



### **The Chemistry and Metallurgy Research Replacement Project - Nuclear Facility: Early Construction Should Not Be Allowed Before a Credible Baseline Cost Estimate**

- Because of the Department of Energy's extensive history of chronic cost overruns Congress should not fund construction projects until designs are 90% complete and credible baseline cost estimates are known. A baseline cost estimate for the CMRR-Nuclear Facility is not currently scheduled until FY 2013.
- Advance site preparation should be barred as well. Site prep can be a huge investment onto itself, has immediate environmental impacts, and obviously prejudices the decision to move forward before Congress has the total cost picture.
- In the name of site prep in FY 2012 the Los Alamos National Laboratory plans to build a materials warehouse, an electrical substation, shelter for construction workers, a concrete batch plant (maybe 2), and install construction trailers. This is clearly a substantial investment of taxpayers' money, but even site prep costs are still not yet publicly available.
- The CMRR Nuclear Facility is currently the subject of a supplemental environmental impact statement (SEIS), with a draft expected in late April and a Record of Decision in September.
- NNSA has requested \$300 million in CMRR funding for FY 2012, of which ~\$270 million is allocated as "TBD" [To Be Determined] (is it design? construction?). Under questioning a local NNSA official has admitted that once the Record of Decision is issued LANL plans to immediately proceed into CMRR-NF site preparation.
- Still more site prep is planned for FY 2013 before 90% design is completed. This includes the 125' deep excavation for the facility to allow for a 225,000 cubic yard concrete "base mat" to mitigate seismic concerns, installation of utilities, rerouting an existing road, and building lay-down areas for construction materials storage.
- If allowed, this advanced site prep will snowball the CMRR-Nuclear Facility well before Congress knows its final estimated costs. To put this in context, when first requested in 2004 NNSA told Congress that the CMRR Project's total costs would be \$660 million. Today, informal estimates have total project costs at nearly \$6 billion (see graph below). In the present fiscal climate Congress must exercise greater financial control over NNSA.

#### **Defense Authorization Act Senate Report 111-201 Language Should be Strengthened**

- Existing language: "The committee continues to believe that replacing the existing Chemical and Metallurgical Research facility is essential but that the new Chemical and Metallurgical Research Replacement (CMRR) facility has many unresolved issues including the appropriate size of the facility... The committee is concerned that the phase III project is being divided into multiple sub-projects. Notwithstanding this management approach the committee directs the CMRR baseline to reflect all phases and subprojects for the purposes of the cost and schedule baseline provision and to be accounted for as a single project."
- [http://thomas.loc.gov/cgi-bin/cpquery/4?&sid=TSOPopUwb&refer=&r\\_n=sr201.111&db\\_id=111&item=4&&sid=TSOPopUwb&r\\_n=sr201.111&dbname=cp111&hd\\_count=4&item=4&&sel=TOC\\_881579&](http://thomas.loc.gov/cgi-bin/cpquery/4?&sid=TSOPopUwb&refer=&r_n=sr201.111&db_id=111&item=4&&sid=TSOPopUwb&r_n=sr201.111&dbname=cp111&hd_count=4&item=4&&sel=TOC_881579&)

### **Congress Should Codify the Intent of DOE Order 413.1 into Law**

- Starting construction before 90% design is complete and credible costs estimated is contrary to the intent of DOE Order 413.1. However, DOE orders are not legally binding and are self-regulated with major loopholes. In our view, Congress should put a stop to that.

### **The CMRR-Nuclear Facility is No Mere Replacement**

- The CMRR-NF is primarily needed to expand plutonium pit production capacity at LANL to up to 80 pits per year. But the need for greater than the currently sanctioned level of 20 pits per year has neither been established nor approved, despite repeated federal reviews.
- The taxpayer money that may be imprudently invested into the CMRR-Nuclear Facility would be better put into maintenance and upgrades of existing facilities and programs. Because of its huge size and the Lab's institutional investment, inside sources say that the CMRR-NF is the 900-pound gorilla that is sucking the oxygen out of the room for more important priorities such as critically needed stockpile surveillance and maintenance.

### **The Timing for CMRR-NF Completion Does Not Support the NNSA Stockpile Stewardship Program**

- Originally the CMRR-NF was largely proposed to support plutonium pit production for new-design nuclear weapons, the so-called Reliable Replacement Warheads (RRWs). However, Congress decisively rejected RRWs.
- Current and future "Life Extension Programs" seek to extend the service lives of the W76 and W78 ballistic missile warheads and the B61 bomb. However, these programs are scheduled for completion before the CMRR-NF's projected operational date of 2022.
- The ultimate purpose of the CMRR-NF is not clear. We speculate that it is to preserve the option for production of completely new-design and/or heavily modified plutonium pits. That itself could become a serious national security issue if confidence in stockpile reliability is eroded because of increasingly straying from originally tested design pedigrees.

### **A new "special nuclear materials" (SNM) vault may be all that is really needed**

- LANL built a new vault in the mid-1980's, but screwed it up so bad that SNM was never placed there. The CMRR-NF is being designed with a vault for storing up to 6 metric tons of SNM.
  - The possible need for a SNM vault should be de-linked from the CMRR-NF as a whole. A new vault may be a good thing while providing for enhanced safe and secure storage of already existing SNM inventories. A new vault could perhaps allow for de-inventorying the old and unsafe CMR Building and freeing up floor space in LANL's existing plutonium pit production facility so that the CMRR-Nuclear Facility is not built.
- June 15, 2011*

