details of facility and site operations required for an appropriate*

analysis of this subject exceed the scope of the current SPEIS and are not currently available. In the future, if inventory projections show a need for additional disposal capacity for TRU waste, DOE will develop strategies for expanding the Department's capacity. This potential future action would be subject to its own NEPA analyses.

14.M.6 A commentor stated that TA-14 is not RCRA permitted.

Response: *The open burn cage at TA-14, Q Area, has interim status. Because it was in existence at the time of the enactment of RCRA, it is 'grandfathered in' and open burning can take place there under the provisions of RCRA. As such, the SPEIS statement that this site is permitted to treat waste under RCRA is correct.*

14.M.7 A commentor stated 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. As for low level waste, the Draft SPEIS states that such low level waste would be disposed of onsite at LANL at TA-54, Area G. 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. It is irresponsible to even contemplate adding low level waste to Area G until legacy waste impacts there are actually mitigated.”

Response: *An updated performance assessment for Area G is in preparation. Until this document is finalized and approved, the current performance assessment and composite analysis for waste disposal remains valid. To the extent possible, the most recent technical documents have been considered in the final SPEIS analysis. Information currently under development that is not available for use in the final SPEIS will be considered as it becomes available and, in accordance with the NEPA compliance process, the SPEIS impact analyses would be reviewed and supplemented as necessary based on the newly available information. See comment-response 14.M.2 for more information on Area G.*

14.M.8 Comments were received that the Draft SPEIS did not adequately analyze the environmental impacts of wastes for the alternatives discussed. Specific comments regarding wastes from RRW were as follows:

- The assertions in the Draft SPEIS that the RRW program would create less environmental impacts are not proven.
- Any nuclear weapons complex, with or without RRW, would create

radioactive and hazardous waste.

- The Draft SPEIS does not adequately analyze the environmental impacts of those wastes for the alternatives discussed.

Response: *The Reliable Replacement Warhead (RRW) is not a part of any of the Complex Transformation SPEIS alternatives. The RRW discussion, which may be found in Section 2.5 of Volume I of the SPEIS, is included due to high levels of Congressional and public interest as to what influence (if any) RRW would have on the proposals, should it be pursued at a later date. NNSA agrees that the RRW is still in the design stage and that it cannot delineate precise estimates of waste products that would be generated by the manufacture of such warheads. As discussed in Chapter 2, Volume I, it is clear, however, that less machining and therefore less waste would be generated. As evidenced in Sections 5.1.14, 5.2.14, 5.3.14, 5.4.14, 5.5.14, 5.8.14, and 5.9.14 (Volume II), NNSA considered the waste categories and volumes that would be generated by the various programmatic alternatives and indicates how these wastes would be managed. Other Sections such as 5.13.3.4, 5.15.4.3, 5.16.3.1, 5.16.3.5, and 5.17.3 (Volume II) describe the management of D&D waste resulting from the consolidation associated with the project specific alternatives, such as SNM Consolidation, Tritium R&D, Flight Test Operations, Hydrodynamic Testing, and Environmental Testing.*

14.M.9 One commentor stated that TRU waste generation amounts in the Draft SPEIS do not make sense and are not credible.

Response: *Due to the waste management procedures required by NNSA for the management of TRU waste, NNSA keeps very good records to allow for the accountability of TRU waste. Projections of TRU waste generation rates for proposed actions were based on these actual generation rates and were developed by NNSA waste experts knowledgeable of existing practices and NNSA proposed actions. Without more specific detail as to which specific TRU waste numbers the commentor believes do not make sense, it is not possible to address this concern in more detail...*

14.M.10 A commentor stated: “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.”

Response: *The Complex Transformation 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. Other actions, such as*

the remediation of NNSA sites are the programmatic concerns of other DOE programs and are not within the scope of this document.

DOE has a large remediation program and is addressing past contamination issues with aggressive programs at each of its facilities. These programs are being conducted in accordance with Federal and state regulatory requirements and include implementation of administrative and engineered controls to minimize additional releases as well as surveillance monitoring of the environment and reporting of exposure assessments.

- 14.M.11** A commentor stated that the SPEIS is silent on waste generation, treatment, and disposition and that NNSA should address plans for management of wastes for each alternative in the SPEIS.

Response: *As evidenced in Sections 5.1.14, 5.2.14, 5.3.14, 5.4.14, 5.5.14, 5.8.14, and 5.9.14, of Volume II of the SPEIS NNSA considered the waste categories and volumes that would be generated by the various programmatic alternatives and indicates how these wastes would be managed. Other Sections such as 5.13.3.4, 5.15.4.3, 5.16.3.1, 5.16.3.5, and 5.17.3 of Volume II of the SPEIS describe the management of D&D waste resulting from the consolidation associated with the project specific alternatives, such as SNM Consolidation,*

Tritium R&D, Flight Test Operations, Hydrodynamic Testing, and Environmental Testing.

Each of these Sections estimates the amount of waste which would be generated for each alternative at each candidate site, by waste category, and then compares these volumes to the existing waste management infrastructure and assesses the ability to manage these volumes.

- 14.M.12** A commentor stated: “The draft SPEIS 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 draft SPEIS 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.

Response: *A CPC would be designed and operated to minimize risk to both workers and the general public during normal operations and in the event of an accident. Benefiting from decades of experience, a CPC would employ modern*

processes and manufacturing technologies and would utilize an oversight structure for safety, environmental protection, and management oversight that has been established by DOE since Rocky Flats ceased operations.

Modern safety and security design standards require substantially different structures than the earlier pit manufacturing facilities at the Rocky Flats Plant, near Golden, Colorado. The buildings at the Rocky Flats Plant were constructed in the 1950s with metal roof sheeting covered by a built-up weather seal. In contrast, the exterior walls and roof of PF-4 (the current interim production plutonium machining facility at LANL) are constructed of reinforced concrete more than a foot thick. Internal walls at PF-4 are designed to provide multiple-hour fire barriers between wings. A CPC would be designed with similar improvements over practices at Rocky Flats.

