



Workshop on Plutonium 'Pit' Programmatic EIS

May 22, 2025

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Nuclear Watch New Mexico

In collaboration with Savannah River Site Watch, Tri-Valley CAREs
and the Union of Concerned Scientists

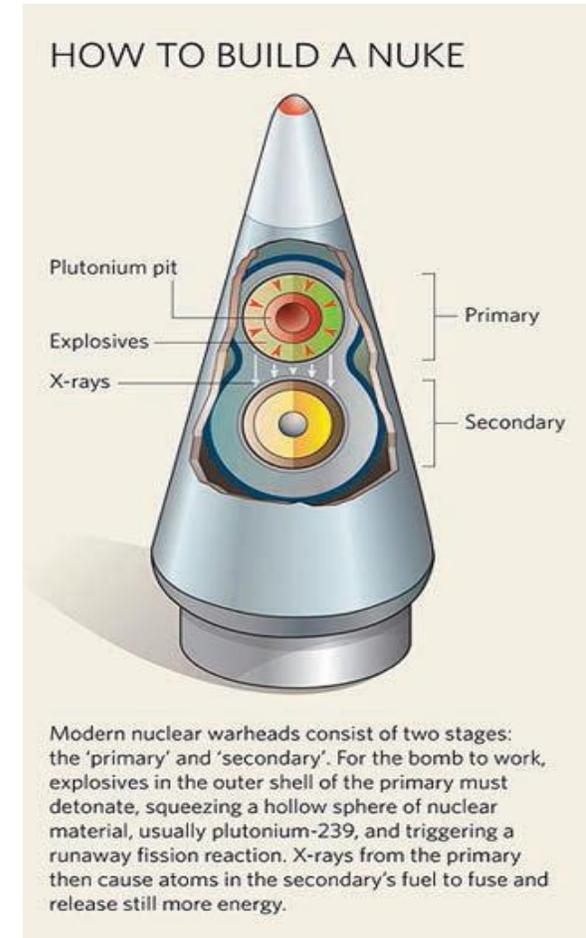
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What is a Plutonium Pit?

- A plutonium pit destroyed Nagasaki 80 years ago.
- A 1989 FBI raid stopped industrial-scale pit production at the Rocky Flats Plant near Denver.
- The National Nuclear Security Administration's plan: >30 pits per year at the Los Alamos Lab in NM and >50 pits per year at the Savannah River Site in SC.
- But why? Pits last at least a century and the U.S. already has at least 15,000 existing pits.
- Future plutonium pit production is NOT to maintain the existing stockpile. **Planned new pits are for new-design nuclear weapons for the new arms race.**



Credit: *Nature*

How We Got Here

The Department of Energy is a chronic NEPA Offender

- The National Environmental Policy Act (NEPA) requires a “hard look” at major federal proposals and opportunity for public comment.
- In 1990 the Natural Resources Defense Council successfully sued for programmatic environmental impact statements on the needed post-Cold War nuclear weapons complex and cleanup.
- DOE ignored that court order until 1996 when forced to agree to a “Stockpile Stewardship & Management PEIS.”
- However, DOE has never completed a PEIS on the cleanup of the U.S. nuclear weapons complex, the most expensive environmental restoration program in human history.

Why Are We Here Now?

- First, there is a **\$2 trillion “modernization” program to keep nuclear weapons forever**, for which expanded pit production is the key choke point .
- The NNSA failed in 4 previous NEPA processes to increase pit production. Its conclusion? Don't do NEPA.
- Nuclear Watch New Mexico, Savannah River Site Watch and Tri-Valley CAREs wrote to NNSA five times demanding a PEIS. We got no answer.
- In June 2021 the South Carolina Environmental Law Project filed lawsuit.
- In September 2024 a federal judge ruled that **NNSA had violated NEPA**.
- Our settlement mandated a PEIS that begins with public “scoping” hearings to determine the range of issues that NNSA should address.
- After NNSA publishes its draft PEIS there will be in-person hearings in Livermore, CA; Santa Fe, NM; Kansas City, MO; Aiken, SC; and Wash DC.

Why bother commenting?

- NEPA produces valuable information and increases government accountability and transparency.
- It can result in tangible benefits for the public and the government.
- NEPA processes create a legal administrative record and have led to important litigation, going all the way back to 1990.
- NEPA itself is under assault by Trump. Use it or lose it!
- There is no other legally required opportunity that enables the public to comment on the “modernization” program to keep nuclear weapons forever.
- Therefore, let’s transform this Pit Production PEIS into a public referendum on the new nuclear arms race!

