



June 5, 2023

SNL/NM SWEIS Comments
National Nuclear Security Administration Sandia Field Office
PO Box 5400
Albuquerque, New Mexico 87185

By email to: SNL-SWEIS@nnsa.doe.gov

Re: Comments on the needed scope of the Site-Wide Environmental Impact Statement for Continued Operation of Sandia National Laboratories/New Mexico (DOE/EIS-0556)

Dear SNL/NM SWEIS document managers,

Nuclear Watch New Mexico (NWNM) respectfully submits these comments on the needed scope of the *Site-Wide Environmental Impact Statement for Continued Operation of Sandia National Laboratories/New Mexico (DOE/EIS-0556)* (hereinafter “Sandia SWEIS”). We would appreciate their serious consideration by the National Nuclear Security Administration (NNSA) and look forward to the agency’s comprehensive response.

*Our mission statement: Through comprehensive research, public education and effective citizen action, **Nuclear Watch New Mexico** seeks to promote safety and environmental protection at regional nuclear facilities; mission diversification away from nuclear weapons programs; greater accountability and cleanup in the nation-wide nuclear weapons complex; and consistent U.S. leadership toward a world free of nuclear weapons.*

We work on contemporaneous budget, environmental and policy issues concerning nuclear weapons facilities. We have publicly and vocally pressed the National Nuclear Security Administration (NNSA) to diversify its missions away from nuclear weapons programs and move more toward critically needed programs, such as nonproliferation efforts, other new national security priorities (for example, port security), and pure science and energy efficiency programs. Through detailed budget analyses, we hope to demonstrate that Sandia National Laboratory (SNL) can move towards these real national security issues and still contribute to the economy of New Mexico.

The U.S. is flirting with the initiation of another nuclear arms race, the first since the end of the Cold War. The Department of Energy’s plan is to rebuild the nuclear weapons complex for continuing nuclear warhead production throughout the 21st century, including new designs. The National Environmental Policy Act (NEPA) requires a hard look at reasonable alternatives to preferred federal proposals. The SNL SWEIS process, as currently framed, offers a false choice between varying degrees of increased nuclear weapons production.

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, this should not be interpreted as support for more nuclear weapons, plutonium 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.

General Comments

An unconscionable amount of taxpayer money is typically expended for nuclear weapons research and production at SNL. Please analyze the impacts of diverting these funds away from cleanup, renewable energy, and nonproliferation programs to directly support production of nuclear weapons.

The Sandia SWEIS Must Be Completely Free of Predetermination

This process must be completely unprejudiced by the fact that hundreds of millions of dollars are spent on nuclear weapons research and production at SNL.

Purpose And Need Must Be Thoroughly Addressed

Please explain the impact of scoping comments from the public.

The Proposed Alternatives Must Be Clarified and Added To

The Annular Core Research Reactor Must Be a Particular Focus of this SWEIS

All Impacts of All Construction Must Be Analyzed

Environmental Justice – Both Economic and Ethnicity Analyses Are Needed

DOE must address the following questions:

How many jobs will be created for local residents? How long will these jobs last?

Will people be brought in from outside of the area to work at these facilities?

If so, what positions will they fill?

How many construction workers will be needed, by year?

- Where do the economic benefits end up?
- Please analyze the socioeconomic effects for all surrounding New Mexico counties, including limited housing and an induced rising cost of living.
- How much of every dollar spent for construction would actually stay in New Mexico?
- What is the impact of housing construction workers in local communities?
- What are the risks of increased transport of materials to and from the site?

Analyses Must Protect Those Most at Risk

Many federal standards for protection of human health, such as limits on how much residual radiation will be allowed in contaminated soil, are based on "Reference Man." He is defined as a hypothetical adult Caucasian male who is 20 to 30 years old, 154 pounds in weight, five feet seven inches tall, and is "Western European or North American in habitat and custom." He does not represent other humans, including women, children, and embryos/fetuses, that are more sensitive to the harmful effects of radioactive, toxic, and hazardous materials. All analyses must address the risk to a pregnant woman farmer, her fetus, and her other children under age 18, rather than "Reference Man." As a matter of reproductive and environmental justice, the most potentially vulnerable human beings must be protected.

Environmental Monitoring and Reporting Requirements Must Be Met

Waste Processing and Disposal Facilities Must be Analyzed as Connected Actions

DOE must analyze impacts to all other facilities that are required to support nuclear weapons research and production at SNL. Uncertainties surround the current support facilities. DOE must fully analyze all alternatives.