- 14.M.13** Commentors questioned whether the interaction between LANL cleanup activities outlined in the Compliance Order on consent and the activities proposed for Complex Transformation have been evaluated? Another commentor stated that Los Alamos County strongly supports the schedule of the Compliance Order being maintained or improved.

Response: *On May 2, 2002, the New Mexico Environmental Improvement Division (now NMED) issued a Determination of Imminent and Substantial Endangerment to Health and the Environment and a draft order compelling investigation and cleanup of environmental contamination at LANL. After receiving public comments, NMED revised its Determination and issued a final Compliance Order on November 26, 2002. After negotiations among the University of California, DOE and NMED a Consent Order was reached. On September 1, 2004 NMED issued a revised Consent Order and on March 1, 2005 the final Consent Order was entered into by NMED, the State of New Mexico Attorney General, DOE, and the University of California (NMED 2005).*

The Consent Order requires LANL investigation and cleanup pursuant to stipulated procedures and schedules (NMED 2004). Schedules in the Consent Order may be adjusted to account for delays in NMED approvals; or to accommodate requests from DOE or its contractor. Additional details of this Consent Order may be found in Appendix I of the Final LANL SWEIS (LANL 2008). See also comment-responses 14.M.2 and 14.E.3 for further discussion of the Consent Order.

- 14.M.14** The following comments regarding waste management at LLNL were received:

- 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, 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 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:
 - potential health and environmental impacts,
 - potential security impacts and vulnerabilities,
 - 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,
 - constraining impact (along with the RRW program of which it a part) on the development of a consolidation alternative that would result in changing Livermore Lab's mission.

Response: *Continued operations with plutonium at LLNL are considered in detail in the LLNL SWEIS (DOE 2005a). These continued operations produce the impacts on the affected environment presented in Section 4.2, of Volume II, of the SPEIS. In this SPEIS, the analysis focuses on the changes that could result if Category I/II SNM operations are phased out of LLNL (Section 5.12.2, Volume II). In this manner, the SPEIS provides NNSA with the relevant environmental information that it needs in order to make decisions with respect to future plutonium operations at LLNL.*

L-cast is a development and demonstration foundry that incorporates advanced casting technology (die-casting) and automation to enable technology transformation in pit manufacturing. In the LLNL SWEIS (DOE 2005a), the L-cast was included in the Expanded Operations Alternative, and NNSA assessed the increased material amounts for two rooms in Superblock (Building 332) that were needed to support the L-cast. However, in August 2007, NNSA decided not to install the L-cast at LLNL.

14.M.15

A commentor stated: “This [waste management] 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 water and groundwater 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.”

Response: *Some contamination of ground and surface waters has occurred due to past LANL operations. As discussed in Chapter 2 of Volume I of the SPEIS, (Section 2.2.6), NNSA is conducting an environmental restoration program to address the remaining potential release sites at LANL including material disposal areas, firing sites, outfalls, and others. With respect to material disposal areas, the LANL SWEIS (LANL 2008) addresses two broad options for remediation: capping in place and removal. Capping would enhance the current configuration of the material disposal areas, providing greater environmental protection over the long term. Removal would completely remove the waste. As suggested by the commentor, each option would have environmental impacts as well as benefits. For example, Section I.5.10 of Appendix I of the SWEIS, addresses possible impacts from transporting wastes from environmental restoration to offsite treatment and disposal facilities. Transuranic waste would not be transported through the Santa Clara Pueblo, and low-level radioactive waste would be transported through the Santa Clara Pueblo only if a decision is made to dispose of the waste in a commercial facility. NMED will decide how this area is remediated. Mitigation measures for impacts identified in the LANL SWEIS are addressed in Chapter 5, Section 5.14, of that SWEIS.*

14.M.16 One commentor stated that there was a failure to identify hazardous waste and toxic contamination or appropriate remediation approaches at NTS acceptable to the Western Shoshone.

Response: *Areas that were contaminated by past activities have been identified and are being remediated in accordance with the Federal Facility Agreement and Consent Order with the State of Nevada and all applicable laws, regulations, and orders. The goal of the Environmental Restoration Program at the NTS is to ensure that risks to the environment and to human health and safety, as posed by inactive and surplus facilities and sites, are either eliminated or reduced to protective levels. Protective levels are determined through site conditions, risk assessments, and consultation with federal and state regulatory authorities.*

14.M.17 A commentor stated that DOE is already way behind mandated environmental clean-up requirements and that Complex Transformation will make the situation worse to the point of threatening our environment.

Response: *DOE is committed to remediation of past contamination issues at its facilities and has a very aggressive remediation program. This program is conducted on a site-by-site basis, in conjunction with Federal and state regulators. This program is funded separately from the NNSA activities, based on the authorization and funding decisions made by the Congress. Complex*

transformation will not make legacy contamination worse or more difficult to remediate.

- 14.M.18** Commentors stated that the SPEIS provides insufficient specific discussion of the environmental benefits that would result from selection of the Preferred Alternative compared with the No Action Alternative. Additional areas would be available for clean-up.

Response: *NNSA has added Section 5.20 to Volume II of the SPEIS to discuss the impacts of the Preferred Alternative specifically, and has made changes to the summary Tables (Table 3.16-1 in Chapter 3, Volume I, and Table S.3.16-1 in the Summary) to better compare the Preferred Alternative to other alternatives.*

- 14.M.19** A commentor stated that the mixed waste landfill at SNL/NM is in violation of federal law because it does not have monitoring wells and does not have the required permits for operations.

