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Mr. John Tegtmeier
CMRR-NF SEIS Document Manager
Los Alamos Site Office
3747 West Jemez Road
TA-3 Building 1410
Los Alamos, New Mexico, 87544

Dear Mr. Tegtmeier:

The possible construction of a CMRR building in Los Alamos costing $4.5 billion comes at a time when the United States is calling others to join us in planning a nuclear-weapons-free world and at a time when government finances are so precarious that the basic needs of the people in health, welfare and education are not being met. This is becoming a lost generation, hanging paralyzed between opposing ideas of the future.

The need for this Supplemental EIS is obvious, since the concept and perhaps the mission of the new building have changed since the completion of the EIS in 2003. Below are outlined specific areas of concern that relate to 1) justice, 2) an 8-fold increase in the production of plutonium triggers? 3A-C) several serious questions about the continually-delayed cleanup commitment, and, perhaps the question most requiring attention, 4) standards to insulate the proposed building from seismic effects, which is also a partial guarantee of safety for the surrounding communities.

1) Environmental Justice – Both Economic and Ethnicity Analysis Needed
Los Alamos County is the third richest county in the U.S.A. It is surrounded by some of the poorest and most ethnically diverse counties in the country. Therefore, shipping waste to anywhere else is an inherent environmental justice issue. 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?

2) Existing Nuclear Facility is Working – Justification for New NF Is Needed
In 2003, the direction forward for the nuclear weapons complex was uncertain. Since then many things have changed, including a Presidential vision for a nuclear weapons free world. Manufacturing of the plutonium triggers at LANL has been on-going since that time, with a production rate of less than ten plutonium pits per year. DOE must justify why a $4.5 billion new NF is needed.

3A) Cleanup Must Be the Priority – Not a New Nuclear Facility
DOE made a commitment to clean up the legacy waste sites at LANL when it signed the Compliance Order on Consent with the New Mexico Environment Department on March 1, 2005. The Order requires cleanup of certain sites by December 31, 2015, including the dump in Area G at Technical Area 54. Construction activities for a new NF will interfere with cleanup activities, including those at the nearby Material Disposal Area C (MDA C), a waste dump that was used before Area G.

- DOE proposes to realign Pajarito Road in order to accommodate the new NF, which could interfere with possible excavation of MDA C; and
- Building a concrete batch plant further down the Pajarito Road for NF construction could interfere with both the possible excavation and realignment of the road.

3B) Cleanup of the Existing Mess Must Be the Priority – Not a New Nuclear Facility
DOE made a commitment to cleanup the legacy waste sites at LANL when it signed the Compliance Order on Consent with the New Mexico Environment Department on March 1, 2005. The Order requires cleanup of certain sites by December 31, 2015, including the dump in Area G at Technical Area 54. Construction activities for a new NF will interfere with cleanup activities, including those at the nearby Material Disposal Area C (MDA C), a waste dump that was used before Area G.

- DOE proposes to realign Pajarito Road in order to accommodate the new NF, which could interfere with possible excavation of MDA C; and
- Building a concrete batch plant further down the Pajarito Road for NF construction could interfere with both the possible excavation and realignment of the road.

3C) Any Analysis Must Include the Decontamination, Decommissioning and Demolition (DD&D) of the Existing CMR Building
The 2004 Record of Decision (ROD) for the CMRR Project stated the existing CMR building would be DD&D in its entirety. However, the actual

implementation of these decisions is dependent on DOE funding levels and allocations of the DOE budget across competing priorities, including construction of a new NF.

At the time it was built, the existing CMR was the largest building in New Mexico at 550,000 square feet. The 2004 ROD stated DOE would submit a work plan; but it does not specify to whom the work plan would be submitted. DOE must provide its DD&D work plan as part of its NEPA analysis. We must review the plan now in order to ensure that the DD&D activities will become part of the complete NEPA analysis.

4) The Costs of Trying to Build a Plutonium Pit Factory in a Geologically Unstable Area Are Just Too High

LANL is located between a rift valley (the Rio Grande in that area) and an extinct volcano (the Jemez Mountains) in a seismic fault zone (the Pajarito Plateau). An updated seismic hazards analysis was published in May 2007. It showed a potential huge increase in seismic ground motion and activity. In all likelihood, most of the over $3 billion in cost estimate increases since 2008 (see graph above) are due to effort to address the increased seismic hazards. DOE must analyze whether $3 billion is too high of a premium in order to build a new NF.

To address these increased seismic hazards, DOE now plans to excavate 225,000 cubic yards of earth under the proposed NF and fill the hole with concrete. DOE must address the following questions: Is surrounding geology strong enough to support all that concrete? Has construction of a NF ever before been done on such an enormous concrete slab? If so, what were the results? Will a seismic event cause it to sink or shift? This SEIS is analyzing the effects of this action, and this SEIS should also examine the effects of removing it.

Thank you for reading. I look forward to seeing these concerns addressed in the SEIS that began collecting comments on October 1.

Sincerely,

Basia Miller

Basia Miller, Ph.D.
Board Member
Concerned Citizens for Nuclear Safety