“Deterrence” itself is the threat

Central Mission of Los Alamos National Laboratory



Los Alamos
NATIONAL LABORATORY
EST. 1943
Operated by Los Alamos National Security, LLC for NNSA

UNCLASSIFIED

NNSA

- The overarching rationale for the \$2 trillion nuclear weapons modernization program and pit production is “deterrence.”
- The U.S. government’s official policy is to “pursue negotiations in good faith” leading to nuclear disarmament, as per the 1970 NonProliferation Treaty. That good faith has never happened.
- **The Pentagon has always rejected minimal deterrence** while “reiterating the need to maintain counterforce capabilities... not rely[ing] on a counter-value or minimum-deterrence approach...”
Report on the Nuclear Employment Strategy of the United States, DoD, November 2024
- **Nuclear warfighting is why we have 1,000s of warheads and an aggressive plan to keep nuclear weapons forever.**

There is a long history of accidents and miscalculations (e.g., Cuban Missile Crisis and 1983 “Man Who Saved the World”). What happens when artificial intelligence sidelines human judgment?
This so-called “deterrence,” constantly promoted as deterring threats, is itself the threat!

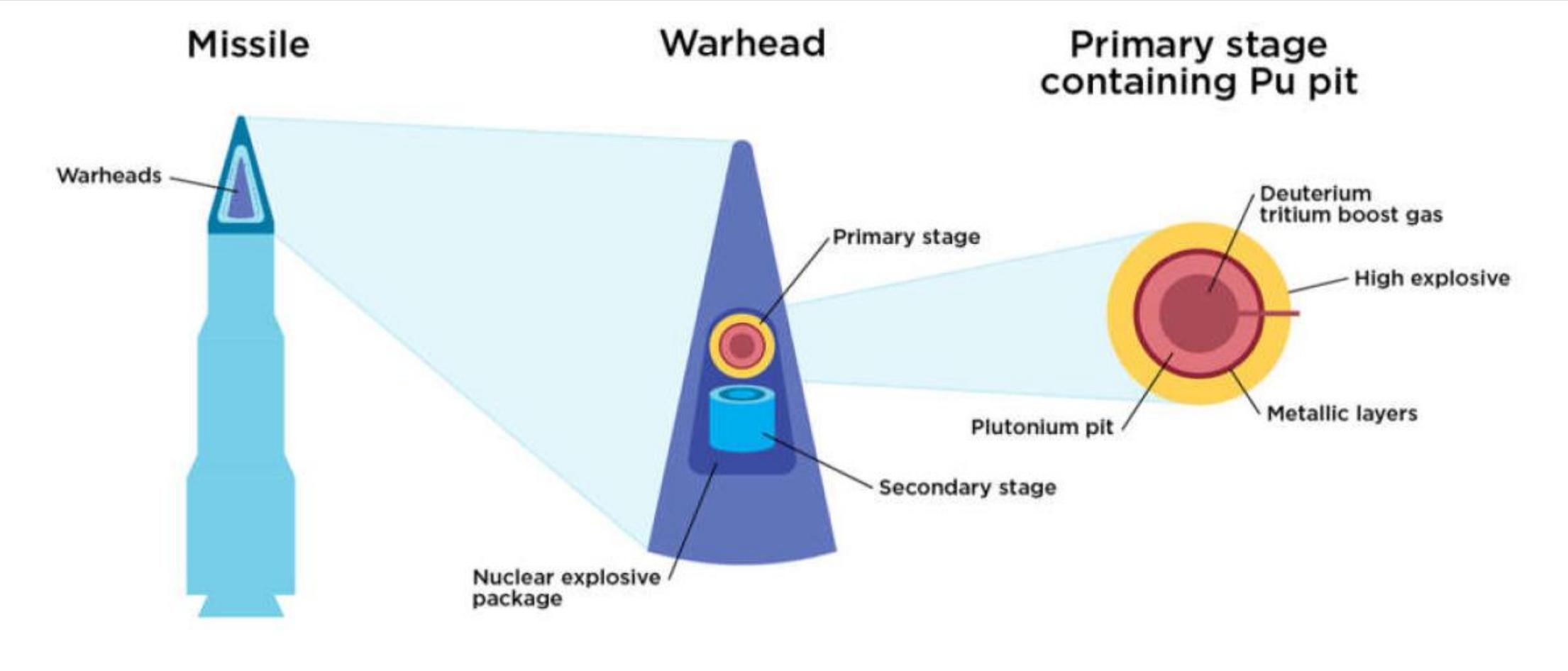
An aerial photograph of the Los Alamos National Laboratory campus at sunset. The sky is a mix of orange, pink, and purple. The foreground is filled with green pine trees. The middle ground shows various laboratory buildings, including a prominent multi-story building with a glass facade. The background features rolling hills and mountains under the colorful sky.