Response: *The mixed waste landfill is operated under a RCRA Part B permit and a Compliance Order On Consent. The mixed waste landfill is in full compliance. There are currently seven groundwater monitoring wells at the mixed waste landfill. Three additional groundwater monitoring wells will be installed as directed by the New Mexico Environment Department.*

14.N FACILITY ACCIDENTS

The following comments related to accidents were received:

- Concern about the possibility and effects of facility accidents including subsequent social impacts that could result from an accident.
- A commentor attached an email exchange between the commentor and a citizen concerned about the effects of a reported facility accident in an article by Frank Munger (also attached).
- The possibility of a facility accident poses both environmental risk and health risk.
- Bomb and plant accidents have killed 9.7 million people.
- Concern about the impacts and subsequent uselessness of the land if a catastrophic event occurred at LANL.
- There is no plan for safe evacuation in the event of an accident or terrorist attack.

Response: *Accidents are addressed in the Health and Safety Sections for each site. All new facilities and building expansions would be designed to withstand the maximum expected earthquake-generated ground acceleration in accordance with DOE Order 420.1B, Facility Safety, and accompanying safety guidelines. Earthquakes are addressed in this SPEIS in the Geology and Soils Sections for each potentially affected site. Site geologic conditions and*

reasonably expected natural disasters would not likely have substantial adverse affect on the facilities that could result in significant impact health or the environment. NNSA does not have information on commentor's assertion that "bomb and plant accidents have killed 9.7 million people."

14.N.1 Commentors stated that there is no plan for safe evacuation of Los Alamos – or anywhere else- in the event of a catastrophic accident or terrorist attack.

Response: *LANL and Los Alamos County have developed emergency management programs to govern evacuations. Los Alamos County is responsible for evacuation of county land (including county communities), and, with LANL's input, has prepared the Los Alamos County All Hazards Plan which is required by the State of New Mexico. That plan has been reviewed and approved by the State of New Mexico. The laboratory has implemented two notification systems to alert LANL and county occupants of emergencies:*

- *Community Alert Network. This system includes all of Los Alamos County and is capable of notifying all occupants by telephone, cable TV sub-caption, and radio stations in the event of an emergency.*
- *Site-Wide Area Notification. This system has special two-way radios located in LANL facilities and is capable of site specific or LANL-wide notification in the event of an emergency.*

Other sites have also established appropriate emergency management programs.

14.N.2 A commentor noted that the building and rebuilding of all of these nuclear weapons could be damaging if located 45 minutes from Las Vegas, NV, the entertainment capital of the world.

Response: *Section 5.3.12.2.1, of Volume II of the SPEIS, analyzes the impacts to the offsite population residing within 50 miles of the NTS location from a set of postulated accidents that bound the impacts of all reasonably foreseeable accidents that could occur from the Consolidated Plutonium Center at NTS. The accident with the highest potential consequences to the offsite population (see Table 5.3.12-1, Volume II) is a beyond evaluation basis earthquake and fire. Approximately 0.47 latent cancer fatalities could result from such an accident in the absence of mitigation measures. When probabilities are taken into account (see Table 5.3.12-2, Volume II) the accident with the highest risk to the maximally exposed individual is an explosion in a feed casting furnace. For this postulated accident, the latent cancer fatality risk to the maximally exposed individual would be approximately 1 in 150,000.*

14.N.3 A commentor stated that the Los Alamos County Fire Chief and Police Chief need to review the classified appendix.

Response: *In order to review the classified appendix, an individual must have a need to know and possess the authorized clearance level for the information to be reviewed. NNSA would welcome contact from the Los Alamos County Fire Chief and Police Chief regarding this issue.*

14.N.4

Citing Appendix B of the Draft SPEIS, one commentor stated that the role of the LANL Emergency Response Organization cannot conflict with either the established HAZMAT response protocols or violate state law or local jurisdictional authority.

Response: *The cited Section of Appendix B is a general description of DOE emergency response planning. DOE Order 1551.C, Comprehensive emergency Management System, provides the basis for all DOE Emergency Response Plans. As noted in Appendix B, that order “requires coordination with tribal, state, and local agencies and organizations responsible for offsite emergency response.” The order also states, “Each DOE/NNSA site/facility must have an Operational Emergency Base Program that implements the requirements of applicable Federal, State, and local laws/regulations/ordinances for fundamental worker safety programs (e.g., fire, safety, and security).”*

LANL’s Emergency Response and Management Program is operated out of an Emergency Operations Center (EOC). The EOC is the command center for responding agencies in an emergency and has space and resources to house up to 120 personnel, including representatives from other Federal agencies, neighboring Pueblos, National Guard, New Mexico State Police, Los Alamos County Police, firefighters, Emergency Managers, the Red Cross, and others. LANL emergency management staff and Los Alamos County police, fire, emergency medical and 911 dispatch personnel operate out of the LANL EOC. A computer-aided dispatch system provides a centralized dispatch capability for the Los Alamos Police and Fire Departments. First responders from different agencies share real-time information from the same EOC, resulting in a more coordinated emergency response.

LANL uses several mechanisms to coordinate site emergency response plans and training opportunities with local offsite response agencies. Routine coordination between LANL staff and offsite agencies is primarily handled through the Los Alamos County Local Emergency Planning Committee (LEPC). The LEPC includes representatives from LANL, various Los Alamos County and nearby county emergency response agencies, the National Forest Service, the National Park Service, and other interested parties.

DOE emergency responders follow the National Incident Management System protocol. All DOE sites conduct at least one emergency response exercise annually and coordinate all exercises with at least; local police departments, fire departments, local hospitals and the FBI.

14.N.5 A commentor expressed concern that accidents will happen.

Response: *The commentor's concern is noted. The SPEIS assesses the potential impacts associated with accidents in Chapter 5 of Volume II.*

14.N.6 A commentor stated that NNSA is required to examine the environmental consequences of the maximum accident event at the TA-55 facility and the planned CMRR facility for pit production at LANL under its maximum pit production scenario.

