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DOE Issues Controversial Decision to Pursue a Plutonium Bomb Plant (PBP) at Savannah River Site (SRS); Inadequate Environmental Review and Lack of Justification for Production of 50 or More “Pits” per Year to Modernize Entire Nuclear Weapons Stockpile Open to Legal Challenge

The U.S. Department of Energy (DOE) today issued a formal decision that it will pursue a massive Plutonium Bomb Plant (PBP) at the DOE’s Savannah River Site (SRS) in South Carolina, in order to produce plutonium “pits,” or cores, for nuclear warheads. The provocative decision, which adds fuel to concerns about a new nuclear arms race with Russia and China, drew immediate opposition from public interest groups near DOE sites in South Carolina, New Mexico and California.

The issuance by DOE’s National Nuclear Security Administration (NNSA) of the [“Record of Decision”](#) (ROD) on the [Environmental Impact Statement](#) (EIS) on pit production at SRS, issued in late September, officially affirms the “preferred alternative” that DOE intends to produce a minimum of 50 plutonium “pits” per year by 2030 at SRS. Also on November 5, NNSA issued an [“Amended Record of Decision”](#) (AROD) to its 2008 nation-wide Complex Transformation Programmatic Environmental Impact Statement that incorporated its SRS pit-production decision. The production of pits at SRS, a totally new and challenging mission for the site, would be in order to produce pits for new-design nuclear warheads and to maintain a massive nuclear weapons stockpile of around 4000 active and reserve warheads as an integral part of the dangerous U.S. policy to prepare for full-scale nuclear war.

Plutonium pits are the fissile cores or “triggers” of modern thermonuclear weapons. The NNSA and Department of Defense jointly announced in 2018 that production would quadruple from its currently authorized limit of 20 pits annually to at least at least 30 pits per year at the Los Alamos National Laboratory (LANL) and at least 50 additional pits per year at the Savannah River Site in South Carolina for a total of 80 or more. At LANL, pit production has been plagued with chronic nuclear safety problems spanning a decade. At SRS, NNSA plans to “repurpose” the partially constructed Mixed Oxide (MOX) Fuel Fabrication Facility at SRS, at a cost of about \$5 billion by 2030. Around \$8 billion was wasted on the mismanaged MOX project before it

failed and was terminated by NNSA in 2018, a sobering example to the public of the risks of a new, complicated plutonium pit-production mission.

In the SRS pit-plant decision, the ROD, released on the morning of November 5, states: “NNSA has decided to implement the Proposed Action to repurpose the MFFF to produce a minimum of 50 war reserve pits per year at SRS and to develop the ability to implement a short-term surge capacity to enable NNSA to meet the requirements of producing pits at a rate of not less than 80 war reserve pits per year beginning during 2030 for the nuclear weapons stockpile. Pit production at SRS would be limited to the analyzed limit in the SRS Pit Production EIS to meet national security requirements.”

[Nuclear Watch New Mexico](#) (Santa Fe, NM), [Tri-Valley Communities Against a Radioactive Environment](#) (Livermore, CA) and [Savannah River Site Watch](#) (Columbia, SC), all members of the [Alliance for Nuclear Accountability](#), vigorously oppose plans to greatly expand pit production at the Los Alamos National Lab in New Mexico and to SRS. The groups have communicated on many occasions to NNSA over the last two years that an overarching Programmatic EIS (PEIS), which would look at pit production issues across the DOE complex, is necessary before expansion of new pit production moves forward. The groups have clearly stated to NNSA that failure to prepare the legally mandated PEIS could result in a lawsuit under the National Environmental Policy Act (NEPA).

Jay Coghlan, Nuclear Watch New Mexico director, commented, “NNSA has chosen to rely upon an outdated 2008 programmatic environmental impact statement to justify expanded plutonium pit production nation-wide. To use NEPA jargon, there are clearly “new information and changed circumstances” which require the agency to take another “hard look” at that national program. The fact alone that NNSA never before considered simultaneous plutonium pit production at two different sites is proof positive of its legal requirement to do so. We strongly advise NNSA to follow that legal requirement.”