{ Technical Background – Why the need for a Programmatic EIS?

Dr. Dylan Spaulding
Senior Scientist, Global Security Program

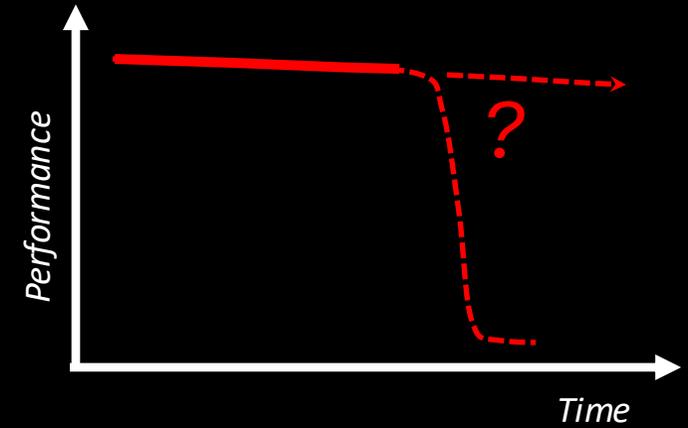
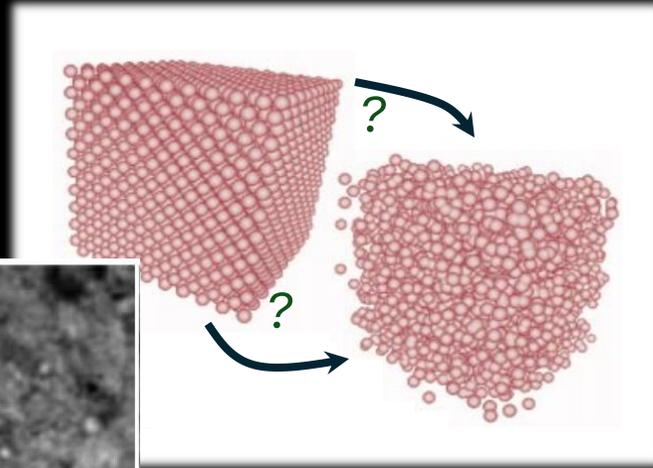
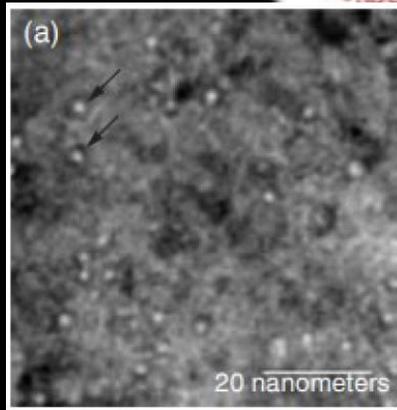
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Plutonium Pits are the cores of thermonuclear weapons