Response: *Section 5.1.12 of Volume II of the SPEIS, presents the information requested by the commentor.*

14.N.7 A commentor noted that the impact of an accident (or other release scenarios including earthquake or terrorism attack) with tritium at LLNL were not considered in the Draft SPEIS and must be.

Response: *The potential impacts of intentional destructive acts (terrorism) are presented in a classified appendix. With respect to potential accidents associated with an earthquake, those accidents are presented in the LLNL SWEIS (LLNL 2008). Those impacts are relevant and expected to be greater than any impacts associated with the proposed actions. For actions at LLNL that would reduce radiological materials within the site, the SPEIS presents an analysis of the reduced impacts that could result (see Section 5.12.1 of Volume II of the SPEIS).*

14.N.8 The following comments were received regarding accidents at LLNL: The Draft SPEIS proposes to keep highly enriched uranium and plutonium at LLNL at least for the next five years, yet fails to consider the Lab's environmental record of accidents, spills, leaks etc. with these materials.

- There have been numerous fires and other accidents involving uranium at LLNL.
- Problems with the LLNL plutonium facility are relevant and must be examined in the SPEIS.
- Safety vulnerabilities such as the ventilation system and electrical system must be considered carefully.
- The SPEIS does not discuss the environmental impacts of plutonium in Livermore at all, and must.
- Is DOE is still using the old 5 percentleak path factor.
- The SPEIS should describe how the significance of LLNL's reliance on air monitors/emergency generators and negative airflow.
- 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 included in the SWEIS describing how all of these things could have failed at once and describing how these types of failures would not happen again.

Response: Pursuant to DOE Orders, normal plutonium operations at LLNL (and at all other plutonium operations in the nuclear weapons complex) rely on safety class systems and administrative controls to ensure that worker exposures are as low as reasonably achievable and that the facility operates within its authorized safety basis. It is unfortunate reality that accidents sometimes happen. NNSA analyzes the accidents that do occur to determine the causes and to apply lessons learned to future activities to help in the prevention of future accidents. There can be no certainty that accidents will not occur in the future. That is why the SPEIS provides analysis of the potential consequences of accidental releases and exposures.

With respect to leak path factors, they are considered in order to determine the source term (the amount of material released) from a facility during an accident. The leak path factor is essentially an estimate of how easily material would escape containment and reach the environment. A leak path factor of 1 (or 100 percent) means that all of the material would escape to the environment for that particular accident. A leak path factor of 0.05 (or 5 percent) means that 5 percent of the material would escape to the environment for that particular accident. Leak path factors are determined by many things, including facility design, system design, type of material, pressure and temperature, and the type of accident. Leak path factors are generally determined through detailed facility-specific safety analysis reports. At LLNL, the leak path factor associated with the plutonium operations is 0.05 (or 5 percent) (see Appendix D of DOE 2005a).

14.N.9 NOT USED

14.N.10 Commentors stated that the SPEIS should address:

- Impacts to quality of life factors that make the community vulnerable to accidents;
- Impacts to services such as law enforcement resulting from the lack of training or emergency preparedness; and,
- Impacts to self-governance and tribal administration of the tribe that could result from a failure of institutional capacity to deal with the demands of an accident or disaster related

Another commentor stated that an appropriate environmental justice analysis would 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. A commentor stated that both nuclear weapons and complex transformation are hazardous to the environment.

Response: *The SPEIS addresses the probability and reasonably foreseeable environmental impacts from potential accidents. The SPEIS does not address issues such as quality of life, lack of training, or self-governance. These issues are beyond the scope of the analysis. Potential impacts from accidents are presented in Chapter 5 of the SPEIS. With respect to emergency response, DOE Order 1551.C provides the basis for all DOE Emergency Response Plans. As noted in Appendix B, that Order requires coordination with tribal, state, and local agencies and organizations responsible for offsite emergency response. More information on the emergency response, may be found in comment-response 14.N.4.*

14.O

CUMULATIVE IMPACTS

The following comments were received regarding cumulative impacts:

- Nuclear weapons are hazardous to the environment and public health.
- Cumulative impacts from operations throughout the state of New Mexico must be considered in the SPEIS.
- NNSA should provide a summary view chart with the potential environmental impacts including information pertaining to radionuclides in the water supply. Profound environmental contamination at the proposed sites is responsible for radical differences in the baseline data used to assess the environmental impacts.

Response: *Radioactive materials and wastes, if not handled correctly, are hazardous. For this reason, DOE has developed extensive and strictly enforced processes for dealing with radioactive materials and wastes. The most effective means to avoid harm from these materials and wastes is to avoid contact. All DOE radiological and waste management facilities are located in areas with controlled access and operated in strict compliance with all applicable laws, regulations, and orders.*

NNSA has added Section 6.4 of Volume II of the Final SPEIS to provide more information on the potential cumulative impacts from activities at all New Mexico sites. The text in the final SPEIS has been revised to better describe the cumulative impacts in those areas of the state where the potential environmental impacts from a site might overlap with the impacts from another site or sites. The analysis considers LANL, SNL/NM, White Sands Missile Range, WIPP, the National Enrichment Facility in Lea County, and GNEP's potential programmatic impacts.

Tables S.3.16-1 through S.3.16-8 and 3.16-1 through 3.16-8, (Volume I of the SPEIS), provide a summary of impacts for all of the alternatives addressed in the Complex Transformation SPEIS. See also comment-response 14.O.1, below, for additional discussion of cumulative impacts in New Mexico and comment-response 14.E for additional information on impacts to water resources.

