

## **COMMENT RESPONSE DOCUMENT, CHAPTER 2: COMMENT DOCUMENTS**

This chapter is a compilation of all the documents that the National Nuclear Security Administration (NNSA) received on the *Draft Site-Wide Environmental Impact Statement for the Y-12 National Security Complex* during the public comment period. The documents are presented alphabetically by commentor's last name. On each document the first number represents the comment number within that document and the second number represents the issue summary code assigned to this comment. This number can be used to locate the summary and response relating to this comment. Section 1.3 describes the organization of the Comment Response Document (CRD) and discusses the tables provided in Chapter 1 to assist readers in tracking their comments to the respective comment summary and response. Comments that were received on the Wetland Assessment of the haul road extension are also contained in this CRD.

**Akins, Darrell**

**Page 1 of 1**

**WD065**

**From:** Darrell Akins [DAkins@akinscrisp.com]  
**Sent:** Friday, January 08, 2010 2:34 PM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** SWEIS Comment

Ms. Pam Gorman  
Y-12 SWEIS Document Manager  
800 Oak Ridge Turnpike  
Suite A-500  
Oak Ridge, TN 37830

Dear Ms. Gorman:

1|7.0 |As a resident and business owner in Oak Ridge, I support Alternative 4, Capability-Sized UPF Alternative, at the Y-12  
2|12.P |National Security Complex, and the construction of the Complex Command Center. Additionally, I support the IFDP effort  
as a critical component to the overall future success of Y-12. Y-12's mission is critical to the security of our country and  
these projects are vital to Y-12. Thank you.

Darrell Akins, Chairman & Partner  
AkinsCrisp Public Strategies  
173 Mitchell Rd.  
Oak Ridge, Tennessee 37830

Home address:  
102 Crest Pointe Lane  
Oak Ridge, Tennessee 37830

**Akuthota, Nithin**

**Page 1 of 4**

**WD101**

**From:** Nithin Akuthota [nithin@eteba.org]  
**Sent:** Friday, January 29, 2010 1:58 PM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** Y-12 SWEIS Public Comments - ETEBA  
**Attachments:** ETEBA Y-12 SWEIS Written Comments.pdf; ETEBA Y-12 SWEIS Written Comments

**Importance:** High

1|7.0 |Please review the attached comments from ETEBA in support of NNSA's preferred alternative for the  
modernization of the Y-12 National Security Complex. Please contact us with any questions.

Nithin

Nithin Akuthota  
Executive Director  
Energy, Technology and Environmental  
Business Association (ETEBA)  
(P) 202.360.9210  
(F) 202.747.5731  
[nithin@eteba.org](mailto:nithin@eteba.org)

Akuthota, Nithin

Page 2 of 4

**WD101**



January 28, 2010

Ms. Pam Gorman  
Y-12 SWEIS  
Document Manager  
800 Oak Ridge Turnpike  
Suite A500  
Oak Ridge, TN 37830

**RE: Draft Site-Wide Environmental Impact Statement for the Y-12 National Security Complex (SWEIS)**

Thank you for the opportunity to comment on the Draft Site-Wide Environmental Impact Statement (SWEIS) for the Y-12 National Security Complex. The Energy, Technology & Environmental Business Association (ETEBA) is a 501c(6) nonprofit trade association, which has been active in Oak Ridge for over twenty years. ETEBA is comprised of more than 200 businesses that provide services to the Department of Energy (DOE) and the National Nuclear Security Administration (NNSA). According to a 2007 economic impact study conducted by Dr. Matt Murray, ETEBA companies generated over 16,000 jobs in Tennessee (including the effect of multipliers) and a total income of \$1.3 billion.

Over the years, ETEBA has participated in numerous NEPA proceedings and community workshops involving Oak Ridge's federal facilities. As many ETEBA companies currently work or have done work at Y-12, our organization is well-positioned to provide comments on the proposed Draft SWEIS currently before us today. This document is an important document in the Y-12 decision-making framework. It constitutes the most recent and comprehensive summary of the purpose and need for future missions at Y-12 and the related environmental and regulatory considerations associated with the proposed actions.

1|7.0 (cont) For the record, ETEBA would like to state its support of the "Capability-Sized UPF Alternative", which is the NNSA's preferred alternative. However, ETEBA and its member companies stand ready to implement whichever alternative is decided upon in the final record of decision, and would encourage maximum subcontracting opportunities during implementation.

2|13.b We would also like to take this opportunity to make the following points for the record: (1) the continued operation of Y-12 is critical to the national security of the United States; (2) Y-12 must be modernized to ensure a safe, secure, and reliable stockpile of nuclear weapons; and (3) the Integrated Facilities Disposition Project is key to Y-12 modernization and must be fully incorporated into the ROD

1

Akuthota, Nithin

Page 3 of 4

**WD101**

**(1) The continued operation of Y-12 is critical to the national security of the United States;**

The continued operation of Y-12 is critical to DOE NNSA's Stockpile Stewardship Program and to preventing the spread and use of nuclear weapons worldwide. Y-12 is key to the national interest in maintaining a safe, secure, and reliable stockpile of weapons in the most effective and efficient manner.

Specifically, the construction of the uranium Processing Facility (UPF) is the integral component to the modernization of the Y-12 complex. UPF, as described in the preferred "capability-sized" alternative, would achieve the following:

- Consolidate all enriched uranium production operations from 8 old large facilities;
- Achieve lean, agile, affordable manufacturing;
- Eliminate safety and environmental risks of old facilities and infrastructure;
- Apply advanced technology for safety, security, quality, and efficiency;
- Achieve cost effective compliance with Graded Security Protection Policy requirements;
- Enable reduction of the high security area by 90%, from 150 acres to 15 acres; and
- Reduce annual operating cost by \$205M/Yr

2|3.b (cont) Construction of the UPF will replace decrepit old facilities that are environmental and worker safety risks. It would also support NNSA's Supplemental Programmatic Environmental Impact Statement (SPEIS), which designated Y-12 Site as the Uranium Center of Excellence. The Highly Enriched Uranium Materials Facility (HEUMF), which has been constructed and is operational, will support UPF operations.

2|3.b (cont) UPF at Y-12 would also ensure Quality Assurance needed to continually assess our stockpile through surveillance measures. It will also provide uranium feedstock to Naval Reactors, for which Y-12 is the only source. Moreover, it will preserve the nation's capability to produce nuclear weapons again if needed. Finally, the capability-sized UPF supports continued dismantlement of nuclear weapons components, which is essential to complying with arms-control agreements and reducing the backlog of materials in storage. Several retired weapon systems are planned for dismantlement during the next five years.

**(2) Y-12 must be modernized to ensure a safe, secure, and reliable stockpile of nuclear weapons; and**

Continued operation of Y-12 is made more difficult because most of the facilities at Y-12 are old, oversized, and inefficient. Over time, nearly all Y-12 facilities will need to be replaced with structures designed for their intended present-day use. According to the SWEIS, modernizing this old, over-sized, and inefficient infrastructure is a key strategic goal of DOE NNSA and is consistent with strategic planning initiatives and prior programmatic NEPA documents.

!

#

Akuthota, Nithin

Page 4 of 4

WD101

**(3) The Integrated Facilities Disposition Project is key to Y-12 modernization efforts and must be fully incorporated into the ROD**

The IFDP estimates that over the next 15-25 years, 3.9 million square feet of contaminated floor space will become excess as a result of NNSA Modernization and the relocation of NE and SC facility activities to ORNL. Under the IFDP, the D&D of approximately 188 facilities at ORNL, 112 facilities at Y-12, and remediation of soil and groundwater contamination would occur over the next 30 to 40 years.

3|12.P According to the SWEIS, benefits of the IFDP include reduced risk to workers and the public from potential exposure hazardous and radioactive materials; and the reduction of surveillance and maintenance costs for obsolete, inactive facilities. On June 21, 2007 a Critical Decision (CD)-0 was approved. Approval of the CD-1 package is expected in early 2009.

D&D, as envisioned by the IFDP, is a vital piece to the Y-12 modernization efforts because it:

- Eliminates excessive S&M costs & ES&H liabilities and risks to the workforce
- Improves effectiveness and efficiency of site, soil, and groundwater remediation
- Improves plant security buffer. Stops the legacy mercury source (e.g. Alpha 4 & 5)

ETEBA believes that Y-12 cleanup and footprint reduction should be more fully integrated into the final SWEIS and subsequent Record of Decision.

**Conclusion**

ETEBA supports the capability-sized UPF alternative and believes that (1) the continued operation of Y-12 is critical to the national security of the United States; (2) Y-12 must be modernized to ensure a safe, secure, and reliable stockpile of nuclear weapons; and (3) the Integrated Facilities Disposition Project is key to Y-12 modernization and must be fully incorporated into the ROD. We look forward to maintaining an active dialogue with NNSA on items of mutual interest with respect to the site-wide environmental evaluation for the Y-12 National Security Complex, and would be pleased to answer any questions the agency has on our comments.

Sincerely,  


Nithin Akuthota  
Executive Director

Anderson, Dave

Page 1 of 1

OR1D05



Draft Y-12 Site-wide  
Environmental Impact Statement—  
U.S. Department of Energy  
National Nuclear Security Administration



**Written Comment Form**

Must be received on or before January 29, 2010.

1|13.0 I SUPPORT THE Y12 SWEIS BEING ADOPTED PROPOSED. IN TODAY'S WORLD WE NEED A STRONG DEFENSE AND THE INFRASTRUCTURE TO SUPPORT IT. THE CURRENT FACILITIES Y12 WERE BUILT DURING COLD WAR AND MAKE THE EFFORT TO BE MODERN FACILITY WITH UPDATED MANUFACTURING EQUIPMENT AND ASSOCIATED IMPROVEMENTS WORKER SAFETY. IMPROVEMENTS IN WORKER SAFETY AND PUBLIC SAFETY ARE AS IMPORTANT AS DEVELOPING MODERN FACILITY

2|3.B I COMMEND NNSA AND CONGRESS IN SUPPORTING IMPROVEMENTS AT Y12 SITE AND BUILDING UPF \$600

DAVE ANDERSON  
(Dave Anderson)

Please use other side if more space is needed.

Comment forms may be mailed to:  
Ms. Pam Gorman  
Y-12 SWEIS Document Manager  
800 Oak Ridge Turnpike, Suite A-500  
Oak Ridge, TN 37830

Comment forms may be faxed to:  
(865) 483-2014  
or sent by email to:  
y12sweis.comments@tetrattech.com

You may also submit comments through the project website which can be found at:  
<http://www.Y12sweis.com>

Angelo, Peter

Anonymous, Anonymous

Page 1 of 1

Page 1 of 1

MD040



Draft Y-12 Site-wide  
Environmental Impact Statement—  
U.S. Department of Energy  
National Nuclear Security Administration



NNSA  
National Nuclear Security Administration

**Written Comment Form**  
*Must be received on or before January 29, 2010.*

The United States has relied on an effective nuclear deterrent since the end of World War II. Associated with this reliance, there has been a stockpile of uranium that remains a national asset. As the stockpile serves the greater goal, so should handling, process and manufacture of products associated with this material safely and securely. A Uranium Processing Facility, modernized and fully compliant to existing federal requirements is required for the next hundred years. Uranium products produced in the current suite of facilities are vulnerable to passing regulatory burden, and providing little assurance programs and commitments will continue effectively in a changing world.

The proposed new Uranium Processing Facility consolidates many diverse uranium processing and manufacturing operations to complement the recently constructed HEUWF. The UPF-HEUWF tandem provides for effective management of all operations involving uranium safely and securely.

It is a moral imperative to leave as a legacy to future generations over the ~~next~~ <sup>this</sup> century, the effective means to handle, process, and store uranium. The effective processing capability, fully compliant to federal regulation and requirements can only be demonstrated by a new, integrated and modernized UPF. The logical location is at the Y-12 National Security Complex.

Sincerely, *Peter Angelo*  
Dr. Peter Angelo  
Oak Ridge TN

Please use other side if more space is needed.

Comment forms may be mailed to:  
Ms. Pam Gorman  
Y-12 SWEIS Document Manager  
800 Oak Ridge Turnpike, Suite A-500  
Oak Ridge, TN 37830

Comment forms may be faxed to:  
(865) 483-2014  
or sent by email to:  
y12sweis.comments@tetrattech.com

You may also submit comments through the project website which can be found at:  
<http://www.Y12sweis.com>

MD041



Draft Y-12 Site-wide  
Environmental Impact Statement—  
U.S. Department of Energy  
National Nuclear Security Administration



NNSA  
National Nuclear Security Administration

**Written Comment Form**  
*Must be received on or before January 29, 2010.*

BUILD IT  
The OLD ONE IS  
IN ROTTEN SHAPE

Please use other side if more space is needed.

Comment forms may be mailed to:  
Ms. Pam Gorman  
Y-12 SWEIS Document Manager  
800 Oak Ridge Turnpike, Suite A-500  
Oak Ridge, TN 37830

Comment forms may be faxed to:  
(865) 483-2014  
or sent by email to:  
y12sweis.comments@tetrattech.com

You may also submit comments through the project website which can be found at:  
<http://www.Y12sweis.com>





Anonymous, Anonymous

Page 1 of 1

MD051



Draft Y-12 Site-wide  
Environmental Impact Statement—  
U.S. Department of Energy  
National Nuclear Security Administration



NNSA  
National Nuclear Security Administration

**Written Comment Form**  
*Must be received on or before January 29, 2010.*

113.0 We have the technology here we need to  
keep it here

---

Please use other side if more space is needed.

Comment forms may be mailed to:  
Ms. Pam Gorman  
Y-12 SWEIS Document Manager  
800 Oak Ridge Turnpike, Suite A-500  
Oak Ridge, TN 37830

Comment forms may be faxed to:  
(865) 483-2014  
or sent by email to:  
y12sweis.comments@tetrattech.com

You may also submit comments through the project website which can be found at:  
<http://www.Y12sweis.com>

Anonymous, Anonymous

Page 1 of 1

MD052



Draft Y-12 Site-wide  
Environmental Impact Statement—  
U.S. Department of Energy  
National Nuclear Security Administration



NNSA  
National Nuclear Security Administration

**Written Comment Form**  
*Must be received on or before January 29, 2010.*

117.0 CONTINUING TO SUPPORT THE MODERNIZATION OF THE  
Y-12 NATIONAL SECURITY COMPLEX SHOULD BE A PRIORITY  
FOR DOE AND THE U.S.  
I SUPPORT OPTION 4 TO PROVIDE THE HPF AND  
THE COMPLEX COMMAND CENTER.

---

Please use other side if more space is needed.

Comment forms may be mailed to:  
Ms. Pam Gorman  
Y-12 SWEIS Document Manager  
800 Oak Ridge Turnpike, Suite A-500  
Oak Ridge, TN 37830

Comment forms may be faxed to:  
(865) 483-2014  
or sent by email to:  
y12sweis.comments@tetrattech.com

You may also submit comments through the project website which can be found at:  
<http://www.Y12sweis.com>

**Armstrong, Monica**

**Page 1 of 1**

**WD070**

**From:** Monica Armstrong [reddoormama@gmail.com]  
**Sent:** Friday, January 22, 2010 11:29 AM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** Citizen Comment

1|10.D | I oppose spending \$3 billion of my - and other taxpayers' - money for a "modernized" nuclear weapons plant in Oak Ridge, TN.  
 2|14.0 | I support the dismantling of nuclear warheads, not the building of new secondaries.

Thank you for taking my views into consideration in making your final determination. Monica Armstrong

**Arnshek, Angela**

**Page 1 of 1**

**WD090**

**From:** Al Grooms [sswo2do@yahoo.com]  
**Sent:** Wednesday, January 27, 2010 2:59 PM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** orepa 6

1|9.A | Please don't build the 3.5 billion dollar facility at Oak Ridge in Tennessee, but instead build OREPA alternative  
 6.

Thank you for your time and consideration.  
 Angela Arnshek  
 46 Coleman Ave  
 Asheville NC

Ashworth, Samuel

Page 1 of 1

WD055

**From:** Ashworth, Samuel C (SA5) [ashworths@y12.doe.gov]  
**Sent:** Monday, December 21, 2009 1:13 PM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** Form posted from Windows Internet Explorer.

firstName=Samuel  
 lastName=Ashworth  
 organization=Navarro Research & Engineering [email=ashworths@y12.doe.gov](mailto:ashworths@y12.doe.gov) address1=120A Arcadian Lane  
 address2= city=Oak Ridge state=TN zip=37830 country=US subject=Draft Y-12 SWEIS comments=My  
 comments are in favor of the Y12 UPF. I have worked in nuclear processing for over 30 years, including  
 uranium, plutonium, rare gases, environmental cleanup, operations, research, and design. I have BS/MS in  
 chemical engineering, a PhD in mathematics, and registered as a professional engineer in several states. In my  
 professional and personal opinions, I believe the new facility is imperative for the U.S. energy and military  
 strategies. Many of the plants I worked in, which were safely operated, are now closed with no plans of  
 reopening. Our nuclear capabilities have severely deminished since I first started in the nuclear industry. I also  
 worked for the French government. They have done the opposite and are now approximately 60% energy  
 independent using nuclear energy in France. When the US dropped the ball, France and other countries ran  
 with it and have made enormous progress in engineering, safety, power, and radionuclide/waste  
 management. This is where the US should be and the new UPF is a step in the right direction. Enriched  
 uranium is a very valuable resource and needs to be preserved not dwindled away by further plant closures  
 and cancelled projects.  
 draftcd=Draft CD-Rom Only

Bane, Ken

Page 1 of 1

MD044



Draft Y-12 Site-wide  
 Environmental Impact Statement—  
 U.S. Department of Energy  
 National Nuclear Security Administration



Written Comment Form

Must be received on or before January 29, 2010.

113.0 I fully support this project  
 We need this facility

Ken Bane  
 Ph: 865-435 6676

Please use other side if more space is needed.

Comment forms may be mailed to:  
 Ms. Pam Gorman  
 Y-12 SWEIS Document Manager  
 800 Oak Ridge Turnpike, Suite A-500  
 Oak Ridge, TN 37830

Comment forms may be faxed to:  
 (865) 483-2014  
 or sent by email to:  
 y12sweis.comments@tetrattech.com

You may also submit comments through the project website which can be found at:  
<http://www.Y12sweis.com>

Barakat, Yusif

Page 1 of 8

WD094

From: yusif barakat [yusifpeace@gmail.com]  
 Sent: Thursday, January 28, 2010 2:25 PM  
 To: DIV.Y12SWEIS.Comments  
 Subject: Comments for Y-12 SWEIS  
 Attachments: Yusif's\_Testimony\_at\_Y-12\_on\_2-26-2008.doc

Dear Pam Gorman,

Though I know you must be overwhelmed with comments, especially as the deadline is tomorrow, I want to be sure you receive the attached as my submission for this current public comment period for the Y-12 SWEIS.

I support OREPA's "Alternative 6" and pray it is not only seriously considered by will be adopted.

Thank you for all your work on this huge project.

Yusif Barakat  
 10836 Monticello  
 Pinckney, MI 48169-9326

1

Barakat, Yusif

Page 2 of 8

WD094



TESTIMONY REGARDING THE CONTINUED MANUFACTURING OF  
 NUCLEAR WEAPONS  
 by Yusif Barakat

OAK RIDGE, TENNESSEE  
 FEBRUARY 26, 2008

**SPEAK TRUTH TO POWER  
 EMPOWER THOSE WHO SPEAK TRUTH**

SALAAM ALAYKUM: I am aware of the many people that support spending 200 billion dollars of our tax money to build a new plant for the sole purpose of manufacturing nuclear weapons. (Bombs of Mass Destruction) I understand and sympathize with those who support this project because they are interested in MAKING A LIVING!  
 I am here to talk about PRESERVING LIFE!

Nuclear bombs have only one purpose--- to destroy life and damage the earth!  
 Nuclear weapons should not be used for making a living.

NUCLEAR WAEPONS, LIKE ALL "WEAPONS OF MASS DESTRUCTION",  
 SHOULD BE ABOLISHED FROM THE EARTH!

I know that you are only the Nuclear Commission and I am not here talk to you about Atomic Energy or Nuclear Bombs. I know you are only a piece of the puzzle. I want to talk to you about the whole puzzle -- not just the piece you are responsible for. I want to talk to you about the "whole pie."

I am not going to bore you with data, statistics and details, as I am sure you have heard them all!

I am here to talk about:

CRIMES AGAINST HUMANITY!

I am here to remind you about:

CRIMES AGAINST NATURE AND THE EARTH!

I know if you had a chance to talk to me -- you would tell me, how it is all about my security --- I know you would tell me all about the ENEMY (that YOU have created) and that what you are proposing is supposed to make me feel more safe and secure! I know that you will tell me that, this is all for my protection!

I ASK YOU, WHO WILL PROTECT ME FROM MY PROTECTORS?

I do not give you permission to do this. DO NOT DO THIS IN MY NAME!

I would like to show you the scroll from this pen, which I will leave with you, along with two charts of our federal spending, as a token of my appreciation for allowing me the time for this presentation.

1

Barakat, Yusuf

Page 3 of 8

WD094



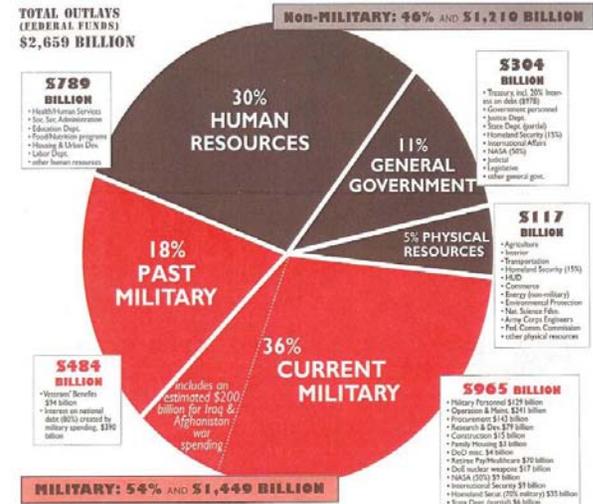
2

Barakat, Yusuf

Page 4 of 8

WD094

**WHERE YOUR INCOME TAX**  
U.S. FEDERAL BUDGET 2009 FISCAL YEAR  
**MONEY REALLY GOES**



**HOW THESE FIGURES WERE DETERMINED**

Current military includes Dept. of Defense (\$653 billion), the military portion from other departments (\$180 billion), and an additional \$162 billion to supplement the budget's misleading and vast underestimate of only \$30 billion for the "war on terror." Past military\* represents veterans' benefits plus 80% of the interest on the debt.\* For further explanation, please go to [www.warresisters.org/piechart.htm](http://www.warresisters.org/piechart.htm).

These figures are from an analysis of detailed tables in the "Analytical Perspectives" book of the Budget of the United States Government, Fiscal Year 2009. The figures are federal funds, which do not include trust funds — such as Social Security — that are raised and spent separately from income taxes. What you pay (or don't pay) by April 15, 2008, goes to the federal funds portion of the budget. The government practice of

combining trust and federal funds began during the Vietnam War, thus making the human needs portion of the budget seem larger and the military portion smaller.

\*Analysis differs on how much of the debt stems from the military; other groups estimate 50% to 60%. We use 80% because we believe others had been no military spending since (if not all) of the national debt would have been eliminated.

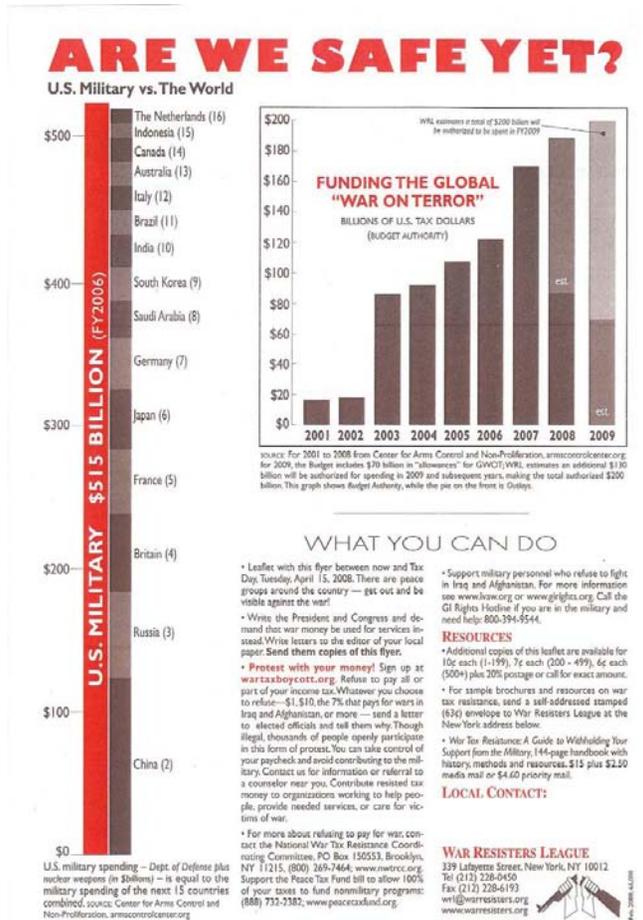
**WAR RESISTERS LEAGUE** 339 Lafayette Street • NY, NY 10012 • 212-228-0450 • [www.warresisters.org](http://www.warresisters.org)

3

Barakat, Yusuf

Page 5 of 8

WD094



Barakat, Yusuf

Page 6 of 8

WD094

Ladies and Gentlemen: What you are proposing is a crime against humanity and you are responsible for it! Spending 50% of our tax dollars and of the earth's resources on killing machines and nuclear bombs, that only kill people, destroy their homes and land and pollute the earth for millions of years IS AN INSANITY!

Spending trillions of dollars on wars and nuclear arsenals, while the world is suffocating --- while the majority of the world's population are diseased, homeless and hungry --- not counting the ones we slaughter in the process --IS NOT ONLY LUNACY --- IS NOT ONLY A CRIME AGAINST HUMANITY --- IT IS A CRIME AGAINST GOD AND CREATION!

IT MUST BE STOPPED!

We must convert the earth's precious resources to care for all of humanity and the preservation of Mother Earth!

CAN YOU IMAGINE A WORLD THAT WORKS FOR ALL?

I was born in Haifa in 1935. I became a Palestinian Refugee in '47, at the age of 12. I have been in America for 60 years --- and what I have learned, is that:

MIGHT DOES NOT MAKE RIGHT!  
THE END DOES NOT JUSTIFY THE MEANS!  
EQUAL DOES NOT MEAN SAME!

Einstein said it best:  
"YOU CAN NOT SOLVE A PROBLEM WITH THE SAME MINDSET THAT CREATED IT!"  
That statement especially applies to the ancient tradition of solving conflict by waging war. War is not the answer, war is the problem.

Imagine if all money spent on war and armaments, including the nuclear arsenal, was used to build up nations instead of destroying them! Imagine how it would be if that money was used to help people raise crops, build schools and hospitals; fight disease and poverty. The world (spurred on by the United States) operates under the paradigm of having...and having is never enough! Capitalism, corporate greed and avarice; putting profits ahead of people and economics ahead of humanity; colonialism and occupying other peoples' land are all self-defeating propositions. The expenditure of human and environmental resources and military spending, is lopsided, and results in killing and destroying innocent people and their possessions.

IMAGINE, if we can convert to the paradigm of being where people are ahead of profits, where humanity is ahead of economics...IMAGINE, how wonderful the world could be...not only for us but for all humanity!

The major fear is terrorism...but we are creating terrorism and we are committing terrorism! There is such a thing as state-sponsored terrorism! Prime examples are the U.S. invasion of Iraq and the Israeli invasion and occupation of Palestine! The peoples' only response under such immense show of force is to protect themselves, their families, homes and land, is to fight back through unconventional terrorists acts!

REMEMBER: WAR IS THE TERRORISM OF THE RICH AND TERRORISM IS THE WAR OF THE POOR!

We must develop a new mind set from which can spring a new age of sharing resources and focusing on human needs. We must stop our own terrorist acts before we can ask others to do the same! We must stop building nuclear weapons before we can ask others to do the same. AMERICA MUST BE THE SHINING EXAMPLE TO LEAD THE WORLD INTO A NEW DAWN OF PEACE!

Barakat, Yusif

Page 7 of 8

WD094

I brought you another gift in appreciation for listening to me:



LANGUAGES (as they appear)	SYMBOLS (from the cross - right)
English	Christianity
Arabic	Hinduism
Russian	Confucianism
Spanish	Sikhism
Japanese	Taoism
German	Judaism
French	New Age/Bhono/Visitors choice
Portuguese	Zenicism
Chinese	Zoroastrianism
Rumanian	Buddhism
Hungarian	Islam
Pakistani	
Philippine	
Korean	
Polish	
Tamil	

Barakat, Yusif

Page 8 of 8

WD094

THERE WILL BE PEACE ON EARTH, WHEN THERE IS PEACE  
 AMONGST THE WORLD RELIGIONS!

I want to ask you:  
 IF JESUS WAS STANDING IN FRONT OF YOU --- WOULD YOU RECOGNIZE HIM?

IF JESUS WAS TESTIFYING HERE, WOULD HE APPROVE OF YOUR PROJECT?

I want to leave you with Chief Seattle's Native American Prayer and a comment from The Dalai Lama  
 --- to guide you to your higher awareness--- and lead you to your~  
 CHRIST/BUDDHA CONSCIOUSNESS!

**I KNOW THAT FROM THAT PLACE  
 YOU WILL BE GUIDED TO DO THE RIGHT THING!**

\*\*\*\*\*

Teach Your Children....

that the earth is our mother.  
 Whatever befalls the earth befalls the  
 sons and daughters of the earth.

This we know.  
 The earth does not belong to us;  
 We belong to the earth.

This we know.  
 All things are connected-  
 like the blood which unites one family.  
 All things are connected.

Whatever befalls the earth  
 befalls the sons and daughters of the earth.  
 We did not weave the web of life;  
 We are merely a stand in it.  
 Whatever we do to the web,  
 we do to ourselves!

\*\*\*\*\*

Global Peace can not occur all at once. All of us, every member of the world community, has a moral responsibility to help avert immense suffering...no one can afford to assume that someone else will solve our problems. Every individual has a responsibility to help guide our human family in the right direction. Good wishes are not sufficient. We must assume responsibility! Since periods of great change, such as the present one, comes so rarely in human history, it is up to each and every one of us to use our time well to help create a happier more peaceful world!

SALAAM ALAYKUM

Respectfully submitted:  
 Yusif Barakat  
 yusifpeace@gmail.com

Barker, Lawrence

Page 1 of 1

MD033

# Ada Chapel

Grant Street  
Wilmington, Ohio 45177

December 17, 2009

Pam Gorman  
Y-12 Sweis Document Manager  
Y-12 Site Office  
800 Oak Ridge Turnpike, Suite A-500  
Oak Ridge, Tennessee 38730

Dear Pam Gorman:

11.E We have learned of what appears to be an effort to build a new 3.5 billion dollar bomb plant at Y-12. This seems to be totally out of step with the need to reduce nuclear weapons in the world. Our nuclear stockpile needs to be safely and securely reduced.

219.A We want a world free of nuclear weapons. We want our country to be the world leader in developing a future free of nuclear weapons. We request that we do not build more nuclear weapons, but rather devote our nation's resources to downsizing the weaponry. OREPA has proposed an alternative which could save the nation billions and still provide for our safety while maintaining our national defense. Please give careful consideration to the OREPA's alternative.