Analysis of Climate Change Impacts Required – “Just-Do-It”

The DOE NEPA Lessons Learned Quarterly for June 2009 states, “Given the advances in climate science, extensive litigation, and potential regulation, there is little doubt that DOE will need to analyze the reasonably foreseeable effects of greenhouse gas (GHG) emissions in its NEPA documents.” On February 18, 2010, the Council on Environmental Quality released draft guidance to the public for comment about how “Federal agencies can improve their consideration of the effects of GHG emissions and climate change in their evaluation of proposals for Federal actions under the NEPA.” While the guidance is being developed, the Office of NEPA Policy and Compliance recommends taking a “just-do-it” approach to considering GHGs in NEPA analyses. DOE should do so in this SWEIS process.

Analysis Must Include the Decontamination, Decommissioning and Demolition (DD&D)

DD&D activities must become part of the complete NEPA analysis as a “connected action.”

Operations will likely involve the DD&D of many existing contaminated facilities. Inevitably, radioactive and hazardous wastes will be shipped and dumped in a number of sites across the country.

- Please include the environmental impacts of the DD&D of all possible buildings.
- Please consider the alternative of storing all waste on-site.
- For all of the alternatives, the SWEIS must describe the volumes and types of nuclear and hazardous waste, how and 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 DD&D of existing facilities, the cost of designing, constructing, operating, decontaminating, and decommissioning all the facilities in must be fully analyzed and the costs described in the draft SPEIS.
- Please describe the health and environmental impacts of the existing complex as well as the proposed new complex.

Update Impacts to Endangered Species

Please analyze any potential impacts to endangered flora and fauna.

All DNFSB Risk Analyses Must Be Considered

All Defense Nuclear Facilities Safety Board (DNFSB) reports and recommendations should be incorporated into the new SEIS. DNFSB monitors the SNL’s nuclear operations. The Board has made a number of critiques and suggestions over the years that should be incorporated into the new SWEIS to improve future operational safety. The effects of SNL not following DNFSB recommendations in a timely fashion should be considered. We also ask that DOE recalculate the

accident scenarios and consequences to address the concerns and comments expressed by the DNFSB.

Cumulative Impacts from Past, Present and Reasonably Foreseeable Actions

NEPA requires DOE to address the cumulative impacts on the 50-mile radii surrounding DOE facilities and missions. DOE must be specific about potential impacts to water, air and soil, environmental justice, transportation, economics (including tourism), emergency preparedness, and waste generation.

Update the Status of Compliance with All Applicable Federal, State and Local Statutes and Regulations

Include all international agreements, and required Federal and State environmental permits, consultations, and notifications.

Promptly Place All SWEIS Related Documents Online

At the request of the public, DOE has posted documents specifically related to the NEPA processes online. These websites facilitate better public participation and comments. DOE has an excellent recent history concerning NEPA action websites, and this practice must be made consistent across all DOE sites.

Please Make All Reference Documents Available to the Public on the DOE Website As Soon As Possible

In order for the public to make meaningful and informed comments on the draft SWEIS, all reference documents must be available when the comment period on the draft begins. In our experience, the cited reference documents form the baseline foundation for all DOE NEPA processes, but yet the Department is often negligent in making those reference documents available in a conveniently accessible and modern fashion.

Intentional Destructive Acts Must Be Evaluated

What will the potential impacts be from an accident or terrorist attack at SNL? What emergency response services are going to be available should this happen? What will be the impacts of an accident or attack during transportation? What emergency response services are going to be available should this happen? Any and all possible terrorist attacks must be considered. Specifically state the weights, velocities, and general parameters used in each analysis. An unclassified summary of these impacts must be included in the SWEIS.

All Potential Impacts from Postulated Accidents Must be Analyzed

Please describe postulated accidents in detail.

Emissions From the Utilities Must Be Reexamined

The environmental impacts of new facilities must be analyzed. Will additional electric power lines be required?

All Potential Impacts on Public Health Must Be Analyzed

Exposure to hazardous materials under routine operations must be included.

All Impacts on Surface and Groundwater Must Be Analyzed

Please describe all unavoidable adverse environmental impacts. Describe any proposed mitigation.

Describe all construction impacts.
Describe the storm water pollution prevention.

All Impacts on Air Quality Must Be Analyzed

Please include global climate change and noise.
Describe all unavoidable adverse environmental impacts.
Describe any proposed mitigation.
Describe all construction impacts.

All Impacts on Geology and Soil Must Be Analyzed

Please describe all unavoidable adverse environmental impacts.
Describe any proposed mitigation.
Describe all construction impacts.

Potential Impacts on Land-Use Plans Must Be Analyzed

Include policies and controls, and visual resources. Please describe all future land use plans.

Thank you in advance for your consideration of these scoping comments. Again, we look forward to the NNSA's comprehensive response.

Respectfully,

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