14.O.1 The following comments related to cumulative impacts were received:

- The SPEIS needs to look at cumulative impacts (economic and health) from activities at all New Mexico sites including White Sands, uranium enrichment in Lea County, WIPP and the "endless stream of nuclear facilities."
- The cumulative impact of concentrating weapon building and testing at three sites within a few hundred miles of each other in the single state of New Mexico needs to be considered.
- The 50-mile radius analysis of impacts of LANL and SNL/NM overlap. The cumulative impacts to the public of these two facilities must be analyzed, along with the WIPP transportation route, planned increases in uranium mining and processing in the area, and operation of additional commercial nuclear reactors under the Global Nuclear Energy Partnership (GNEP).
- The Draft SPEIS gave no consideration to the cumulative risks of additional body burden from all future weapons making activities in New Mexico coupled with existing risks from past operations.

Response: *NNSA has added Section 6.4 of Volume II of the final SPEIS to provide more information on the potential cumulative impacts from activities at all New Mexico sites. The text in the SPEIS has been revised to better describe the cumulative impacts in those areas of the state where the potential environmental impacts from a site might overlap with the impacts from another site or sites. This analysis considers LANL, SNL/NM, White Sands, WIPP, the uranium enrichment facility in Lea County, and GNEP's potential programmatic impacts.*

The 50-mile radius was not intended as a limit for cumulative impacts analysis. Each resource area may have a different region of influence; for instance, cumulative impacts to cultural resources would be largely confined to a single site. However, surface water resources could potentially have cumulative impacts far downstream on the Rio Grande. Impacts from radiological air emissions are typically modeled out to 50 miles (80 kilometers). If the modeling results indicate that air quality impacts could be significant beyond 50 miles (80 kilometers), additional analysis is performed. Operational impacts are greatest within a few miles of the source of the air emissions. The radiological doses from airborne emissions decrease as a function of distance from the source. For

example, at LANL, with increasing distance from LANSCE, the largest radiological air emitter at the site, the dose drops dramatically from approximately 7.5 mrem per year at 0.5 miles (0.8 kilometers) to 0.035 mrem per year at 50 miles in the direction of the highest potential dose (north-northeast of LANSCE). The large drop in radiological dose with distance is due primarily to dispersion of the emitted contaminants, which reduced their concentrations. See the LANL Final SWEIS (LANL 2008) for additional discussion and a graphic depiction that was added to Appendix C. Extending the impacts analysis of air emissions from the most severe potential accident at LANL out to 100 miles (161 kilometers) would change calculated results for population doses by approximately 3 percent.

See comment-response 14.D.6 for a discussion of the dose information for LANL. The SNL/NM doses to the MEI and population are less than 1 percent of the LANL doses. As such, even if the results of the 50-mile radius air emissions modeling for SNL/NM were superimposed on the 50-mile radius of impacts for LANL, the combined impacts would be very small. Comment-responses 14.K and 14.I provide further discussion of health effects and socioeconomic impacts respectively. See also comment-response 14.O, above, for additional discussion of cumulative impacts in New Mexico.

14.O.2

A commentor stated that NEPA Categorical Exclusions must be included in the cumulative impacts

Response: *NNSA considers hundreds of proposals each year to determine whether they are covered by one of the categorical exclusions listed in Appendices A and B of DOE's NEPA regulations, 10 CFR Part 1021. Most of these proposals involve routine activities and may include activities related to decontamination and decommissioning. In this Complex Transformation SPEIS, any action undertaken pursuant to application of a categorical exclusion is part of ongoing operations and included in the No Action Alternative.*

DOE's categorical exclusions were established through a rulemaking process with public review and comment. Through this process, DOE determined that the class of action embodied in each categorical exclusion does not "individually or cumulatively have a significant effect on the human environment." (10 CFR §1021.410(a)) Any proposal must pass three tests before DOE determines that a categorical exclusion can be applied: (1) the proposal fits within an existing categorical exclusion, (2) there are no "extraordinary circumstances related to the proposal that may affect the significance of the environmental effects of the proposal," and (3) the proposal is not connected to other actions with potentially significant effects, related to other actions with cumulatively significant impacts, and is not part of an action for which an EIS is being prepared (unless it qualifies as an interim action). (10 CFR §1021.410(b)).

Guidance from the Council on Environmental Quality discourages Federal

agencies from adopting "procedures that would require the preparation of additional paperwork to document that an activity has been categorically excluded." (CEQ, *Guidance Regarding NEPA Regulations*, 48 FR 34263, 1983) Accordingly, DOE does not require documentation of the application of categorical exclusions. DOE has issued guidance, however, recommending that "a simple record of a categorical exclusion determination be kept for all but the most routine proposed actions." (DOE, *Guidance on National Environmental Policy Act (NEPA) Categorical Exclusion Determinations*, 1998) Such records are available through individual site offices.

14.O.3 The following comments were received related to cumulative water impacts:

- Cumulative water impacts for all of the national laboratories are not analyzed. Water usage must be analyzed individually and cumulatively and for each of the various alternatives, including the "No Production, Only Reduction" alternative that they believe must be added to the SPEIS.
- Loss of groundwater resources and the contamination of those resources due to potentially increased contamination resulting from complex transformation must be analyzed.
- Volumes of water that would be contaminated with radiation and hazardous waste from prior and future activities must be analyzed for human health and the environment.

Response: *NNSA acknowledges that cumulative impacts may occur at all of its sites. Sites where potential impacts are minor are not discussed. NNSA focused this programmatic analysis on sites where the cumulative impacts could be significantly affected by the programmatic alternatives analyzed in the Complex Transformation SPEIS. The analysis complies with CEQ NEPA regulations, and the CEQ handbook, "Considering Cumulative Effects Under the National Environmental Policy Act." No further analysis is warranted.*

14.O.4 A commentor stated that the cumulative impacts of future activities at Site 300 must be analyzed in the Draft Complex Transformation SPEIS. The commentor noted that DOE recently filed an application for an air permit with the San Joaquin Valley Air Pollution Control District for an eight fold increase over current levels (up to 8000 pounds of high explosives annually, including 20 mg (200 curies) of tritium and up to 5,000 pounds of uranium-238). Since LLNL officials have publicly stated that experiments for other federal agencies will continue at Site 300 in any event, such actions are clearly foreseeable. The commentor states that 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.