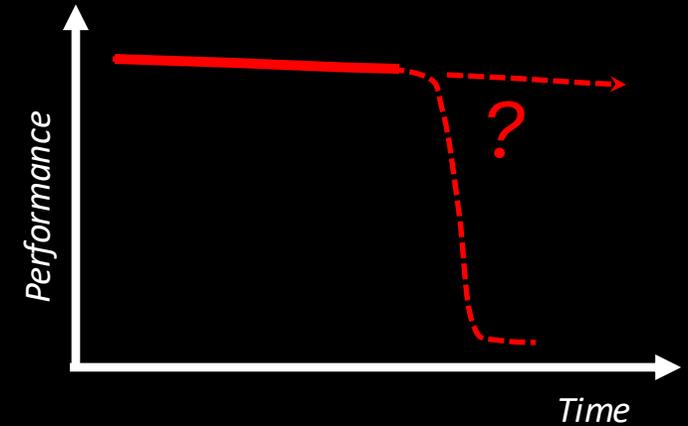
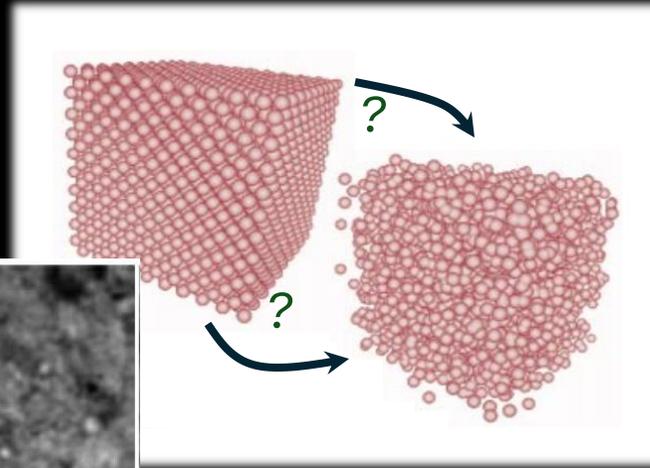
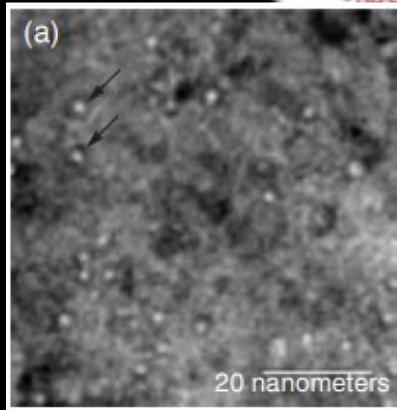
Plutonium Aging as Motivation for New Production?

Does change accumulate smoothly with time or is there run-away degradation?



Plutonium Aging as Motivation for New Production?

Does change accumulate smoothly with time or is there run-away degradation?



Plutonium aging is often cited as the driving force requiring production of all new pits but the national labs have shown no evidence that plutonium is a life-limiting component in nuclear weapons. UCS analysis supports this conclusion.

“Restoring the ability to produce plutonium pits for primaries will guard against the uncertainties of plutonium aging in today’s stockpile and will allow new pit designs to be manufactured, *if necessary for future weapons.*” [emphasis added]

DOE/EIS-0552, 1-7

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DOE/EIS-0552, 1-7

New pits from Los Alamos are, in fact, ONLY for *unnecessary* new weapons, not to take care of the stockpile we have.