Marylia Kelley, executive director at the Livermore-based Tri-Valley CAREs noted, “The ‘driver’ for dramatically expanding pit production is a novel warhead currently under development at the Lawrence Livermore National Laboratory in my community. The W87-1 will be the first U.S. nuclear weapon produced since the end of the Cold War using entirely new or remanufactured components, including new-design pits. Instead of dangerously rushing an untenable production schedule at SRS for a proliferation-provocative new weapon, the next administration should instead engage in a full discussion of the financial, policy and environmental risks of the entire program. Superior alternatives exist to designing new warheads and ramping up pit production to serve them. These alternatives should be pursued in a new Nuclear Posture Review.” The last Nuclear Posture review was released in 2018.

Tom Clements, director SRS Watch in Columbia, SC, said “Pit production at SRS would cause an additional 7.5 metric tons of plutonium to be trucked into the state, which would pose the risk of being stranded here when the ill-conceived pit project falters. While DOE claims that a large amount of plutonium waste coming from pit production would go to the DOE’s Waste Isolation

Pilot Plant in New Mexico, there is no demonstration that there would be capacity for that waste, posing a grave risk that South Carolina could be left holding the plutonium bag. It's clear that the Plutonium Bomb Plant at SRS is being driven by contractors and boosters who stand to profit by making South Carolina ground zero for an unacceptable new nuclear arms race that endangers national security and that places our state at environmental risk.”

[SRS already stores 11.5 metric tons of plutonium](#), stranded at the site when the mismanaged MOX project was terminated. Plans to process and remove this material, as required by law, remain vague. “At a minimum, no more plutonium should come into South Carolina for pits or the plutonium disposition program until all plutonium now stored in the old K-Reactor has been removed,” according to Clements.

In 2021, the Alliance for Nuclear Accountability and arms control groups will work in Congress to remove authorization and eliminate funding for the Plutonium Bomb Plant at SRS.

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Record of Decision (ROD) on the *Final Environmental Impact Statement (EIS) for Plutonium Pit Production at the Savannah River Site (SRS) in South Carolina (DOE/EIS-0541)*, published in the Federal Register on November 5, 2020: <https://www.govinfo.gov/content/pkg/FR-2020-11-05/pdf/2020-24517.pdf>

Amended Record of Decision (AROD) for the *Complex Transformation Supplemental Programmatic Environmental Impact Statement*, Federal Register, November 5, 2020: <https://www.govinfo.gov/content/pkg/FR-2020-11-05/pdf/2020-24516.pdf>

***Final Environmental Impact Statement (EIS) for Plutonium Pit Production at the Savannah River Site (SRS) in South Carolina (DOE/EIS-0541)*, September 25, 2020:** <https://www.energy.gov/nepa/downloads/doeeis-0541-final-environmental-impact-statement>

Federal Register notice on issuance of final EIS, September 30, 2020: <https://www.govinfo.gov/content/pkg/FR-2020-09-30/pdf/2020-21606.pdf>

Submission by lawyers for SRS Watch, Nuclear Watch New Mexico, Tri-Valley CAREs and NRDC for the SRS pit plant EIS record before the ROD was issued, October 23, 2020: <https://srswatch.org/wp-content/uploads/2020/10/Letter-to-NNSA-Regarding-the-Continuing-Need-for-a-Programmatic-EIS-for-Plutonium-Pit-Expansion-Oct-23-2020.pdf>

Alliance for Nuclear Accountability (ANA) “top ten” list of priorities for new administration and new Congress, including on new pit production, November 2, 2020: <https://ananuclear.org/wp-content/uploads/2020/11/ANA-Priorities-for-Nuclear-Weapons-Communities.pdf>