With Christian Love and Concern,



Ada Chapel Friends Meeting  
Lawrence Barker, Clerk

Barkman, William

Page 1 of 1

WD036

**From:** Barkman, William Edward (WYB) [barkmanwe@y12.doe.gov]  
**Sent:** Thursday, November 19, 2009 1:54 PM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** FW: EIS comments

Address typo

**From:** Barkman, William Edward (WYB) [mailto:barkmanwe@y12.doe.gov]  
**Sent:** Wednesday, November 18, 2009 1:46 PM  
**To:** 'y12sweis.comments@tetratecg.com'  
**Subject:** EIS comments

1113.0 I have worked in the Nuclear Weapons Complex, now the Nuclear Security Enterprise (NSE), for over 37 years and am very familiar with the activities at the Y-12 National Security Complex (Y-12) and the other NSE sites. Y-12 is by far the best location for continuing the weapons manufacturing activities described in the EIS (as evidenced by NNSA's decision to keep the work at Y-12 and the historical example of the astronomical expenses associated with moving the Pu work from Rocky Flats to LANL) and the preferred alternative provides the most flexibility, in a cost-effective package, for dealing with existing requirements as well as responding to future political uncertainties in the global arena.

1

**Bassett, David**

Page 1 of 1

WD073

**From:** David Bassett [dbassett14@knology.net]  
**Sent:** Sunday, January 24, 2010 5:00 PM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** Draft Y-12 SWEIS

Thank you for holding the public hearings held in Oak Ridge, Tennessee on the Draft Y12 Site Wide Environmental Impact Statement (SWEIS). I understand that the Department of Energy's preferred alternative involves a Uranium Processing Facility (UPF) that will manufacture thermonuclear secondaries. This facility would update, and perhaps add to, our stockpile of nuclear warheads, so that they can remain viable for a century or more.

At the public hearings, most of the comments voiced support for the federal government's investment in a UPF. Many comments stressed the enhancement of Oak Ridge's economic vitality. Other comments mentioned plant safety, modernization, production efficiency, and the national security provided by having nuclear weapons as a deterrent to war.

Clearly, a \$3 billion national investment in the Oak Ridge Y12 facility is desired by the Y12 work force, and many civic and community organizations in Oak Ridge.

111.C In my opinion, the United States government should be seeking ways to lead the world in nuclear disarmament. As more and more countries around the world gain the nuclear weapons capabilities, the argument that having such weapons contributes to a stable political climate seems tenuous, and the likelihood of worldwide annihilation by nuclear destruction seems more likely. Thus, Alternative 6, proposed by the Oak Ridge Environmental Peace Alliance, seems to be the most reasonable option. This calls for current production facilities to be consolidated and downsized as needed to meet safety, environmental, and health concerns. Dismantlement and disposing of retired nuclear weapons would become important activities of the facility. In addition, the Oak Ridge facility would create technologies that could allow an international body to verify other nations' claims regarding nuclear weapons capabilities.

219.A In summary, the Y12 SWEIS should consider options that reflect the U.S. government's efforts to reduce its nuclear arsenal. Oak Ridge, as a city that is a leader in nuclear weapon technologies, is well positioned to play an important role in this area.

Sincerely,

David R. Bassett, Jr.  
 7632 Sabre Dr.  
 Knoxville, TN 37919  
 USA

e-mail: [dbassett14@knology.net](mailto:dbassett14@knology.net)

1

**Beck, Stephen**

Page 1 of 1

WD060

**From:** STEPHEN BECK [sbeck@beck-consulting.com]  
**Sent:** Thursday, December 31, 2009 11:21 AM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** UPF Project Support

firstName=Steve  
 lastName=Beck  
 organization=Beck Consulting  
[email=sbeck@beck-consulting.com](mailto:sbeck@beck-consulting.com)  
 address1=6731 TIMBER RUN LANE  
 address2=  
 city=KNOXVILLE  
 state=TN  
 zip=37918  
 country=United States  
 subject=Draft Y-12 SWEIS

113.0 comments=I would like to submit my support for UPF. I know first hand that it is needed very much for the plant, Oak Ridge and residents of surrounding areas. You have my support for the project as planned to replace existing facilities.

Steve Beck  
**BECK CONSULTING**  
 Mobile 865.403.9277  
[sbeck@beck-consulting.com](mailto:sbeck@beck-consulting.com)  
[www.beck-consulting.com](http://www.beck-consulting.com)

1

Bedford, Crayton

Page 1 of 1

WD110

**From:** Crayton Bedford [cbedford@charter.net]  
**Sent:** Friday, January 29, 2010 5:01 PM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** Comments on Oak Ridge

To whom it may concern:

1|9.A I just learned that today is the last day to express an opinion about the plans for a nuclear facility in Oak Ridge, TN. I understand that the OREPA alternative 6 would prevent nuclear warheads from being made there, and that is the alternative I would like to see approved.

2|3.A I live in Asheville, NC, not far from the facility under consideration. I do not want nuclear bombs made in my backyard. Furthermore, it is hard to understand the military need for such armaments. By 2018, when it would be completed, I cannot conceive that we will still be trying to threaten the rest of the world with our nuclear arsenal. Surely we will have moved beyond that. Furthermore, it is not clear to me that the number of nuclear warheads permitted under the START treaty would even permit the production contemplated at Oak Ridge.

1|9.A (cont) Please support the OREPA Alternative 6.

Crayton Bedford  
 828-299-3225  
 26 N. Pershing Rd  
 Asheville, NC 28805

Beehan, Tom

Page 1 of 3

MD022

CITY OF  
 OAK RIDGE



OFFICE OF THE MAYOR

POST OFFICE BOX 1 • OAK RIDGE, TENNESSEE 37831-0001

November 23, 2009

Ms. Pam Gordon  
 Y-12 SWEIS Document Manager  
 Y-12 Site Office  
 800 Oak Ridge Turnpike  
 Suite A-500  
 Oak Ridge, TN 37830

**Draft Site-Wide Environmental Impact Statement (SWEIS)  
 for the Y-12 National Security Complex (DOE/EIS-0387, October 2009)**

Dear Ms. Gordon:

Enclosed is a certified copy of Resolution No. 11-108-09 as unanimously adopted by the Oak Ridge City Council in regular session on November 16, 2009.

1|13.0 As you will note, this resolution places the Council on record as endorsing the preferred alternative identified as *Alternative 4: Capability-sized UPF*, in which NNSA would construct a new 350,000 square feet Uranium Processing Facility (UPF) that would allow Y-12 to maintain all capabilities for producing secondaries and cases, and capabilities for planned dismantlement, surveillance and uranium work for other NNSA and non-NNSA customers; and the construction of the Complex Command Center (CCC), that would serve as a new emergency services complex for Y-12, house equipment and personnel for the plant shift superintendent, Fire Department, and Emergency Operations Center.

Please ensure that this resolution is entered into the record as the official comments of the City of Oak Ridge.

Sincerely,

Thomas L. Beehan  
 Mayor

jb

Enclosure

Beehan, Tom

Page 2 of 3

NUMBER 11-108-09

**RESOLUTION**

WHEREAS, the National Nuclear Security Administration (NNSA), a semi-autonomous agency within the DOE was established by Congress in 2000 to manage the nation's nuclear weapons complex; and

WHEREAS, the NNSA is the federal agency responsible for maintaining and enhancing the safety, security, reliability, and performance of the U.S. nuclear weapons stockpile; and

WHEREAS, the NNSA operates the Y-12 National Security Complex (Y-12) located in Oak Ridge, Tennessee; and

WHEREAS, Y-12 has a significant economic impact on the region, with over 4,500 employees and subcontractors; procurements worth millions of dollars annually; as well as other spin-off activities; and

WHEREAS, the City of Oak Ridge strongly supports the continued operation of Y-12 and its national security mission as a center of excellence for uranium and other special nuclear materials, including the safe and secure storage and processing of uranium; and

WHEREAS, Y-12's highly trained and talented workforce cannot be easily replicated anywhere in the world; and

WHEREAS, the City of Oak Ridge commends the NNSA for its ongoing efforts to improve operating efficiencies, enhance safety and security, and accelerate nuclear weapons dismantlement activities; and

WHEREAS, investments in the modernization of the nuclear weapons complex, including Y-12, will help ensure that vital national security missions are performed in a safe and efficient manner; and

WHEREAS, in accordance with the National Environmental Policy Act (NEPA) of 1969, the NNSA has issued the *Draft Site-Wide Environmental Impact Statement (SWEIS) for the Y-12 National Security Complex (DOE/EIS-0387, October 2009)*; and

WHEREAS, the purpose of the SWEIS is to analyze the potential environmental impacts of alternatives for ongoing and foreseeable future operations, facilities and activities at Y-12, including those related to construction and operation of the Uranium Processing Facility (UPF); and

WHEREAS, the NNSA is soliciting comments on the scope of the SWEIS in accordance with the Council on Environmental Quality (CEQ) regulations implementing NEPA and DOE NEPA Implementing Procedures; and

WHEREAS, the City of Oak Ridge desires to officially comment to NNSA on the SWEIS; and

WHEREAS, the NNSA's preferred alternative as described in the SWEIS is identified as *Alternative 4: Capability-sized UPF*, in which NNSA would construct a new 350,000 square feet Uranium Processing Facility (UPF), which would allow Y-12 to maintain all capabilities for producing secondaries and cases, and capabilities for planned dismantlement, surveillance and uranium work for other NNSA and non-NNSA customers; and

WHEREAS, included in this alternative is the construction of the Complex Command Center (CCC), which would serve as a new emergency services complex for Y-12, house equipment and personnel for the plant shift superintendent, Fire Department, and Emergency Operations Center; and

WHEREAS, the location of the UPF and CCC at Y-12 is highly desirable and logical; and

WHEREAS, the City Manager recommends the transmittal of a resolution endorsing the NNSA's preferred alternative identified as *Alternative 4: Capability-sized UPF*, in which NNSA would construct a new 350,000 square feet Uranium Processing Facility (UPF) that would allow Y-12 to maintain all capabilities for

Beehan, Tom

Page 3 of 3

producing secondaries and cases, and capabilities for planned dismantlement, surveillance and uranium work for other NNSA and non-NNSA customers; and the construction of the Complex Command Center (CCC), that would serve as a new emergency services complex for Y-12, house equipment and personnel for the plant shift superintendent, Fire Department, and Emergency Operations Center.

NOW, THEREFORE, BE IT RESOLVED BY THE COUNCIL OF THE CITY OF OAK RIDGE, TENNESSEE:

1113.0  
(cont)

That the recommendation of the City Manager is approved and the City of Oak Ridge endorses the preferred alternative identified as *Alternative 4: Capability-sized UPF*, in which NNSA would construct a new 350,000 square feet Uranium Processing Facility (UPF), that would allow Y-12 to maintain all capabilities for producing secondaries and cases, and capabilities for planned dismantlement, surveillance and uranium work for other NNSA and non-NNSA customers; and the construction of the Complex Command Center (CCC), that would serve as a new emergency services complex for Y-12, house equipment and personnel for the plant shift superintendent, Fire Department, and Emergency Operations Center.

BE IT FURTHER RESOLVED that this resolution be transmitted to NNSA as the official comments of the City of Oak Ridge.

This the 16th day of November 2009.

APPROVED AS TO FORM AND LEGALITY:

*Kurt R. Kusche*  
City Attorney

*Thomas J. Beehan*  
Mayor

*Jacquelyn J. Bernard*  
City Clerk

I, Jacquelyn J. Bernard, City Clerk of the City of Oak Ridge, Tennessee, certify this document to be a true and exact copy of Resolution No. 11-108-09 as adopted by the Oak Ridge City Council on November 16, 2009.

Given under my hand and official seal of the City of Oak Ridge, Tennessee, this the 24<sup>th</sup> day of November, 2009.

*Jacquelyn J. Bernard*  
City Clerk

Belbeck, Mike

Page 1 of 1

MD016



Draft Y-12 Site-wide  
Environmental Impact Statement—  
U.S. Department of Energy  
National Nuclear Security Administration



National Nuclear Security Administration

**Written Comment Form**  
Must be received on or before January 29, 2010.

1|13.0 I want to express my full support for the  
continued development of the Uranium Processing  
Facility at Y-12. This will mean more jobs for our  
community and continued economic growth of our  
2|12.H region. In addition, it will position Oak Ridge  
and Y-12 as the leader in technology that we  
need to be. Thank you for your consideration.

Sincerely,

Mike Belbeck  
135 Rockbridge Greens Blvd  
Oak Ridge, TN 37838

Please use other side if more space is needed.

Comment forms may be mailed to:  
Ms. Pam Gorman  
Y-12 SWEIS Document Manager  
800 Oak Ridge Turnpike, Suite A-300  
Oak Ridge, TN 37830

Comment forms may be faxed to:  
(865) 483-2014  
or sent by email to:  
y12sweis.comments@tetratech.com

You may also submit comments through the project website which can be found at:  
<http://www.Y12sweis.com>

Bell, Rebekah

Page 1 of 1

WD062

**From:** Rebekah Bell [rebekahbell@comcast.net]  
**Sent:** Sunday, January 03, 2010 7:56 PM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** Y-12 Site Wide EIS Comment

firstName=Rebekah  
lastName=Bell  
organization=  
[email=rebekahbell@comcast.net](mailto:rebekahbell@comcast.net)  
address1=11310  
address2=  
city=Knoxville  
state=TN  
zip=37931  
country=United States  
subject=Draft Y-12 SWEIS

1|13.0 | comments=I support the preferred alternative for the Y-12 Site Wide Environmental Impact Statement.

Thanks!

1

**Bennet, Mark-Ellis**

Page 1 of 1

WD097

**From:** Mark Bennet [pv58firefly@gmail.com]  
**Sent:** Friday, January 29, 2010 9:46 AM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** OREPA Alternative 6

19.A | I prefer OREPA Alternative 6.  
 Mark-Ellis Bennett  
 Asheville, NC

1

**Bergmann, Fred**

Page 1 of 1

WD024

**From:** Fred W Bergmann [fwb@innoveering.com]  
**Sent:** Wednesday, November 18, 2009 12:38 AM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** Comment: Nuclear anything is an environmental catastrophe

firstName=Fred  
 lastName=Bergmann  
 organization=  
[email=innoveer3@netscape.net](mailto:innoveer3@netscape.net)  
 address1=W5679 State Road 60  
 address2=  
 city=Poynette  
 state=WV  
 zip=53955  
 country=USA  
 subject=Draft Y-12 SWEIS

comments=The purpose of the facility being considered for this Environmental Impact Statement is to concentrate hugely dangerous and long lived materials for disbursement upon other premises sometime in the future. This delivery is uncertain and unpredictable, and if fortune is with us, belligerency will not cause this disbursement and perhaps we will be able to reduce their concentration and spend vast amounts of money to prevent their seeping into the surroundings of their present site sometime in the next thousands of years.

114.0

It is very simple. Belligerent use of the products of the Oak Ridge site will have intolerable environmental consequences.  
 If the products are never deployed on purpose, their ability to cause massive harm far outlives the human race. The efforts of all human institutions to safely use and quarantine these materials from the environment have all been miserable failures in the several decades that we have been able make such concentrations. Continuing on such a course is foolhardy.  
 draftcd=Draft CD-Rom Only  
 finalcd=Final CD-Rom Only  
 rod=Record of decision

1

Bevan, Hesperia

Page 1 of 1

MD032 738 Lebanon Road  
Clarksville, Ohio 45113  
December 11, 2009

Pam Korman  
800 Oak Ridge Turnpike  
Oak Ridge, Tennessee 37830

Dear Ms. Korman:

I am concerned that a new 3.5 billion dollar nuclear bomb facility is being planned for the Oak Ridge area.

It seems that money directed at creating something to destroy lives should be directed toward creating that which saves and improves lives.

Certainly in today's world we don't need more weapons of mass destruction; we need means to secure peace among nations and jobs that will preserve the world in which we live.

Sincerely,  
Hesperia Bevan

114.0

Billmeier, Gerard

Page 1 of 1

WD041

**From:** Billmeier [billmeier@comcast.net]  
**Sent:** Monday, November 23, 2009 8:42 AM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** Form posted from Windows Internet Explorer.

firstName=Gerard J.  
lastName=Billmeier, Jr. MD  
organization=OREPA/American Academy of Pedi [email=billmeier@comcast.net](mailto:billmeier@comcast.net)  
address1=6465 Massey Lane  
address2=  
city=Memphis  
state=TN  
zip=38120  
country=USA  
subject=Draft Y-12 SWEIS

1)2.F) comments=The Y12SWEIS proposal fails to consider all reasonable alternatives as required by law. Massive expenditures in the billions of dollars for a new facility cannot be justified. The OREPA Alternative should be considered as a cost savings means of maintaining security and safe workplace conditions for the next 50-60 years. We urge that this alternative be strongly considered in the interest of our nation's security and the deterrence of a nuclear arms escalation.

2)9.A) drafts=Draft SWEIS Summary  
rod=Record of decision

1

Birchenough, Katie

Page 1 of 1

WD077

From: Katie Birchenough [ksbirch@charter.net]  
 Sent: Wednesday, January 27, 2010 9:21 AM  
 To: DIV.Y12SWEIS.Comments  
 Subject: Oak Ridge facility

Hello,

19.A As a resident of Asheville, NC, I prefer the OREPA 6 alternative to the nuclear energy debate in Oak Ridge,  
 Tenn. We need to make sense with our choices for energy, and as I understand it, the facility would be  
 21.A.1 outdated by the time it was finished and we would have more warheads than we could legally use. The  
 OPREPA option 6 offers a reasonable alternative. Please choose wisely.

Thank you,  
 Katie Birchenough

Bodley, William

Page 1 of 1

William & Roberta Bodley  
 53262 Butternut  
 Chesterfield Twp., MI 48051

MD030

29 Dec. 2009

Ms. Pam Gorman  
 712 SWEIS Document Mgr  
 800 Oak Ridge Turnpike, Suite A-500  
 Oak Ridge, TN 37830

Dear Ms Gorman,

13.A Please accept this note, my  
 recommendation that plans to build a  
~~but~~ a new bomb plant be abandoned.  
 29.C There is no military or security need  
 for this. It flies in the face of President  
 Obama's call for real progress for a nuclear  
 free world.

13.A (cont) Please excuse this paper - but I have  
 low vision and this kind of paper makes  
 writing easier. But I am a father and grand-  
 father and feel deeply that the future of  
 our common humanity requires a nuclear free  
 world, not done building new nuclear  
 weapons facilities.

Sincerely yours,  
 William & Bodley

Bolin, A.

Page 1 of 1

MD035



Draft Y-12 Site-wide  
Environmental Impact Statement—  
U.S. Department of Energy  
National Nuclear Security Administration



NNSA  
National Nuclear Security Administration

**Written Comment Form**  
*Must be received on or before January 29, 2010.*

115.0 I fully support Alternative #2 - Uranium Processing Facility  
Alternative. I do not believe that with Countries like Iran, and  
213.B Venezuela and many others, elimination of Nuclear Weapons is in  
the best interest of our country. Even as Russia talks of their  
elimination they are testing new missiles to carry them.  
No matter what the through put becomes on the new facility  
all the equipment and processes are still needed, so a reduction  
115.0 (cont) in size is not ~~feasible~~ feasible, in fact it is creating many  
design problems trying to fit the needed processes into the  
small footprint we are currently given. The design time  
could have been reduced considerable with a larger building  
to work with, from the beginning. The facility will be needed  
213.B (cont) not only for assembly but disassembly of the old weapons.  
I believe the new facility is badly needed to maintain  
the safety of the environment and the workers. Of course  
the hope and dream is for elimination of all nuclear weapons,  
but that is only a dream which could lead to the destruction  
of our country by those who hate us so deeply.  
*Andr Bolin*

Please use other side if more space is needed.

Comment forms may be mailed to:  
Ms. Pam Gorman  
Y-12 SWEIS Document Manager  
800 Oak Ridge Turnpike, Suite A-500  
Oak Ridge, TN 37830

Comment forms may be faxed to:  
(865) 483-2014  
or sent by email to:  
y12sweis.comments@tetrattech.com

You may also submit comments through the project website which can be found at:  
<http://www.Y12sweis.com>

Bone, Gerald

Page 1 of 2

WD016

**From:** Jerry Bone [jerrybone@tvuuc.org]  
**Sent:** Tuesday, November 17, 2009 4:14 PM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** Form posted from Windows Internet Explorer.

firstName=Gerald  
lastName=Bone  
organization=Veterans for Peace, OREPA  
[email=geraldbone@bellsouth.net](mailto:geraldbone@bellsouth.net)  
address1=321 E. Emerald Ave.  
address2=  
city=Knoxville  
state=TN  
zip=37917  
country=USA  
subject=Draft Y-12 SWEIS  
comments=Comments concerning Y12 SWEIS:

From: Gerald W. Bone  
321 E. Emerald Ave.  
Knoxville, TN 37917

Date: November 17, 2009

114.0 My name is Jerry Bone. I am a resident of Knoxville, 70 years of age. I am a great-grandfather and a proud member of both the Oak Ridge Environmental Peace Alliance and Veterans for Peace. I have been opposed to the development, deployment and proliferation of nuclear weapons for as long as I can remember.

114.0 (cont) We live in a world of great peril, on many fronts. The future of our children and of all the children in the world is threatened by climate change, hunger and grinding poverty, violently promoted political ideologies wrapped in the garb of religion, water shortages, poisoned food sources, pandemics yet to be dreamed of. The list is much longer than that. Yet at this dismal, perilous time in world history, we people of the world have begun to take extraordinarily hope-inspiring steps toward stopping the proliferation of nuclear weapons.

219.A This is what this hearing is about. Will we continue these steps or will we the people be thwarted once again by the misguided and selfish minority that holds sway in the halls of power?  
I was reading a recent issue of The Nation a few days ago. It featured an interview with former Soviet President Mikhail Gorbachev. In this interview, Gorbachev talked about then-president Ronald Reagan and how he thought of Reagan as a "cereal dinosaur." Reagan, in turn, referred to Gorbachev as "a CIA diehard Bolshevik." Yet, these two men are as ideologically opposed as any two leaders in history--were in agreement when they wrote to the people of the world in 1985: "Nuclear war is inadmissible, and in it there can be no victors." Still later, at Reykjavik, they agreed that nuclear weapons should be abolished.

31.E I urge the adoption of Alternative 6 of this proposal, which reflects the current policy of the United States under President Obama. The ground that was broken at Reykjavik in 1986 must not be cemented over by the outdated, often hysterical, rhetoric of the cold war. In order for non-proliferation to work, there must be dismantling of nuclear weapons and a plan to reduce these horrific weapons to zero in a reasonable period of

1

**Bone, Gerald**

**Page 2 of 2**

3|1.E  
(cont)

time. Most nuclear nations will expect it and the non-nuclear nations will demand it. Whatâ€¦WD016 all the worldâ€™s children deserve to live in a world where these most horrific weapons of mass destruction can no longer threaten their lives.

I thank you for the opportunity to express my concerns on this matter.

Sincerely,

Gerald W. Bone

2

**Boosinger, Laura**

**Page 1 of 1**

WD116

---

**From:** Laura Boosinger [lauraboosinger@gmail.com]  
**Sent:** Friday, January 29, 2010 10:28 PM  
**To:** DIV.Y12SWEIS.Comments

1|14.0 PLEASE do not make nuclear BOMBS in my backyard in Oak Ridge, TN.. Why do we need more bombs in the world anyway????? stop this nonsense.  
 Laura Boosinger

---

I am using the Free version of [SPAMfighter](#).  
 We are a community of 6 million users fighting spam.  
 SPAMfighter has removed 3504 of my spam emails to date.  
 The Professional version does not have this message.

1

Bowen, Mary Ellen

Page 1 of 1

MD028 119.A

*Yes I think Alternative 6 Below is the Best option!*

safety and security into a "modernization program" that would spend tens of billions of dollars on new bomb plants.

The stakes could not be higher. New bomb plants send precisely the wrong message to Iran and the rest of the world.

**OREPA'S ALTERNATIVE**

OREPA believes the Y12 SWEIS fails to consider all reasonable alternatives, as the law requires. Over the next 25 years, the mission of Y12 will undergo a fundamental change as the US reduces its nuclear stockpile. The need for production capacity will decline rapidly; facilities for routine surveillance and maintenance of the declining stockpile are all that will be needed and, eventually, even they will be phased out. Massive capital expenditures for a new, long-lived production facility can not be justified.

At the same time, the demand for dismantlement and disposition capacity will be growing, and current facilities will be insufficient to meet the demand.

So we propose Alternative 6, reflecting a forward-looking vision.

Current production facilities should be consolidated and down-sized in an existing facility, upgraded as necessary to meet environmental, safety and health standards. Envisioning US participation in an international verification regime during disarmament, safeguard and transparency protocols should be incorporated into the upgrades as they are designed. Throughput capacity of ten warheads a year or less will be adequate to as-

sure the safety and security of the current stockpile as it awaits retirement.

At the same time, a new state-of-the-art single-purpose facility dedicated to dismantlement and staging for disposition of retired nuclear weapons secondaries/cases should be constructed. The location of this facility should be determined by a balancing of mission, security efficiency and environmental, safety, and health requirements.

Under OREPA's Alternative, not currently included in the Y12SWEIS, the high security footprint could be reduced by as much as 60%. The new,

dedicated dismantlement facility could be designed and built at considerable savings over the proposed UPE, and would provide the most efficient and effective technologies for this critical mission as well as safe working conditions for its workforce over its 50-60 year life span.

OREPA believes the currently operating production facilities can be upgraded to standards protective of worker and public health and safety as well as protective of nuclear materials themselves for \$100 million—a dramatic savings over the estimated \$3.5 billion (with a B) cost of the UPF.

Ways to comment

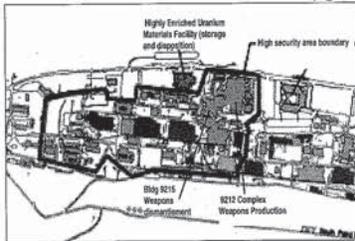
Two public hearings are being held at the New Hope Center in Oak Ridge. Tuesday evening, November 17, from 6:30 - 9:00pm and Wednesday, November 18, from 10:00am - 12:30pm.

Comments can also be submitted in writing to:  
Pam Gorman  
Y-12 SWEIS Document Manager  
Y-12 Site Office  
800 Oak Ridge Turnpike, Suite A-500  
Oak Ridge, TN 37830  
(865) 483-2014 fax

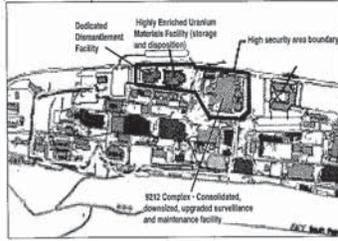
You can also download the Y12 Site Wide Environmental Impact Statement (Summary, or the full document) and make comments through the web site: [www.Y12SWEIS.com](http://www.Y12SWEIS.com). **Comment deadline: January 6, 2009.**

For OREPA's talking points and a detailed analysis of the SWEIS:  
[www.stopthebombs.org](http://www.stopthebombs.org)  
or email [orep@earthlink.net](mailto:orep@earthlink.net)  
865 776 5050

*Mary Ellen Bowen, 152 5th Rd, Summertown,  
931-94-2534 TN 38483*



Y12 Today



Alternative 6 : New Dismantlement facility

OREPA News • 3 • November 2009

*Yes!*

Bradshaw, David

Page 1 of 1

WD074

**From:** David Bradshaw [drb1@comcast.net]  
**Sent:** Sunday, January 24, 2010 11:55 PM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** Form Post from Firefox

firstName=David  
lastName=Bradshaw  
organization=  
[email=drb1@comcast.net](mailto:drb1@comcast.net)  
address1=116 Pratt Lane  
address2=  
city=Oak Ridge  
state=TN  
zip=37830  
country=USA  
subject=Draft Y-12 SWEIS

113.0 comments=My opinion: Construct and operate a new UPF to replace existing enriched uranium processing facilities. In addition, construct a new Complex Command Center to house Y-12's site and emergency management operations.

Bramlage, Nancy

Page 1 of 1

WD059

From: S. Bramlage, Nancy [nancy.bramlage@srcharitycinti.org]  
 Sent: Wednesday, December 30, 2009 3:42 PM  
 To: DIV.Y12SWEIS.Comments  
 Subject: Form posted from Windows Internet Explorer.

firstName=Nancy  
 lastName=Bramlage  
 organization=Sisters of Charity of Cincinnati [email=nancy.bramlage@srcharitycinti](mailto:email=nancy.bramlage@srcharitycinti).  
 address1=5900 Delhi Rd.  
 address2=  
 city=Mt. St. Joseph  
 state=OH  
 zip=45051  
 country=  
 subject=Draft Y-12 SWEIS  
 comments=To whom it may concern:

- 19.C I am strongly opposed to the NNSA building a new bomb plant at Y12 in Oak Ridge, TN.  
 This plant will only accelerate the global pursuit for more nuclear weapons, which is counter to President Obama's commitment to work for a nuclear free world.  
 We need instead to dismantle the 15 year backlog of retired weapons in Oak Ridge waiting to be dismantled.
- 21.C This new plant will not help create national security, but will lead instead to a more dangerous society, with more and more countries following our example of creating more nuclear weapons - with a greater and greater danger that one of these countries will use the weapons.  
 Building the plant would lead us in the wrong direction.

1

Bredesen, Phil

Page 1 of 1

MD069

PHIL BREDESEN  
 THE GOVERNOR OF TENNESSEE

27 January 2010

The Honorable Thomas P. D'Agostino  
 Administrator  
 National Nuclear Security Administration  
 U.S. Department of Energy  
 1000 Independence Avenue, S.W.  
 Washington, DC 20585-0701

Dear Administrator D'Agostino:

17.0 On behalf of the residents of Tennessee, I want to thank you and the National Nuclear Security Administration (NNSA) for your Record of Decision last year to maintain our nation's critical uranium mission at the Y-12 National Nuclear Security Complex in Oak Ridge and to construct the Uranium Processing Facility (UPF) at Y-12. As you proceed by drafting the necessary Site-Wide Environmental Impact Statement (SWEIS), I urge you to move as quickly as possible toward constructing a capability-sized UPF at Y-12 NSC.

213.0 As you know, Y-12 has played an integral role in protecting our national security since the days of the Manhattan Project. While Y-12's processing facilities are safe and operational today, aging threatens to impact future operations. The need for UPF is best summarized by the findings of a 2009 bipartisan congressional report entitled, "*Final Report of Congressional Commission on the Strategic Posture of the United States*." The Committee found that "existing facilities are genuinely decrepit and are maintained in a safe and secure manner only at a high cost."

As our nation's Uranium Center of Excellence, the center of our nation's nuclear security mission, Y-12 deserves better. Thank you for acting to modernize the facilities at Y-12 and strengthen our national security through the construction of a capability-sized UPF.

Warmest regards,



Phil Bredesen

cc: NNSA Y-12 Site Office Manager Theodore Sherry  
 Y-12 SWEIS Document Manager Pam Gorman

Brown, Betty

Page 1 of 1



East Bay  
Peace Action  
for a sane world

P.O. Box 6574  
Albany, CA 94706  
Phone (510) 233-0915

MD061

---

EAST BAY PEACE ACTION BOARD  
Betty Brown  
Mildred Dandridge  
Roger Greensfelder  
Dolores Rodriguez  
Andrea Turner

NATIONAL ADVISORY BOARD  
Rev. William Sloane Coffin, Jr.  
Andrea Ayzajian  
Rabbi Leonard Beerman  
Harry Belafante  
Walden Bello  
Rabbi Balfour Brickner  
Robert S. Browne  
Noam Chomsky  
Barry Commoner  
David Cortright  
Cassie Davis  
The Hon. Ronald Dellums  
Marian Wright Edelman  
The Rev. F. Forrester  
Bishop Thomas J. Gumbleton  
Dennis Hayes  
David R. Hunter  
Anne Jackson  
Michio Kaku  
David Keppel  
Corretta Scott King  
Michael Klare  
George J. Kourpias  
Betty Lall  
Frances Moore Lappe  
Sally Lillenthal  
Dr. Joseph E. Lowery  
Hon. Hilda Howland M. Mason  
David McKeynolds  
Marcus Reskin  
Tom Schlesinger  
Pete Seeger  
Toshi Seeger  
John Simmons  
Pam Solo  
Dr. Benjamin Spock  
Betsy Taylor  
Prof. George M. Temmer  
Peter Yarrow

January 22, 2010

Pam Gorman,  
Y 12 SWEIS Document Manager  
Y 12 Site Office  
800 Oak Ridge Turnpike, Ste. 500  
Oak Ridge, TN 37830

To whom it may concern:

This is to submit comments relevant to the Draft Site Wide Environmental Impact Statement (SWEIS) for the Y 12 plant at Oak Ridge Tennessee.