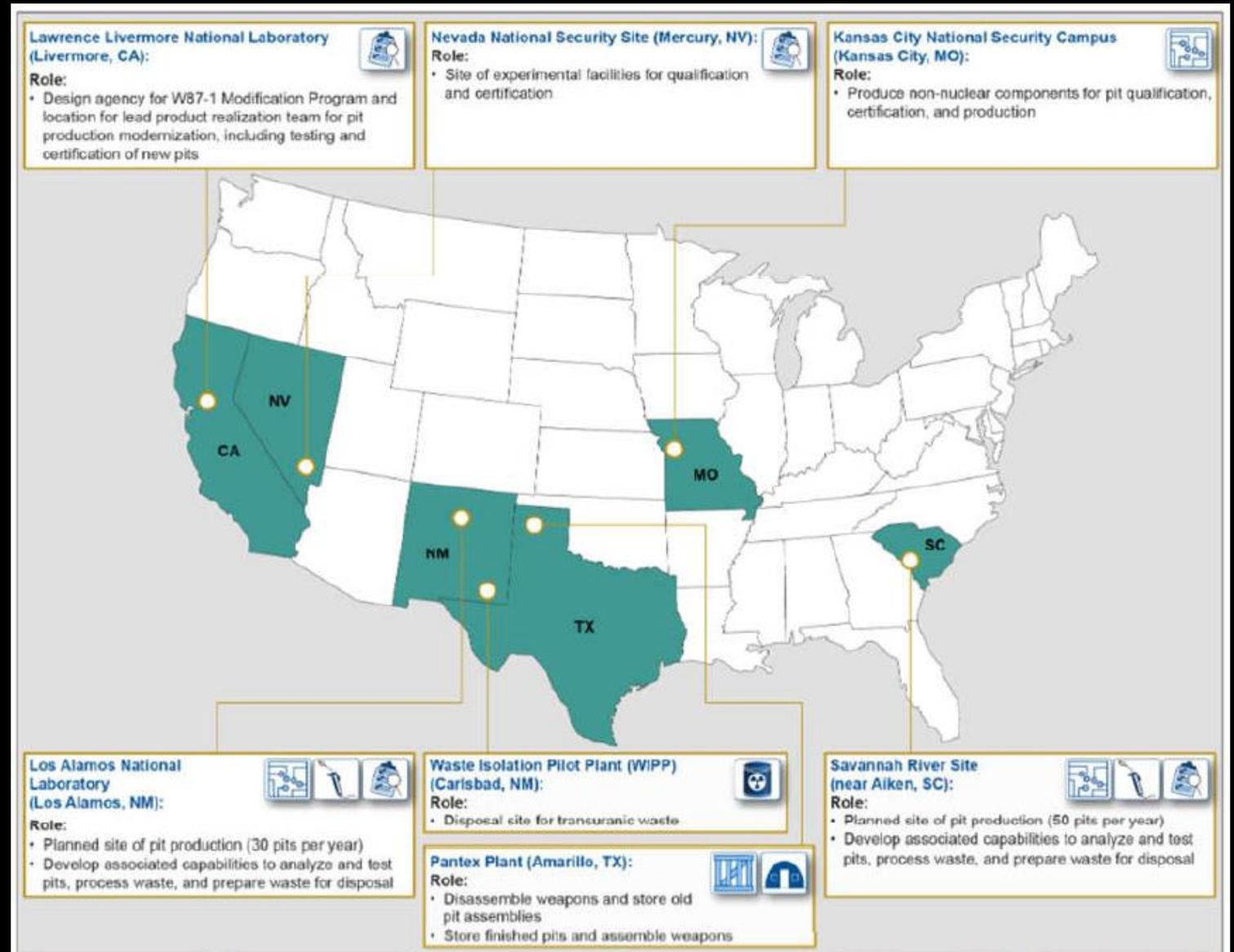


COLUMBIA CLASS SUB OVER BUDGET, LATE



Why Programmatic and not site-specific?

Work is “connected, cumulative, or similar” across multiple sites or facilities



Why Programmatic and not site-specific?

All of these steps require multi-site coordination:

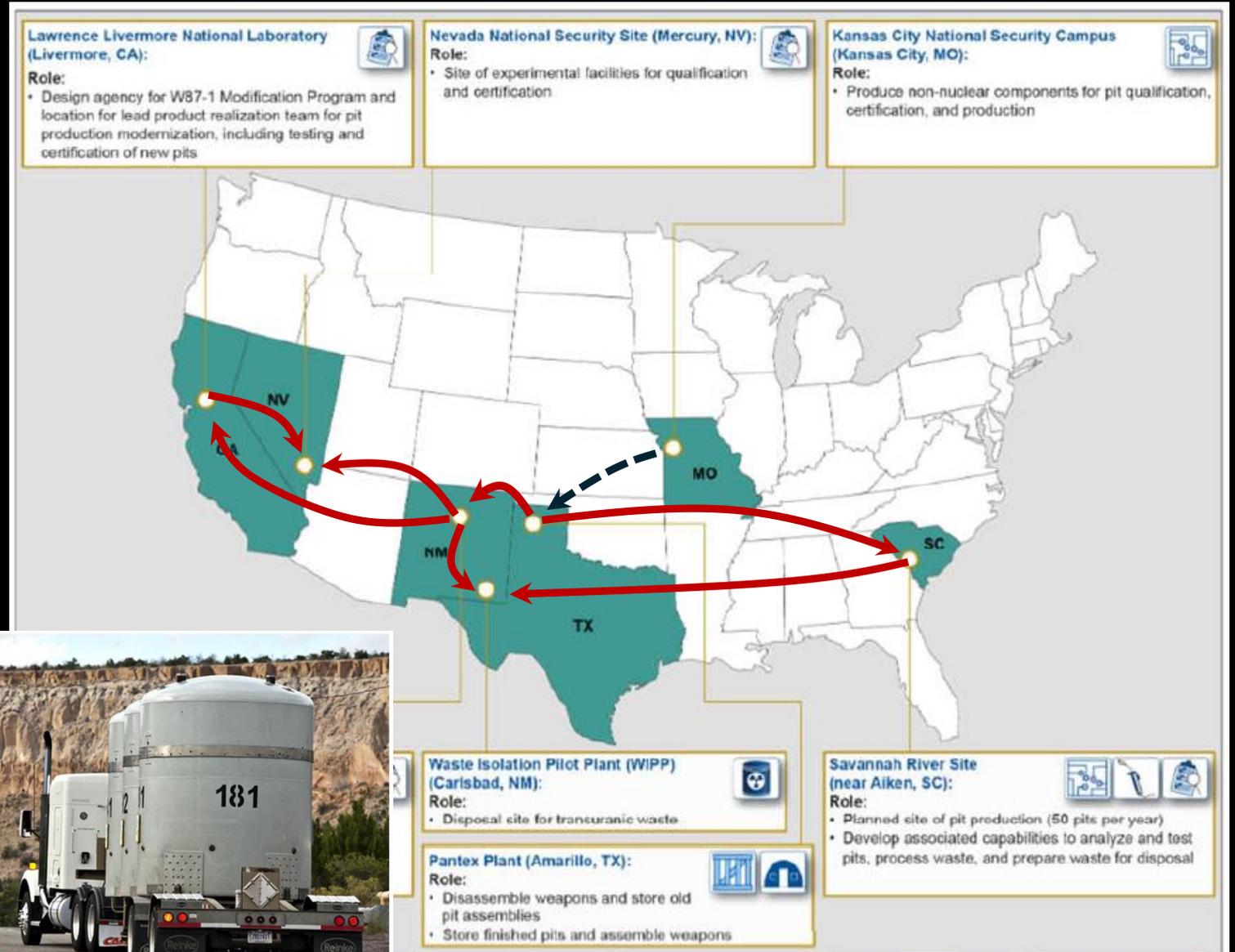
Material Processing

Waste Management

Qualification

Assembly

Transportation



Technical Concerns for PEIS Comments

The PEIS should demonstrate the viability of NNSA's long-term plans for waste management and storage, including contingencies.

The PEIS should address the engineering and safety controls being installed at Los Alamos and Savannah River to protect the public and the environment from worst-case accidents and potential release of hazardous material.

Administrative and engineering controls for worker safety and material handling should be explicitly outlined according to best-practices

Transportation risks, routes, and frequency of shipments should be transparently communicated for affected communities

Measures to address and remediate existing legacy waste at each site should be addressed with proposed timelines and methods.

**New UCS Report Appearing Next Week,
Wednesday, May 28th**

Plutonium Pit Production

*The Risks and Costs of US Plans to Build New
Nuclear Weapons*

www.ucs.org/resources/plutonium-pit-production

NNSA's PEIS on Plutonium Pit Production National in Scope Legal Significance of Comments

May 22, 2025

Scott Yundt
Executive Director
Tri-Valley CAREs



SINCE 1983

Tri-Valley CAREs

Communities Against a Radioactive Environment

Working for Peace, Justice and a Healthy Environment

www.trivalleycares.org

National Scope of PEIS

The National Environmental Policy Act (NEPA) requires agencies, when determining the scope of their review, to **include connected actions**.

The proposed action for new plutonium pit production involves numerous sites in the NNSA nuclear weapons complex in addition to the two proposed production sites, Los Alamos National Laboratory and Savannah River Site, including:

- **Lawrence Livermore National Laboratory- LLNL (CA)**
- **The Kansas City National Security Campus - KCNSC (MO)**
- **Pantex Plant (TX)**
- **Waste Isolation Pilot Plant - WIPP (NM)**



Pit Production Support Work- LLNL

LLNL is an NNSA nuclear weapons research and design lab located ~50 east of San Francisco.

- Lead design lab for the new W87-1 warhead for the Sentinel ICBM program. W87-1's will require new plutonium pits, designed by LLNL, the first of which was “diamond stamped” in November 2024 at LANL. Production of W87-1 pits will take ~ 10+ years.
- Budget for “**Enterprise Pit Production Support**” is **\$97.35m**.
- Recently announced its plan for “**Enhanced Plutonium Utilization**” to increase plutonium throughput, increase the amount of plutonium allowed at work stations, increase security, and generate more radioactive wastes. NEPA scoping concluded in March 2025.



Pit Production Support Work- KCNSC

KCNSC is primarily responsible for producing and procuring the non-nuclear components for nuclear weapons and is located roughly 5 miles from downtown Kansas City, Missouri.

- KCNSC will manufacture and procure all of the non-nuclear components necessary for the new plutonium pits, such as mechanical, electronic, and engineered materials.
- Plutonium Pit Production will heavily increase the shipments of components between KCNSC and LANL and, eventually, KCNSC and SRS.



managed by **Honeywell FM&T**

Nuclear Weapon Assembly - Pantex Plant

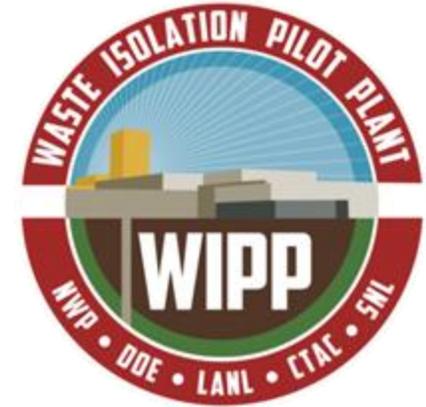
Pantex Plant is where all nuclear weapons are assembled and disassembled, as well as where ~10,000 existing plutonium pits are stored. It is located approximately 30 miles east of Amarillo in the Texas Panhandle