Response: *NNSA has added additional discussion of reasonably foreseeable operations at LLNL Site 300 and also with respect to the air permit requests referred to by the commentors. This additional analysis may be found in Section 6.5 of Volume II of the final SPEIS.*

14.O.5

A commentor stated that the Draft SPEIS did not adequately assess cumulative impacts at NTS:

- “The Draft SPEIS 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 Draft SPEIS.
- 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 Draft SPEIS 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 would 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 Draft SPEIS 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.
- The Draft SPEIS should also have evaluated cumulative impacts from existing and future operations at the Nevada Test and Training Range.

Response: *The Complex Transformation SPEIS is a programmatic level analysis. NNSA would conduct appropriate site-specific analyses of cumulative impacts as part of the NEPA process associated with a decision to site at the NTS facilities or activities resulting from decisions on complex transformation. The cumulative impacts assessment for the programmatic consideration of complex transformation is in Section 6.3.2 of Volume II of this SPEIS. Cumulative transportation-related impacts for Complex Transformation and the proposed Yucca Mountain Repository are addressed in Section 6.3.2 of Volume II of this SPEIS.*

Groundwater impacts associated with complex transformation are addressed in Section 5.3.5 of Volume II of this SPEIS, and are further discussed in comment-response 14.E. The only groundwater impact at NTS related to transformation would be use of water for construction and operations. No complex transformation facility or activity would reasonably be expected to cause any contamination to groundwater at the NTS.

Based on long-term studies and extensive monitoring of the groundwater at NTS and in the surrounding region, the only nuclear test-related radionuclide that has the potential to migrate from the immediate area of an underground test is tritium. As an isotope of hydrogen, tritium binds readily in water and is readily transported in the groundwater. To date, offsite migration of tritium, or any other radionuclide, has not been detected. With a radioactive half-life of about 12.5 years, the amount of tritium in the groundwater beneath the NTS is already less than one-half of the original source term for that radionuclide. It is estimated that within 65 years the concentration of tritium in the groundwater beneath the NTS will be lower than the U.S. Environmental Protection Agency drinking water standard of 20,000 picocuries per liter.

The cumulative impact assessment in Section 6.3.2, of Volume II, of this SPEIS addresses Yucca Mountain. Cumulative impacts of transportation for the maximum Complex Transformation “related activity and a Yucca Mountain Repository are addressed in that section.”

14.O.6

A commentor stated that Complex Transformation relies on the implementation of the Global Nuclear Partnership (GNEP).

Response: *The Complex Transformation and the Global Nuclear Energy Partnership EISs are separate actions and are not connected. Complex transformation does not rely, in any way, on decisions related to GNEP.*

15.0 GENERAL SUPPORT COMMENTS

Commentors expressed general support for Complex Transformation. Several commentors expressed support for siting Complex Transformation facilities and activities at specific sites, such as Pantex, LANL, Y-12, and SRS. Commentors supported the plans to reduce the facilities footprint, workforce, and redundant capabilities within the nation's nuclear weapons complex.

Response: *NNSA notes these comments.*

15.A and 15.A.1 SUPPORT FOR COMPLEX TRANSFORMATION

Comments were received supporting differing elements of complex transformation for differing reasons. The following summarizes the comments received:

- Reduction in footprint and potential environmental impacts was the right thing to be doing at this time;
- Reduction in footprint would allow the clean-up of more facilities as more facilities are closed;
- Adoption of the Preferred Alternative would enhance the national laboratories' ability conduct research unrelated to the weapons program and some said that the weapons program received benefits from other science being conducted at the national laboratories;
- Adoption of the Preferred Alternative would allow the national laboratories to continue to recruit the best and brightest new scientists
- Adoption of the Preferred Alternative would allow this nation to continue to reduce the number of nuclear weapons in our stockpile and still be able to respond to changing conditions in the world;
- NNSA activities were a critical economic engine for their regions and without the jobs and other expenditures of the facilities there would be significant impacts on the economy of the region;
- Nuclear weapons had preserved the peace since the end of WWII and are still an essential element of our national defense;
- Many comments were received supporting consolidation of special nuclear materials for security reasons; and,
- Commentor expressed appreciation for the dismantlement work done by Pantex and looked forward to the day when there would be less than 500 nuclear weapons possessed by either Russia or the United States

Response: *NNSA notes these comments.*

16.0 GENERAL OPPOSITION COMMENTS

A number of commentors expressed general opposition to NNSA activities concerning the nuclear weapons program. Many commentors stated that this

nation does not need or want nuclear weapons. Several commentors expressed opposition to continuing NNSA activities at each site and expressed general opposition to ongoing modernization activities at all of the sites. Specific comments were received expressing opposition to continuing the CMRR and UPF projects. Commentors also expressed general opposition to Complex Transformation and nuclear weapons.

Response: *NNSA notes these comments.*

16.A and 16.A.1

OPPOSITION TO COMPLEX TRANSFORMATION

Comments were received opposing differing elements of complex transformation for differing reasons. The following summarizes the comments received by general topic:

Complex Transformation Opposition – General

- Complex transformation is immoral
- World inhabitants and the environment would be safer if all members of the NNSA were tried before the World Court and incarcerated as war criminals for continuing to plan crimes against humanity
- 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
- The money spent on nuclear weapons is wasted and would be better used for such things as healthcare, education, environmental cleanup, alternative forms of energy, or other social programs
- Restarting U.S. nuclear warhead production and possibly building new weapons as called for by the Energy Department's preferred plan, would risk the lives of the entire human family
- A commentor also stated that the SPEIS needs to consider the following issues:
 - The need for, and proliferation of, nuclear weapons
 - The need for a long term energy policy
 - The need for a nuclear test ban treaty and arms control agreements
 - The credibility and accountability of the DOE
 - The need for safe nuclear waste storage facilities
 - The need to resolve excavation and remediation of existing sites
 - The effect of future nuclear weapon production on cleanup efforts and contamination
 - The location of new high level waste repositories after the WIPP fills up
 - The past lies and failures of DOE to clean up the contamination at