We support those who call for broadening the scope to:

- \* consider the closing of the site;
- \* include an analysis of the impact of the SWEIS on the prospects for the United States to move the world towards reduction and elimination of nuclear weapons (The Nuclear Non Proliferation Treaty makes any testing of, or improvements to nuclear weapons a violation of international law and hence, the laws of the United States. The World Court has also declared nuclear weapons illegal.);
- \* prohibit any new sub-critical tests under the guise of the Stockpile Stewardship program;
- \* include tracking of off-site contaminants and monitoring of upstream wells;
- \* consider the lives of workers in terms of re-employment instead of maintaining nuclear weapons as a jobs program.

Sincerely,  
*Mrs. Betty Brown*  
Mrs. Betty Brown for the  
EBPA Executive Board

Brown, Mira

Page 1 of 1

WD056

---

**From:** Mira Brown [mira@main.nc.us]  
**Sent:** Wednesday, January 27, 2010 9:16 AM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** comment on new Oak Ridge construction of bomb making facility

To Whom it May Concern, I live just an hour or so from Oak Ridge. My daughter came to speak at the hearing held there not long ago. I wish to affirm that our entire family is NOT in favor of the building of a new bomb making facility in Oak Ridge. I do not understand how it could possibly make sense, since by the time it is completed it could not be utilized for its constructed purpose without negating the treaties we have made in regard to nuclear weapons. We wish to support OREPA Alternative 6. My understanding of this situation is that if a majority of us support this alternative, it will be implemented. Is this accurate? Thank you,  
Karen Watkins 201 Sang Branch Rd, Burnsville, NC 28714 828-682-9263.

--  
Miss Brown  
[mira@main.nc.us](mailto:mira@main.nc.us)  
(828)-682-9263

1

Brown, Rick

Page 1 of 1

WD079

**From:** Rick Brown [rick.brown@earthlink.net]  
**Sent:** Monday, January 25, 2010 9:04 PM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** Form posted from Windows Internet Explorer.

firstName=Rick  
 lastName=Brown  
 organization=  
[email=rick.brown@earthlink.net](mailto:rick.brown@earthlink.net)  
 address1=1084 Lindsey Drive  
 address2=  
 city=Sevierville  
 state=TN  
 zip=37876  
 country=USA  
 subject=Draft Y-12 SWEIS

1|12.O comments=My first comment is that the "site-wide EIS was not that; there was no information about the legacy and possible continuing environmental impacts resulting from nuclear weapons production at the Y-12 Plant. I am aware that much has been done to correct the historical problems, but groundwater  
 2|12.D contamination still exists. What is the current status of environmental remediation efforts?

3|10.B My second, and main comment concerns what is the gist of the "site-wide EIS" - the intention to construct a new production facility. To me this is wrong for many reasons; it is a huge expenditure in a time of recession and large deficits when the country has so many needs, and this, at most, will only create a few jobs, most of them short term; this is the only possible benefit and this could be done in many ways that would be better in all respects. President Obama has committed to working for a world free of nuclear weapons. This is the kind of world I want my children to be able to raise their families in. The minimal proposal, Alternative 5, would  
 4|1.E have a new production facility constructed that could produce 10 secondaries per year. This is unneeded since it is projected that Y-12 will have upgraded weapons to the limit allowed under the Comprehensive Test Ban Treaty by 2020; also, the fact that America is building a new nuclear weapon production facility would not be lost on other countries such as Iran, which some think may be taking steps toward building nuclear weapons and which the USA has condemned even without conclusive evidence.

5|9.A I support the Oak Ridge Environmental Peace Alliance's "Alternative 6". This alternative would use stimulus money, create jobs, and keep workers employed at Y-12 for a long time doing work that most people would agree is useful and necessary; this is dismantling the nuclear stockpile at a faster pace (which would still take many years) and preparing the materials for downblending and safe storage in a facility that is specifically designed for this purpose. While I would rather not have nuclear weapons work in my back yard, I recognize that the plant is here, the work force is here, and this is a task we can all support and which will keep this generation of workers in their jobs contributing to their families and the local economy. I hope you will more fully explore Alternative 6 and seriously consider this option.  
 rod=Record of decision

1

Brown, Rick

Page 1 of 1

WD026

**From:** Rick Brown [rick.brown@earthlink.net]  
**Sent:** Tuesday, January 26, 2010 9:00 PM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** Form posted from Windows Internet Explorer.

firstName=Rick  
 lastName=Brown  
 organization=  
[email=rick.brown@earthlink.net](mailto:rick.brown@earthlink.net)  
 address1=1084 Lindsey Drive  
 address2=  
 city=Sevierville  
 state=TN  
 zip=37876  
 country=United States  
 subject=Draft Y-12 SWEIS

1|12.O comments=My first comment is that this was supposed to be a site-wide EIS. As such the EIS should have discussed the current state of environmental remediation of legacy problems at the site and the current state of environmental compliance (all media) for the whole site. The EIS did not do this.

2|10.B My main comment is concerned with what the site-wide EIS did focus on completely; that is, the intention to construct a new nuclear weapons facility. I believe this is wrong for many reasons. With the country in a serious recession and running huge deficits we shouldn't be constructing something that is not needed. I can understand spending money to create jobs but there are many better ways to do this. The minimum proposed alternative, alternative 5, calls for a new facility that can construct 10 secondaries per year. It has been projected that with the current capabilities the Y-12 Plant will have refurbished the maximum number of warheads allowed under the Non-Proliferation Treaty by 2020 when the new facility would come on line, so at that time the new facility would be completely unneeded and would put the US in violation. Moreover,  
 3|1.E construction of a new weapons production facility cannot help but be noticed by other countries such as Iran, which is being told that they can't even enrich uranium to a far below bomb-grade concentration. President Obama has expressed an intent to work toward a world free of nuclear weapons. That is the kind of world I want for my children and grandchildren-to-be.

4|9.A I do support "Alternative 6" as proposed by the Oak Ridge Environmental Peace Alliance. This alternative would designate any new construction for the specific purpose of dismantling nuclear weapons and preparing the materials for downblending and safe storage. This alternative has the advantage of using stimulus money to create jobs for construction and keeps a significant work force employed in Oak Ridge for many years; even at an increased pace of dismantling there is projected to be enough work to allow the existing work force at Y-12 to finish their careers dismantling weapons. Jobs and money will stay in the community under this alternative, and the work they will be doing will be something we can be proud of.  
 rod=Record of decision

1

Brown, Sandra

Page 1 of 1

WD040

From: Brown, Sandra G (SGZ) [brownsg@y12.doe.gov]  
 Sent: Monday, November 23, 2009 7:49 AM  
 To: DIV.Y12SWEIS.Comments  
 Subject: UPF and Complex Command Center

113.0 I support the UPF project. It is needed in order to sustain the viability of the Y-12 Plant.  
 I support the Complex Command Center. It is needed for centralization of several functions.

Brummett, Matt

Page 1 of 1

MD046



Draft Y-12 Site-wide  
 Environmental Impact Statement—  
 U.S. Department of Energy  
 National Nuclear Security Administration



Written Comment Form

Must be received on or before January 29, 2010.

115.0 I strongly voice support for Alternative #2  
 Y-12 needs the capability to run existing operations as well  
 as being able to support future R&D + work for other missions  
 213.B Not replacing old, aging, + sometimes dangerous facilities is not only  
 irresponsible to the taxpayers but unsafe + unable to conduct work  
 317.0 The one problem w/ capability size UPF A4 is that there is  
 NO room to grow + perform multiple missions. WFO work  
 already has to wait.

Sincerely,  
 Matt Brummett

Please use other side if more space is needed.

Comment forms may be mailed to:  
 Ms. Pam Gorman  
 Y-12 SWEIS Document Manager  
 800 Oak Ridge Turnpike, Suite A-500  
 Oak Ridge, TN 37830

Comment forms may be faxed to:  
 (865) 483-2014  
 or sent by email to:  
 y12sweis.comments@tetratech.com

You may also submit comments through the project website which can be found at:  
<http://www.y12sweis.com>

Bryan, Mary

Page 1 of 2

WD039

**From:** Mary Bryan [countinggirl@frontiernet.net]  
**Sent:** Saturday, November 21, 2009 2:14 PM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** Form posted from Windows Internet Explorer.

firstName=Mary  
 lastName=Bryan  
 organization=  
[email=countinggirl@frontiernet.net](mailto:countinggirl@frontiernet.net)  
 address1=P. O. Box 261  
 address2=  
 city=Maynardville  
 state=TN  
 zip=37807  
 country=USE  
 subject=Draft Y-12 SWEIS

comments=I am writing to voice my opinion about the preferred alternative (building a Capability-Sized Uranium Processing Facility) as presented in the Y-12 Site Wide Environmental Impact Statement. It would appear that under this alternative a new bomb plant is being proposed for the Y-12 site. This bomb plant (the UPF) would manufacture secondaries to be used in a Life Extension Program of aging nuclear weapons. These weapons will be modified in some cases to become new weapons with new military capabilities. The capacity to produce newly designed nuclear warheads would be retained as well.

1|1.B |This alternative flies in the face of President Obama's commitment to a world free of nuclear weapons as he expressed in Cairo: "I strongly reaffirm America's commitment to seek a world in which no nations hold nuclear weapons." By investing new money in new production facilities, we are sending a message to the rest of the world: it is alright for the United States to continue producing nuclear weapons at the same time that we are demanding that other nuclear weapon-seeking states not do so.

2|1.C |This all comes at a time when the Nuclear Nonproliferation Treaty, which committed nuclear weapons states to "pursue in good faith negotiations leading to disarmament at an early date," comes under review in 2010. If the US decides to continue to produce new nuclear weapons under the guise of a Life Extension Program, it may well put the NPT in danger of collapse. It will also negate any gains we might hope to make in nonproliferation efforts through the START Treaty renewal and the Comprehensive Test Ban Treaty ratification.

3|9.A |A sixth Alternative should be considered in the Y12 SWEIS in which current production facilities are consolidated and down-sized in an existing facility with upgrading necessary to meet environmental, safety and health standards. The US participation in an international verification regime during disarmament should also be envisioned and incorporated into the upgrades. At the same time, a new single-purpose facility dedicated to dismantlement and staging for disposition of retired nuclear weapons secondaries should be constructed. This new dedicated dismantlement facility could be designed and built at considerable savings over the proposed UPF.

I hope that the Department of Energy's National Nuclear Security Administration will deeply consider the ramifications of Alternative 5 presented in the Y12 SWEIS and embrace a different alternative, such as the one

1

Bryan, Mary

Page 2 of 2

3|9.A |briefly described above, that will not provoke other states around the world such as Iran and ~~WD039~~  
 (cont) |during this critical time in the history of nuclear weapons.

rod=Record of decision

2

Burch, Lillian

Page 1 of 1

WD028

**From:** Lillian Burch [lburch@drctn.org]  
**Sent:** Wednesday, November 18, 2009 10:34 AM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** Form posted from Windows Internet Explorer.

firstName=Lillian  
 lastName=Burch  
 organization=  
[email=lillianburch@rocketmail.com](mailto:lillianburch@rocketmail.com)  
 address1=1549 Fox Hollow Trail  
 address2=  
 city=Knoxville  
 state=TN  
 zip=37923  
 country=USA  
 subject=Draft Y-12 SWEIS

1|14.0 |comments=We do not need any more nuclear bombs!!!

Byrd, James

Page 1 of 1

MD042



Draft Y-12 Site-wide  
 Environmental Impact Statement—  
 U.S. Department of Energy  
 National Nuclear Security Administration



**Written Comment Form**

*Must be received on or before January 29, 2010.*

1|13.0 I am in complete support of NNSA proceeding with  
 the construction of the new UPF and Y-12 Complex  
 Command Center. I believe Y-12 is essential to  
 our national security and contributes significantly  
 to our local community and economy. I believe  
 Y-12 and the NNSA to be good stewards of the  
 environment and are proactive in addressing  
 any environmental issues. My hope and prayer  
 is that we never again have to use nuclear  
 weapons. I do believe that nuclear weapons play  
 an important role as a deterrent and ensure  
 2|1.B our freedoms and the national security of our  
 great nation.

*James V. Byrd, Jr.*  
 James V. Byrd, Jr.  
 Louisville, TN.

Please use other side if more space is needed.

Comment forms may be mailed to:  
 Ms. Pam Gorman  
 Y-12 SWEIS Document Manager  
 800 Oak Ridge Turnpike, Suite A-500  
 Oak Ridge, TN 37830

Comment forms may be faxed to:  
 (865) 483-2014  
 or sent by email to:  
[y12sweis.comments@tetrattech.com](mailto:y12sweis.comments@tetrattech.com)

You may also submit comments through the project website which can be found at:  
<http://www.Y12sweis.com>

**Campbell, Henry**

Page 1 of 1

WD027

██████████

---

**From:** Campbell, Henry nmn (C17) [campbellh@y12.doe.gov]  
**Sent:** Wednesday, November 18, 2009 10:47 AM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** SWEIS

11/18/2009

Sirs;

My name is Henry Campbell. I live in Knoxville, Tennessee and work at Y-12. I have been employed as a Pipefitter for close to 28 years.

17.0 | I am writing to lend my support in favor of 'Alternative 4' the Preferred Alternative for a  
 17.0 | capability sized UPF. I attended the meeting on the evening of Nov. 17 and came away  
 17.0 | with that decision. It was not a hard decision because I believe in our mission here at Y-  
 17.0 | 12.

Thank You  
Henry Campbell

**Carawan, Carolanne**

Page 1 of 1

WD033

██████████

---

**From:** Guyncandie@aol.com  
**Sent:** Wednesday, November 18, 2009 3:17 PM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** No Subject

14.0 | We are way past the time when we should be building new nuclear weapons. Rather we should be safely  
 14.0 | reducing the weapons we currently have. Locally, we are tired of the endless news stories of leaks and lax  
 14.0 | security and dangerous conditions at the Oak Ridge bomb complex. We want clean-up and an end to weapons  
 14.0 | production.  
 (cont) | Thank you,  
 Carolanne M. Carawan, New Market, TN

Carden, Fred

Page 1 of 1

WD078

From: Fred Carden [fredcarden@yahoo.com]  
 Sent: Monday, January 25, 2010 7:53 PM  
 To: DIV.Y12SWEIS.Comments  
 Subject: Written Comments to Y-12 SWEIS

113.B I am in favor of the capability sized UPF alternative. Continuing to use existing facilities does not protect worker safety, is more expensive and delays production upgrades needed now. This approach I believe is the lowest life-cycle cost to the NNSA/DOE. Nuclear weapons are here for a long time. The NNSA needs to bring their facilities up to date with new safety codes to protect both the public and the defense workers.

Fred Carden  
 203 Village Green Pkwy  
 Knoxville, TN 37934-3726  
 (865) 607-9467

1

Carroll, Bonnie

Page 1 of 1



MD029

November 25, 2009

Ms. Pam Gorman  
 Y-12 SWEIS Document Manager  
 800 Oak Ridge Turnpike, Suite A-500  
 Oak Ridge, TN 37830

Dear Ms. Gorman:

This letter is written in support of the proposed Uranium Processing Facility (UPF) at the Y-12 National Security Complex in Oak Ridge. We, at IIA, believe this facility will serve as an excellent anchor to the modernization initiative currently underway at Y-12. It promises to enhance the safety and health of the workforce, and it is the most effective plan to carry out the crucial national security missions performed at the Y-12 complex.

1113.0 We support the statement made by ETEC and other local organizations at the first public support meeting, "Our region has always been strong in support of the uranium processing and nuclear related missions of the Oak Ridge complex. We are prepared to continue to fully support such missions and to continue to invest in regional workforce development that is required for these operations. We do believe that Y-12's continued role in manufacturing and disassembling nuclear warhead components should be conducted in modernized facilities with cost effective and safety focused processes. We think this preferred option of a new UPF achieves this objective."

As a woman-owned, small business with headquarters in Oak Ridge, we, at IIA, agree with that statement and pledge our support as a member of this community. We believe that Y-12's designation as the NNSA's Uranium Center of Excellence, along with the modernization activities being undertaken, are an excellent part of the plan for "Complex 2030".

Please do not hesitate to contact me should you need further information and I would be happy for you to include these statements in the official EIS.

Sincerely,

*Bonnie C. Carroll*  
 Bonnie C. Carroll  
 President

Cc: Ted Sherry  
 Congressman John Duncan  
 Congressman Lincoln Davis  
 Congressman Zach Wamp  
 Senator Bob Corker  
 Senator Lamar Alexander

(865) 481-0388 • Fax (865) 481-0390  
 1055 Commerce Park Drive, Suite 110  
 PO Box 4219  
 Oak Ridge, TN 37831-4219  
[www.iiaweb.com](http://www.iiaweb.com)

## Christiansen, Jennifer

Page 1 of 1

WD034

**From:** Jennifer [jchristiansen@twcnv.rr.com]  
**Sent:** Wednesday, November 18, 2009 4:00 PM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** Form posted from Windows Internet Explorer.

firstName=Jennifer  
 lastName=Christiansen  
 organization=  
[email=jchristiansen@twcnv.rr.com](mailto:jchristiansen@twcnv.rr.com)  
 address1=1717 Lake Shore Road  
 address2=  
 city=Chazy  
 state=NY  
 zip=12921  
 country=USA  
 subject=Draft Y-12 SWEIS

114.0 | comments=Stop the madness of a nuclear project. Our planet is suffering enough! Our planet's existence is  
 already in peril. This proposal will weaken our role in world peace. Please document that I oppose this plan  
 absolutely.

1

## Christoffer, Fred

Page 1 of 1

WD069

**From:** Fred [fredisnow@bellsouth.net]  
**Sent:** Thursday, January 21, 2010 2:48 PM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** Form Post from Firefox

firstName=Fred  
 lastName=Christoffer  
 organization=  
 address1=3505 Hackworth Rd  
 address2=  
 city=knoxville  
 state=tn  
 zip=37931  
 country=  
 subject=Draft Y-12 SWEIS

115.0 | comments=Please build the UPF, alt 2. I rather be safe then sorry or dead. Mindless socialist utopian idiots  
 have no place in this world. I was prompted to comment by a moronic letter in the News-Sentinel 1/21/10.

I want to die peacefully in my sleep like my grandfather. Not screaming in terror like his passengers.

I'm never wrong. Once, I thought I was, but I was mistaken

1

Clark, Christopher

Page 1 of 1

WD049

From: Chris Clark [cclarkusa@gmail.com]
Sent: Monday, December 07, 2009 7:57 PM
To: DIV.Y12SWEIS.Comments
Subject: Form posted from Windows Internet Explorer.

firstName=Christopher
lastName=Clark
organization=
email=cclarkusa@gmail.com
address1=1813 Hart Road
address2=
city=Knoxville
state=TN
zip=37922
country=USA
subject=Draft Y-12 SWEIS

comments=I have reviewed the draft Y-12 SWEIS online and believe that the Alternative 4: Capability-sized UPF is the appropriate path to take.

17.0 Our nation needs a processing facility for uranium to support dismantlement, naval reactors and the stockpile. The current facility has gone well beyond it's original design life, and had worn out the band-aid upgrades to keep it operational. The preferred economic alternative for our nation is to accelerate construction of a new UPF sized for the anticipated needs of our country.

Clark, Donald

Page 1 of 6

WD007

From: Don Clark [clarkjd@frontiernet.net]
Sent: Monday, November 16, 2009 1:07 PM
To: DIV.Y12SWEIS.Comments
Subject: Resources to supplement the testimony of Donald B. Clarkas attachments. To be a part of the record
Attachments: tool\_kit.pdf; ussigners.pdf; UCS\_Complex2030\_factsheet.pdf; mciCurriculum.pdf

firstName=Donald
lastName=Clark
organization=Network for Environmental and email=clarkjd@frontiernet.net address1=P.O.Box 220
address2= city=Pleasant Hill state=TN
zip=38578
country=USA
subject=Draft Y-12 SWEIS

115.0 comments=Submitting 4 multipage attachments seems impossible by this method. Please supply an EMAIL ADDRESS Thank you

SUDDENLY ONE APPEARED Thank you
Donald B. Clark, on behalf of
Cumberland Countians for Peace & Justice and Network for Environmental & Economic Responsibility United Church of Christ P..O.Box 220, Pleasant Hill, TN 38578
(931) 277-5467 clarkjd@frontiernet.net

Also represent the Southern California Ecumenical Council , the Cornucopia Network of New Jersey ,Inc. The Caney Fork Headwaters Association.

Clark, Donald

Page 2 of 6

WD007

**BREAKING FAITH  
WITH NUCLEAR WEAPONS**

A Guide for Religious Communities

Prepared by Faithful Security: the National Religious Partnership on the Nuclear Weapons Danger

[www.faitfulness.org](http://www.faitfulness.org)

Clark, Donald

Page 3 of 6

WD007

**NUCLEAR INFORMATION  
AND RESOURCE SERVICE**

6930 Carroll Avenue, Suite 340, Takoma Park, MD 20912  
301-270-NIRS (301-270-6477); Fax: 301-270-4291  
[nirsnet@nirs.org](mailto:nirsnet@nirs.org); [www.nirs.org](http://www.nirs.org)

**"We do not support construction of new nuclear reactors as a means of addressing the climate crisis. Available renewable energy and energy efficiency technologies are faster, cheaper, safer and cleaner strategies for reducing greenhouse emissions than nuclear power."**

**U. S. Organizational Signers (611 as of 4 pm, September 23, 2009)**

**National Organizations**

- Nuclear Information and Resource Service
- Greenpeace
- Sierra Club
- Friends of the Earth
- US PIRG
- Public Citizen
- Clean Water Action
- Environmental Working Group
- Sun Day Campaign
- Institute for Energy and Environmental Research
- Physicians for Social Responsibility
- Rainforest Action Network
- Sustainable Energy and Economy Network
- Code Pink
- Voters for Peace
- Energy Justice Network
- Alliance for Nuclear Accountability
- Government Accountability Project
- Beyond Nuclear
- Peace Action
- Nuclear Age Peace Foundation
- Global Network Against Weapons and Nuclear Power in Space
- U.S. Climate Emergency Council
- Healthy Building Network
- Epsilon Eta—National Environmental Honors Fraternity
- NukeFree.Org
- Lawyer's Committee on Nuclear Policy
- Indigenous Environmental Network
- Radiation and Public Health Project

Clark, Donald

Page 4 of 6

## New Nuclear Weapons: RRW <sup>WD007</sup>

Union of Concerned Scientists Fact Sheet

The U.S. Department of Energy (DOE) has proposed the development of a new generation of nuclear warheads. Over the next several decades, the so-called Reliable Replacement Warhead (RRW) program would **redesign and replace the entire U.S. nuclear arsenal with new warheads**. First funded at \$9 million in Fiscal Year 2005 (FY05), the Bush administration's request for FY08 is \$88.8 million in DOE funding for design and development work and \$30 million for the Navy to plan to install RRW warheads on Trident missiles. Through FY12, the total proposed budget for RRW is \$725 million.



Trident II  
missile launch

### The Reliable Replacement Warhead Program...

#### Is unnecessary.

All the evidence indicates that the existing U.S. stockpile of nearly 10,000 nuclear warheads is highly reliable and that it will remain so for many decades. Based on an extensive testing and monitoring program at the three nuclear weapons laboratories, the Secretaries of Energy and Defense have certified to the President, each year since 1997, that **all warhead types in the U.S. nuclear stockpile are safe, secure and reliable**. In late 2006 the JASONs (an independent panel of scientists and engineers that has long advised the U.S. government on nuclear weapons issues) assessed data from plutonium "accelerated aging" experiments conducted at the nuclear weapons laboratories. The report concluded that the **plutonium components in U.S. nuclear warheads have lifetimes of at least 85 years**, and possibly much longer. Since the oldest warheads were built in the 1970s, the core nuclear components of current warheads will remain vital for at least another fifty years.

The initial design of the first new warhead, designated RRW-1, was recently approved, and a First Production Unit is planned to be built by 2012. It would replace the 100-kiloton W76 warhead deployed on U.S. Trident II submarine-launched ballistic missiles. Yet **the W76 does not need to be replaced**. A refurbishment program on the W76 is just beginning that will extend its lifetime for 30 years.

For the first time since the end of the Cold War, the DOE would task the nuclear weapons laboratories to design a new nuclear core (the Nuclear Explosive Package or NEP) containing the fission primary—with its plutonium "pit"—and the thermonuclear secondary device. A nuclear weapon consists of several thousand components, of which the NEP is considered to be the most reliable. The **NEP has few moving parts** and is inherently robust: in formal reporting, it has traditionally been **described as 100% reliable**. In contrast, the least reliable component of the weapon is the delivery system—the missiles or bombers that carry the warheads to their targets. Results from missile flight tests indicate that approximately 15% of the time, some type of delivery system failure would prevent the warhead from reaching its target.



Components of 340 kiloton yield  
B61 gravity bomb.

Clark, Donald

Page 5 of 6

WD007

#### Won't yield REAL nuclear reductions for decades.

Proponents of RRW maintain that the program will lead to reductions in the U.S. nuclear stockpile, particularly in the reserve, or "hedge," forces. By 2012, the United States plans to maintain some 6,000 nuclear warheads, including 2,200 operationally-deployed strategic weapons. The DOE has made clear that **reductions below this level would await creation of a "responsive infrastructure"** that could quickly build additional weapons, including new types, if judged necessary. According to DOE, creating this capability would require developing and producing several new types of RRW warheads, which would take two decades or more. Moreover, a U.S. infrastructure that could quickly produce a large number of warheads would raise concerns among other nuclear weapon states and be a barrier to deep reductions in nuclear arsenals worldwide.

The RRW could be "misunderstood by our allies, exploited by our adversaries, complicate our work to prevent the spread of nuclear weapons, and make resolution of the Iran and North Korea challenges all the more difficult."

~ Sam Nunn, Congressional Testimony,  
March 29, 2007

#### Could lead to new nuclear explosive testing.

The DOE maintains that these new warheads can be deployed without conducting nuclear explosive tests. However, the United States has never certified and deployed a new nuclear warhead design without first conducting a series of full-scale nuclear explosive proof tests. Many weapons scientists are skeptical that a new warhead could be certified to be reliable and safe with the same level of confidence as our existing weapons without nuclear testing. In any case, there would be **tremendous political and military pressure to test any new nuclear designs**, if only to reassure future U.S. politicians, the military and our allies that the new warheads will work as designed.

### We Need New Policies, Not New Weapons.

The **RRW program would return the nuclear weapons laboratories to the Cold War cycle** of nuclear weapon design, development and production. It would preserve and extend an irrational nuclear war-fighting posture left over from the Cold War that makes the United States less secure. Despite the end of the Soviet Union, the United States still maintains thousands of nuclear weapons on high alert, capable of being launched within minutes. **This nuclear posture undermines U.S. nonproliferation goals** and perpetuates the only current threat that could destroy the United States: a Russian nuclear attack—either accidental, unauthorized, or deliberate but based on false information.

**Congress should eliminate funding for the RRW program.** It is unnecessary: our current nuclear arsenal is safe and reliable. What is needed is **a new nuclear policy that would lead to the elimination of nuclear weapons**. Congress should begin now to consider what such a policy would look like.

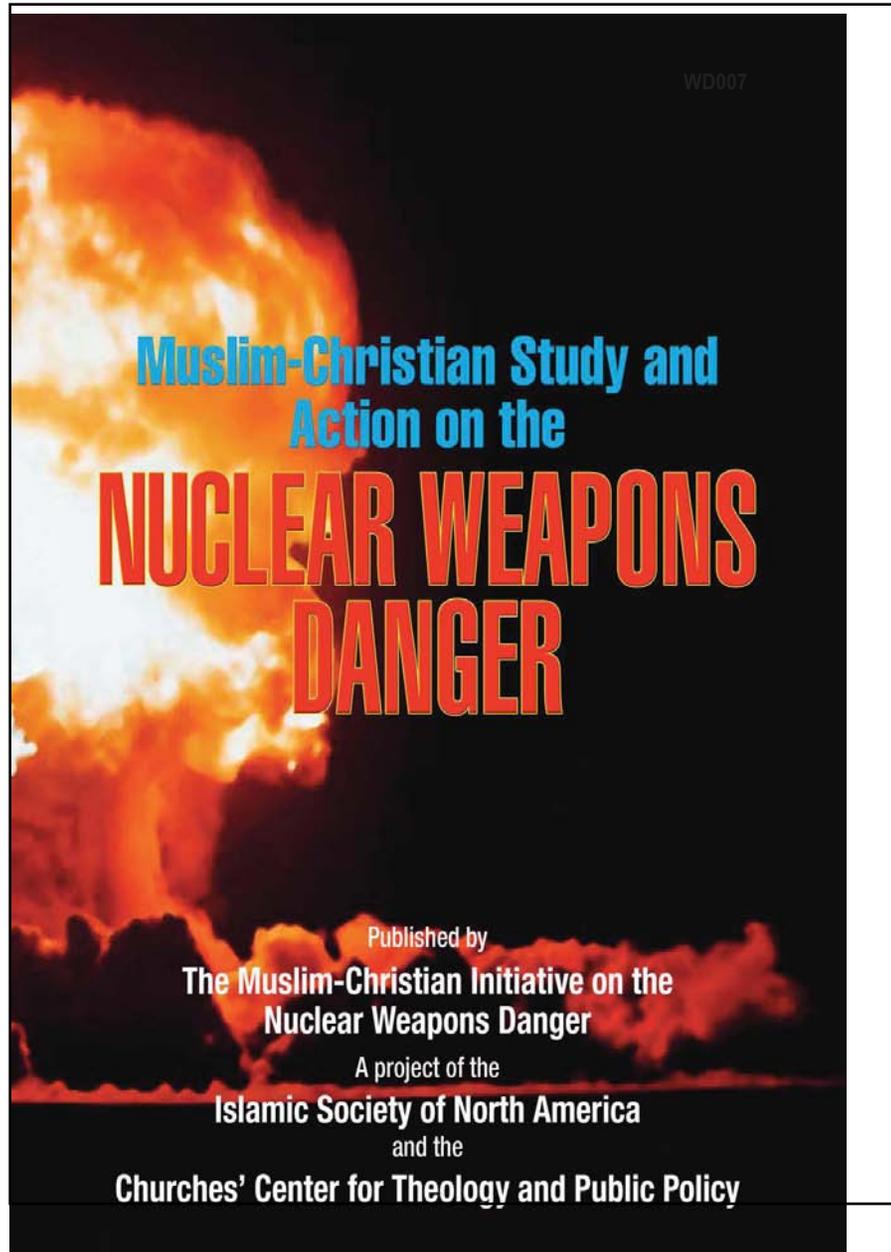
For more information, contact Dr. Robert Nelson, Senior Scientist, at [rnelson@ucsusa.org](mailto:rnelson@ucsusa.org) or 202-558-5307; or Stephen Young, Washington Representative, at [syoung@ucsusa.org](mailto:syoung@ucsusa.org) or 202-331-5429.

