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## **NNSA Proposal to Raise Plutonium Limit Ten-Fold in Los Alamos' Rad Lab Is First Step in Expanded Plutonium Pit Production: Environmental Assessment Is Premature and Deceptive By Omission**

**Santa Fe, NM** – On February 22 the National Nuclear Security Administration (NNSA) released a draft environmental assessment for the Radiological Laboratory Utility and Office Building (AKA “Rad Lab”) at the Los Alamos National Laboratory (LANL). This is pursuant to requirements under the National Environmental Policy Act to provide the public with the opportunity to review and comment on major federal proposals. The comment period closed on April 25.

NNSA’s proposal is to re-categorize the Rad Lab as a Hazard Category-3 nuclear facility so that it can raise ten-fold the amount of plutonium used there from 38.6 grams of plutonium-239 to 400 grams. NNSA claims that the proposal’s only purpose is to maintain materials characterization<sup>1</sup> and analytical chemistry<sup>2</sup> capabilities for plutonium at LANL. This involves transferring those operations out of the old, deteriorating Chemistry and Metallurgy Research (CMR) Building to the Rad Lab and its neighboring plutonium pit production facility, PF-4.<sup>3</sup>

Re-categorizing the Rad Lab as a Hazard Category-3 nuclear facility is just one of four distinct construction subprojects at the Rad Lab and PF-4 that relocate analytical chemistry and materials characterization operations, and together they cost \$2 billion. Even though the draft Rad Lab environmental assessment lists four “reasonably foreseeable actions” that will affect LANL (such as future land transfers), it completely fails to mention expanded plutonium pit production. That omission is absurd (intentional?), since expanded pit production is far more than just foreseeable - - it is statutorily required by the FY 2015 Defense Authorization Act and is being actively planned for.

The independent, congressionally commissioned Defense Nuclear Facilities Safety Board recognizes this, and calls it for what it is. As one of its weekly reports in 2015 states:

**Plutonium Infrastructure Strategy:** Late last month, the Deputy Secretary of Energy approved a restructuring of the subprojects covered under the CMR Replacement project. There are now four subprojects: (1) RLUOB Equipment Installation, Phase 2; (2) Plutonium Facility Equipment Installation, Phase 1; (3) Plutonium Facility Equipment Installation, Phase 2; and (4) Re- categorizing the RLUOB to Hazard Category 3 with a material-at-risk limit of 400 g plutonium- 239 equivalent. **The first two subprojects enable LANL to cease programmatic activities in the CMR by 2019, while the latter two subprojects primarily support the increased capacity required for larger pit manufacturing rates.**<sup>4</sup>

Moreover, budget data in the NNSA's FY 2019 Congressional Budget Request show that the agency will spend \$1 billion on the first two subprojects to move AC and MC operations out of the old CMR Building by 2021 (which slipped from 2019). Then the budget data show that NNSA will spend another billion dollars expanding AC and MC capabilities at the Rad Lab and PF-4 after 2021, when operations in the old CMR Building are slated to cease. This includes transforming the Rad Lab into a Hazard Category-3 nuclear facility after 2021, which raises the question of how can that be for only maintaining AC and MC capabilities as NNSA claims?

To top it off, the draft Rad Lab is grossly premature. It has been widely reported that the NNSA will announce on May 11 where future plutonium pit production will take place, either at LANL, the Savannah River Site, or both.<sup>5</sup> It is absurd that NNSA started the environmental assessment process before that decision, which could render re-categorization of the Rad Lab to a Hazard Category-3 nuclear facility unnecessary to begin with.

More narrowly, some of the Rad Lab environmental assessment's specific deficiencies are:

- It lacks any consideration of toxic beryllium risks, when the FY 2019 NNSA budget says that beryllium analysis will be a new capability at the Rad Lab;
- Contrary to stated Department of Energy National Environmental Policy Act (NEPA) policy, there is no analysis of Intentional Destructive Acts, defined as sabotage or terrorism, including intentional airplane crashes;
- The draft Rad Lab environmental assessment explains away safety and seismic concerns based on "preliminary" analyses. That's not good enough. Safety and seismic concerns should be resolved through completed, peer-reviewed analyses.
- NEPA requires that connected actions must be analyzed together. NNSA should consider the four related subprojects relocating AC and MC capabilities at the Rad Lab and PF-4 together in a broader environmental impact statement.