DOE sites

- Whether the Complex should operate
- The unacceptable environmental effects, and the moral, ethical, bio-psychic conduct of participation in designing, building, testing and more nuclear weapons of mass destruction

Need for Nuclear Weapons

- The majority of Americans are against nuclear weapons
- Building and stockpiling nuclear weapons for years to come is of great concern both locally and globally, as are the economic commitments we will have to make for upcoming centuries if we allow Complex Transformation to move forward
- Many former policy makers in the United States, such as George Schultz, William Perry, Colin Powell, Henry Kissinger, and Sam Nunn, recommend that nuclear weapons be abolished
- The United States has too many nuclear weapons, that nuclear weapons are not needed, that modernization of the nuclear weapons complex is not needed, and that the United States should pursue peace
- Nuclear weapons are immoral and will lead to extinction of mankind and destruction of the world.

Opposition Specific to Pantex

- The neighbors of Pantex care about the issues of security, safety, environmental responsibility and integrity, and have lived with what Pantex has done.
- The Pantex neighbors had put up with enough and did not need additional facilities and missions at Pantex.

Response: *NNSA notes these comments. As stated in Chapter 2, of Volume II, of the SPEIS, NNSA maintains the safety, security, and reliability of the U.S. Nuclear weapons stockpile through the Stockpile Stewardship Program. Whether this nation has nuclear weapons or the number and type of weapons in this nation's stockpile are not determined by NNSA, but are determined by the President and the Congress. Our nation's nuclear stockpile has been decreasing over the past several years and is expected to continue to decrease (see also comment-response 1.C). The SPEIS analyzes alternatives to best manage the Stockpile Stewardship program in light of a decreasing stockpile size. NNSA also cares about security, safety, environmental responsibility, and integrity. The proliferation of nuclear weapons are discussed in comment-response 1.J, the Comprehensive Test Ban Treaty is discussed in comment-response 1.E, waste management is discussed in comment-response 14.M, and the cumulative impacts of transformation are discussed in comment-response 14.0.*

16.B NOT USED**16.C OPPOSITION TO SITING AT LLNL**

Commentors expressed opposition to siting Complex Transformation at LLNL.

Response: *NNSA notes these comments.*

16.D – 16.F NOT USED**16.G OPPOSITION TO SITING AT SNL**

Commentors expressed opposition to siting Complex Transformation at SNL.

Response: *NNSA notes these comments.*

16.H OPPOSITION TO SITING AT Y-12

Commentors expressed opposition to siting Complex Transformation at Y-12.

Response: *NNSA notes these comments.*

16.I – 16.Q NOT USED**16.R OPPOSITION TO MOVING FLIGHT TESTING FROM TTR**

Commentors expressed opposition to moving Flight Testing from TTR.

Response: *NNSA notes these comments. NNSA has not made a decision as to the future location of flight test operations. The Preferred Alternative is discussed in Section 3.17 of Volume II of the SPEIS. Once the Complex SPEIS has been completed, the environmental impacts of the various flight test operations alternatives will be evaluated along with other cost, technical and risk analyses prior to reaching a decision as to the future location of flight test operations. This decision, along with other decisions will be announced in a Record of Decision.*

17.0 NOT USED**18.0 STAFFING REDUCTIONS**

Some commentors expressed concern about the economic impacts of staffing reductions throughout the complex.

Response: *As stated in the SPEIS, Complex Transformation is expected to result in a reduction in the number of workers involved in the nuclear weapons*

complex over time. However, in general it is expected that this reduction would occur over a long period of time as missions and facilities are readjusted within the Complex. Most reductions would be able to be accommodated by attrition of the workforce through retirements and other voluntary means. NNSA seeks to avoid involuntary staff reductions (i.e., layoffs) if possible.

18.A SITE SPECIFIC STAFFING

Commentors believe that the NNSA has a set goal of 20 to 30 percent reduction in nuclear weapons work force over the course of ten years. Several commentors expressed concerns about staffing reductions at specific sites, for example:

- Commentors stated that the TTR community is very dependent on and involved with TTR and the current decision making process pertaining to relocation of flight testing operations and expressed concern about the loss of jobs at TTR. Commentors stated that the dependency of the community on TTR makes it more susceptible to the impacts from relocating the flight testing mission as opposed to a larger community with a more diversified economy.
- Commentors stated that the Nye County Board of County Commissioners prefers the alternatives that will add good paying jobs to Nye County.
- Commentor expressed concern about the jobs that would be lost/staff reductions from the potential relocation of NNSA flight testing operations from Tonopah.
- Commentors are concerned about possible staff reductions and associated impacts at all locations.
- Commentors stated that NNSA and its contractors have had a very significant impact on local economy (in all locations) that would be adversely affected by moving the work elsewhere.

Response: *As stated in the SPEIS, Complex Transformation is expected to result in a reduction in the number of workers involved in the nuclear weapons complex over time, including both federal and contractor employees. However, in general it is expected that this reduction would occur over a long period of time as missions and facilities are readjusted within the Complex. Most reductions would be able to be accommodated by attrition of the workforce through retirements and other voluntary means. NNSA seeks to avoid involuntary reductions among its federal and contractor workforce if possible. See also comment-response 6.C for related discussion.*

NNSA has not made decisions on complex transformation. Once the Complex Transformation SPEIS has been completed, the environmental impacts of the

alternatives will be evaluated by NNSA along with other cost, technical and risk analyses prior to its decisions. These decisions will be announced in a Record of Decision. See comment-response 14.I for more discussion of potential socioeconomic impacts.