- Newly produced plutonium pits will be shipped to Pantex Plant from wherever they are produced.
- Pantex Plant is where the new nuclear warheads or bombs will be assembled for which the new plutonium pits are the primary.
- New weapons assembly work takes precedence over the disassembly of retired weapons.



Increased Transuranic Waste to WIPP

WIPP is located approximately 30 miles east of Amarillo in the Texas Panhandle. The facility is built 2,150 feet underground in a salt formation, making it the nation's only licensed repository of defense-related transuranic (TRU) waste.



- WIPP is licenced only to accept legacy waste from nuclear weapons complex sites.
- Plutonium pit production will result in new TRU waste generation.
- The Government Accountability Office estimates “that TRU waste from reestablishing a plutonium pit production capability represents about 68 percent of DOE’s total amount bound for WIPP beyond 2033”



PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT



Suggested Talking Points –

**This PEIS covers a period of 50 years.
Is this nuclear weapons forever?**

The Notice of Intent states, “The No-Action Alternative will be based on NNSA’s prior decision to produce 30 pits per year at LANL with surge efforts to produce up to 80 pits per year.” The NNSA has rigged the PEIS by calling this a “No Action Alternative” when it in fact describes **expanded nuclear weapons programs.**

- **A Reduced Operations Alternative must be included.
We must call for a true range of alternatives.**



PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Suggested Talking Points –

The Non-Proliferation Treaty

- The PEIS must be consistent with and support the U.S.'s obligations under the Treaty on the Non-Proliferation of Nuclear Weapons (NPT).
 - This **requires** that it have a reduced operations alternative instead of **expanding nuclear weapons programs**.
 - The final PEIS should comport not only with the NPT's mandate to **disarm nuclear stockpiles**, but also with the essential **need for the U.S. to lead by example** toward ridding the world of weapons of mass destruction.



PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Suggested Talking Points –



New Plutonium Pit Production is Unnecessary

- While publicly stated rationales for the program often emphasize a need to replace aging pits, the national laboratories have offered no evidence that the nation's existing pits are anywhere near the end of their service lives. Nor is the plutonium in those pits currently at risk of age-related failure that would reduce the safety, security, or reliability of present warhead designs.

Pit Re-Use Must be Considered

- **Planned future pit production is only for new-design nuclear weapons.** The PEIS must consider the strategy of foregoing new designs and new pit production for them while relying on non-intrusive pit requalification, or pit "reuse," to maintaining the existing, extensively tested stockpile as needed.
- This is what the PEIS should consider as a credible alternative to expanding plutonium pit production.

