



Summary of Nuclear Watch New Mexico Comments on the Draft CMRR-NF Supplemental Environmental Impact Statement

Overview:

Nuclear Watch New Mexico Comments on the draft *Supplemental Environmental Impact Statement for the Nuclear Facility Portion of the Chemistry and Metallurgy Research Building Replacement Project at Los Alamos National Laboratory (LANL), Los Alamos, New Mexico.*

We appreciate public involvement in the NEPA process. We also support safe, monitored storage of radioactive wastes as a matter of national security and environmental protection. However, these should not be interpreted as support for more nuclear weapons, pit production, nuclear power, or the generation of more nuclear wastes. In our view, the best way to deal with the environmental impacts of nuclear waste is to not produce it to begin with.

We look forward to the agency's withdrawal of this draft for the reasons stated here, and look forward to further comment once NNSA puts out a serious draft without an un-predetermined outcome.

SUMMARY Points:

Our overall recommendation: The hastily prepared draft Supplemental EIS is incomplete, inadequate and should be withdrawn until a more thorough Supplement or a completely new EIS can be prepared.

- Estimated CMRR costs are out of control
- The Nuclear Facility is the keystone to an expanded plutonium pit production complex.
- For ~six billion dollars the amount of jobs the Nuclear Facility creates is pathetic.
- This draft SEIS predetermines the outcome by not offering real alternatives.
- Two of the three alternatives provided in the draft SEIS are false alternatives.
- The Draft SEIS for the CMRR-NF fails to offer and analyze realistic alternatives.
- NNSA must justify why a new Nuclear Facility is needed.
- Current and proposed Life Extension Programs do not justify the Nuclear Facility.
- The appropriate configuration of LANL's AC and MC missions.
- LANL's analytical chemistry mission has already been relocated to PF-4.
- A "Technical Area-55 Capabilities Study" is needed.
- The mission need for the CMRR-Nuclear Facility does not justify exploding costs.
- Does management of a very large construction project fit into LANL's mission?
- A cost-benefit analysis is needed.
- Congressional concerns over CMRR costs.
- New cost information must force a re-evaluation of the alternatives.
- A new formal business case must be executed.

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- Costs of building a plutonium pit complex in a geologically unstable area are too high.
- A new draft SEIS should examine CMRR compliance with DOE Order 413.
- Is NNSA backing away from previously made CMRR-NF safety commitments?
- All DNFSB risk analyses must be considered.
- The Shallow Construction Option is not mature and must not be considered as an alternative until analysis of this option is complete.
- The proposed alternatives must be clarified and added to.
- A new dSEIS is needed that is completely free of predetermination.
- No Action Alternative - All construction and program impacts must be reexamined.
- MDA C, potential release sites and the CMRR-NF.
- dSEIS must analyze the impacts of air quality of the CMRR-NF project on Bandelier.
- Volcanic eruption impacts must be analyzed.
- This dSEIS must be withdrawn and reissued when all known seismic hazards are addressed.
- This dSEIS must be withdrawn and not rereleased until all issues with the seismic modeling software used are addressed.
- This draft dSEIS underestimates and misrepresents seismic hazards.
- Explain why LANL is still the best site for the Nuclear Facility.
- References must be given with sufficient detail that they can be thoroughly checked.
- Reference documents must be correctly cited and publically available at the time of the release of the draft SEIS.
- Tribal notes must be included.
- All impacts of NF construction on the Consent Order must be analyzed.
- Present waste processing and disposal facilities are failing and must be analyzed as connected actions.
- Where will the wastes go?
- Any analysis must include DD&D of the existing CMR Building.
- Update impacts to endangered species.
- Update the status of compliance with all applicable federal, state and local statutes and regulations.
- Intentional destructive acts must be independently evaluated.
- The JASON report on “rare events” in the analysis of intentional destructive acts must be considered.
- All potential impacts from postulated accidents must be analyzed.
- Emissions from the utilities must be reexamined.
- Analysis of the Pajarito Road re-alignment must be included in a new dSEIS.
- This SEIS should be supplemented with annual updates.
- Global climate change and drought.
- A New dSEIS should analyze what effects long-term drought and climate warming might have on CMRR-Nuclear Facility operations.

- How would the Nuclear Facility be secured in the event of an overwhelming wildfire?
- Given the wildfires, is Los Alamos the right location for the Nuclear Facility and expanded nuclear weapons operations?