Union of Concerned Scientists  
[www.ucsusa.org](http://www.ucsusa.org)

2 Brattle Square • Cambridge, MA • 02238-9105 • Phone: 617-547-5552 • Fax: 617-864-9405  
1707 H St NW, Suite 600 • Washington, DC • 20006-3962 • Phone: 202-223-6133 • Fax: 202-223-6162  
2397 Shattuck Avenue, Suite 203 • Berkeley, CA • 94704-1567 • Phone: 510-843-1872 • Fax: 510-843-3785

Clark, Donald

Page 6 of 6



Clark, Olga

Page 1 of 1

WD048

---

**From:** Chris Clark [clclarkusa@gmail.com]  
**Sent:** Monday, December 07, 2009 7:57 PM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** Form posted from Windows Internet Explorer.

firstName=Olga  
 lastName=Clark  
 organization=  
[email=olgarclark@gmail.com](mailto:email=olgarclark@gmail.com)  
 address1=1813 Hart Road  
 address2=  
 city=Knoxville  
 state=TN  
 zip=37922  
 country=USA  
 subject=Draft Y-12 SWEIS

1|7.0 |comments=I have reviewed the draft Y-12 SWEIS online. Building Alternative 4, a Capability-sized Uranium Processing Facility is the right option. We need a facility in the US to process high enriched uranium. Y-12 is the logical place to build the replacement facility.

1

Coghlan, Jay

Page 1 of 19

WD118

From: Jay Coghlan [jay@nukewatch.org]  
 Sent: Saturday, January 30, 2010 11:33 PM  
 To: DIV.Y12SWEIS.Comments  
 Subject: NukeWatch NM Y12 comments  
 Attachments: NWNM-Y12 SWEIS draft comments1-30-10.pdf

Dear Ms. Gorman:

Attached are Nuclear Watch New Mexico's comments on the Y12 dSWEIS.

I would appreciate acknowledgment of receipt and readability.

Thank you,  
 Jay

Jay Coghlan, Executive Director  
 Nuclear Watch New Mexico  
 551 W. Cordova Rd., #808  
 Santa Fe, NM 87505  
 Phone and fax: 505.989.7342 cell: 505.920.7118  
[jay@nukewatch.org](mailto:jay@nukewatch.org)  
[www.nukewatch.org](http://www.nukewatch.org)  
[www.nukewatch.org/watchblog/](http://www.nukewatch.org/watchblog/)

1

Coghlan, Jay

Page 2 of 19

WD118



January 30, 2010

Ms. Pam Gorman  
 Y-12 SWEIS Document Manager  
 800 Oak Ridge Turnpike, Suite A500  
 Oak Ridge, TN 37830

Via email to: [y12sweis.comments@tetrattech.com](mailto:y12sweis.comments@tetrattech.com) and [comments@y-12sweis.com](mailto:comments@y-12sweis.com)

Nuclear Watch of New Mexico respectfully submits these comments for the Draft Site-Wide Environmental Impact Statement for the Y12 National Security Complex in Oak Ridge, Tennessee (DOE/EIS-0387), hereinafter "Y12 dSWEIS." Nuclear Watch is a Santa Fe, NM-based watchdog organization that works both on nuclear weapons policy and related environmental issues, with a particular focus on the Los Alamos National Laboratory (LANL). However, we know that all National Nuclear Security Administration (NNSA) sites are integrated and interlocking parts of a national nuclear weapons complex, in which the whole exceeds the sum of its parts, and therefore take an active interest in Y-12 as well.

#### The Y12 dSWEIS Should Be Re-Scoped After the Pending Nuclear Posture Review

The original Y-12 SWEIS scoping period was over four years ago. We request that this dSWEIS be withdrawn and re-scoped, which we believe is particularly apt given the newly declared long-term national security goal of eliminating nuclear weapons and a new Nuclear Posture Review (NPR) scheduled for release within a month. It is unseemly for the agency to not wait one more month in the face of its long delay in releasing this Y12 dSWEIS.

12.1 More than just the ineffectual adverb "unseemly," arguably NNSA is acting contrary to its legal obligations under the National Environmental Policy Act (NEPA). Council on Environmental Quality NEPA regulations, which the Department of Energy (DOE) had to adopt, states:

Environmental impact statements may be prepared, and are sometimes required, for broad federal actions such as the adoption of new agency programs or regulations (Sec. 1508.18). Agencies shall prepare statements on broad policy actions so that they are relevant to policy and are timed to coincide with meaningful points in agency planning and decisionmaking. CEQ Regulations for Implementing NEPA, §1502.4, parentheses in the original.

Clearly the soon to be released NPR is a huge "meaningful point in agency planning and decisionmaking." Buttressing that, CEQ NEPA Regulations §1508.18 "Major Federal Action" states:

Nuclear Watch New Mexico 551W. Cordova #808 Santa Fe NM 87505  
 505.989.7342 Phone and Fax \* [www.nukewatch.org](http://www.nukewatch.org) \* [info@nukewatch.org](mailto:info@nukewatch.org)

Coghlan, Jay

Page 3 of 19

WD118

(b) Federal actions tend to fall within one of the following categories:

1.... Formal documents establishing an agency's policies which will result in or substantially alter agency programs.

2. Adoption of formal plans, such as official documents prepared or approved by federal agencies which guide or prescribe alternative uses of Federal resources, upon which future agency actions will be based.

3. Adoption of programs, such as a group of concerted actions to implement a specific policy or plan; systemic and connected agency decisions allocating agency resources to implement a specific statutory program or executive directive. Ibid., § 1508.18

1|2.1 (cont)

Again, clearly the pending Nuclear Posture Review falls within the ambit of all of the above.

The "Cover Sheet" to the existing Y12 dSWEIS states:

NNSA had originally planned to issue the Draft Y-12 SWEIS in late 2006; however, in October 2006, NNSA decided to prepare a supplemental programmatic environmental impact statement (SPEIS) related to transforming the nuclear weapons complex ("Complex Transformation SPEIS"). As a result, NNSA decided to delay the Draft Y-12 SWEIS until the programmatic decisions on the Complex Transformation SPEIS were made. On December 19, 2008, NNSA announced a Record of Decision related to the Complex Transformation SPEIS (73 FR 77644). In that decision, NNSA decided that the manufacturing, storage, and research and development missions involving uranium will remain at Y-12, and NNSA will construct and operate a Uranium Processing Facility at Y-12. This Draft Y-12 SWEIS assesses the potential environmental impacts of reasonable alternatives for implementing that programmatic decision at Y-12.

As the Complex Transformation SPEIS explains "The Nuclear Posture Review establishes the broad outline for future U.S. nuclear strategy, force levels, and infrastructure. The Nuclear Posture Review is a classified report prepared by the Department of Defense." CT SPEIS, p. 1-4. The predecessor to the CT SPEIS is the 1996 Stockpile Stewardship and Management PEIS (which, after all, the CT SPEIS is technically a "Supplement" to). The CT SPEIS continues, "The 1994 NPR defined and integrated past and present U.S. policies for nuclear deterrence, arms control, and nonproliferation objectives. At the time of the 1994 NPR, it was anticipated that the *START II Treaty* would enter into force in 2004. Based on this anticipation, the 1996 SSM PEIS analyzed the potential impacts of reasonable alternatives that might be implemented over a 10-year period." Ibid., p. 2-3.

In Figure 2-1 – "Policy Perspective of the Stockpile Stewardship Program and Complex Transformation" the CT SPEIS depicts how the 2001 NPR is a major policy piece that with others (like international treaties and Presidential Decision Directives) sequentially drive the CT SPEIS' "purpose, need proposed action, and alternatives." It further states, "NNSA has been considering

Nuclear Watch New Mexico • Comments on the Draft Y-12 SWEIS  
January 30, 2010 • Page 2

Coghlan, Jay

Page 4 of 19

WD118

how to continue the transformation of the Complex since the [Bush Administration] Nuclear Posture Review was transmitted to Congress in early 2002." Ibid., 3-1. NNSA now states, "In this new Y12 SWEIS, NNSA continues to assess alternatives for the modernization of Y12, including implementation of the Complex Transformation SPEIS decisions." Y12 dSWEIS, p. S-4.

One CT SPEIS decision was

Manufacturing and R&D involving uranium will remain at the Y-12 National Security Complex in Tennessee. NNSA will construct and operate a Uranium Processing Facility (UPF) at Y-12 as a replacement for existing facilities that are more than 50 years old and face significant safety and maintenance challenges to their continued operation. CT SPEIS Record of Decision, NNSA, 12/18/08.

The Obama Administration has stated that its new Nuclear Posture Review will be released this March 1. It was originally due before the end of 2009. NNSA first issued a Notice of Intent for a new Y12 dSWEIS on November 28, 2005. Yes, the Obama NPR is late, but we strongly argue that NNSA should have rescoped this Y12 dSWEIS after the release of the NPR. It is not sufficient to predict that the NPR will justify the UPF (maybe it will, maybe it won't). Especially galling, as a minimalist position, is NNSA's decision to not extend the deadline for designated public comment period until at least a few weeks after the release of the new Nuclear Posture Review.

1|2.1 (cont)

#### The Y12 dSWEIS Should Be Re-Scoped Because NNSA Has Changed the Alternatives

The NNSA Federal Register Notice of Intent <<http://www.oh.doe.gov/nepa/noi/71270.pdf>> dated\_11/28/05 notes under Alternatives for the Y12 dSWEIS:

Alternative 1 includes the No Action Alternative and proposes to modernize the Y-12 National Security Complex around a modern Uranium Processing Facility (UPF). Alternative 2 includes the No Action Alternative and proposes extending the life of existing facilities with only the most cost effective modernization possible without replacing the current structures. Alternative 3 consists of reducing site operations as facilities reach the point where they can no longer be safely operated without significant repairs or modernization.

However, this present Y12 dSWEIS is based on the 2001 Y-12 SWEIS, not the scoping that was done in December 2005 and January 2006, as the document states:

#### S.1.4 Scope of this Y-12 SWEIS and Alternatives

This Y-12 SWEIS (DOE/EIS-0387) expands on and updates the analyses in the 2001 Y-12 SWEIS (DOE/EIS-0309) (DOE 2001a), and includes alternatives for proposed new actions and changes since the 2002 Y-12 SWEIS ROD (see Section S.3 for a more detailed discussion of these alternatives). The No Action Alternative for this SWEIS is the continued implementation of the 2002 ROD, as modified by decisions made following analysis in subsequent NEPA reviews.

Nuclear Watch New Mexico • Comments on the Draft Y-12 SWEIS  
January 30, 2010 • Page 3

Coghlan, Jay

Page 5 of 19

WD118

1|2.1 (cont) NSA errs in a disconnect between what it solicited for public scoping comment in 2005 and what it does does now in this Y12 dSWEIS. Further, NNSA has expanded the range of legal alternatives from 3 in the 2005 Notice of Intent to five in the present Y12 dSWEIS. We argue this inappropriate course of agency action further buttresses the need to rescope this Y12 dSWEIS.

**This Y12 dSWEIS Must Be Site-Wide and Not Just UPF Centered**

2|2.F The purpose of the Y12 SWEIS is to update the 2002 Y12 Site-Wide Environmental Impact Statement. The Department of Energy's NEPA regulations that require SWEISs also require a Supplemental Analysis every five years in order to determine whether a new SWEIS should be prepared. In this instance, DOE did not wait five years to begin preparing a new SWEIS—three years after the Record of Decision, which issued from the first SWEIS, on November 25, 2005, NNSA announced its intent to prepare a second SWEIS. This decision was not based on a Supplemental Analysis as required by NEPA regulations, but was driven by the desire to move forward with construction of the Uranium Processing Facility, a decision which NNSA declared not yet "ripe for consideration" in the initial SWEIS. Please explain the timing of this SWEIS.

The Y12 SWEIS is supposed to undertake a comprehensive presentation and analysis of ongoing and future operations, activities and facilities at Y12. The purpose of a SWEIS, rather than a more simple EIS on the Uranium Processing Facility alone, is to take a more comprehensive look—to place proposed actions in the broader context. The Draft Y12 SWEIS fails to provide such analysis and evaluation, describing instead two proposed new construction projects:

1. Facility(s) required to meet uranium production mission requirements (five alternatives are considered, including three sizes of a new Uranium Processing Facility); and
2. A new command post for security and emergency response operations (the Complex Command Center).

3|2.G.1 The environmental impacts of all current and foreseeable operations at Y-12 must be included in a final Y12 SWEIS. The dSWEIS includes a vague assurance that the location for the new CCC will be chosen to avoid CERCLA issues. The description of the new facility contains no evaluation or analysis of environmental impacts associated with the CCC, despite its seven acre footprint. The vague assurance provided in the dSWEIS Summary is insufficient to meet NEPA requirements for Categorical Exclusion let alone an Environmental Impact Statement. Since NNSA has determined that the CCC is covered by this SWEIS, a more thorough environmental analysis must be prepared. It must include consideration of locations (outside the security zone v. proximity for emergency response), impact on remediation activities, an assessment of vulnerabilities associated with a consolidated center, and a complete accounting of costs over the lifetime of the facility. Other reasonable alternatives must be considered, including a No Action alternative.

In today's economic climate—with a proposed three-year freeze on much federal spending and major sectors of the government being asked to endure sacrifices and reductions, NNSA must show that the benefits of the CCC justify the considerable expense of this elective project; it is not enough to declare up-front savings through a privatization scheme. The CCC may be a wise expenditure of public money, and the proposed location may be ideal; but given the absence of

Coghlan, Jay

Page 6 of 19

WD118

3|2.G.1 (cont) information in the SWEIS, there is simply no way to tell. The public should be able to look at real plans and numbers to determine whether the CCC is a valid, justifiable expense and to comment *before* a Record of Decision is announced.

The vast majority of the dSWEIS is devoted to the facility(s) required to meet the uranium handling, processing and production mission requirements, including an analysis of five "reasonable" alternatives: No Action (NA); Upgrade-In-Place; a new Uranium Processing Facility with a throughput production capacity of 125 warheads/year (UPF125); the "Capability-Sized UPF" with a production capacity range of 50-80 warheads/year (UPF80); and the "No Net Production UPF, with a production capacity of 5 warheads/year (UPF5).

**The Uranium Processing Facility Should Be Re-Missioned,  
Or Not Built at All**

4|3.B A key reference document for the Complex Transformation SPEIS, the *Independent Business Case Analysis of Consolidation Options for the Defense Programs SNM and Weapons Programs*, [http://www.complexttransformationspeis.com/links\\_ref\\_pdfs.html](http://www.complexttransformationspeis.com/links_ref_pdfs.html) ("TechSource 2007a"), noted that all existing nuclear weapons undergoing refurbishment through Life Extension Programs receive a rebuilt Canned Subassembly (i.e., secondary) with old secondaries as the feedstock. (Page 6-2). In many ways this appears to be the unpublicized but main programmatic driver for the Uranium Processing Facility to build these new secondaries.

5|3.C The Y12 SWEIS should explain why rebuilt secondaries are necessary for refurbished US nuclear weapons. There is a plutonium component analogy here, where NNSA use to claim that the reliable lifetime of plutonium pits was on the order of 45 years. In contrast, a review by the independent JASONs concluded that plutonium pits last 85 years or more. It is generally accepted that secondaries are far less complicated and sensitive than plutonium pits. NNSA should specifically answer in Y12 SWEIS the question why rebuilt secondaries are necessary for refurbished US nuclear weapons.

4|3.B (cont) Even in the event that rebuilt secondaries are necessary, NNSA needs to answer the question why a multi-billion dollar Uranium Processing Facility is necessary. Why can't the existing 9212 complex be sufficiently restored and/or upgraded, and related or not why can't some floor space be made available in the new ~\$700 million HEU Materials Facility for necessary residual secondary components production? The Y12 SWEIS needs to seriously examine these alternatives that could save American taxpayers serious money and better achieve the newly stated national security goals of suppressing nuclear weapons proliferation by example.

**Presentation of Alternatives Must Be Made Clearer**

7|2.G.2 The distinction between No Action, which includes a list of upgrades, maintenance and replacement activities already self-approved by NNSA, and Upgrade-in-Place is not clear from the analysis provided. Any assessment meant to inform a decision would have to include costs. None are provided, though statements about employment and economic impact, unsupported by real or estimated dollar numbers, are included in the assessment.

Coghlan, Jay

Page 7 of 19

WD118

8|7.B The physical distinction between the UPF80 and the UPF5 is not clear from the information presented in the SWEIS—the description suggests the two alternatives have identical floor space and equipment; the designations of throughput capacity appear to be a distinction without a difference. The only apparent difference is the number of people working, a difference that can be erased by an ad in the newspaper. If there is a real capacity difference between the UPF80 and the UPF5, the SWEIS should make it clear—the proliferation implications are enormous. The UPF80 expands US warhead production capacity and sends a powerfully provocative message to the rest of the world. The UPF5 is more supportive of US nonproliferation goals and indicates a serious US commitment to a nuclear weapons free future.

9|10.C Failure to provide cost estimates is a serious deficiency. The United States is currently in a severe economic recession; funding for many social services and programs are being cut at the very time they are most needed. The cost of each of the proposed alternatives is a significant determinative factor. The SWEIS is long on benefits, especially of its preferred alternatives, and makes claims of cost savings through efficiencies, workforce and footprint reduction, etc. But no legitimate cost estimates of the five alternatives is presented which would allow a comparison of costs and benefits associated with each alternative. A final decision would certainly benefit from such an analysis. We argue that since NEPA requires an analysis of socio-economic impacts, the analysis must be included in the SWEIS and subject to broad scrutiny. Please provide the estimated costs of all alternatives. More strongly put, NNSA has made unsubstantiated claims that “Complex Transformation” will save taxpayers money. Great, we hope so, but in the strongest terms challenge NNSA to back up these claims with credible data.

The recent report of the General Accounting Office on DOE’s cost-estimating practice does not inspire confidence in the cost estimates that have been publicized to date about the UPF. Rather than follow accepted procedures for estimating costs, NNSA has provided estimates that apparently have no basis in reality and at least a 50% margin of error—the difference between two and three billion dollars is significant. NNSA should provide reliable cost estimates resulting from approved estimating procedures that allow a fair comparison of the cost/benefits of each alternative.

#### The Purpose and Need Of This SWEIS Are Based on Outdated Assumptions

This is the starting point for the SWEIS. The purpose and need are predicated on a number of documents and policies, which define the mission requirements at Y12. The SWEIS lists several of the documents, which govern current missions: the 2001 Nuclear Posture Review, the START Treaty (now expired), and the Moscow Treaty. Each of these demonstrates the continuing reduction of the US nuclear stockpile. Diminishing requirements have already led to the decision to downsize the Special Materials Complex.

10|1.A.1 While it is impossible to predict the future with certainty, it is clear that US nuclear weapons policy is in transition. Presidents Obama and Medvedev are preparing to sign a new START Treaty, which will reduce the current stockpile ceiling to 1,675 warheads. President Obama has called these reductions a “first step” toward deeper reductions. Most experts foresee a stockpile size of 1,000 warheads or less within the decade. The Nuclear Posture Review being prepared for President Obama is now expected to be released in March of 2010—it will provide force structure requirements, which will directly impact the mission requirements at Y12.

Nuclear Watch New Mexico • Comments on the Draft Y-12 SWEIS  
January 30, 2010 • Page 6

Coghlan, Jay

Page 8 of 19

WD118

After delaying the release of the Draft SWEIS for several years, NNSA has now declined to hold the public comment period open an extra sixty days to allow for an informed engagement with the public after the Y12 mission requirements are clearer. NNSA says it has built in flexibility with alternatives that cover a range of possibilities. This is not preferable to a focused examination of a specific proposal; it is inefficient and places an unnecessary burden on the public to address hypothetical scenarios.

Within these constraints of uncertainty, it is still possible to reflect on the impact on Y12’s mission requirements from what *is* known about the future of the US nuclear stockpile. Five critical facts:

- 10|1.A.1 (cont)
1. The stockpile will continue to get smaller. Reductions set in the START Treaty of 2010 will retire more than 500 warheads; President Obama has indicated his determination to pursue further deep reductions, and President Medvedev concurs.
  2. The warheads that remain in the US arsenal will need to be maintained. Given the recent report of the JASON certifying the reliability of the US arsenal, it is clear that a program of surveillance and maintenance will be sufficient to guarantee the reliability of the existing US stockpile for the foreseeable future—at least forty-five years. There is no urgent need for expanded warhead production capacity.
  3. There is currently a significant backlog, at least ten years and maybe as many as fifteen years, of retired warheads awaiting dismantlement. Reports from Y12 indicate storage capacity issues for secondaries and cases continue to grow. It is clear that existing capacity is not sufficient to address the dismantlement requirements from previous arms reduction agreements and warhead retirements.
  4. The need for dismantlement capacity will grow, rapidly and urgently, as new arms control agreements enter into force. Current facilities, already stretched beyond their capacity, will be expected to absorb and process hundreds more secondaries and cases over the next decade.
  5. The US has no need for expanded warhead production capacity. Statements from State Undersecretary Ellen Tauscher in January, 2010, affirm the US will not pursue new warhead design or expanded military capabilities for the nuclear arsenal.

4|3.B (cont) Please explain the purpose and need of the proposed UPF in light of these on-going developments.

#### The Nonproliferation Impacts of UPF Alternatives Must Be Considered

11|1.E.1 The impact of the UPF decision on US efforts to constrain nuclear proliferation is perhaps more important than the local or regional environmental and socioeconomic impact analyzed in the SWEIS. The SWEIS does not address nonproliferation concerns in detail, which is a shortcoming that must be rectified in the final SWEIS—or addressed in a Supplemental EIS on Nonproliferation Impacts. The Y12 SWEIS refers instead to nonproliferation analysis prepared for the Stockpile Stewardship and Management PEIS in 1996, asserts the program is fully consistent with US obligations under the Nonproliferation Treaty, and further asserts the analysis remains valid.

The arguability of the 1996 assertion is obvious; it was not tested against the expectations or understanding of other NPT parties. To assert that a program designed to extend the life of the

Nuclear Watch New Mexico • Comments on the Draft Y-12 SWEIS  
January 30, 2010 • Page 7

Coghlan, Jay

Page 9 of 19

WD118

US nuclear stockpile for the indefinite future is in compliance with the NPT, in which the US promised to pursue in good faith complete disarmament at an early date defies, common sense. The plain meaning of the words of the NPT contradict DOE's 1996 assertion.

11|1.E.1 (cont) The context—indeed the entire landscape—for nuclear nonproliferation discussions has changed so dramatically and so fundamentally that no clear-thinking person can imagine an analysis prepared in 1996 would be anything more than historically interesting. In other words, no analysis of nonproliferation concerns in 1996 can be relied upon with a straight face in 2010; to attempt to do so, as the Y12 SWEIS does, is either a demonstration of ignorance or a clumsy attempt to dodge the most serious and central concern attached to the proposal to build a new weapons production facility.

Whichever of these explanations lies closer to the truth is not important—what is important is the necessity of a serious, thorough consideration of the nonproliferation impacts, circa 2010, of the proposal to build a new nuclear weapons production facility as part of a complex-wide effort to reconstitute full-scale warhead production capacity.

If the NNSA believes it can move forward with a UPF, or a UPF80, or even an “expandable” UPF5 without undermining US nonproliferation efforts in 2010, it has a responsibility to explain its rationale and subject it to external review.

#### Purpose and Need Cry for a Reality Check

9|1.A.1(cont) According to the recent JASON study analyzing the Stockpile Stewardship Program, the US has a safe, secure, and reliable stockpile. Since 1996, more than \$90 billion has been spent “modernizing” the nuclear weapons stockpile. By 2018 (the time a new UPF would come on-line) the US stockpile of refurbished “Life Extended” warheads will exceed the maximum number allowed by the START Treaty.

12|9.C At this point, it seems clear that the idea of a full-scale UPF, or any Alternative that would maintain a production capacity throughput of 125 warheads/year, stands outside the bounds of what is “reasonable.” Construction of a \$3.5 billion-plus warhead production facility when the US is attempting to regain its stature as an international leader in nonproliferation efforts, to assuage concerns of non-nuclear weapons states on the eve of the NPT Review, and to dissuade Iran from further developing its nuclear capability is not only not reasonable, it is not rational.

13|3.A The UPF125 is no longer NNSA's bomb plant of choice. Whether NNSA has abandoned its original proposal because it recognized the changing realities of US nuclear stockpile force structure or because it recognized a full-scale UPF would be a hard sell to Congress does not matter. What matters is that the NNSA no longer needs to be able to build 125 secondaries and cases/year.

14|7.A By a not-so-remarkable coincidence, the warhead production capacity of the preferred alternative is 50/80 warheads per year—not 60/90 or 50/75—and 50/80 warheads per year matches the capacity of the Chemistry and Metallurgy Research Replacement-Nuclear Facility at Los Alamos. No explanation is given for this apparently arbitrary capacity or for the range of

Nuclear Watch New Mexico • Comments on the Draft Y-12 SWEIS  
January 30, 2010 • Page 8

Coghlan, Jay

Page 10 of 19

WD118

warheads rather than a target number. Please explain the purpose and need of each of the alternatives' capacities.

15|1.D At this point, it is clear that the equation of purpose and need has been significantly redrawn since the UPF was first proposed in 2005, and has continued to seek a new equilibrium since the Draft Y12 SWEIS was published in October 2009. The US has now disavowed new warhead production or design, and significant modifications to the existing stockpile. As Ms. Tauscher indicates, this shift is an effort to demonstrate the seriousness of the US commitment to nonproliferation. As the US commitment to nonproliferation grows, the “need” for the UPF80 evaporates.

This leaves on NNSA's table three alternatives: No Action, Upgrade-In-Place, and the UPF5. Each of these is, according to the Y12 SWEIS, examined because it is reasonable. The UPF5 proposes a new facility, cost undeclared, sufficient to meet the needs of a Stockpile Stewardship program that provides passive surveillance and maintenance of the stockpile and can produce a limited number of replacements for components lost during destructive testing. What is most important about the UPF5 is the number—5. NNSA says this is the capacity needed to maintain the existing arsenal.

16|8.A NNSA identified the UPF80 as its preferred option in the SWEIS (pp. 3-41,42). *Every single benefit of the UPF80 listed accrues equally to the UPF5.* In other words, there is no distinguishing benefit of the UPF80 over the UPF5. On the other hand, the one distinctive difference—the UPF80 reconstitutes full-scale nuclear warhead production capacity—carries a profound liability; it undermines the President's commitment to demonstrate global leadership in disarmament efforts and it ~~corrupts US~~ nonproliferation goals.

17|7.C The draft SWEIS does not adequately provide information to support the square footage requirements asserted for the space in the preferred alternative, what amount of the UPF would be used for what stated purpose and what amount of the facility is set aside for future purposes. This failure to adequately describe space requirements for the individual operational requirements of UPF violates NEPA and prevents the public, elected officials and decision makers from their ability to comment on the analysis. A much more detailed and thorough description of space requirements for the each purpose of the project, the amount of space set aside for future purposes and other information relevant to analyzing the adequacy of the size and scale of the facility proposed in the preferred alternative is required by law.

#### An Alternative 6 Must Be Analyzed: Dedicated Dismantlement Facility - Consolidate and Down-Size Production Capacity (5 warheads/year) in Existing Upgraded Facility.

18|9.B As we did in our January 30 2006 Y-12 scoping comments, we again state that dismantlement activities must be more than casually addressed and that an expanded dismantlement alternative must be considered in this SWEIS.

We again suggest that the Y-12 SWEIS must make an agency-wide robust dismantlement program central to its analyses under all alternatives. We still think it best that a mission devoted overwhelmingly to dismantlements should be a sixth formal alternative, but clearly the activity is

Nuclear Watch New Mexico • Comments on the Draft Y-12 SWEIS  
January 30, 2010 • Page 9

Coghlán, Jay

Page 11 of 19

## WD118

- relevant to NNSA's other proposed alternatives, all of which should be infused with expanded dismantlement activities.
- 18|9.B (cont) Please analyze a sixth alternative to the five outlined in the Y12 dSWEIS. This alternative most fully addresses Y12 mission requirements for the foreseeable future. It has the added virtue of maintaining more jobs than the UPF80 or the UPF5, and achieves the cost savings of a reduced security footprint.
- The draft SWEIS does not distinguish between the equipment "needs" for dismantlement of nuclear weapon secondaries at Y-12 and the equipment "needs" for their production, including the production of new and modified designs. While there is some crossover or dual use, it is nonetheless true that one can draw a line between equipment for dismantlement and equipment for production. They are not the same from a technical perspective. They are not the same from a NEPA compliance perspective. Further, the people of the US and the world can and do distinguish between disarmament and dismantlement of nuclear weapons and producing new ones. They are not the same in terms of policy and political impacts.
- 19|2.G.3 The draft SWEIS is fatally flawed by its willful refusal to substantively distinguish between these two different activities (production and dismantlements). All of the UPF options presented, including the "preferred alternative" fail to analyze a dismantlement-missioned UPF and distinguish it from the production oriented UPF options. Thus, the alleged alternatives in the draft SWEIS are reduced to being mere variations on the same production theme with only a marginal difference in square footage between them.
- The future of Y12 is in dismantling tens of thousands of nuclear weapons. Because this part of Y12's mission has been largely neglected for decades, there is a 12-15 year backlog of retired secondaries and subassemblies awaiting dismantlement and disposition. The backlog is large enough to create storage issues and, on more than one occasion, criticality safety violations.
- Y12 projects future dismantlement at a steady rate—but this is not enough to meet the country's needs and certainly not enough to persuade other nations we are aggressively acting to reduce our stockpile and meet our obligations under the NPT. Y12 should establish the capability to more than double its throughput for dismantling nuclear weapons; a new dedicated, single-use facility, with security, safeguards, and transparency designed in, should be built.
- 20|9.D The current Y12 SWEIS pays little attention to dismantlement operations, treating them as an adjunct to the production mission of the UPF. Over the course of the next decade, however, the need for production capacity will continue to diminish, and the demand for dismantlement/disposition capacity will balloon. While there is some overlap of operations and equipment used in production and dismantlement operations, DOE/NNSA documents also suggest dismantlement operations can stand alone.
- 21|9.B We propose construction of a new, single-purpose Dedicated Dismantlement Facility (DDF), equipped only with machines and equipment necessary for dismantlement. The DDF must avoid dual-use capabilities if it is to remain not provocative and internationally verifiable. The facility design should incorporate verification and inspection protocols as they are developed.