18.B GENERAL COMMENTS ON PERSONNEL IMPACTS

A commentator stated that the loss of staff and capabilities must be stopped. Several comments focused on personnel impacts that would occur at TTR stating that if NNSA decides to move the Flight Test Operations from TTR employees would have no choice other than to move to find new employers.

Response: *As stated in the SPEIS, Complex Transformation is expected to result in a reduction in the number of workers involved in the nuclear weapons complex over time. However, in general it is expected that this reduction would occur over a long period of time as missions and facilities are readjusted within the Complex. Most reductions would be able to be accommodated by attrition of the workforce through retirements and other voluntary means. NNSA seeks to avoid involuntary reductions among its federal and contractor workforce if possible. See comment-response 6.C for related discussion.*

NNSA has not made a decision as to the future location of flight test operations. Once the Complex SPEIS has been completed, the environmental impacts of the various flight test operations alternatives will be evaluated by NNSA along with other cost, technical and risk analyses prior to its reaching a decision on the future location of flight test operations. This decision, along with other decisions will be announced in a Record of Decision. See comment-response 14.I for more discussion of potential socioeconomic impacts.

18.C ECONOMIC CONCERNS (PERSONNEL)

A number of commentators expressed concern about the economic impacts Complex Transformation would have, including: the loss of jobs due to downsizing at several sites. Several commentators expressed concern related to the economic implication from moving the Flight Test operations out of TTR. Commentors also expressed concern about potential downsizing at LLNL associated with some alternatives of Complex Transformation and noted the negative impact that would have on the local economy and the non-profit social service sector. A commentator stated that a mission change at LANL would not result in a loss of jobs and would be beneficial for the region. Another commentator stated that the region needs LANL to stay funded and active so that economic development can take place within the city and valley in order to mitigate further budget cuts at LANL. Commentors stated that the jobs and welfare of the workers at Y-12 need to be included in any discussion on nuclear weapons.

Response: *As stated in the SPEIS, Complex Transformation is expected to result in a reduction in the number of workers involved in the nuclear weapons complex over time. However, in general it is expected that this reduction would occur over a long period of time as missions and facilities are readjusted within the Complex. Most reductions would be able to be accommodated by attrition of the workforce through retirements and other voluntary means. NNSA seeks to avoid involuntary reductions among its federal and contractor workforce if possible.*

NNSA has not yet made a decision as to the future location of flight test operations. Once the Complex SPEIS has been completed, the environmental impacts of the various flight test operations alternatives would be evaluated by NNSA along with other cost, technical and risk analyses prior to its reaching a decision as to the future location of flight test operations. This decision, along with other decisions will be announced in a Record of Decision. See comment-response 14.I for more discussion of potential socioeconomic impacts.

18.D ECONOMIC ISSUES ROI OR COST-BENEFIT COMMENTS

A commentor stated that more jobs could be created from cleanup operations than from nuclear weapons production operations.

Response: *NNSA notes this comment. Remediation is an ongoing DOE activity that will continue without regard to decisions that might be made on complex transformation.*

18.E ENVIRONMENTAL JUSTICE IN STAFF REDUCTIONS

A commentor was pleased that environmental justice was included in the presentation given at the public hearing.

Response: *NNSA notes this comment.*

19.0 FEDERAL OVERSIGHT

19.A AUTHORIZATION BASIS

A commentor stated that technical approach, project oversight, and management breakdowns are important factors resulting in a lack of funding for cleanup at LANL.

Response: *NNSA notes this comment. Ongoing environmental restoration activities at any of the sites are important but are not within the scope of this SPEIS.*

19.B – 19.D NOT USED

19.E SEISMIC PROTECTION OF PROPOSED FACILITIES

Commentors expressed general concern for the seismic protection of proposed facilities. Some commentors were specifically concerned with the CMRR at LANL and the siting of new facilities at LANL.

Response: *Information related to seismicity at NNSA facilities is in Volume II of the SPEIS in Sections 4.1.6 for LANL, 4.2.6 for LLNL, 4.3.6 for the NTS, 4.4.6 for TTR, 4.5.6 for Pantex, 4.6.6 for SNL/NM, 4.7.6 for White Sands Missile Range (an alternative location for Flight Testing), 4.8.6 for Savannah River Site, and 4.9.6 for Y-12. In addition, please see comment- responses 14.F.1, 14.F.2, and 14.F.4 for more information related to seismicity at existing NNSA facilities.*

All new facilities and building expansions would be designed to withstand the maximum expected earthquake-generated ground acceleration in accordance with DOE Order 420.1B, Facility Safety, and accompanying safety guidelines. Thus, site geologic conditions and reasonably expected natural disasters would not likely have substantial adverse affect on the facilities. The CMRR is required to meet these requirements.

20.0 OUT-OF-SCOPE

A number of comments were received that are outside the scope of Complex Transformation because the comments have no bearing on complex transformation or this SPEIS, including:

- Some commentors believed it was inappropriate for the LANL contractor to hire a public relations firm to help garner public support for LANL's missions.
- Another commentor stated the importance of the Russians and the United States following through with their commitment to dispose of plutonium from dismantled weapons and went on to suggest Russia send their plutonium, in the form of MOX fuel, to France for user in French power generating reactors.
- A commentor stated that it is the people who make decisions and that the DOE program managers should do what is morally right and be the ones to make the decision to not make weapons.
- According to some commentors, adverse psychological impacts related to stigma or "special effects" in fallout accidents cause some to live in a heightened state of anxiety from fear of nuclear hazard
- Commentors felt there was a stigma associated with accidents and an awareness of nuclear testing that causes psychological fear.

Response: *NNSA notes these comments and appreciates the time and effort that was spent making these comments as part of the NEPA process for Complex Transformation. However, because these comments are out of scope, no further response is provided.*