

The National Environmental Policy Act and the SRS Plutonium Bomb Plant

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June 14, 2019

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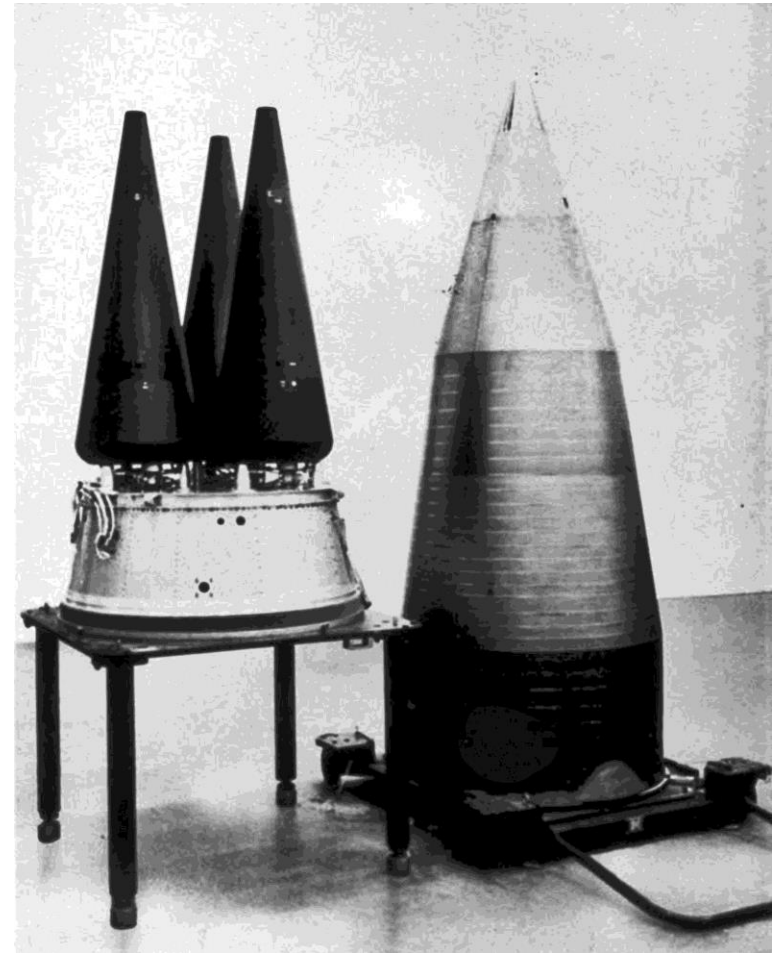
LANL Central Mission

Central Mission of Los Alamos National Laboratory



\$1.7 Trillion “Modernization”

- New ICBMs, Heavy Stealth Bombers, Cruise Missiles, Submarines
- Rebuilt Nuclear Warheads with New Military Capabilities
- Perpetual Cycle of “Life Extension Programs”



Deterrence?

Post-2010 Nuclear Posture Review:

“The new guidance requires the United States to maintain significant counterforce capabilities against potential adversaries. The new guidance does not rely on a “counter-value’ or “minimum deterrence” strategy.”

Report on Nuclear Implementation Strategy of the United States, Specified in Section 491 of 10. U.S.C. , Department of Defense, June 2013, page 4 (quotation marks in the original), <http://www.globalsecurity.org/wmd/library/policy/dod/us-nuclear-employment-strategy.pdf>

That is why we have thousands of weapons for nuclear warfighting rather than the few hundred needed for deterrence-only. In turn that is why we have expanded plutonium pit production.

National Environmental Policy Act requires opportunity for public comment

- SRS environmental impact statement is good, but programmatic EIS (PEIS) is required:
 - To raise production from 20 pits per year to 80+.
 - Because a second site is now involved.
- 1998 Natural Resource Defense Council court order requires supplemental PEIS when DOE considers more than 50 pits per year at Los Alamos Lab (or 80 under multiple work shifts).

<https://law.justia.com/cases/federal/district-courts/FSupp2/20/45/2423390/>

NEPA requires looking at purpose and need

- Why is FY 2015 Defense Authorization Act requirement for 80 pits per year “...driven by the requirement to hedge against technical and geopolitical risk and not solely by the needs of life extension programs”?
- Up to 20,000 existing pits at the Pantex Plant.
- 2006 independent study concluded pits last at least a century.
- New pits were for recently canceled “Interoperable Warhead.”
- “...required capacity must happen even if the W87-1 program must, for some unplanned reason, deploy with a reused pit. If that were to be the case, then the pit manufacturing campaign would provide new pits for the LEP or replacement program that follows the W87-1.” <https://nukewatch.org/newsite/wp-content/uploads/2019/03/W78-Replacement-Program-Cost-Estimates-IHE-1.pdf>
- New “W87-like” pits, raising reliability & testing issues.

NEPA requires analysis of environmental and safety impacts

- Heavy contamination from pit production at both the Rocky Flats Plant and Los Alamos Lab.
- Incomplete cleanup at Rocky Flats. DOE plans to “cap and cover” rad & toxic wastes at LANL.
- Pit production will inevitably add to contamination, radioactive wastes and plutonium inventory at SRS.
- Chronic, unresolved safety problems at both Rocky Flats and LANL. How safe is SRS?

Costs of expanded pit production

- SRS alternative estimated at \$27.8 billion over 30 years.
 - Cost of repurposing problem-plagued MOX Fuel Fabrication Facility?
- Los Alamos cost is \$14.8 billion, or \$42.6 billion combined.
https://nukewatch.org/newsite/wp-content/uploads/2019/03/FINAL-Pu-Pit-Production-EA-Results-05.14.18_Unclassified.pdf
- Estimated 1,807 pit production jobs at SRS.
https://nukewatch.org/newsite/wp-content/uploads/2019/03/Pu-Pit-Engineering-Assessment-Report-Rev-2_20-April-2018.pdf, p. 3-7. Existing SRS work force is ~11,000, net addition not available.
- Military spending has lowest beneficial economic multiplier (generally around 1.3) How many more jobs would be produced through comprehensive cleanup, cyber security or renewable energy research?

The NEPA process

- “Scoping” hearing for SRS EIS, June 27, 2019 (5:00 p.m.–9:00 p.m. EST) at the North Augusta Community Center, 495 Brookside Ave, North Augusta, SC 29841. Submit oral scoping comments and/or in writing to NEPA-SRS@srs.gov
- Draft EIS, date TBD. Submit comments!
- Final EIS followed by Record of Decision.
- Programmatic environmental impact statement?

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