Nuclear Watch New Mexico • Comments on the Draft Y-12 SWEIS  
January 30, 2010 • Page 10

Coghlán, Jay

Page 12 of 19

## WD118

- Production capacity for the purpose of stockpile surveillance and maintenance can be accomplished at a 5 warhead/year throughput capacity within an existing facility, a capacity now known to be "reasonable" according to the NNSA. In keeping with the goals of NNSA's Integrated Facilities Disposition Project, operations can be consolidated and downsized in an existing facility, mostly likely Building 9212, which is slated to receive more than \$100 million worth of upgrades in the next decade. Envisioning US participation in an international verification regime during disarmament, safeguard and transparency protocols should be incorporated into the upgrades as they are designed. Throughput capacity of five warheads a year will be adequate to assure the safety and security of the current stockpile as it awaits retirement.
- 21|9.B (cont) The location of the DDF should be determined by a balancing of mission, security efficiency, and environmental, safety, and health requirements.
- 21|9.B (cont) The high security footprint could be reduced by as much as 60%. The new, dedicated dismantlement facility could be designed and built at considerable savings over the proposed UPF, and would provide the most efficient and effective technologies for this increasingly critical mission as well as safe working conditions for its workforce over its 50-60 year life span.
- The currently operating production facilities can be upgraded to standards protective of worker and public health and safety as well as protective of nuclear materials themselves for \$100 million (NNSA's estimate)—a dramatic savings over the estimated \$3.5 billion cost of the UPF.
- 22|12.H Under NNSA's proposals, a new UPF would have a significant detrimental economic impact on the Oak Ridge community and surrounding regions. Workforce reductions range from 40% (nearly 2,600 jobs lost) in the UPF80 scenario to 48% (3,100 jobs lost at Y12, nearly 11,000 jobs lost in the region) under the UPF5 alternative. Compounding the regional negative economic impact: the jobs to be cut would belong-term, high-salary jobs (annual DOE median salary is \$54,000) rather than lower-paying short term construction jobs (industry average \$26,000).
- Alternative 6 provides a win/win for the local workforce and regional economy. Construction of a new Dedicated Dismantlement Facility along with ES&H upgrades to existing facilities would preserve construction jobs and maximize job security for operational workforces—an increase in dismantlement jobs might be expected to mitigate the impact of any job losses experienced due to the inevitable reduction in Y12's production mission.
- 21|9.B (cont) In any scenario, the increase in security efficiency combined with a reduction in the high security area footprint will result in a decrease in security employment. Reduction of the high security footprint should permit acceleration of demolition and cleanup projects at Y12 which are currently hampered by security concerns—an aggressive effort by local leaders to secure funding for cleanup could offset losses in the security sector and minimize the regional economic impact. This is true for Alternative 6 as well as NNSA's.
- Alternative 6 is the *only* alternative that fully supports the nuclear policy goals of the current Administration: it supports maintenance of a safe, secure and reliable stockpile through passive surveillance and maintenance as the stockpile diminishes toward zero in a way that bolsters US

Nuclear Watch New Mexico • Comments on the Draft Y-12 SWEIS  
January 30, 2010 • Page 11

Coghlan, Jay

Page 13 of 19

WD118

nonproliferation efforts on the international stage by demonstrating leadership as called for by President Barack Obama in Cairo, Egypt. DOE's alternatives fail to walk this tightrope, sacrificing US nonproliferation/security goals on the altar of a reconstituted nuclear weapons production complex.

21|9.B (cont) Finally, Alternative 6 has the potential to save billions of dollars, reducing the price tag for new construction from \$3 billion for a new UPF, to funding for a new dismantlement facility (cost to be determined, but likely in the neighborhood of \$1 billion) and upgrades to existing facilities (NNSA estimate \$100 million). The Final Y12 SWEIS should fully analyze the economic impact of Alternative 6. Given the recent findings of the General Accounting Office that "The cost estimates of the four projects we reviewed [one of which was the UPF] lacked credibility because DOE did not sufficiently cross-check the projects' cost estimates with ICEs, use best practices when identifying the level of confidence associated with the estimates, or sufficiently analyze project sensitivities," cost estimates for all alternatives should be subjected to a rigorous outside audit.

#### Seismic Events/Natural Phenomena Must be Analyzed

The SWEIS does not address seismic risks in detail. It asserts that, under the No Action alternative, there is no change in risk from earthquakes. In assessing the UPF, the SWEIS states new construction would incorporate protections into the design of the new facility that would reduce risks from seismic activity, but absent specific design information, the SWEIS says a full analysis of consequences of an earthquake are not possible. Nevertheless, the SWEIS declares a UPF designed to Performance Category 3 would be sustain damage "less frequently than in existing facilities."

23|12.M.1 While it is not necessary that Y12 production operations continue uninterrupted in the event of a natural phenomena event, it is crucial that building integrity be maintained for security purposes as well as for worker, environmental and public health protection. It is not clear from the description provided in the SWEIS, that a PC2 or even a PC3 designation provides that level of building integrity.

Similar analysis addressing risks from tornadoes and flooding must also be conducted; the location of Y12 in a narrow valley, combined with the naturally high water table in Bear Creek Valley, indicate a significant risk from floods. The immersion of HEU in water changes criticality calculations dramatically, adding a unique dimension to the analysis required in assessing risks from flooding.

An updated seismic hazards analysis must be done for the Y-12 site.

#### Accident Scenarios And Risk Analysis Of Release Events Must Be Given A More Thorough Analysis

The actions at Y-12 do not take place in a vacuum; the Y-12 site was added to the Environmental Protection Agency's National Priorities List (Superfund) in December 1989. The Superfund list documents the nation's most pressing environmental contamination challenges. All discussion of future activities and environmental impacts must start from this baseline. The draft Y-12 SWEIS

*Nuclear Watch New Mexico • Comments on the Draft Y-12 SWEIS  
January 30, 2010 • Page 12*

Coghlan, Jay

Page 14 of 19

WD118

should discuss the effects of completed Superfund actions and the future effects of any proposed remedies or mitigation actions.

24|12.J.3 In light of the historic astounding releases of such a dangerous substance, the draft SWEIS should fully document past, present and projected future releases of mercury to all media (soil, water, air); explore the potential harm of past, present and projected future releases to humans, flora, fauna and the environment; and fully describe past, present and future cleanup of mercury in soil, water, and facilities. Generally, the SWEIS should elevate and prioritize Y-12 cleanup of all contaminants as a central mission, which we note is significant in its absence as a site mission in the SWEIS. The draft SWEIS should indeed posit cleanup as a central mission, and discuss future cleanup programs in full.

The SWEIS evaluation of accident scenarios cites methodologies used to "evaluate the potential consequences associated with a release of each chemical in an accident situation." (p. 5-91) This language suggests multiple materials were analyzed for risks to workers, the environment and the public from releases. But the actual accident scenario description says, "the chemical analyzed for release was nitric acid," suggesting only one chemical was used for computer modeling to evaluate consequences associated with a release. There is no indication that nitric acid is a reasonable or realistic substitute for all possible chemical releases—does it match anhydrous hydrogen fluoride, for instance in solubility, migration in soils, dispersion in air? Is nitric acid chosen as a representative of the worst possible chemical released?

Hydrogen fluoride, as used at Y-12, represents the potential for significant health and safety exposures to workers and the off-site public. Please describe and name the computer models used for off-site release scenarios. Please include the raw input data used for these models.

25|12.M.2 The draft SWEIS mentions lithium in numerous places but neglects to detail the forms in which it is used and the attendant environmental risks. Lithium hydride, for example, is "extremely hazardous" to health (requiring full protective suits); it is flammable and reactive. In particular, it reacts violently with water (including human perspiration).

Because little was said about lithium in the draft SWEIS, it is impossible to comment more fully on the specific hazards posed by lithium at Y-12 and how to mitigate them. We note, however, that the weapons activities at Y-12 that would use lithium generally would present all of the above-listed hazards. Therefore, a more complete analysis of lithium risks and mitigation measures must be included in the SWEIS. In this context, we note also the failure to include other hazardous materials used at Y-12 in this draft SWEIS.

The SWEIS should analyze a range of accident/spill scenarios, including multiple contemporaneous excursion events due to catastrophic events. Chemicals and hazardous materials that represent the full range of risks posed by materials used at Y12 should be analyzed. "The purpose of a SWEIS is to provide...an analysis of potential individual and cumulative environmental impacts associated with ongoing and reasonably foreseeable new operations and facilities," [Y12 Draft SWEIS, p.1-22] not a narrow look at one scenario involving one hazardous material or an evaluation of impacts associated with one new facility or operation.

*Nuclear Watch New Mexico • Comments on the Draft Y-12 SWEIS  
January 30, 2010 • Page 13*

Coghlan, Jay

Page 15 of 19

## WD118

23|12.M.1(cont) The bounding accident considered in the Y12 SWEIS is an aircraft crash/attack on the UPF. This may, in fact, be the bounding accident for the UPF, but it is not the bounding accident for Y12 site-wide, including the UPF. In the site-wide EIS, an earthquake of magnitude great enough to cause structural failure of several facilities—including the UPF and emergency response and security facilities (the CCC, if built, for instance), with ongoing or uncontrolled releases of hazardous materials—volatiles, fuels, toxic contaminants, uranium, lithium, beryllium, natural gas, mercury—into air and water, loss of material control. This apocalyptic scenario is actually not outside the realm of probability given the confined and compact location of facilities at Y12. A detailed analysis of the cumulative and compounding impacts possible in a severe earthquake or tornado event should be analyzed in the SWEIS as a “bounding event.”

26|2.G.4 Please state how DNFSB recommendation 2004-2, Active Confinement Systems, and DNFSB/TECH-34 are being implemented in the UPF. Passive confinement systems are not necessarily capable of containing hazardous and radioactive materials with confidence because they allow a quantity of unfiltered contaminated air to be released from an operating nuclear facility following certain accident scenarios. Please list the type of confinement for each Y-12 facility, including proposed facilities, and the plans for upgrading existing buildings to active systems. Please describe the effects of having these systems, or not, on releases.

**The Impacts of D&D on Waste Streams Must Analyzed**

Several of the alternatives proposed for the future of Y12—the UPF125, the UPF80, the UPF5, and the Dedicated Dismantlement Facility, will downsize the footprint of Y12’s controlled access area and will permit decommissioning and demolition of a number of facilities, some of which are contaminated with radioactive and hazardous wastes from past operations.

27|12.L The SWEIS must analyze the waste streams generated by accelerated D&D, and all of the wastes streams must be fully characterized and quantified. Treatment, disposal and/or storage options for those wastes must be evaluated. In addition, the Y12 SWEIS should identify other cleanup operations which may have an impact on the environment that are likely to take place over the next five to seven years. In cases where waste streams might compete for limited storage or disposal space, the SWEIS should be clear about the criteria that will be used to make decisions. The use of off-site facilities, and the transportation hazards attendant to off-site shipments, should be evaluated and compared to the benefits and hazards of on-site treatment, storage or disposal.

The Draft SWEIS acknowledges that massive waste streams will be generated during D&D but does not analyze them, stating only that they “cannot be estimated without a detailed assessment of the facilities.” This is insufficient and does not meet the standard required of a “Site-Wide Environmental Impact Statement” in name. It may be true that it is not possible to fully characterize exact quantities of waste with specificity, but that does not mean gross generalizations are the only thing that can be said [e.g. “D&D activities would also cause health and safety impacts to workers (occupational and radiological), as well as potential health impacts to the public through the release of radiological materials...” p. 5-98]. The Final SWEIS must do better—either attempt a thorough characterization of waste streams, or propose a timeline for preparing a Supplemental EIS on Waste Streams from D&D.

Coghlan, Jay

Page 16 of 19

## WD118

28|12.O At present, there is no other forum for a comprehensive analysis of environmental management activities at Y12. This segmentation of cleanup projects has obvious disadvantages—the SWEIS provides a vehicle for at least identifying cross-cutting issues and establishing a minimal level of information that can be used to coordinate cleanup/waste management activities. Since no such vehicle exists otherwise, the SWEIS should be a site-wide environmental impact statement (duh!).

The draft SWEIS fails to adequately analyze the existing contamination and then compounds the failure by not properly prioritizing cleanup in considering the future of Y-12. Cleanup and dismantlement of secondaries are examples of two crucially important (and reasonable and practical) future missions for Y-12 that must receive far more detailed consideration than given in this draft SWEIS.

**Risks From Releases Must Be Given A More Thorough Analysis**

24|12.J.3 (cont) The SWEIS treatment of potential releases to air and water is partial, incomplete and deficient. It does not list materials/contaminants used at Y12; does not provide information about scenarios in which materials might be released; and does not even use a probability/risk matrix to perform a cursory overview of risks posed by the various materials used in uranium processing operations at Y12. It may be true that some small fraction of these materials is classified, but the vast majority of materials have been documented elsewhere—in the Oak Ridge Health Agreement Steering Panel study, for instance. The SWEIS can provide detailed analysis of these materials and assessment of risks associated with release scenarios without disclosing their purpose.

29|12.J.4 In instances where releases are examined, the analysis must be complete and meaningful. With regard to uranium discharges to the atmosphere, for instance, the amount of uranium released is measured in curies. Uranium is also a toxic heavy metal that carries risks from its chemical properties; these risks must also be evaluated, along with an analysis that combines the biologic and radiologic risks. Use of curies as unit of measure gives no hint to the amount of material released or its particle size, or its toxic burden.

An example of the level of detail appropriate for analysis in the SWEIS can be found on pages 2-16 and 2-17 of the Draft SWEIS, where NNSA provides detailed descriptions, including quantities, of reductions in materials through the Pollution Prevention, Conservation and Recycling Programs.

**Effects On Water Quality Must Be Analyzed For All Foreseeable D&D Projects**

30|12.D Water quality, particularly the negative impact of Y12’s operations on East Fork Poplar Creek, continues to be a concern. The SWEIS indicates 70kg of uranium was released offsite through liquid effluent in 2007 (apparently the most recent year for which numbers are available). The SWEIS also indicates NNSA has appealed for relief from water permits, and that mercury releases at Station 17 exceed Tennessee Water Quality Criteria 75% of the time.

As noted above, D&D and likely new construction has the potential to add to this burden, and the site-wide EIS is the starting point for an assessment of the characteristics of that additional

Coghlan, Jay

Page 17 of 19

WD118

burden. The effects on water quality must be analyzed for all foreseeable D&D projects and for all operations at the Y-12 site.

#### Nuclear Materials From Other Locations Must Be Analyzed

Y12's mission includes support for the Global Threat Reduction Initiative. Y12's role is to support the retrieval, processing and disposition of Special Nuclear Materials. The SWEIS addresses this mission (p. 5-94ff) and refers to documentation prepared for previous shipments of materials to Y12.

The treatment in the SWEIS of materials received from foreign sources is inadequate. Impacts are assessed only for Special Nuclear Materials. In reality, special nuclear materials are often only part of the total material received. During Project Sapphire, for instance, more than 100 barrels of waste were shipped to Y12; the amount of uranium was only 1,245 pounds, a miniscule fraction of the total amount of waste material imported to Y12. Environmental documentation ignored this other waste material. At the time the Project Sapphire EA was completed, and a Finding of No Significant Impact issued, DOE had not even fully characterized the accompanying materials to determine what hazardous or toxic materials might be present. It was asserted that characterization of a random sampling was sufficient, though the contents of 100 barrels were not homogenous.

The analysis of impacts from the GTRI must be comprehensive and detailed; the impacts of all materials, not just the Special Nuclear Material, must be included. In some cases this will be a relatively easy project. In other cases, like Project Sapphire, it may require an intensive effort. In all cases, workers and the public should be assured ahead of time ("before decisions are made," p. 1-22) that Y12 has the capacity and the capability to safely manage and dispose of *all* material associated with shipments under the GTRI, not just special nuclear materials.

#### Work For Others Must Be Analyzed

The Work for Others Program at Y12 has continued to grow over the last nine years, since the last SWEIS. Work for Others Program activities should be described in detail in this SWEIS, along with the facilities in which the work takes place, materials used, waste streams generated, potential impacts of releases, etc.

#### Analyze Climate Change Effects– 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 a little doubt that DOE will need to analyze the reasonably foreseeable effects of greenhouse gas (GHG) emissions in its NEPA documents," said Eric Cohen, Office of NEPA Policy and Compliance, to participants at the NEPA Compliance Officers meeting. Currently, there is little Federal agency guidance on climate change and NEPA, he said, so DOE's guidance could be among the first. While guidance is being developed, Mr. Cohen recommended taking a "just-do-it" approach to considering GHGs in EAs and EISS" (pg. 12).

There is little doubt that DOE must evaluate GHG/climate change impacts under NEPA. Please use the Ten-Step Approach to Addressing GHG and Climate Change Impacts *from Ron Bass's presentation, "NEPA and Climate Change: What Constitutes a Hard Look?"* The recommended

Nuclear Watch New Mexico • Comments on the Draft Y-12 SWEIS  
January 30, 2010 • Page 16

Coghlan, Jay

Page 18 of 19

WD118

10-step approach takes into consideration the existing provisions of the NEPA regulations, recent court decisions, and various state programs. The steps conform to the main elements of a NEPA document.

#### Affected Environment

**Step 1** – Describe the existing global context in which climate change impacts are occurring and are expected to continue to occur in the future.

**Step 2** – Summarize any relevant state laws that address climate change.

**Step 3** – Describe any relevant national, statewide, and regional GHG inventories to which the project will contribute.

#### Environmental Consequences

**Step 4** – Quantify the project's direct and indirect GHG emissions.

**Step 5** – Convert the GHG emissions into carbon equivalents using an established "carbon calculator."

**Step 6** – Discuss whether the project would enhance or impede the attainment of applicable state GHG reduction.

**Step 7** – Describe the cumulative global climate change impacts to which the proposed action would contribute, i.e., the impacts of the project on climate change. (This may use the same information as in Step 1.)

**Step 8** – Describe how the impacts of global climate change could manifest themselves in the geographic area in which the project is proposed, and therefore potentially affect the project, i.e., the impacts of climate change on the project (e.g., sea level rise could affect a coastal project).

#### Alternatives

**Step 9** – Include alternatives that would meet the project objectives but would also reduce GHG emissions.

#### Mitigation Measures

**Step 10** – Identify mitigation measures that would reduce GHG emissions, including both project design or operational changes and potential compensatory mitigation (e.g., carbon offsets).

#### Analyze All Potential Cumulative Environmental Effects Of Past, Present, And Reasonably Foreseeable Future Actions

The cumulative impacts of all nearby facilities, including ORNL and ETPP, must be examined, including accidents at nearby facilities. This project is connected to the already completed HEUMF, both physically and in terms of its environmental impacts. In addition the Consolidated Manufacturing Complex (CMC) that is planned for the near term future at Y-12 will also be linked to these facilities. The DOE is required by NEPA to analyze connected actions together in one Environmental Impact Statement. By improperly segmenting the HEU storage (HEUMF), HEU processing (UPF), and the "production operation zone" upgrades, (which are envisioned as developing into a small complex or possibly a CMC) the required "hard look" at the cumulative impacts of these facilities together is avoided.

Pursuant to the CEQ's NEPA regulations, "Cumulative impact" is the impact on the environment that results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency or person undertakes such other actions." 40 C.F.R. §1508.7. The cumulative impacts section of the draft SWEIS unreasonably fails to include a look at the connected impacts of the three facilities in one NEPA review document.

Nuclear Watch New Mexico • Comments on the Draft Y-12 SWEIS  
January 30, 2010 • Page 17

**Coghlan, Jay**

**Page 19 of 19**

**WD118**

34|12.N (cont) Cumulative impacts and synergistic effects of potential releases must be analyzed, include all other known existing and possible future contaminants. Describe any additional DOE or NNSA actions potentially impacting operations at Y-12. A 50km radius must be examined for potential cumulative impacts.

- End of Comments -

Respectfully submitted,

Jay Coghlan, Executive Director  
Scott Kovac, Operations Director  
Nuclear Watch New Mexico

**Corcoran, David**

**Page 1 of 1**

**WD061**

**From:** David Corcoran [dcorcor@sbcglobal.net]  
**Sent:** Sunday, January 03, 2010 2:38 PM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** Form Post from Firefox

firstName=David  
lastName=Corcoran  
organization=  
[email=dcorcor@sbcglobal.net](mailto:dcorcor@sbcglobal.net)  
address1=834 South Wolf Road  
address2=  
city=Des Plaines  
state=IL  
zip=60016  
country=USA  
subject=Draft Y-12 SWEIS

1|14.0 comments=Get rid of ALL Nuclear Bombs. We don't need them. They are a treat and a hazard to world peace. NO NEW NUKES are necessary or even maintaining the old ones.

Cordell, Terry

Page 1 of 1

WD112

██████████

---

**From:** Terry Cordell [tjcordell@live.com]  
**Sent:** Friday, January 29, 2010 7:44 PM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** Prefer OREPA alternative 6

Dear Ms. Gorman,  
 I hope it is not too late for me to let you know that:

- 1)9.A | I prefer the OREPA (Oak Ridge Environmental Peace Alliance) alternative 6, which would only cost 100 million and would not include the actual making of nuclear bombs in Oak Ridge, Tennessee;
- 2)3.A | I think it is senseless and irresponsible to spend billions on a facility which, by the time it is completed in 2018, will no longer be needed because the US stockpile of "life extended" warheads will exceed the number allowed by the START treaty at that point, and our focus should be on reducing the stockpile of nuclear bombs;
- 3)12.H | I think it would also not make sense to lose the 2,500 jobs that would be lost in Oak Ridge with the new facility, since it would be largely automated.

Thank you.  
 Terry Cordell  
 Asheville, NC

---

Hotmail: Free, trusted and rich email service. [Get it now.](#)

1

Crowe, Charles

Page 1 of 1

WD076

██████████

---

**From:** Charles Crowe [crowecd@bellsouth.net]  
**Sent:** Monday, January 25, 2010 4:24 PM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** Comments

To whom it may concern.

- 1)7.0 | I am a local business owner and have lived in Oak Ridge, TN for the past 32 years. I support NNSA's Preferred Alternative (#4) to construct the Uranium Processing Facility (UPF) and the Complex Command Center (CCC) at the Y12 Nuclear Security Complex in Oak Ridge, TN, and feel it is important to the continued growth and stability of this community.

Charles Crowe  
 129 Mockingbird Lane  
 Oak Ridge, TN 37830

C&C Specialty Advertising LLC  
 (865) 482-3555  
 Fax: 483-8408

1

Dale, Sigrid

Page 1 of 1

Jan. 21, 2010

MD062

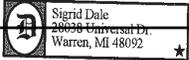
Dear Ms. Gorman,

Thank you for your willingness to listen to ordinary citizens regarding the draft SWEIS for the Y-12 National Security Complex in Oak Ridge, TN

I'm very much opposed to the plans for a new Uranium Processing Facility at Y-12. As a very wise man has said, nuclear weapons are immoral, profoundly dangerous, illegal, hugely expensive and unnecessary. With the increasing poverty in our country, throwing \$ 3.5 billion to continue work on a new nuclear weapons plant is outrageous! And what does that say to potential enemies like Iran and North Korea, whom we are forbidding to create nuclear weapons. I believe this to be the height of hypocrisy, especially at a time when our President has said he wants to see a world without nuclear weapons.

As a follower of Jesus I strongly support "Alternative B" as proposed by the Oak Ridge Environmental Peace Alliance.

Sincerely  
Sigrid Dale  
Warren, MI



Davis, Lincoln

Page 1 of 1

LINCOLN DAVIS  
4th District, Tennessee  
SENIOR WHIP



MD018

COMMITTEES:  
APPROPRIATIONS

SUBCOMMITTEE ON AGRICULTURE,  
RURAL DEVELOPMENT, FOOD AND DRUG ADMINISTRATION,  
AND RELATED AGENCIES  
SUBCOMMITTEE ON ENERGY AND WATER DEVELOPMENT

Congress of the United States  
House of Representatives  
Washington, DC 20515-4204  
November 17, 2009

Ms. Pam Gorman  
Y-12 SWEIS Document Manager  
800 Oak Ridge Turnpike  
Suite A-500  
Oak Ridge, Tennessee 37830

Dear Ms. Gorman,

Please accept this letter as acknowledgement of my full support for the construction of a new capability-sized Uranium Processing Facility at the Y-12 National Security Complex in Oak Ridge to replace the site's current World War II era production complex.

As the Representative to Tennessee's Fourth Congressional District, I have a great appreciation for the critical national security role our men and women serve each day at the Y-12 National Security Complex. Over the past few years, I have had the pleasure of witnessing the tremendous transformation of the Oak Ridge site as the National Nuclear Security Complex prepares to meet our future national and global security challenges. We now must continue this momentum by focusing our attention on the hub of our nation's nuclear security operations, Y-12's uranium processing facilities, which were built more than 50 years ago and are in dire need of replacement.

I urge the National Nuclear Security Administration (NNSA) to move swiftly in replacing these facilities with a new capability-based Uranium Processing Facility at Y-12. It is imperative we build a better and more secure facility that will be safe and provide protection to our workers who have dedicated their lives to this critical security mission.

It is with great pride and gratitude that I give my support to NNSA's decision to maintain our nation's important uranium mission at Y-12 by constructing the new capability-sized Uranium Processing Facility.

Sincerely,

Lincoln Davis  
Member of Congress

Cc: NNSA Administrator Tom D'Agostino  
NNSA Y-12 Site Office Manager Theodore Sherry

410 CANNON HOUSE OFFICE BUILDING  
WASHINGTON, DC 20515  
(202) 225-6631  
Fax: (202) 225-6172

629 NORTH MAIN STREET  
JACKSONVILLE, TN 38505  
(931) 879-2361  
Fax: (931) 879-2389

477 NORTH CHANCERY STREET  
SUITE A-1  
MCMINNVILLE, TN 37110  
(931) 473-7251  
Fax: (931) 473-7259

1054 NORTH GATEWAY AVENUE  
ROCKWOOD, TN 37854  
(865) 954-3323  
Fax: (865) 954-3216

1804 CARMACK BOULEVARD  
SUITE A  
COLUMBIA, TN 38401  
(931) 490-8696  
Fax: (931) 490-8675

www.house.gov/lincolndavis

Davis, Phil

Page 1 of 1

WD098

**From:** phildavisdds [phildavisdds@bellsouth.net]  
**Sent:** Friday, January 29, 2010 9:56 AM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** OREPA alternative 6

1|9.A |Please go with OREPA alternative 6 to halt the new bomb making facility. We really don't need that.  
 2|10.B |Put money into rebuilding bridges and rapid rail passenger transit.

THANKS!  
 Phil Davis  
 Asheville, NC

1

Delap, Ann

Page 1 of 1

WD043

**From:** Ann Delap [anndelap@bellsouth.net]  
**Sent:** Thursday, November 26, 2009 11:32 AM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** Form posted from Windows Internet Explorer.

firstName=Ann  
 lastName=Delap  
 organization=  
[email=anndelap@bellsouth.net](mailto:anndelap@bellsouth.net)  
 address1=5812 Toole Dr.  
 address2=  
 city=Knoxville  
 state=TN  
 zip=37919  
 country=  
 subject=Draft Y-12 SWEIS

1|3.A |comments=Why in the world do we need a new bomb plant? How do weapons of aggression make our country more secure? If we build more bombs, it just encourages our enemies to do the same, escalating tensions around the world.

I realize that many favor any project that promises new jobs, something our economy desperately needs, but why not put people to work dismantling outmoded WMD's? Can't we accomplish this by upgrading existing facilities? We also need to continue the clean-up efforts in Oak Ridge and other places contaminated with nuclear waste.

2|14.0 |Oak Ridge needs to shed its "Cold War" mindset and come up with a new mission, something that will lead us into the future. The real threat to our future is diminishing resources (water, food, energy, etc.) due to climate change and overpopulation. We owe it to our children and future generations to apply our energy, our intellect and our increasingly scarce financial resources to the real challenges ahead. More bombs is NOT the answer.

1

Denton, Kim

Page 1 of 1

WD109

**From:** Kim Denton [denton@orcc.org]  
**Sent:** Friday, January 29, 2010 4:04 PM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** Y-12 SWEIS

Dear Ms. Gorman,

I am writing on behalf of the Oak Ridge Economic Partnership board of directors in reference to the Y-12 National Security Complex Site-wide Environmental Impact Statement. The Oak Ridge Economic Partnership leads the business recruitment, expansion and retention efforts for the City of Oak Ridge.

The Partnership board strongly favors NNSA's Alternative 4: Capability-sized Uranium Processing Facility, which includes the construction and operation of a smaller UPF (350,000 SF) with a throughput of approximately 50-80 secondaries and cases per year, and the construction and operation of a new Complex Command Center.

In step with the Oak Ridge Chamber of Commerce, the Oak Ridge Economic Partnership board respectfully encourages actions from the United States Congress that will support Alternative 4 due to the following rationale:

- 17.0
- Improved operational reliability
  - Improved security posture for special nuclear materials
  - Improved health and safety for workers and the public
  - Highly attractive return on investment

Without UPF, the reliability of existing facilities will continue to erode because of aging facilities and equipment. By proceeding with Alternative 4, operating and maintenance costs will be reduced by approximately 33% from current operations. Further, reducing the cost of the high security area would produce an average annual savings over the 50-year facility life of \$205 million in FY 2007 dollars.

On behalf of the Oak Ridge Economic Partnership board of directors, I appreciate the opportunity to weigh in on the most important issue regarding our nation's security.

Respectfully,

*Kim K. Denton*

Kim K. Denton, CEcD, President  
 Oak Ridge Economic Partnership  
 (865) 483-1321  
[www.oakridgetn.org](http://www.oakridgetn.org)  
 Oak Ridge -- The Energy City

Email Protection & Privacy Policy  
 The information transmitted is intended solely for the individual or entity to which it is addressed and may contain confidential and/or privileged material. Any review, retransmission, dissemination or other use of or taking action in reliance upon this information by persons or entities other than the intended recipient is prohibited. If you have received this email in error, please contact the sender and delete the material from any computer.

Duncan Jr., John

Page 1 of 1

JOHN J. DUNCAN, JR.  
 2ND DISTRICT, TENNESSEE

MD020

2207 RAYBURN HOUSE OFFICE BUILDING  
 WASHINGTON, DC 20515-4202  
 PHONE: (202) 225-5485  
 FAX: (202) 225-6440

Congress of the United States  
 House of Representatives  
 Washington, DC 20515-4202

800 MARKET STREET, SUITE 110 KNOXVILLE, TN 37902  
 PHONE: (865) 528-3772  
 FAX: (865) 544-0728

200 E. BROADWAY AVE, SUITE 414  
 MARYVILLE, TN 37804-5782  
 PHONE: (865) 884-5464  
 FAX: (865) 994-4521

6 EAST MADISON AVENUE COURTHOUSE  
 ATHENS, TN 37303-4297  
 PHONE: (423) 745-4671  
 FAX: (423) 745-6025

November 16, 2009

COMMITTEES:  
 TRANSPORTATION AND INFRASTRUCTURE  
 SUBCOMMITTEES:  
 HIGHWAYS AND TRANSIT—RANKING MEMBER  
 WATER RESOURCES AND ENVIRONMENT  
 AVIATION  
 NATURAL RESOURCES  
 SUBCOMMITTEES:  
 NATIONAL PARKS, FORESTS, AND PUBLIC LANDS  
 OVERSIGHT AND GOVERNMENT REFORM  
 SUBCOMMITTEES:  
 NATIONAL SECURITY AND FOREIGN AFFAIRS  
 GOVERNMENT MANAGEMENT, ORGANIZATION,  
 AND PROCUREMENT

Ms. Pam Gorman  
 Y-12 SWEIS Document Manager  
 Y-12 Site Office  
 800 Oak Ridge Turnpike  
 Suite A 500  
 Oak Ridge, Tennessee 37830

Dear Ms. Gorman:

I am pleased to contact you today on behalf of the thousands of employees who report to work at the Y-12 National Security Complex each day.

11/13.0  
 Y-12 has played a very important role throughout our Nation's history. With the adoption of the Capability-sized Uranium Processing Facility Alternative, the future of Y-12 can be secured as the pre-eminent highly-enriched materials site in the Nation.

11/13.0  
 (cont)  
 Y-12 is already home to the Highly Enriched Uranium Materials Facility, which, through no modest taxpayer investment, and no small amount of dedication by its employees, sets Y-12 apart from much of the rest of the nuclear weapons complex. It is my hope that the Capability-sized UPF Alternative will allow the NNSA to make the necessary investments into modernization that will preserve our nuclear capabilities while protecting the taxpayer at the same time.

With kindest regards, I am

Yours truly,

JOHN J. DUNCAN, JR.  
 Member of Congress

JJD:jjg

Earley, Patte

Page 1 of 1

WD072

From: Patte Earley [pcearley@centurylink.net]  
 Sent: Saturday, January 23, 2010 11:01 AM  
 To: DIV.Y12SWEIS.Comments  
 Subject: Form posted from Windows Internet Explorer.

firstName=Patte  
 lastName=Earley  
 organization=  
[email=pcearley@centurylink.net](mailto:pcearley@centurylink.net)  
 address1=1923 Waters Edge Dr  
 address2=  
 city=Johnson City  
 state=TN  
 zip=37604  
 country=  
 subject=Draft Y-12 SWEIS

11.E comments=Please do not build the Uranium Processing Facility in Oak Ridge TN. By building this facility we are encouraging proliferation of nuclear weapons world wide. US needs to set an example of non-proliferation for the rest of the world if we expect other countries to not build nuclear weapons.  
 rod=Record of decision

Ellis, Jeff

Page 1 of 1

Jan 20 2010 4:36PM YSO Front Office 865 576 1237 page 1

FD002



Draft Y-12 Site-wide  
 Environmental Impact Statement—  
 U.S. Department of Energy  
 National Nuclear Security Administration



Written Comment Form

Must be received on or before January 29, 2010.