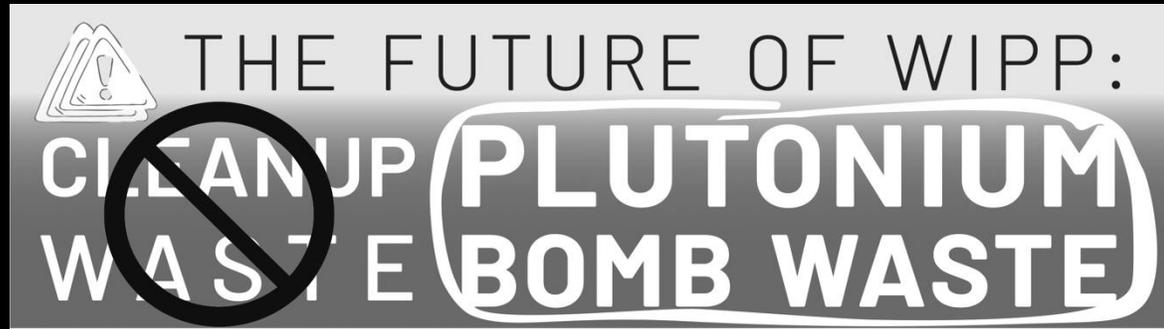


PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Suggested Talking Points –

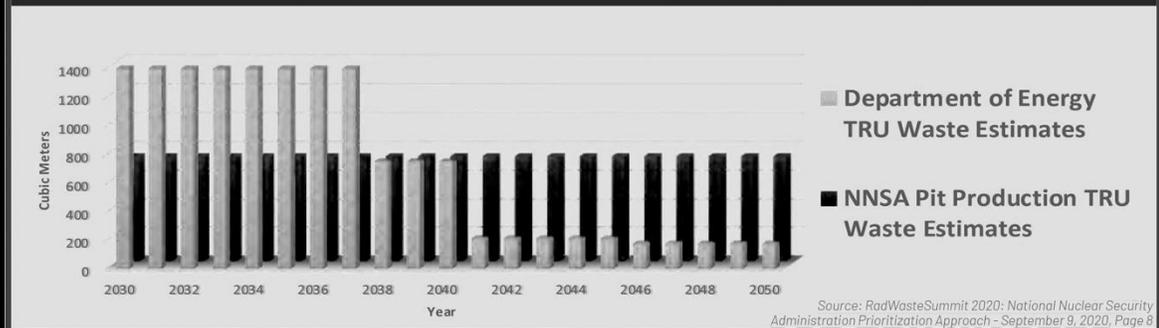
The Waste Isolation Pilot Plant

The only repository for transuranic (TRU) wastes is the Waste Isolation Pilot Plant (WIPP) in southern New Mexico. WIPP is already way oversubscribed for all of the possible TRU wastes that the Department of Energy and NNSA would like to send to it. *It is not clear where future TRU wastes from plutonium pit production will go in the long term.*



U.S. DEPARTMENT OF ENERGY 20 Year TRU Waste Projections NNSA National Nuclear Security Administration

DOE/NNSA TRU Waste 20 Year Projections (2030-2050)



Source: RadWasteSummit 2020: National Nuclear Security Administration Prioritization Approach - September 9, 2020, Page 8



PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Suggested Talking Points –



The Waste Isolation Pilot Plant

- **NNSA cannot assume WIPP will be available for radioactive waste disposal for the next 50 years.**
- The new New Mexico state permit requires prioritization of **Los Alamos Lab's legacy waste** - *not* new pit production waste. In addition, it requires that DOE start looking for another out-of-state radioactive waste dump (which will be politically controversial).
- New waste from pit production will require a permanent solution for safe disposition. It is not clear that the Waste Isolation Pilot Plant (WIPP) in NM, currently the nation's **ONLY** nuclear waste repository, can handle the long-term waste stream, nor that the state of NM will allow it for decades to come. **Solutions for handling and responsibly disposing of hazardous waste from pit production must be considered as part of any credible PEIS.** WIPP faces its own challenges and problematic safety history.



PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Suggested Talking Points –



- This PEIS is required because a court ruled that the NNSA failed to properly adhere to NEPA guidelines in considering the cumulative impacts of one of their biggest projects ever. Through this process, **they must be held accountable for ensuring the safety and well-being of communities and workers who may be affected by plutonium pit production.**
- Plutonium pit production involves multiple sites across the nation and includes the transportation and disposal of hazardous and radioactive materials. **The cumulative impacts from new facilities, transportation, and generation of waste must be considered for the anticipated lifespan of the project, which may be many decades.**



PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Suggested Talking Points –



There are risks to the environment and communities.

- **Rushing to meet an arbitrary, unnecessary deadline heightens the risks for the workforce recruited to carry out complex, hazardous plutonium processing.** LANL's plutonium facility has a troubling record of recent safety violations, worker exposure to plutonium, and fires and floods. The program there appears to have prioritized expediency and cost-savings over safety. This endangers the workforce and the local community—as well as the program itself should a significant accident occur.



How to Provide Comments

We encourage you to formally comment on the PEIS!

How to Submit Oral Comments

The NNSA will hold two virtual hearings where ORAL comments can be submitted. If you are interested in attending or speaking, we are available to help you prepare, please email Katherine at kyelle@ucs.org for more information.

Tuesday, May 27, 2025	Wednesday, May 28, 2025
5:00-7:30 p.m. ET	7:00-9:30 ET
https://bit.ly/PuPEISMtg1	https://bit.ly/PuPEISMtg2
Dial in by Phone: (571) 429-4592	Dial in by Phone: (571) 429-4592
Phone conference ID: 808 821 801#	Phone conference ID: 989 289 432#

You can also submit written comments on the scope of the PEIS:

Email to: PitPEIS@nnsa.doe.gov by July 14, 2025

Put in email subject line: “2025-08140 (90 FR 19706) Programmatic Environmental Impact Statement for Plutonium Pit Production Scoping Public Comment.”