Finally, if NNSA decides on May 11 to conduct expanded plutonium pit production at the Savannah River Site, or perhaps LANL as well, then a nation-wide programmatic environmental impact statement (PEIS) will be required. In any event, NNSA is required to produce a new or supplemental PEIS to raise the current 20 pits per year cap on pit production that has been in place since 1996. Ironically, future pit production is not to keep the existing nuclear weapons stockpile safe and reliable. Instead, it is for future speculative new-design nuclear weapons called Interoperable Warheads<sup>6</sup> that the Navy doesn't even want.<sup>7</sup> Moreover, future pit production could undermine confidence in nuclear weapons reliability, since exact replicas of existing pits are NOT going to be produced.<sup>8</sup>

Jay Coghlan, Nuclear Watch Director, commented, "NNSA needs to go back to the drawing board to get its plutonium ducks in a row under the National Environmental Policy Act. Following its May 11 decision, NNSA should begin nation-wide review of plutonium pit production, why it's needed, and what it will cost the American taxpayer in financial, safety and environmental risks. These are all things that the public should know."

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[Copying URLs into browsers is recommended.]

NNSA's "Rad Lab" environmental assessment is available at <https://energy.gov/node/2501991>

Nuclear Watch's extended comments on the Draft Rad Lab environmental assessment are available at <https://nukewatch.org/importantdocs/resources/NWNM-Rad-Lab-comments-4-25-18.pdf>

Nuclear Watch's additional comments are available at <https://nukewatch.org/importantdocs/resources/NWNM-Addendum-Rad-Lab-comments-4-27-18.pdf>

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<sup>1</sup> Materials characterization ensures that the plutonium and/or highly enriched uranium are of sufficient “weapons-grade” to begin pit production to begin with.

<sup>2</sup> Analytical chemistry performs up to a hundred quality control samples per pit as it is being produced.

<sup>3</sup> Plutonium pits are the fissile cores of nuclear weapons, currently produced only at Los Alamos National Laboratory (LANL).

<sup>4</sup> *Los Alamos Report for Week Ending December 18, 2015*, DNFSB, emphasis added, [https://www.dnfsb.gov/sites/default/files/document/8898/wr\\_20151218\\_65.pdf](https://www.dnfsb.gov/sites/default/files/document/8898/wr_20151218_65.pdf)

<sup>5</sup> See, for example, *Energy Secretary Rick Perry promises more triggers for nuclear weapons*, Paul Sonne, The Washington Post, March 22, 2018, [https://www.washingtonpost.com/world/national-security/the-us-military-wants-more-plutonium-triggers-for-nuclear-warheads/2018/03/22/b5d1516c-2d58-11e8-911f-ca7f68bff0fc\\_story.html](https://www.washingtonpost.com/world/national-security/the-us-military-wants-more-plutonium-triggers-for-nuclear-warheads/2018/03/22/b5d1516c-2d58-11e8-911f-ca7f68bff0fc_story.html)

<sup>6</sup> The Interoperable Warhead is supposed to be “interoperable” between the Air Force’s land-based ICBMs and the Navy’s sub-launched ballistic missiles. At best they would have a common nuclear explosives package, as they can never be truly interoperable. Most of all, the Interoperable Warhead appears to be a gigantic make-work project by the nuclear weapons labs, particularly Lawrence Livermore.

<sup>7</sup> See 2012 Navy memo demonstrating its lack of support for the Interoperable Warhead at <https://www.nukewatch.org/importantdocs/resources/Navy-Memo-W87W88>.

<sup>8</sup> There are four references to “W87-like” pits in the FY 2019 NNSA Congressional Budget Request, beginning at page 70. The fact that these won’t be exact replicas of an existing pit type could be of supreme importance. Should these “W87-like” pits be significantly different from the tested, true pedigree, there could be a loss of confidence in their reliability because they cannot be full-scale tested. Or alternatively, that could prompt the U.S. to return to full-scale testing with potentially grave international proliferation consequences.