117.0 I support the Capability - Sized UPF Alternative

Jeff Ellis  
 Jeff Ellis  
 Delta Research Associates,  
 Y-12 Site Office  
 (865) 576-2406

Please use other side if more space is needed.

Comment forms may be mailed to:  
 Ms. Pam Gorman  
 Y-12 SWEIS Document Manager  
 800 Oak Ridge Turnpike, Suite A-500  
 Oak Ridge, TN 37830

Comment forms may be faxed to:  
 (865) 483-2014  
 or sent by email to:  
 y12sweis.comments@tattotech.com

You may also submit comments through the project website which can be found at:  
<http://www.Y12sweis.com>

Ezelle, J.

Page 1 of 1

OR2D01



**Draft Y-12 Site-wide  
Environmental Impact Statement—  
U.S. Department of Energy  
National Nuclear Security Administration**

**Written Comment Form**  
*Must be received on or before January 29, 2010.*



**NNSA**  
National Nuclear Security Administration

---

The Y-12 Plant is the most logical and cost effective location for the UPF, since the co-location with HEUMF will enhance Safeguards & Security by decreasing shipments of HEU cross-country. Furthermore, experienced, technically cognizant employees are available at Y-12 to support the safe and efficient operation of HEUMF & UPF. I support the environmentally & fiscally sound location of UPF at Y-12, Oak Ridge.

Respectfully,  
J. Don Ezelle  
J. Don Ezelle 11-18-09  
865.576.8862  
9110 Timber Oaks Ct.  
Knoxville, TN 37922

---

Please use other side if more space is needed.

Comment forms may be mailed to:  
Ms. Pam Gorman  
Y-12 SWEIS Document Manager  
800 Oak Ridge Turnpike, Suite A-500  
Oak Ridge, TN 37830

Comment forms may be faxed to:  
(865) 483-2014  
or sent by email to:  
y12sweis.comments@tetrattech.com

You may also submit comments through the project website which can be found at:  
<http://www.Y12sweis.com>

Farmer, Mike

Page 1 of 1

MD007



**Office of the County Executive  
Roane County Courthouse**

November 13, 2009

Ms. Pam Gorman  
Y-12 SWEIS Document Manager  
Y-12 Site Office  
800 Oak Ridge Turnpike, Suite A-500  
Oak Ridge, TN 37830

Dear Ms. Gorman:

I am writing you as County Executive of Roane County in support of the proposed Uranium Processing Facility (UPF) at the Y-12 National Security Complex in Oak Ridge. This facility will be another anchor to the modernization initiative currently underway at Y-12. The draft Site-Wide Environmental Impact Statement (EIS) presents this as the preferred option from several alternatives considered.

Prior to being elected County Executive of Roane County I worked inside the Y-12 plant and have a unique working knowledge of its operation. Also, portions of the Oak Ridge DOE Complex, as well as the City of Oak Ridge, are in Roane County.

Our county and region have always been strong supporters of the uranium processing and nuclear related missions of the Oak Ridge complex. Our region has invested in the development of a highly skilled workforce that has always been responsive to the safe conduct of the operations associated with these missions for more than 60 years. We are prepared to continue to fully support such missions and to continue to invest in regional workforce development that is required for these operations. We do believe that Y-12's continued role in manufacturing and disassembling nuclear warhead components should be conducted in modernized facilities with cost effective and safety focused processes. We think this preferred option of a new UPF achieves this objective.

Thank you for your consideration of these comments. Please include them in the official record of this EIS.

Sincerely,  
  
Mike Farmer  
Roane County Executive

MF:sl  
cc: Ted Sherry  
Congressman John Duncan  
Congressman Lincoln Davis  
Congressman Zach Wamp  
Senator Lamar Alexander  
Senator Bob Corker

P.O. Box 643 • Kingston, TN 37763 • Phone: 865.376.5578 • Fax: 865.717.4215

**Flagg, Thomas**

**Page 1 of 1**

**WD037**

██████████

---

**From:** thomas flagg [drdodrdo@earthlink.net]  
**Sent:** Friday, November 20, 2009 8:49 AM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** no new atomic weapons

1|14.0 | i vote "no" on the topic of new atomic weapons. rather, let's finally begin to dismantle the atomic weapons we now have. and let's involve other nuclear weapons nations to do the same!!

thomas flagg  
[drdodrdo@earthlink.net](mailto:drdodrdo@earthlink.net)  
EarthLink Revolves Around You.

**Ford, Dean**

**Page 1 of 1**

**WD051**

██████████

---

**From:** Dean Ford [dford006@comcast.net]  
**Sent:** Thursday, December 10, 2009 9:02 PM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** Site Wide EIS comments

firstName=Dean  
lastName=Ford  
organization=  
[email=dford006@comcast.net](mailto:dford006@comcast.net)  
address1=11310 Lancaster Ridge Dr.  
address2=  
city=Knoxville  
state=TN  
zip=37932  
country=United States  
subject=Draft Y-12 SWEIS

1|3.B | comments=I think we need to replace the current facilities. Y-12 serves an important mission and the buildings and equipment being used needs to be replaced and upgraded. The current facilities are so old the are unsafe to be in , to work in and are just environmentally unsound. For the safety of the workers and the pubic they need to be replaced. The current facilities were not designed or built with the current environmental regulations in mind. They have been used for processes over the years that they were never really suited for and many of them just need to be torn down and replaced. Some of the equipment is so old the rest of industry quit using years ago. The Complex Command Center needs to be replaced and consolidated to provide better service to the site and better protection for the surrounding areas in case of an emergency.

Freeman, Jenny

Page 1 of 1

WD038

**From:** Jenny Freeman [jfreeman@stratag.org]  
**Sent:** Friday, November 20, 2009 11:51 AM  
**To:** DIV.Y12SWEIS.Comments  
**Cc:** nithin@eteba.org; 'Richard Macon'  
**Subject:** Comments on SWEIS for Y-12

Ms. Pam Gorman  
 Y-12 SWEIS Document Manager  
 800 Oak Ridge Turnpike  
 Suite A-500  
 Oak Ridge, TN 37830

Ms. Gorman:

17.0 I would like to go on record as supporting Alternative 4, Capability-Sized UPF Alternative to construct and operate a new UPF at the Y-12 National Security Complex that would have a reduced capacity while maintaining all enriched uranium processing capabilities. In addition, I support the construction of an emergency management Complex Command Center. These two key components of modernization of Y-12 are essential to the future of the site.

Thank you very much,

Jenny M. Freeman

865-934-3400

371 East Dr. Oak Ridge, TN 37830

Garvey, Lydia

Page 1 of 1

11.20.09 MD031 Ms Lydia Garvey  
 429 S 24th St  
 Clinton, OK 73601-3713

Dear Ms. Gorman,  
 Alternative 6! Current production facilities need to be consolidated, down-sized, meeting environmental, safety & health standards by envisioning U.S. participation in international verification for disarmament, safeguard & transparency protocols. New facility for disposition of retired nuclear weapons needs to be constructed. This would cost \$100M - VS. \$3.5B for UPF! The sanity is clear.

Ending global nuclear proliferation by building more arsenals - is as credible as preaching abstinence - get real! Nukes are toxic - from start to finish.

Your attention to this most urgent matter would be much appreciated by all present & future generations of all species.

Do your job! You work for citizens - Not industry.

Thank-you,  


119.A

Gawarecki, Susan

Page 1 of 2



July 9, 2010

Ms. Pam Gorman  
 NNSA Y-12 Site Office  
 Y-12-10  
 P.O. Box 2050  
 Oak Ridge, TN 37831

*Subject: Y-12 Wetland Assessment*

Dear Ms. Gorman:

The following comments are submitted regarding Appendix G – Wetlands Assessment for the Y-12 National Security Complex. These are transmitted on the deadline by e-mail and will be followed by a hard copy for your files.

- 1|12.T.1 1. Nowhere in the notice or document does it specify what the parent document is for Appendix G. This makes it difficult for stakeholders to put it in the appropriate context and examine the actions that make the haul road necessary and whether it was proposed in the larger document.
- 2|12.T.2 2. Two permits for this action were applied for prior to this wetlands assessment being released. The applications should have been done after public input was received and the decision finalized. By applying for the permits first, Y-12 gives the appearance that it will proceed with the proposed action with no regard for public opinion.
- 3|12.T.3 3. There is confusion regarding the proposed Haul Road extension. "Haul Road" is the commonly understood name of the road that is used to transport waste from East Tennessee Technology Park to the CERCLA Waste Facility. The confusion could be alleviated by including a map of the area that shows the relationship between the UPF site, the various resource sites, the affected wetlands, Bear Creek Road and the CERCLA Waste Facility and its haul road. The use of annotated photographs is insufficient to show the geographic relationships, and the labels of locations on the photos are too tiny to be readable.
- 4|12.T.4 4. Section 2.1 states "Although the primary use for the Haul Road extension would be for construction activities related to UPF, it could also be used to support other Y-12 activities (e.g., future EM cleanup activities at Y-12)." If it does not connect to the CERCLA haul road, then how would support of future cleanup activities be justified? Unless there are well established future needs, it would be preferable to plan for the decommissioning of the Haul Road extension and restoration of affected wetlands after the UPF is finished.
- 5|12.T.5 5. The document seems to imply that soil will be taken from borrow areas for fill and excess soils placed at spoils sites, all accessed by the Haul Road. Appropriate planning for UPF site preparation can minimize the amount of soils transported; soils cut from the site should be used for fill where needed. This will also help control construction costs.
- 6|12.T.6 6. Section 2.3 – The document should give the cost comparison between widening Bear Creek Road and extension of the Haul Road. Additionally, transportation always involves risks, and one must assume that tractor trailers and other large vehicles use Y-12 roadways on a regular basis, with automobile drivers exercising appropriate caution. It is unclear why large dump trucks are expected to pose a special risk.

**Anderson • Meigs • Rhea • Roane • City of Oak Ridge • Knox • Loudon • Morgan**

102 Robertville Rd., Suite B • Oak Ridge, TN 37830 • Phone (865) 483-1333 • (888) 770-3073 • Fax (865) 482-6572 • loc@lox.net • www.local-oversight.org

Gawarecki, Susan

Page 2 of 2

P. Gorman  
 07/09/10  
 Page 2 of 2

- 7|12.T.7 7. In general, it is undesirable to fragment habitats, whether they are wetlands or not. NNSA should reconsider whether existing roadways can be used to support construction of the UPF. The impacts to Bear Creek from widening of Bear Creek Road are likely minimal compared to the habitat and wetland damage and fragmentation from constructing 1.2 miles of Haul Road, which at 40 feet in width equals habitat destruction totaling nearly 6 acres.

Finally, I would like to address your refusal to extend the comment deadline. The Local Oversight Committee's (LOC) Citizens' Advisory Panel (CAP) was not able to review, modify, and approve these comments because the release of the document and its comment deadline fell between the monthly meetings. The CAP is composed of stakeholders from the greater Oak Ridge area and has a strong interest in the use and management of Oak Ridge Reservation lands. As a matter of fact, we are all stakeholders in this effort together.

- 8|12.T.8 None of the reasons you listed for not extending the deadline are compelling; you seem to imply that because you have done the minimum required, you do not need to accommodate a stakeholder group's request. This is a far cry from the excellent working relationship that the LOC and CAP (as well as other community stakeholders) have cultivated with Oak Ridge Office's Environmental Management Program, which has shown courtesy and flexibility in accommodating meeting schedules, and which we had hoped would be duplicated with Y-12. Moreover, citing other documents that have been in the public domain is irrelevant; the comment period is for the Y-12 Wetlands Assessment only. In addition, most Public Notices for NEPA documents available for comment include a statement that comments received after the deadline will be incorporated to the extent possible; it would have been appropriate for you to state this.

We hope that deadlines associated with future Y-12 documents will give sufficient time for stakeholder groups to read, evaluate, and prepare comments.

Sincerely,

Susan L. Gawarecki, PhD  
 Executive Director, Oak Ridge Reservation Local Oversight Committee, Inc.

cc: LOC Document Register  
 LOC Board  
 LOC CAP  
 John Owsley, Director, TDEC DOE-O  
 Pat Halsey, FFA Coordinator, DOE ORO EM  
 Ted Sherry, Manager, Y-12 Site Office, NNSA  
 John Michael Japp, DOE ORO, Y-12 Projects  
 Steven Wyatt, YSO Public Affairs  
 Amy Fitzgerald, City of Oak Ridge  
 Ron Murphree, Chair, ORSSAB  
 Spencer Gross, ORSSAB Staff  
 Mark Livesay, YSO Program and Business Management (electronic only)  
 Terri Slack, YSO General Attorney (electronic only)  
 Thomas Vereb, YSO Program and Business Management (electronic only)

## Gilbert, Constance

Page 1 of 1

WD019

From: Constance Gilbert [connie@cyberhenge.com]  
 Sent: Tuesday, November 17, 2009 6:00 PM  
 To: DIV.Y12SWEIS.Comments  
 Subject: Form Post from Firefox

firstName=Constance  
 lastName=Gilbert  
 organization=  
[email=connie@cyberhenge.com](mailto:connie@cyberhenge.com)  
 address1=226 Julia St  
 address2=  
 city=Key West  
 state=FL  
 zip=33040  
 country=  
 subject=Draft Y-12 SWEIS

1|10.B | comments=Please do not spend solely needed dollars on another nuclear facility at this time. We cannot in good  
 2|1.E | faith ask allies (let alone adversaries) to reduce nuclear capabilities when we increase ours. Thank you.  
 rod=Record of decision

1

## Gill, Eric

Page 1 of 1

WD115

From: Eric Gill [ericg14@me.com]  
 Sent: Friday, January 29, 2010 9:35 PM  
 To: DIV.Y12SWEIS.Comments

firstName=Eric  
 lastName=Gill  
 organization=  
[email=Nonprof1@chitogill.com](mailto:Nonprof1@chitogill.com)  
 address1=2537 Crestmoore Place  
 address2=  
 city=Lo Angeles  
 state=Ca  
 zip=90065  
 country=USA  
 subject=Draft Y-12 SWEIS

1|14.0 | comments=The cold war is over. Enough with the bombs already.

-Eric Gill  
 eg design, los angeles ca  
 design, fabrication, management  
<http://ericgilldesign.com>

1

Goff, Gary

Page 1 of 1

MD011



276 Patton Lane Harriman, TN 37748-5011  
(865) 354-3000 Fax (865) 882-4562  
www.roanestate.edu

November 12, 2009

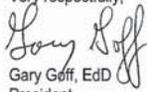
Ms. Pam Gorman  
Y-12 SWEIS Document Manager  
Y-12 Site Office  
800 Oak Ridge Turnpike, Suite A-500  
Oak Ridge, TN 37830

Dear Ms. Gorman,

I am writing you in support of the proposed Uranium Processing Facility (UPF) at the Y-12 National Security Complex in Oak Ridge. This facility will be another anchor to the modernization initiative currently underway at Y-12. The draft Site-Wide Environmental Impact Statement (EIS) presents this as the preferred option from several alternatives considered. This letter documents Roane State's full support of this preferred capability based option.

Roane State Community College has actively and directly participated in the development of a highly skilled workforce that has always been responsive to the safe conduct of the nuclear related operations associated with the Oak Ridge complex for more than 30 years. Roane State is prepared to continue to fully support the education and training needs and to continue to invest in regional workforce development that is required for support of the Oak Ridge complex. We do believe that Y-12's continued role in manufacturing and disassembling nuclear warhead components should be conducted in modernized facilities with cost effective and safety focused processes.

Thank you for your consideration of these comments. Please include them in the official record of this EIS.

Very respectfully,  
  
Gary Goff, EdD  
President

cc: Ted Sherry  
Congressman John Duncan  
Congressman Lincoln Davis  
Congressman Zach Wamp  
Senator Bob Corker  
Senator Lamar Alexander

Serving the counties of  
Roane ♦ Anderson ♦ Campbell ♦ Cumberland ♦ Fentress ♦ Loudon ♦ Morgan ♦ Scott  
(Knox and Blount for Health Sciences)

Goin, Deborah

Page 1 of 1

WD042

**From:** Deb and Laz [debnlaz@att.net]  
**Sent:** Wednesday, January 27, 2010 9:12 AM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** Attn Pat Gorman

I am writing to let you know that there are so many people opposed to the new nuclear warhead facility proposed for Oak Ridge. It seems so senseless and irresponsible to spend billions on a facility which, by the time it is completed in 2018, will no longer be needed. The US stockpile of "life extended" warheads will exceed the maximum number allowed by the START treaty at that point. Also, 2,500 jobs would be lost in Oak Ridge with the new facility, since it would be largely automated. It is a no -win situation for our environment, health and job sector.

I prefer the OREPA alternative 6.  
Thank you for this consideration

Sincerely,  
Deborah Goin  
"If you think you're too small to make a difference, you've never been in bed with a mosquito."

Information from ESET NOD32 Antivirus, version of virus signature database 4810 (20100127)

The message was checked by ESET NOD32 Antivirus.

<http://www.eset.com>

1

Gordon, Gibson

Page 1 of 1

WD018

From: Gordon Gibson [gjgibson@juno.com]
Sent: Tuesday, January 26, 2010 4:19 PM
To: DIV.Y12SWEIS.Comments
Subject: Comments on Oak Ridge Y-12 plans

firstName=Gordon
lastName=Gibson
organization=
email=gjgibson@juno.com
address1=523 N. Bertrand St., Unit 201
address2=
city=Knoxville
state=TN
zip=37917
country=United States
subject=Draft Y-12 SWEIS
comments=I am a citizen whose residence is close enough to Y-12 to be affected by the safety and security of that facility and the safety and security of materials transported to and from that facility.

I follow broad issues on nuclear armaments by reading a number of journals, including Scientific American.

113.0 It seems clear that within the scope of current treaty obligations and strategic objectives of the United States
2|9.A the Alternatives outlined here that come closest to supporting the national interest would include Alternatives
4 and 5. I would also strongly urge positive attention to an "Alternative 6" put forward by the Oak Ridge
Environmental Peace Alliance, which places more emphasis on the dismantlement of existing warheads, which
is of pre-eminent importance in moving in directions enunciated by U. S. Presidents for many decades.

Senior Assisted Living
Put your loved ones in good hands with quality senior assisted living. Click now!
http://thirdpartyoffers.juno.com/TGL2141/c?cp=3HJ5e\_UzTR5oZ\_2XZ5jtsAAAJ1AUfifSyBOLioUhg6jpS5tvO4AAy
AAAAAAAAAAAAAAAAADNAAAAAAAAAAAAAAAAASUQAAAAA=

Gorenflo, Louise

Page 1 of 2

WD064

From: Louise Gorenflo [lgorenflo@gmail.com]
Sent: Wednesday, January 06, 2010 2:23 PM
To: DIV.Y12SWEIS.Comments
Subject: Comments y-12 SWEIS
Attachments: Comments.doc

Please see attached comments.

Your website does not appear to be accepting comments.

Please confirm you have received these comments.

Thank you.

## Gorenflo, Louise

## Page 2 of 2

WD064

Comments: Y-12-SWEIS  
 Louise Gorenflo  
 Cumberland Sustainable  
 185 Hood Drive  
 Crossville, TN 38555  
 lgorenflo@gmail.com

- 1|3.B The proposal by the National Nuclear Security Administration (NNSA) to build a new plant in Oak Ridge for producing nuclear bombs is far too expensive and poorly planned. The estimated cost is about \$3 billion.
- This cost should be reviewed in light of the fact that such a plant is not necessary for Y-12 to carry out its major missions of producing the thermonuclear units and cases for refurbished bombs, dismantling weapons, and safe storing or disposition of nuclear materials.
- 2|1.B This proposal reflects old, Cold War thinking. Most living former secretaries of State, leaders of the Defense department and national security advisers are calling for us to move away from relying on nuclear bombs for security. President George W. Bush ordered deep cuts in our bomb stockpile.
- President Barack Obama has been clear that he is working toward a world without nuclear bombs. There is increasing international interest in this. When the plant is projected to be finished in 2018, the life-extended weapons we already have left in our stockpile will very likely meet our future needs. Does spending \$3 billion for a production plant we probably won't need strike you as good planning?
- 3|12.H This also is not a jobs program. NNSA will cut about 2,600 Y-12 jobs when the proposed plant opens. They also project that no additional construction workers will be needed to build the plant beyond those in Oak Ridge now.
- 1|3.B (cont) Even NNSA recognizes that the current annual capacity of 125 new thermonuclear units and bomb cases is unnecessary. The new plant capacity is in the 50-80 range. But we actually need closer to five for maintaining our bomb stockpile safely. Even if we add another \$100 million for longer-term modernization of Y-12, downsizing and consolidating existing facilities could be done at least 15-20 times cheaper than building the proposed plant.

## Gramling, Nicholas

## Page 1 of 1

WD054

**From:** Gramling, Nicholas (N3G) [gramlingn@y12.doe.gov]  
**Sent:** Thursday, December 17, 2009 6:44 AM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** Y12 SWEIS Comments

Pam,

Please accept the following comments regarding UPF at Y12.

- 1|12.B As a subcontractor working on the UPF project I can admit that Continuing operations in existing facilities is not an option. I would also say that due to the condition of the existing facilities that upgrading the current facilities would be too costly and not a viable option as well. With that said UPF needs to be built but the capacity is the biggest problem. Currently I would say that Construction of a new UPF to replace enriched uranium processing facilities is not necessary. I believe that the technology has advanced to a point that an evaluation should be complete to access the currently used processes for a more efficient one. The main purpose I see in this is that a lot of floor space is currently require for the 1950's developed processes. I believe reducing the footprint is require including reducing capacity. Unfortunately from my experience I have noticed excess equipment and floor space with the typical answer of "we may need it later for future work" and "that is the way we have always done it". I believe that this is not correct methodology and therefore a Capability-Sized UPF alternative or better yet, a No Net Production/Capability-Sized UPF Alternative is the best option. This would allow for research to be completed on advance technology that could possibly be utilized in the future at a location to be determined. These are my opinions and comments, sincerest Regards.
- 2|13.0

*Nicholas Gramling*  
 Mechanical Engineer  
 URS Washington Division  
 1099 Commerce Park Dr. Rm N21  
 Oak Ridge, TN 37830  
 865-241-0034  
[n3g@y12.doe.gov](mailto:n3g@y12.doe.gov)

Haber, Jim

Page 1 of 1

01/06/2006 17:31 7826464814 NEVADA DESERT EXPERI PAGE 02/02  
 FD001



**Nevada Desert Experience**  
 1420 West Bartlett Avenue  
 Las Vegas, NV 89106  
 702.646.4814  
 www.NevadaDesertExperience.org  
 Interfaith Resistance to Nuclear Weapons and War

**Coordinating Committee**  
 Ming San Lai, Chair  
 Sacramento, CA  
 Johnnie L. Bobb and  
 Dr. Bonnie Bobb  
 Austin, NV  
 Alan Edmonson  
 Pleasant Hill, CA  
**National Council**  
 Cheloca Collonge  
 Albuquerque, NM  
 JoAnn Yoon Fukumoto  
 Pearl City, HI  
 Bishop Thomas Grambleton  
 Downs, MI  
 Joe Kennedy  
 Dyer, NV  
 Marcus Page  
 Albuquerque, NM  
 Claudia Peterson  
 St. George, UT  
 Anne Symens-Bucher  
 Oakland, CA  
 Louis Vitale, OFM  
 Oakland, CA  
 Staff  
 Jim Haber  
 Coordinator  
 Megan Rice, SHCJ  
 Assistant  
 Gary Cavalier  
 Bookkeeper

Pam Gorman  
 Y-12 SWEIS Document Manager  
 Y-12 Site Office  
 800 Oak Ridge Turnpike, Suite A-500  
 Oak Ridge, TN 37830  
 17 November 2009

This letter is sent from Las Vegas, NV where the Nevada Test Site is engaged in a scoping process for its updated SWEIS. In both cases, here and in Tennessee, it is alarming to see plans on the table that so clearly violate the spirit of nuclear non-proliferation and our nation's obligation to work towards nuclear disarmament. There is so much fear of weapons of mass destruction, but somehow, justifications abound for the building and retooling of the U.S. stockpiles of just such armaments. |11.E

For the Oak Ridge facility, Alternative 6 as proposed by the Oak Ridge Environmental Peace Alliance is the clear choice in keeping with a commitment to peace. This plan, which needs to be included in the SWEIS and fully given its due consideration, calls for a new dismantlement facility, but no new facilities for Life Extension Programs. Anything that can be construed to be a new generation of nuclear weapons sends the wrong message to the world. There is no justification for building new Secondaries since the U.S. is supposed to be un-building the ones already in existence. Hence there is no possible rationalization to create an enlarged facility to create ever larger numbers of them. |2|9.A

Alternative 5 in the Y-12 SWEIS allows for capacity for construction of up to 10 new Secondaries a year. That is preferable over the alternatives 1 to 4, but why wouldn't any existing Secondaries that are deemed problematic simply be taken off line and ultimately dismantled? |3|1.D

As residents of Nevada in the neighborhood of the Nevada Test Site, we have also spoken out against new weapons designs because ultimately, with enough revisions, new tests will be necessary for deployment. The Comprehensive Test Ban Treaty should be ratified by Congress, and it must be seen to apply to the United States, not just everyone else, and not only to the current list of nations who's people we are told to fear. Therefore everything spent on new and redesigned nuclear weapons will be a waste and may undo progress in the international arena towards reducing the global threat of nuclear weapons. |4|8.0

Finally, any statement about the environment in the context of nuclear weapons (or nuclear power, for that matter) must at the outset acknowledge that any use or creation of this technology is harmful to people and the environment. Nothing can mitigate the problems of the nuclear fuel cycle from mining to waste management. Every step is part of an unsolvable environmental problem. Therefore, every facility's SWEIS needs to recommend the alternative that utilizes no new nuclear material. Anything else creates a worse problem that will last for millennia. |5|1.B

Respectfully submitted,  
  
 Jim Haber  
 Coordinator, Nevada Desert Experience |6|9.0

Hagan, Gary

Page 1 of 2

OR2D04



Draft Y-12 Site-wide  
 Environmental Impact Statement—  
 U.S. Department of Energy  
 National Nuclear Security Administration



**Written Comment Form**  
 Must be received on or before January 29, 2010.

Dear Ms. Gorman.

Thank you for the opportunity to submit  
 comments. I support Alternative 4.  
 I have listened to those who advocate  
 unilateral disarmament, stock pile decay,  
 and alternatives proposed by OREPA. Each  
 of these are idealistic, extreme and dangerous  
 to the nation, NNSA workforce and themselves.  
 A viable nuclear deterrent has prevented global  
 conflicts since their development and allowed our  
 nation to be free. I support sensible stockpile  
 reduction that is best supported by alternative 4  
 and careful disassembly. Our workers reducing  
 the stockpile ~~can~~ best deserve safe facilities  
 and modern tools. The citizens and taxpayers  
 are served best by more efficient operations and  
 eliminating the potential for future sick workers

Please use other side if more space is needed.

Comment forms may be mailed to:  
 Ms. Pam Gorman  
 Y-12 SWEIS Document Manager  
 800 Oak Ridge Turnpike, Suite A-500  
 Oak Ridge, TN 37830

Comment forms may be faxed to:  
 (865) 483-2014  
 or sent by email to:  
 y12sweis.comments@tetrattech.com

You may also submit comments through the project website which can be found at:  
<http://www.Y12sweis.com>

Hagan, Gary

Page 2 of 2



Draft Y-12 Site-wide  
Environmental Impact Statement—  
U.S. Department of Energy  
National Nuclear Security Administration



National Nuclear Security Administration

**Written Comment Form**  
*Must be received on or before January 29, 2010.*

---

My uncle, Bill McNair, was fighting his way across the Pacific when the workers at Y-12 saved his life. I know this because he told me. His twin brother was his wingman and killed in action.

There remain evil and dangerous people in the world that require the strongest possible defense. I too wish this were not true.

313.0 Those who want to wish these materials from the modern world - or believe the existing facilities can be brought up to modern standards - simply lack information - or advocate dangerous approaches.

I have worked in these facilities and designed and built upgrades in the 1980's. UPF and the Complex Command Center ~~are~~ are necessary now. Please select Alternative 4.

117.0 (cont) Gary Hagan 1513 Cranston Drive, Knoxville, TN 37922  
Please use other side if more space is needed.

Comment forms may be mailed to:  
Ms. Pam Gorman  
Y-12 SWEIS Document Manager  
800 Oak Ridge Turnpike, Suite A-500  
Oak Ridge, TN 37830

Comment forms may be faxed to:  
(865) 483-2014  
or sent by email to:  
y12sweis.comments@tetrattech.com

You may also submit comments through the project website which can be found at:  
<http://www.Y12sweis.com>

Hale, Byron

Page 1 of 1

WD045

---

**From:** BHHHale@aol.com  
**Sent:** Monday, November 30, 2009 2:04 PM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** Comments on Y12 National Security Complex-Site-Wide Environmental

Sirs,

Here are my comments on Y-12 National Security Complex Site-Wide Environmental Impact Statement Public Meeting.

113.0 I agree that this country must keep our national defence as the best in the world. I also agree with what I have seen in the Impact statement. But I do not have enough information to be able to decide on which method is best.

I feel the method chosen must be made based on the Economic Analysis of the systems presented. The cheapest methodology must be used as far as I am concerned. But it should be at the Y-12 plant.

I spend 32 years in the Engineering Division and have helped in the design of the facilities that are presently in use. The people at this plant are the best in formulating methodology that will do the job. This plant is much better than the other two. The people have one direction and that is to get the job done.

I was Project Manager for the development and completion of the Alpha 5 North complex. During the enhancement period of 1967. Jim Hodges was the Project Manager of the Beta 2 expansion at the same time. Both were highly successful and have led the United States to where we are today.

11  
13.0  
(cont) I hope these comments are suitable and do not agree with those that are collectively against this project. We as a country must be strong and a leader of the world.

Thanks for the opportunity,

Byron H. Hale  
308 Delta St.  
Clinton, TN 37716  
Ph 865 457 3609

1

Hanley, D. Bridget

Page 1 of 1

**WD022**

---

**From:** Bridget Hanley [bridgethanley@earthlink.net]  
**Sent:** Tuesday, November 17, 2009 10:00 PM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** Form posted from Windows Internet Explorer.

firstName=D. Bridget  
 lastName=Hanley  
 organization=  
[email=b.hanley8@gmail.com](mailto:b.hanley8@gmail.com)  
 address1=11366 Camino Playa Cancun, #7  
 address2=  
 city=San Diego  
 state=CA  
 zip=92124  
 country=U.S.  
 subject=Draft Y-12 SWEIS

1110.B | comments=Please, please, please do not spend billions on building a new plant that will be producing more nuclear weapons. We have plenty already and they are very dangerous weapons.  
 Thank you for your consideration.

1

Hanrahan, Clare

Page 1 of 1

01/06/2010 13:59 FAX 18282326947 4002

~~01/06/2010~~ Box 44  
Apt. 416 MC  
28102  
WR - 318-1118-5700-5000

January 5, 2010 FD004

Ram Gorman  
 Y-12 SWEIS Document Manager  
 Y-12 Site Office  
 800 Oak Ridge Turnpike, Suite A 200  
 Oak Ridge, TN 37830  
 FAX: 865-483-2014 NO, NO, NO  
the  
can't  
NO

Ms Gorman,  
 I trust by now you have heard from many many concerned citizens on this issue. Nuclear weapons are an insane remnant of the last century. The use of such weapons is wrong, dead wrong. The impact on the environment -- on the system of inter connected life that we have a duty to preserve for our children and theirs -- is devastating and dangerous in ways too numerous to list. The risk to us all in dollars and danger is too high.

