

## **Plutonium Pit Production Programmatic EIS “Scoping” Comments**

Pursuant to the National Environmental Policy Act, Nuclear Watch NM, Savannah River Site Watch and Tri-Valley CAREs successfully sued the National Nuclear Security Administration (NNSA) over its failure to complete a required nationwide “programmatic environmental impact statement” (PEIS) for its most costly program ever, the expanded production of plutonium “pit” bomb cores.

To meet its enforced legal obligation, the NNSA is holding these virtual “scoping” hearings:

**Tuesday, May 27, 2025: 5:00-7:30 pm EST**

**Meeting Link:** <https://bit.ly/PuPEISMtg1>

**Phone:** (571) 429-4592 **Phone ID:** 808 821 801#

**Wednesday, May 28, 2025: 7:00 pm-9:30 pm EST**

**Meeting Link:** <https://bit.ly/PuPEISMtg2>

**Phone:** (571) 429-4592 **Phone ID:** 989 289 432#

“Scoping” is to determine the scope or range of issues that should be examined in the PEIS. NNSA seeks to narrowly confine the scope, for example declaring expanded plutonium pit production at the Los Alamos National Lab (LANL) in New Mexico as part of the so-called “No Action Alternative.” NNSA also plans on simultaneous production at the Savannah River Site (SRS) in South Carolina.

### **Suggested talking points for scoping comments:**

- As per the 1970 NonProliferation Treaty (NPT) the official policy of the U.S. government is to pursue nuclear disarmament. How does expanded plutonium pit production comport with that?
- The PEIS’ time horizon is 50 years, in effect nuclear weapons forever. There should be a genuine No Action Alternative of diminishing nuclear weapons programs in alignment with the NPT.
- What is the need for expanded plutonium pit production to begin with? No future production is to maintain the safety and reliability of the existing nuclear weapons stockpile. Instead, all pit production is for new design nuclear weapons. Will this help fuel a new nuclear arms race?
- Could new design nuclear weapons with new pits prompt the U.S. to resume testing?
- In 2006 independent experts concluded that pits have reliable lifetimes of more than a century (their average age now is ~42). Expanded pit production should not proceed until another independent pit life study has been completed.
- The U.S. already has more than 15,000 plutonium pits in storage. The reuse of existing pits should be thoroughly analyzed as a viable alternative to the manufacturing of new pits.
- Pit production at SRS is increasingly over budget and further delayed. As a result, will pit production be increased at LANL? How will this impact the Lab’s poor nuclear safety record?
- NNSA assumes that the Waste Isolation Pilot Plant (WIPP) will be prioritized for disposal of pit production radioactive wastes. In contrast, the New Mexico state permit requires prioritization of LANL cleanup wastes and that DOE start looking for a new out-of-state dump. In addition, WIPP is already oversubscribed for all the radioactive wastes that the Department of Energy wants to send to it. NNSA needs to fully analyze and project plutonium pit waste disposal for the next 50 years.
- NNSA has no credible cost estimates for expanded plutonium pit production. Why?
- The Trump Administration is suppressing environmental justice and climate change issues. I demand full discussion of these issues as they relate to pit production in this PEIS.

These suggested scoping comments are available at <https://nukewatch.org/pit-scoping-comments>  
For more please visit [www.nukewatch.org](http://www.nukewatch.org)