Please register my emphatic, urgent NO to this 3.5 million dollar Bomb plant.

We do not need an "enduring nuclear stockpile."  
 We need a future free of Nuclear Weapons.

Clare Hanrahan

1114.0

Hardy, Parker

Page 1 of 1



Draft Y-12 Site-wide  
Environmental Impact Statement—  
U.S. Department of Energy  
National Nuclear Security Administration



**Written Comment Form**

*Must be received on or before January 29, 2010.*

*Adopting of measures to modernize Y-12 site  
with Center for Uranium Excellence or  
UPF, along with a Complex Command  
Center will clearly enhance our national  
security, the safety & efficiency of our  
workforce & enhance our economy*

*I support the preferred action*

*Parker Hardy  
123 Amanda Drive  
Oak Ridge, TN 37830*

Please use other side if more space is needed.

Comment forms may be mailed to:  
Ms. Pam Gorman  
Y-12 SWEIS Document Manager  
800 Oak Ridge Turnpike, Suite A-500  
Oak Ridge, TN 37830

Comment forms may be faxed to:  
(865) 483-2014  
or sent by email to:  
y12sweis.comments@tetratech.com

You may also submit comments through the project website which can be found at:  
<http://www.Y12sweis.com>

Hardy, Parker

Page 1 of 1

WD099

**From:** Parker Hardy [hardy@orcc.org]  
**Sent:** Friday, January 29, 2010 12:37 PM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** Y-12 SWEIS

The Oak Ridge Chamber of Commerce is 60-year-old association representing the interests of some 600 businesses, business-oriented institutions and individuals. Foremost among our missions is the enhancement of Oak Ridge's economic vitality. Our members employ literally thousands of Oak Ridgers and East Tennesseans.

1|13.0 Previously, and on numerous occasions and in many venues, the Oak Ridge Chamber has gone on record supporting NNSA measures that would modernize the Y-12 national Security Complex, transforming it into America's Center for Uranium Excellence through construction of UPF at Y-12. The 2008 Record of Decision is consistent with that Chamber policy.

2|7.0 The Oak Ridge Chamber fully supports Alternative 4 – and encourages adoption of – that alternative providing for a UPF of at least the capacity recommended by NNSA and construction of a new Complex Command Center.

Thank you for the opportunity to provide our input.

Parker Hardy, CCE  
President/CEO  
Oak Ridge Chamber of Commerce  
1400 Oak Ridge Turnpike  
Oak Ridge, TN 37830  
T - (865) 483-1321  
F - (865) 483-1678  
[hardy@orcc.org](mailto:hardy@orcc.org)  
[www.oakridgechamber.org](http://www.oakridgechamber.org)

**E-Mail Protection and Privacy Policy**

*The information transmitted is intended solely for the individual or entity to which it is addressed and may contain confidential and/or privileged material. Any review, retransmission, dissemination or other use of or taking action in reliance upon this information by persons or entities other than the intended recipient is prohibited. If you have received this e-mail in error please contact the sender and delete the material from any computer.*

Hargrove, Chris

Page 1 of 1

WD021

From: Chris Hargrove [hargrofire368@charter.net]  
 Sent: Tuesday, November 17, 2009 7:01 PM  
 To: DIV.Y12SWEIS.Comments  
 Subject: Form posted from Windows Internet Explorer.

firstName=Christopher  
 lastName=Hargrove  
 organization=  
[email=hargrofire368@charter.net](mailto:hargrofire368@charter.net)  
 address1=2486 Topside Road  
 address2=  
 city=Louisville  
 state=TN  
 zip=37777  
 country=United States  
 subject=Draft Y-12 SWEIS

1114.0 | comments=Please do NOT build this new ruinous new weapons complex in Oak Ridge, TN.  
 Building such a plant could turn out to be the worst decision our country ever made, unleashing a new upward spiral in the arms race on an already dangerous world.

1

Haslam, Bill

Page 1 of 1

MD025



December 7, 2009

Pam Gorman  
 Y-12 SWEIS Manager  
 Y-12 Site Office, 800 Oak Ridge Turnpike  
 Suite A-500  
 Oak Ridge, TN 37830

Dear Ms. Gorman:

I appreciate the opportunity to share our comments on the Draft Site-Wide Environmental Impact Statement (SWEIS), (DOE/EIS-0387) for the Y-12 National Security Complex in Oak Ridge, TN.

The Y-12 complex is very important to the entire region, including the City of Knoxville. The decision that Y-12 would continue its uranium processing in a new facility was key to the economic health of the region.

1113.0 | I fully support the construction of a new Complex Command Center that will provide emergency services to Y-12. The activities and Y-12 are key to the future of our country and we are very pleased to have them in the region. The planned modernization of the facility is especially welcome. The impact of Y-12, with it thousands of skilled employees, on the region cannot be overstated.

Thanks again for the opportunity to write on behalf of the Y-12 complex.

Sincerely,

Bill Haslam

Heck, Anne

Page 1 of 1

WD086

**From:** Anne Heck [anne@anneheck.com]  
**Sent:** Wednesday, January 27, 2010 10:48 AM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** Choose OREPA Alt. 6

Dear Ms. Gorman,

I'm writing with concern about the proposed nuclear bomb facility in Oak Ridge, Tennessee. I am a neighbor, living in Asheville, NC and am appalled not only by the billions of dollars of spending to be incurred by this project, but more importantly about how unnecessary and irresponsible building this facility is.

I want my voice to be heard in support of OREPA alternative 6; please halt any plans toward the bomb facility.

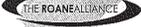
Sincerely,

Anne Heck

Anne Heck  
 15 Arbor Ridge Trail  
 Asheville, NC 28806  
[www.anneheck.com](http://www.anneheck.com)  
 (828) 665-8316

Henderson, Leslie

Page 1 of 1

ROANE COUNTY TENNESSEE  Innovation Valley Partner

MD014

November 18, 2009

Ms. Pam Gorman  
 Y-12 SWEIS Document Manager  
 Y-12 Site Office  
 800 Oak Ridge Turnpike, Suite A-500  
 Oak Ridge, TN 37830

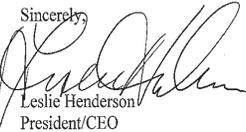
Dear Ms. Gorman:

As the President and CEO of The Roane Alliance, the county's economic development organization, I am writing in support of the proposed Uranium Processing Facility (UPF) at the Y-12 National Security Complex in Oak Ridge. This facility will be another anchor to the modernization initiative currently underway at Y-12. The draft Site-Wide Environmental Impact Statement (EIS) presents this as the preferred option from several alternatives considered.

The economic impact of the Oak Ridge DOE complex on our county and particularly our business community cannot be overstated, as major portions of the Oak Ridge DOE Complex, as well as the City of Oak Ridge, are located here. The impact of the Y-12 operations is a major factor in our local economy and they are a major employer as well.

Our county and region have always been strong supporters of the uranium processing and nuclear related missions of the Oak Ridge complex. Our region has invested in the development of a highly skilled workforce that has always been responsive to the safe conduct of the operations associated with these missions for more than 60 years. We at The Alliance are prepared to continue to fully support such missions and to continue to invest in regional workforce development that is required for these operations. We do believe that Y-12's continued role in manufacturing and disassembling nuclear warhead components should be conducted in modernized facilities with cost effective and safety focused processes. We think this preferred option of a new UPF achieves this objective.

Thank you for your consideration of these comments. Please include them in the official record of this EIS.

Sincerely,  
  
 Leslie Henderson  
 President/CEO

cc: Ted Sherry  
 Congressman John Duncan  
 Congressman Lincoln Davis  
 Congressman Zach Wamp  
 Senator Lamar Alexander  
 Senator Bob Corker  
 Roane County Executive Mike Farmer

INDUSTRIAL DEVELOPMENT BOARD CHAMBER OF COMMERCE VISITORS BUREAU

1209 N. Kentucky Street • Kingston Tennessee 37763 • Telephone: 865.376.2093 • Fax: 865.376.4978 • www.roanealliance.org

Hensley, Noble

Page 1 of 1

MD039



Draft Y-12 Site-wide  
Environmental Impact Statement—  
U.S. Department of Energy  
National Nuclear Security Administration



NNSA  
National Nuclear Security Administration

**Written Comment Form**  
*Must be received on or before January 29, 2010.*

---

113.0 I FULLY SUPPORT THE CONSTRUCTION AND OPERATION OF A NEW URANIUM PROCESSING FACILITY THAT WOULD HAVE A REDUCED CAPACITY WHILE MAINTAINING ALL ENRICHED URANIUM PROCESSING CAPABILITIES. IN ADDITION, I SUPPORT THE CONSTRUCTION OF A NEW COMPLEX COMMAND CENTER AT Y-12.

---

I FULLY SUPPORT THAT THE UPF & CCC BE DESIGNED, CONSTRUCTED AND OPERATED AT Y-12 PLANT, OAK RIDGE, TENNESSEE

---

BOTH FACILITIES SHOULD BE FULLY OPERATIONAL NO LATER THAN 2020.

NOBLE HENSLEY  
*Noble Hensley*, 1-28-10

Please use other side if more space is needed.

Comment forms may be mailed to:  
Ms. Pam Gorman  
Y-12 SWEIS Document Manager  
800 Oak Ridge Turnpike, Suite A-500  
Oak Ridge, TN 37830

Comment forms may be faxed to:  
(865) 483-2014  
or sent by email to:  
y12sweis.comments@tratech.com

You may also submit comments through the project website which can be found at:  
<http://www.Y12sweis.com>

Hickey, William

Page 1 of 1

MD067

January 11, 2010

Pam Gorman, Y-12 SWEIS Document Manager  
Y-12 Site Office  
800 Oak Ridge Turnpike  
Suite A-500  
Oak Ridge, TN 37830

Re New U.S. Nuclear Weapons

Dear Ms. Gorman:

While President Obama has called for abolition of nuclear weapons and initiatives to be taken by nuclear weapons countries and the final review of the nuclear Non Proliferation Treaty will convene in May 2010, there are other voices and actions that undermine these goals and processes.

119.c The US. Department of Energy announced plans for a new nuclear weapons bomb plant in Oak Ridge, TN that will cost 3.5 billion dollars. It will be a full-scale nuclear weapons production facility capable of producing 50-80 secondaries a year. The "secondary" is the thermonuclear part of the nuclear weapon which ignites the massive thermonuclear fusion reaction in the bomb. The Y-12 National Security complex has produced the secondary for every nuclear weapon in the U.S. arsenal.

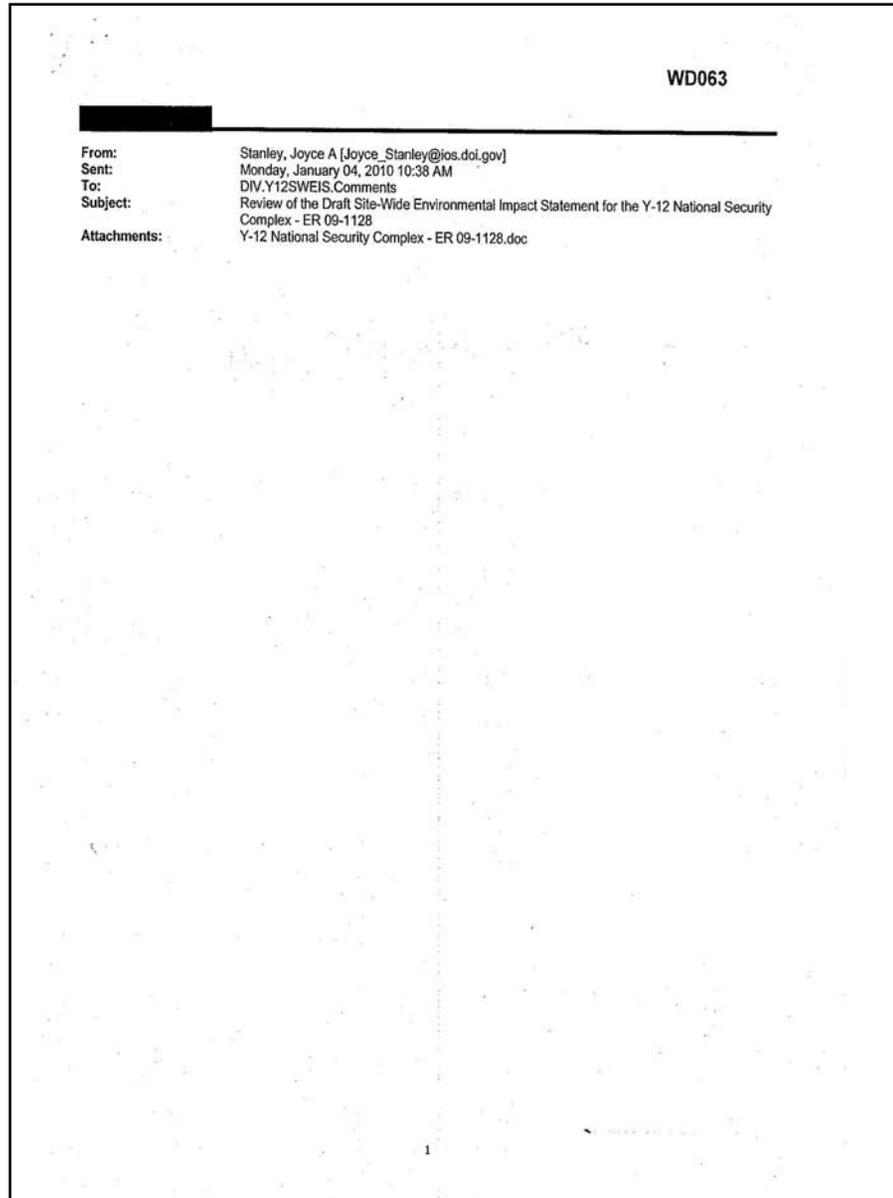
219.a We can no longer tolerate further production of nuclear weapons. They are not simply bigger bombs, are not useable, and are the means of ending all human and animal life on the planet. New nuclear weapons and new nuclear weapons facilities should not be built. Rather, I support the Oak Ridge Environmental and Peace Alliance's (OREPA) Alternative #6, which advocates revamping the Y-12 facility to function primarily in dismantling nuclear weapons in negotiated verifiable steps with other nuclear weapons countries. Furthermore, our nuclear weapons policy should unequivocally renounce first strike use and abandon implicit threats of use against non-nuclear countries. We should end all actions that drive non-nuclear countries to seek nuclear weapons and begin finally to implement our obligations---long ignored---under the Nuclear Non Proliferation Treaty.

Sincerely,

*William Hickey*  
William Hickey  
20445 Briarcliff  
Detroit, MI 48221  
(313) 862-6962

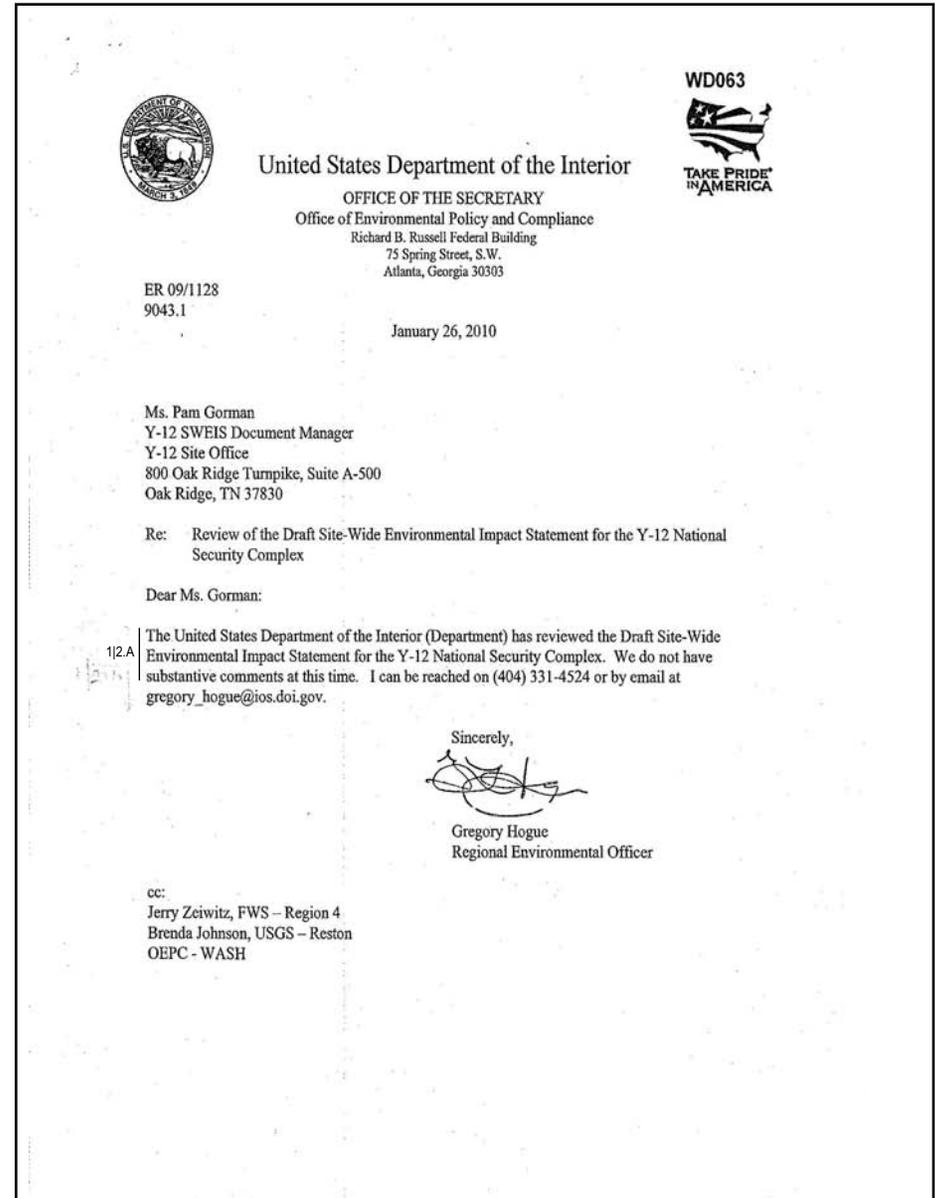
Hogue, Gregory

Page 1 of 2



Hogue, Gregory

Page 2 of 2



Hough, Dennis

Hubbard, Anne

Page 1 of 1

Page 1 of 1

MD053



Draft Y-12 Site-wide  
Environmental Impact Statement—  
U.S. Department of Energy  
National Nuclear Security Administration



NNSA  
National Nuclear Security Administration

**Written Comment Form**  
*Must be received on or before January 29, 2010.*

117.0 I SUPPORT NNSA'S PREFERRED ALTERNATIVE (PROPOSED ALTERNATIVE #4) BASED ON THE NATIONAL SECURITY ~~ISSUES~~ VULNERABILITIES THAT MAY ARISE IF WE (THE COUNTRY) LOSES ITS CAPABILITY, EXPERTISE, AND CAPACITY TO MAINTAIN A NUCLEAR ~~STRATEGIC~~ DETERRENT. THESE NEW FACILITIES AS PROPOSED IN ALTERNATIVE #2 AND #4 SUPPORT KEY NATIONAL SECURITY MISSIONS: MISSIONS WHICH ARE CRITICAL REGARDLESS OF OUR STANCE ON INCREASED NONPROLIFERATION. PLEASE ACCEPT TO THE RECORD MY SUPPORT FOR PROPOSED ALTERNATIVE #4.

*Dennis E. Hough*  
DENNIS E. HOUGH

Please use other side if more space is needed.

Comment forms may be mailed to:  
Ms. Pam Gorman  
Y-12 SWEIS Document Manager  
800 Oak Ridge Turnpike, Suite A-500  
Oak Ridge, TN 37830

Comment forms may be faxed to:  
(865) 483-2014  
or sent by email to:  
y12sweis.comments@tetrattech.com

You may also submit comments through the project website which can be found at:  
<http://www.Y12sweis.com>

MD043



Draft Y-12 Site-wide  
Environmental Impact Statement—  
U.S. Department of Energy  
National Nuclear Security Administration



NNSA  
National Nuclear Security Administration

**Written Comment Form**  
*Must be received on or before January 29, 2010.*

1113.0 Pam

I am definitely in favor of constructing & operating a new WPF that would have a reduced capacity while maintaining all enriched Uranium processing capabilities. In addition I am in favor of constructing a new CCC.

*Thank you!  
Anne Hubbard*

Please use other side if more space is needed.

Comment forms may be mailed to:  
Ms. Pam Gorman  
Y-12 SWEIS Document Manager  
800 Oak Ridge Turnpike, Suite A-500  
Oak Ridge, TN 37830

Comment forms may be faxed to:  
(865) 483-2014  
or sent by email to:  
y12sweis.comments@tetrattech.com

You may also submit comments through the project website which can be found at:  
<http://www.Y12sweis.com>

Hutchison, Ralph

Page 1 of 10

WD103

From: Ralph Hutchison [orep@earthlink.net]  
 Sent: Friday, January 29, 2010 2:52 PM  
 To: DIV.Y12SWEIS.Comments  
 Subject: supplement to OREPA comments  
 Attachments: Future of Y12.pdf

Attached find a pdf of The Future of Y12, supplement to OREPA's comments on the Y12 SWEIS

Ralph Hutchison, coordinator  
 Oak Ridge Environmental Peace Alliance

1

Hutchison, Ralph

Page 2 of 10

WD103



An analysis of capacity and facility needs at the Y12 Nuclear Weapons Complex in Oak Ridge, TN in light of declining production needs and increasing demand for dismantlement.

**I**N A SATELLITE-VIDEO APPEARANCE at the 2001 Nuclear Decision-Makers Forum in Albuquerque, New Mexico, then-Senator Pete Domenici declared from the giant screen that facilities at the Y12 Nuclear Weapons Complex in Oak Ridge, Tennessee were in bad shape. Workers, Domenici said, had to wear hard hats in one building because chunks of concrete were falling from the ceiling. Later in the meeting, the President of BWXT-Y12, operating contractor for the Oak Ridge weapons plant, said Y12 was operating in "run-to-failure" mode.

Upgrading the Y12 facilities has been on the wish-list for the Department of Energy and the National Nuclear Security Administration for nearly two decades. Many of the uranium operations buildings at Y12 were constructed of hollow-clay tiles during the Manhattan Project days of the early 1940s. DOE's own Safety Survey in 1993 said critical facilities would not be expected to survive a design-basis earthquake or a tornado. The current modernization scenario at Y12 envisions consolidation of operations currently conducted in at least six separate buildings into one facility, reducing the security footprint.

Throughout the last two decades, a series of arguments have been put forward in support of a new Uranium facility at Y12. Some of these are:

- worker safety
- enhanced material accountability
- improved capability to withstand natural phenomena
- reduced security footprint/increased security
- efficiency of operations
- increased capacity for handling and storage of uranium
- reduced infrastructure and maintenance costs

Hutchison, Ralph

Page 3 of 10

- local economic benefit of \$3.5 billion dollar construction project
- increased confidence in weapons production capacity
- increased capacity for dismantlement operations
- the prohibitive cost of upgrades to existing facilities

Many of these arguments are now being made in favor of the most recent modernization proposal, the Uranium Processing Facility (UPF). It is clear that a new facility would provide many of the benefits proponents advertise, but this does not automatically mean the UPF should be built. Other factors should be considered as well, such as:

- the impact of new bomb plant construction on

- WD103**
- nonproliferation efforts
- the actual need for secondary life extension upgrades into the distant future
  - scheduled reductions in the US nuclear arsenal
  - promises of further reductions in the US arsenal
  - the risk of continuation of nuclear weapons production
  - the outlay of \$3.5 billion in a time of deep deficit spending
  - cost comparison between consolidation in place with upgrades to old, down-sized facilities and new construction in light of financial realities and reduced capacity demands.
  - job reductions due to innovations in robotics and automated manufacturing processes

11|10.B  
12|10.C

11|1.E

**FINDING:** The arguments for the UPF have, almost without exception, been used for more than twenty years to justify weapons facilities in Oak Ridge. Changes in US policy, concern over nuclear proliferation, and global realities have created an environment in which the power of arguments for a new weapons production facility has eroded significantly.

The Work at Y12

The Y12 Nuclear Weapons Complex in Oak Ridge was built during the Manhattan Project to enrich uranium in the quest to build an atomic bomb. It was successful; the calutrons at Y12 produced the highly enriched uranium that fueled *Little Boy*, the bomb that destroyed Hiroshima, Japan. After the war, the United States turned to gaseous diffusion as its preferred enrichment technology, and Y12 carved out a new niche—it became the sole manufacturer of “secondaries,” also known as “canned subassemblies (CSAs). The secondary is aptly named. The “physics package” in a nuclear warhead or bomb has two parts. The primary, a plutonium sphere with a tritium vial inserted, is a small atomic bomb that acts to trigger the secondary which produces a thermonuclear fusion explosion. The thermonuclear secondary consists of highly enriched uranium, lithium deuteride, depleted uranium, and other classified materials. Y12 has produced the thermonuclear secondary for every nuclear weapon in the US arsenal, more than 70,000 since 1949.

The dominant mission of Y12 today is the production of new and/or refurbished thermonuclear secondaries for existing US nuclear warheads as part of the Stockpile Life Extension Program. In 2009, Y12 is producing secondaries for the W76 warhead; NNSA says the life extension upgrades to the W76 will result in the W-76 Modification 1, a warhead with new military capabilities. Critics note this is essentially new weapons production “backdoored” through the life extension program. According to the 2008 Ten Year Site Plan, the demise of the Reliable Replacement Warhead program renders the W78 Life Extension Program more likely, but Congressional action does not support that assertion. Congress has dedicated money to studying modification of the B61 (producing Modification 12), but

AN ACTIVE SUPERFUND SITE

One byproduct of weapons production activities in Oak Ridge has been pollution. Y12 put environmental concerns on the map in 1983 when it was disclosed that more than 2,000,000 pounds of toxic mercury had been “lost to the environment.” The actual amount of mercury dispersed in the air and spilled into surface and groundwater has not been definitively determined, but it is known to be well in excess of the initial two million pound estimate. In addition, other contaminants (uranium, chromium, PCBs, nitrates) have been poured or spilled into ground and surface waters. East Fork Poplar Creek, which drains the east end of Bear Creek Valley, where Y12 is located, is posted to prevent contact with water. In November 1989, Y12, along with the rest of DOE’s nuclear reservation in Oak Ridge, was added to the EPA’s National Priorities List, making it the first DOE Superfund site among the major weapons production facilities. Unlike most Superfund sites, though, which are closed in order to enable rapid and thorough remediation, Y12 continues to operate. The continued operation of Y12 constrains cleanup operations and sets up a competition for funding between production and cleanup. Today, twenty years after Y12s listing on the NPL, the water draining the weapons plant is supplemented by the addition of millions of gallons of water from the Clinch River every day in order to dilute contamination released from legacy operations. Even with the addition of river water, in periods of heavy rainfall, Y12 releases mercury into East Fork Poplar Creek in excess of EPA and state standards for chronic exposure to biota.

Hutchison, Ralph

Page 4 of 10

has limited the study to non-nuclear upgrades to the B61. Y12 has other missions: production of joint test assemblies for Lawrence Livermore and Los Alamos National Labs (JTAs are blanks—non nuclear warhead packages for testing and analysis), dismantlement of retired warhead secondaries, storage of enriched uranium in safeguarded facilities, preparing excess highly enriched uranium for downblending, supplying special nuclear materials for the nuclear navy, promoting nonproliferation internationally, and a catch-all “work for others” category that refers mostly to work for other federal agencies, including non-nuclear projects for the Department of Defense. The work is carried out by B&W Y12, operating

contractor for the weapons plant. Wacker **WD103** is security for Y12. In addition, Bechtel Jacobs manages the contract for cleanup of a myriad of contaminated sites at Y12.

Money is the main driver for missions at Y12. “There is no driver for dismantlement work at this time,” said William Brumley when he was site manager at Y12. When asked what that meant, Brumley extended his hand and rubbed his thumb in a circular motion across the tips of his index and middle fingers. In recent years, the money that drove the mission at Y12 has been dedicated to the Life Extension Program and the construction of a new uranium storage facility, due to come on-line in 2011.

2|10.A

**FINDING:** The mission of Y12 has always been to serve the national interest as determined by nuclear policy and decision-makers from outside the community. Work at Y12 has been prioritized by the availability of funds appropriated by Congress. As a result, production activities compete for resources with dismantlement, disassembly, disposition, technology development, environmental restoration and other programs.

Defense Programs Facilities at Y12

The Y12 Nuclear Weapons complex occupies 811 acres in Bear Creek Valley; 630 acres are fenced. In 2001, DOE/NNSA reported more than 7 million square feet in 390 buildings were in use at Y12, with Defense Programs—weapons production/dismantlement/storage—claiming 5.3 million square feet. (TYP07, p.3) The work takes place in several clusters of buildings identified by the number of the main building. Just under half of the floor space currently used by Y12 NNSA predates 1950. (TYP07, p.8).

The Building 9212 Complex includes buildings 9212, 9818, 9815, 9980, and 9981. Building 9212 (100,000 sq ft) was built in the 1940s. DOE says “Over 100 operations or processes have been or are capable of being performed within the Building 9212 Complex.” (2001 Y12 SWEIS, Vol 1, p.4-65) These processes include casting of HEU metal for weapons, quality evaluations of metal, recovery and processing of HEU for storage, reuse or future disposition (downblending), packaging of HEU for off-site shipment, support for International Atomic Energy Agency sampling of surplus HEU, preparation of special uranium compounds for research reactor fuel. The two major processing areas are the Chemical Recovery Operations and Metallurgical Operations.

The 9215 Complex includes Building 9215 (127,000 sq ft) and Building 9998 (24,000 sq ft); the two are physically attached at one corner; both were built in the 1940s and have been modified and expanded since. The 9215 Complex aids in dismantlement work, provides for storage and handling of HEU inventories, fabricates metal shapes as needed for stockpile maintenance, and supports other nuclear programs at US and foreign facilities. Both 9215 and 9998 appear on maps to be contiguous with 9212.

Next door to 9215, building 9204-2E (three stories, 68 ft high, 151,200 sq ft; reinforced concrete, clay tile, concrete block with brick veneer) was built in 1971 to house

weapons assemblies. Current operations include: assembly of new or replacement weapons, quality certification of components and assemblies, disassembly of retired weapons assemblies, and storage of retired assemblies, subassemblies and components. The building has five vault-type rooms and one vault in addition to production operations. Building 9204-2 (270,000 sq ft) houses lithium operations. These buildings have dry room facilities [9402-2 has three dry rooms; 9204-2E has one large, 2,500 sq ft dry room with several workstations; the dry rooms have hoists for moving materials (SAR, p.65)] that operate in super-dry conditions; weapons components are fabricated and installed in canned subassemblies in these buildings (SAR 1984, p.11). The 1984 Final Safety Analysis Report lists Building 9204-4 as a disassembly facility; the 2009-2018 Ten Year Site Plan lists building 9204-4 as “not required to support Y12 mission requirements.” Buildings 9204-2 and 9204-2E are equipped with lift equipment, including hoists that run on monorails over equipment and, in Bldg 9204-2E bridge cranes (5-ton and 9-ton) in assembly bays. The 1984 Final Safety Analysis Report for Y12 finds Bldg 9204-2E is at risk of collapse in seismic event or 75 mph winds.

To the west of the production and dismantlement operations buildings are two other mission critical buildings: Building 9720-12 is a warehouse that stores materials that have been removed from higher security buildings in the Material Access Area. Building 9720-5 is used for storage of weapons materials and assemblies. Built in the 1940s it has since been renovated.

Building 9995 is the Analytical Chemistry Lab, constructed in 1952 and located in the high security area. It provides services for weapons production and work-for-others programs. Built in 1952 it has been expanded twice and has had some modifications. Of 150 chemical fuming hoods, approximately 20 were replaced in the mid-1980s;

Hutchison, Ralph

Page 5 of 10

other units have been replaced at times, but most are original equipment. Building 9201-5W is a depleted uranium machine shop and also houses offices. Building 9201-5N houses electroplating processes and depleted uranium machining.

It houses a vertical turret lathe and is served by a 1035-ton bridge crane. It is included in a list (SAR, 1984) as a weapons assembly facility. A cyanide treatment facility has operated in Building 9201-5N; in 2001 it was inactive.

4|12.M.1

**FINDINGS:** The buildings in which Y12 does its work were built as needed over a span of decades; maintenance has been constrained by funding. As a result many of the mission critical facilities are in various stages of disrepair. Currently, an aggressive program to reduce the footprint of Y12 through decommissioning and demolition of facilities no longer required is realizing cost savings. Seismic and other structural integrity concerns about several buildings, especially 9204-2E should be addressed in any future scenario.

**Adequacy of Current Facilities**

The March 2007, Y12 Ten Year site plan says "significant investment is required to consolidate Y12's enriched uranium operations, maintain or upgrade site infrastructure, and meet the current design basis threat." (TYP07, p.1). The 10-Year Plan lists the following critical capabilities for Y12:

- modification, replacement or repair of secondaries (U and Lithium components)
- production of hardware for labs to support testing for certification (JTAs, expected to reduce in 2010 and level off; the NNSA decides the schedule for production of JTAs, TYP07, p. 31)
- surveillance of weapons through disassembly and inspection
- dismantlement, storage and disposition of weapons and materials returned from stockpile (disassembly, dismantlement of various bomb and warhead secondaries; 21 types according to TYP07, p. 31)
- packaging of materials/ components for shipment
- management and secure storage of materials and strategic assets
- supply special nuclear materials for naval reactors
- processing of weapons materials—including chemical recovery, purification and conversion to a storage/disposition/reuse-suitable form

- support other Homeland Security programs (TYP07, p.2)
- One year later, the 2008 Ten Year Plan said the following gaps exist for mission critical operations pending an estimated 2018 or later completion of the UPF:
- > ensuring that mission critical facilities, infrastructure and equipment can bridge the gap to new, modernized facilities
  - > upgrade and modernization of utilities infrastructure system
- The NNSA does not argue that a new Uranium Processing Facility is necessary to meet mission requirements—the work Y12 is expected to perform is currently being done and will continue to be done for ten years in current facilities. If, in fact, the 2007 TYP is correct in identifying that Y12 falls short of meeting the "design basis threat," this serious deficiency should be addressed immediately. If the security of weapons components and special nuclear materials is not currently compromised at Y12, the language of the 2007 TYP is deceptive and should not be used to justify new construction. Given the absolute necessity of protecting nuclear weapons components and special nuclear materials from design basis threats, it is likely the language of the 2007 TYP at the very least exaggerates any possible security shortfall.

3|3.B

**FINDING:** Critical mission requirements are not the driver behind UPF. The 2007 Ten Year Plan (p.61) says other factors drive modernization considerations, including the need for seismic upgrades, enhanced security, and projected environmental, safety and health requirements which are not detailed.

**Cost of Modernization: New Facility v. Consolidate/Upgrade-In-Place**

The Y12 Ten Year Site Plan, March 2009-18, says seismic, ventilation and other upgrades estimated at \$80 million to Building 9212 will be required to keep the building operating safely until the UPF is built. (\$100

million in FIRP funding minus \$20 million in deferred maintenance saved; TYP09, p.19) This number corresponds roughly to a 2007 table indexing current facilities (TYP07, p.61) which says total NNSA mission critical building

Hutchison, Ralph

Page 6 of 10

deferred maintenance cost is \$121,528,000.

The Ten Year Plan provides no comprehensive overview of what the upgrades will cover, or how long the renovated 9212 complex could function safely, but at \$80 million, it seems likely the renovations would be substantial and provide ES&H assurances beyond 2018.

Reduction of the footprint of operations enhances security and reduces security costs, relieves some deferred maintenance costs, and could increase regulatory pressure on Y12 to address legacy contamination issues. Under the best-case scenarios outlined in the Y12 Ten Year Plan, the Y12 mission requirements can be accomplished with 2.5-3 million sq ft. (TYP07, p.3)

The Y12 Building and Location map shows most weapons assembly and dismantlement operations occupy

a small footprint within the PIDA high security area. With the retirement of 9204-4, the relocation of warehoused weapons materials and assemblies from Building 9720-12 could conceivably reduce the high security footprint by 1/3; relocating the outlying 9201-5N (assembly and DU machining), 9201-5W (DU machine shop) and 9720-5 (weapons storage) would result in a further reduction; the high security footprint could occupy one half its current space. Security cost savings under a consolidate-in-place scenario could approach NNSA's estimated security savings for a new UPF.

According to Y12's Ten Year Plan, accelerating dismantlement operations will further reduce the need for high security storage facilities for special nuclear materials (highly enriched uranium).

5|9.A

**FINDING:** A combined program to consolidate operations and upgrade current facilities sufficient to maintain manufacturing and production capacity for the foreseeable future could be accomplished at dramatic savings compared to construction of a new facility. Infrastructure and ES&H driven upgrades to current facilities to "bridge the gap" to a new UPF will not "expire" in 2018 but could be expected to render facilities functional for at least another decade, during which the future of US nuclear force needs would become much clearer. With a pricetag of \$3.5 billion, building a new UPF would cost 43 times as much as a consolidate/upgrade in place scenario.

**The Need for Production Capability in the Long Term**

The future need for production operations at Y12 is uncertain. In April, 2009 President Barack Obama announced a firm commitment to a world free of nuclear weapons; three months later President Obama announced an agreement to reduce the US strategic arsenal to a maximum of 1,695 warheads, pledging efforts to pursue further deep cuts in the renewal of the START Treaty which expires in December 2009.

In keeping with this commitment, the Obama Administration submitted a budget to Congress which include bare bones funding for design of the new UPF; Congress nearly doubled the funding in passing the 2010 budget.

There are many brushes trying to put paint on the picture of the future of nuclear weapons policy in the US. The Nuclear Posture Review, which will recommend force structure requirements to the President, is being prepared by the Pentagon, and early reports indicate it envisions a future with an enduring nuclear arsenal, possibly including new weapon design and production. But powerful voices, led by Henry Kissinger, George Shultz, Sam Nunn and William Perry, have called for the US to move in a new direction. They have been joined, says Shultz, by 3/4ths of all living Secretaries of State, Secretaries of Defense, and National Security Advisers. In an article in Yale Divinity School publication, *Reflections*, Shultz wrote: "We are at a tipping point. The simple continuation of present practice with regard to nuclear weapons is leading in the wrong

direction. We need to change direction."

As a result, it is not completely clear what the mission of Y12 will be in ten or twenty years. But we do know some things:

- We know that dismantlement and disassembly operations will be required to meet arms control agreements
- We know that safe and secure storage of weapons assemblies and special nuclear material will be a priority
- We know that some surveillance of current warheads will be required to meet safety and security requirements
- We know that NNSA has determined that Highly Enriched Uranium operations will be carried out at Y12 and not at another site
- We know there are no current plans or funding for new weapon designs
- We know Life Extension regimes beyond the W76 are uncertain
- We know that the US nuclear stockpile will be further reduced from its present status
- In the uncertain but expected category:
- We can expect that the stockpile ceiling of 1,695 warheads announced by President Obama in June, 2009, will continue to be lowered as arms negotiations move forward—Obama himself called the June announcement a "first step" toward deeper cuts and

## Hutchison, Ralph

## Page 7 of 10

pushed for multilateral arms control efforts in the UN Security Council resolution presented by the US and passed by the Council in September 2009.

- We can expect pressures for further deep reductions will be growing, not only from the international community, but also from influential US advisers whose analysis persuades them an enduring nuclear arsenal undermines US security and

nonproliferation goals.

The picture of US nuclear policy that begins to emerge is not clear, but it offers guidance as one considers what is reasonable to project for the future at Y12. It also raises significant questions for Y12. We know that dismantlement, disassembly, storage and disposition facilities will be increasingly important. And we expect production operations will be of declining importance.

**WD103**

**FINDING:** Any statement of “need” for new production facilities should be predicated on the expectation that demand for production capacity will decline to near zero over the next forty years, while demand for dismantlement/disposition capacity will increase.

61.A.1

**Production v. Dismantlement**

In the context of US nonproliferation goals, considering protocols for safeguarding of weapons components and materials and verification of agreements, an important question arises: should production and dismantlement operations coexist in a dual use facility?

The description of current operations at Y12 indicates no requirement for co-habitation between the programs. “Machining operations for dismantlement operations differ considerably from product fabrication requirements. Technology such as lasers or chipless cutter techniques may be applied to the relatively low accuracy and high throughput needs of dismantlement.” (TYP07, p.42.) Recent news reports indicate that other processes—the use of infrared to melt adhesives—are unique to dismantlement/disassembly and have no application in production activities. The 1984 SAR indicates production and disassembly operations take place in separate facilities and use dedicated equipment: “Specially designed equipment and carefully controlled procedures are used.” (SAR, p.230)

Production operations include metal processing, fabrication, and assembly operations. Some of these are unique to nuclear weapons manufacturing, but others are not. Many current (c. 2007) processes mimic those used in commercial applications for common metals and alloys. Enriched uranium is more specialized and low-volume. (TYP07, p.42)

Y12’s wish list for the new UPF includes new technologies for higher processing yields and better control of chemistry: microwave processing, radiant heating, flexible pressing, and purification that minimizes chemical processing. (TYP07, p.42) Another wish is for the Agile Machine Tool to combine lathes and mills on one platform. (TYP07, p.21) There is no indication that new technologies are necessary as Y12 pursues its current Life Extension mission, nor is it clear that new technologies are a reasonable investment if the future portends further deep cuts in the US arsenal.

Modernization—the UPF— would streamline production operations, shifting from small-lot, batch

mode operations (TYP07, p.42) to enclosed, automated operations. NNSA says the shift would provide environmental, safety and health benefits—the benefits are not enumerated, nor is it clear how necessary they are; no cost-benefit analysis is provided to document the claim. According to NNSA, the shift to automated operations would nearly halve the Y12 workforce.

Production/assembly operations take place in several buildings which are designed to accommodate the distinctive requirements of the mission. Dry rooms in Bldgs 9204-2 and 9204-2E have large viewing windows that allow for monitoring of the work taking place inside. Descriptions of the workflow indicate that a worker in a sealed suit (to control moisture) assembles weapons assembly parts, welding large aluminum, steel, magnesium and depleted uranium parts (and one deleted material, SAR p.123) with remote-operated electron-beam welders, and bonding others with adhesive materials (SAR, p.111); a second worker, outside the dry room, tracks and records the activities inside. In Bldg 9204-2E, a metallic inert gas welder (used to weld Beryllium parts? SAR p.66) operated through glove ports is also available; this building also apparently houses a CO<sub>2</sub> laser welder to weld thin stainless steel parts under an argon/helium cover gas. Activities in the dry rooms include assembly of CSAs and “disassembly for rework.” (SAR, p. 89) Rework apparently refers to subassemblies which fail the leak test performed after assembly is completed. (SAR, p.94)

Bldg 9204-2E houses a heated pneumatic press, the hazardous materials weld finishing booth, and other process that are classified.

Certification (nondestructive testing) includes measuring contours, optical comparison, ultrasonic tests, dimensional inspection, etc (SAR, p. 111). It takes place in a 3,400 sq ft area on the second floor of Bldg 9204-2E.

The 2007 Ten Year Site Plan expects many of the current production processes will be improved or eliminated by new technology developments. If this is the case, prudence would suggest upgrading current operations in place where required to fill the gap and

## Hutchison, Ralph

## Page 8 of 10

investing in new technology development (currently 2% of Y12’s budget) rather than building a new facility and stocking it with equipment that may well be obsolete before it is put into service. (TYP07, p.12)

As surely as production requirements are declining, the demand for dismantlement, disassembly, storage and staging for disposition will increase.

Dismantlement primarily takes place in dedicated facilities. Subassemblies are moved from Building 9720-5 and slated for reclamation or disposal. Subassemblies slated for reclamation are disassembled, their parts assayed, and then dispatched for recycling or salvage. Subassemblies slated for disposal travel through the quality evaluation lab. The outer casing is removed in a dry room and the unit is leak-tested. A valve is installed to take a gas sample for measurement, and the unit is disassembled in an inert glove box.

The Quality Evaluation Lab is a dual use facility used to service retired weapons and production line weapons (SAR p. 155). It is a 15,000 sq ft, large, open room and contains two 10-ton overhead crane bridges, each with two 2-ton hoists which can be used over entire area. Facilities and equipment include: Moisture Outgas Monitoring facility measures hydrogen balance of weapons units (SAR, p.156); Inert Atmosphere Glove Box: used for disassembly under controlled conditions (SAR, p. 156); Vertical Turret Lathe – vertical boring and milling of DU

and nonU metal, also used for the first cut on outside case of weapons assemblies, cooled with 50% freon, 50% oil; Enriched Uranium Lathe for disassembly cuts on EU parts (freon coolant in enclosed hood); No enriched lathe, 60 inch center lathe, to make disassembly cuts on DU and other materials. (nonrecirculating freon, as of 1984) used as coolant. (SAR, p. 162) ; Disassembly booth: 8 sq ft. floor covered with paper to collect corrosion particles that fall to the floor during disassembly, booth uses a 500 lb hoist. (SAR, p. 164). Disassembly also takes place on “Surface Plates” with hand tools. A hydraulic press is used to deform classified weapons shapes (SAR p. 184).

While current information is limited, with the exception of some quality evaluation lab processes which are used retired and production line weapons (SAR, p.155), production operations and the facilities which accommodate them do not appear to overlap significantly with requirements for dismantlement operations.

Finally, the operating contractor of Y12, B&W Y12, sets out a vision of “multipurpose facilities” which will support an ever-changing future with respect to nuclear weapons and the need to seek growth in complementary work and support any new missions.” (TYP07, p.15) At the same time, the NNSA proposes a \$3 billion investment in the UPF as a dedicated, single-purpose, high security/limited access facility.

**FINDING:** Except for Building 9204-2E (a relatively small assembly and disassembly facility), production and dismantlement operations operate independent of each other, in separate facilities. Quality evaluation equipment and lab facilities used for surveillance activities are an area where production and disassembly operations overlap. (SAR, p.155)

**The Future of the Life Extension Program**

The United States is not manufacturing new, from-the-ground-up nuclear weapons. The mission of Y12 today is to support the current stockpile by performing Life Extension Upgrades on existing warheads. The Stockpile Life Extension Program refurbishes old warheads to extend their reliable shelf-life for decades. Estimates of the reliable life of a refurbished warhead range from 40 years (the official DOE number) to 120 years (the number cited by Y12 Site Manager Robert Dempsey in 1998).

What manufacturing capabilities does the US need to maintain a safe and reliable stockpile pending further deep cuts in the nuclear arsenal?

The current active US strategic nuclear stockpile is not terribly old by nuclear weapons standards where weapons were designed with an expected shelf-life\* of 40 years. The oldest active weapons in the US stockpile (excluding those scheduled for deactivation by the Moscow SORT Treaty) are 100 W80 cruise missile warheads produced in 1981, followed by 320 B83 bombs built in 1983—26 years old as of 2009.

Four hundred W88/Mark 5 Trident missiles were

manufactured beginning in 1988; they are reaching the halfway point of their reliable shelf-life. Two hundred six B61/Modification 10 strategic bombs were produced starting in 1990, but they are not in the active stockpile. More recently, 20 B61/Modification 11 bombs were produced in 1997.

Since then, the Stockpile Life Extension program has been refurbishing aging warheads to give them a new lease on death. More than 300 W87 warheads were refurbished (completed in 20–), and more than 2000 W76 warheads are scheduled for LEPs; the first was completed in 2008. A study of LEP/Modification of the B61 has been funded by Congress (the result would be the B61-Mod 12).

The bottom line is this: the United States has more than 1,000 warheads/bombs that are of relatively recent origin and, over the next ten years, could triple that number if currently scheduled LEPs are completed. The weapons include cruise missiles, Trident missiles, and bombs, providing the US with a triad of defensive options.

What does this mean for manufacturing capabilities at Y12?

Hutchison, Ralph

Page 9 of 10

Given the current US arsenal, according to NNSA estimates, \$100-120 million of upgrades will keep Y12 operational until 2018, at which time the US will have "Life Extended" warheads in excess of the numbers President Obama declared in June as the "first step" in arms reductions.

[\*There is no specific reliability boundary; there is no physical reason weapons would be reliable one

day and suddenly unreliable the next—**WD103**—life is an estimate; the warheads would likely remain fully operational for a much longer time. To date, the NNSA has made no documentation of warhead degradation over time publicly available; previous NNSA claims of plutonium pit deterioration due to aging were shown to be false in an independent study by the JASON.]

7|9.D

**FINDING:** As LEP work at Y12 increases the number of refurbished, Life Extended warheads in the US arsenal, arms control agreements are decreasing the size of the US nuclear stockpile. At some point in the near future, those two numbers will meet. The "need" for Y12's production operations will vanish, at least for several decades. At the same time, arms reduction agreements will increase the need for dismantlement, disassembly, storage and disposition capacity at Y12. Proposals for new facilities for Y12 should reflect this shift in mission emphasis and priorities in the future.

**The Nature and Purpose of New Facilities at Y12**

Future weapons activities in the United States are likely to be subject to international verification and safeguard protocols as a consequence of arms control agreements and Nonproliferation Treaty compliance. The United States is pushing for such protocols to be enforced against other nations, and it is clear such a policy is only tenable if the US submits its operations to the same inspection regimes.

The Ten Year Plan suggests Y12 foresees a transparent future: The Transparency Technology Demonstration Complex in Bldg 9203 is a user facility to demonstrate technologies for inspection/verification in support of arms control agreements.

Forward-looking planning for the Y12 of the future must ask: What are the requirements, physical or

otherwise, for IAEA certification of treaty compliance? What challenges does a production / dual use facility present that would be avoided if separate facilities were designed for dismantlement and production activities? What are the cost comparisons of the possible permutations—upgrading aging production facilities (assuming a limited-life requirement for the facilities) and constructing a new dedicated facility for dismantlement operations? What design features of any new facilities or upgrades to old facilities will accommodate inspection and verification requirements?

And a question which will grow more important over the next several years must also be asked: What level of dual-use facilities would the US find acceptable in North Korea or other nations?

8|3.B

**FINDING:** As long as Y12 is responsible for weapons components and special nuclear material, safeguards are of paramount importance. In the nuclear weapons complex of the future, international inspections and verification will be of growing importance; incorporating such needs into the design of any new facilities is prudent and, in the long run, will prove to be cost-effective.

**Future Economic Impact of Y12 in Oak Ridge/East Tennessee**

The economic impact of operations at Y12 is primarily measured in the number of workers employed. Job projections over the next 15 years look different to different sectors of the workforce, but in the end they are similarly bleak.

Building a new UPF or a new dismantlement facility would not result in a surge of construction jobs but would maintain the construction workforce (about 1,000 jobs) currently building the HEU storage facility at Y12. NNSA has not provided an estimate of how many jobs would be created during an upgrade-in-place scenario if the

UPF were not built, so there is insufficient information to compare workforce requirements.

Under modernized / UPF scenario, the Defense Programs workforce would be reduced to 2,000-2,500 from 4,500 (TYP07, p.3) If the UPF were not built, it could be expected that an upgrade-in-place scenario would include some modernization of equipment technology resulting in the loss of some jobs. In either scenario, a significantly reduced footprint would reduce security requirements—the UPF scenario would more dramatically reduce the guard force at Y12.

Hutchison, Ralph

Page 10 of 10

9|12.H

**WD103**

**FINDING:** The future of Y12 shows a sharp decline in jobs for weapons production activities. Depending on the amount of automation incorporated into new or upgraded facilities, an increase in dismantlement operations should result in a steady or slightly diminished workforce requirement.

**Security at Y12**

Pending construction of new facilities, or major renovation of current facilities, "much of the workload during the next 5-10 years will be accomplished in many of Y12's existing Mission Critical facilities. Accordingly investments will be based on the risk in meeting mission commitments and on ES&H and security requirements, balanced with the need to implement Complex 2030 facility and infrastructure improvements." (TYP07, p. 3)

Increasing security assurances is a benefit of modernization, according to NNSA. The UPF would be

a "designed denial facility" (TYP07, xii.) The NNSA does not discuss security operations, so it is not clear in what ways (if at all) a "designed denial facility" would offer qualitative improvements in material, facility or worker security. It is also not clear whether similar "design denial" objectives could be achieved (and at what cost) in a reduced-footprint, consolidated, upgrade-in-place scenario. For obvious reasons, Y12 admits no security vulnerabilities as it is currently configured and operating.

10|11.A

**FINDING:** While it is difficult to assess security needs and requirements because of information classification, the reduction of an overall security footprint should result in higher security whether achieved through a new facility or a consolidation/upgrade-in-place scenario.

**Sources**

- TYP07 refers to the Y12 Ten Year Plan issued in March 2007
- TYP09 refers to the Y12 Ten Year Plan issued in March 2008
- SAR refers to the 1984 Safety Analysis Report DOE 1993 Safety Survey
- Y12 Site Wide Environmental Impact Statement, prepared in 2001.
- Draft Y12 Site Wide Environmental Impact Statement, 2009

**PUBLISHED BY**

The Oak Ridge Environmental Peace Alliance  
November 2009

Hutchison, Ralph

Page 1 of 14

**WD102**

**From:** Ralph Hutchison [orep@earthlink.net]  
**Sent:** Friday, January 29, 2010 2:47 PM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** comments on Y12 draft SWEIS

firstName=Ralph  
 lastName=Hutchison  
 organization=OREPA  
 email=orep@earthlink.net  
 address1=P O Box 5743  
 address2=  
 city=Oak Ridge  
 state=TN  
 zip=37920  
 country=USA  
 subject=Draft Y-12 SWEIS  
 comments=

Comments of  
 the Oak Ridge Environmental Peace Alliance on the Draft Site-Wide Environmental Impact Statement for the  
 Y12 National Security Complex Oak Ridge, Tennessee

On October 29, the National Nuclear Security Administration released the Draft Site-Wide Environmental  
 Impact Statement for the Y12 National Security Complex in Oak Ridge, Tennessee (DOE/EIS-0387).

The purpose of the Y12 SWEIS is to update the 2002 Y12 Site-Wide Environmental Impact Statement. The  
 Department of Energy's NEPA regulations which require SW-EISes also require a Supplemental Analysis every  
 five years in order to determine whether a new SW-EIS should be prepared. In this instance, DOE did not wait  
 five years to begin preparing a new SW-EIS—three years after the Record of Decision which issued from the  
 first SW-EIS, on November 25, 2005, NNSA announced its intent to prepare a second SW-EIS. This decision was  
 not based on a Supplemental Analysis as required by NEPA regulations, but was driven by the desire to move  
 forward with construction of the Uranium Processing Facility, a decision which NNSA declared not yet "ripe for  
 consideration" in the initial SW-EIS.

It is clear from DOE'S NEPA regulations that SW-EISes are intended to look at least five years down the road.  
 During preparation of the original Y12 SWEIS, the Oak Ridge Environmental Peace Alliance suggested  
 DOE/NNSA was segmenting its NEPA analysis in order to minimize the overall impact of planned construction  
 of facilities.  
 DOE/NNSA dismissed OREPA's concerns.

The 2002 Y12 SWEIS focused on two facilities which were, at the time, declared critical to meeting mission  
 requirements. The Record of Decision for the 2002 SWEIS announced DOE would construct two new  
 facilities: the Highly Enriched Uranium Materials Facility and the Special Materials Complex. The HEUMF was  
 subsequently built; the SMC was dramatically downsized due to "changing mission requirements."

Hutchison, Ralph

Page 2 of 14

**WD102**

This is the context for the current Y12 SWEIS and OREPA's comments.

The Y12 SWEIS is supposed to undertake a comprehensive presentation and analysis of ongoing and future  
 operations, activities and facilities at Y12. The purpose of a SWEIS, rather than a simpler EIS on the Uranium  
 Processing Facility, is to take a more comprehensive look—to place proposed actions in the broader context.  
 The Draft Y12 SWEIS [from this point forward, SWEIS, Y12 SWEIS, Draft, Draft SWEIS, and Draft Y12 SWEIS will  
 refer to the October 2009 Draft Y12 SWEIS] fails to provide such analysis and evaluation, describing instead  
 two proposed new construction projects:

1. facility(s) required to meet Uranium production mission requirements (five alternatives are  
 considered, including three sizes of a new Uranium Processing Facility)
2. a new command post for security and emergency response operations (the Complex Command  
 Center).

The SWEIS includes a vague assurance that the location for the new CCC will be chosen to avoid CERCLA  
 issues. The description of the new facility contains no evaluation or analysis of environmental impacts  
 associated with the CCC, despite its seven acre footprint. The vague assurance provided in the SWEIS  
 Summary is insufficient to meet NEPA requirements for a Categorical Exclusion let alone an Environmental  
 Impact Statement. Since NNSA has determined the CCC is covered by this SWEIS, a more thorough  
 environmental analysis must be prepared.

It must include consideration of locations (outside the security zone v. proximity for emergency response),  
 impact on remediation activities, an assessment of vulnerabilities associated with a consolidated center, and a  
 complete accounting of costs over the lifetime of the facility. Other reasonable alternatives must be  
 considered, including a No Action alternative. In today's economic climate—with a proposed three-year freeze  
 on much federal spending and major sectors of the government being asked to endure sacrifices and  
 reductions, NNSA must show the benefits of the CCC justify the considerable expense of this elective project;  
 it is not enough to declare up-front savings through a privatization scheme. The CCC may be a wise  
 expenditure of public money, and the proposed location may be ideal; given the absence of information in the  
 SWEIS, there is simply no way to tell. The public should be able to look at real plans and numbers to determine  
 whether the CCC is a valid, justifiable expense or a Security Taj Mahal and to comment before a Record of  
 Decision is announced.

The vast majority of the content of the SWEIS is devoted to the  
 facility(s) required to meet the Uranium handling, processing and production mission requirements, including  
 an analysis of five "reasonable" alternatives: No Action [hereinafter NA or No Action]; Upgrade-In-Place  
 [hereinafter Upgrade]; a new Uranium Processing Facility with a throughput production capacity of 125  
 warheads/year [UPF125]; the "Capability-Sized UPF" with a production capacity range of 50-80 warheads/year  
 [UPF80]; and the "No Net Production UPF, with a production capacity of 5 warheads/year [UPF5].

Initial comment on the presentation of Alternatives

The distinction between No Action, which includes a list of upgrades, maintenance and replacement activities  
 already self-approved by NNSA, and Upgrade-in-Place is not clear from the analysis provided. Any assessment  
 meant to inform a decision would have to include costs; none are provided, though statements about  
 employment and economic impact, unsupported by real or estimated dollar numbers, are included in the  
 assessment.

## Hutchison, Ralph

## Page 3 of 14

417.A The physical distinction between the UPF80 and the UPF5 is not clear from the information provided in the SWEIS—the description suggests the two alternatives have identical floor space and equipment; the designations of throughput capacity appear to be a distinction without a difference. The only apparent difference is the number of people working, a difference that can be erased by an ad in the newspaper. If there is a real capacity difference between the UPF80 and the UPF5, the SWEIS should make it clear—the proliferation implications are enormous. The UPF80 expands US warhead production capacity and sends a powerful provocative message to the rest of the world; the UPF5 is more supportive of US nonproliferation goals and indicates the seriousness of the US commitment to a nuclear weapons free future.

5110.C Failure to provide cost estimates is a serious deficiency. The United States is currently in a severe economic recession; funding for many social services and programs are being constrained at the very time they are most needed. The cost of each of the proposed alternatives is a significant if not determinative factor. The SWEIS is long on benefits, especially of its preferred alternatives, and makes claims of cost savings through efficiencies, workforce and footprint reduction, etc. But no legitimate cost estimates of the five alternatives is presented which would allow a comparison of costs and benefits associated with each alternative. The final decision will certainly be informed by such an analysis—since NEPA requires an analysis of socio-economic impacts, the analysis must be included in the SWEIS and subject to broad scrutiny.

The recent report of the General Accounting Office on DOE's cost-estimating practice does not inspire confidence in the cost estimates that have been publicized to date about the UPF; rather than follow accepted procedures for estimating costs, NNSA has provided estimates that apparently have no basis in reality and at least a 50% margin of error—the difference between two and three billion dollars is significant. NNSA should provide reliable cost estimates resulting from approved estimating procedures to allow a fair comparison of the cost/benefits of each alternative.

## The Purpose and Need

This is the starting point for the SWEIS. The purpose and need are predicated on a number of documents and policies which define the mission requirements at Y12. The SWEIS lists several of the documents which govern current missions: the 2001 Nuclear Posture Review, the START Treaty (now expired), the Moscow Treaty. Each of these demonstrates the continuing reduction of the US nuclear stockpile.

Diminishing requirements have already led to the decision to downsize the Special Materials Complex.

611.A While it is impossible to predict the future with certainty, it is clear that US nuclear weapons policy is in transition. Presidents Obama and Medvedev are preparing to sign a new START Treaty which will reduce the current stockpile ceiling to 1,675 warheads.

President Obama has called these reductions a "first step" toward deeper reductions. Most experts foresee a stockpile size of 1,000 warheads or less within the decade. The Nuclear Posture Review being prepared for President Obama is now expected to be released in March of 2010—it will provide force structure requirements which will directly impact the mission requirements at Y12.

712.B After delaying the release of the Draft SWEIS for several years, NNSA has now declined to hold the public comment period open an extra sixty days to allow for an informed engagement with the public after the Y12 mission requirements are more clear. NNSA says it has built in flexibility with alternatives that cover a range of possibilities.

811.A This is not preferable to a focused examination of a specific proposal; it is inefficient and places an unnecessary burden on the public to address hypothetical scenarios.

## Hutchison, Ralph

## Page 4 of 14

## WD102

Within these constraints of uncertainty, it is still possible to reflect on the impact on Y12's mission requirements from what is known about the future of the US nuclear stockpile. Five critical facts:

611.A, 1.B (cont) 1. The stockpile will continue to get smaller. Reductions set in the START Treaty of 2010 will retire more than 500 warheads; President Obama has indicated his determination to pursue further deep reductions, and President Medvedev concurs.

911.A 2. The warheads which remain in the US arsenal will need to be maintained. Given the recent report of the JASON certifying the reliability of the US arsenal, it is clear that a program of surveillance and maintenance will be sufficient to guarantee the reliability of the existing US stockpile for the foreseeable future—at least forty-five years. There is no urgent need for expanded warhead production capacity.

1019.D 3. There is currently a significant backlog, at least ten years and maybe as many as fifteen years, of retired warheads awaiting dismantlement. Reports from Y12 indicate storage capacity issues for secondaries and cases continue to grow. It is clear that existing capacity is not sufficient to address the dismantlement requirements from previous arms reduction agreements and warhead retirements.

4. The need for dismantlement capacity will grow, rapidly and urgently, as new arms control agreements enter into force. Current facilities, already stretched beyond their capacity, will be expected to absorb and process hundreds more secondaries and cases over the next decade.

1111.D 5. The US has no need for expanded warhead production capacity. Statements from undersecretary Ellen Tauscher in January, 2010, affirm the US will not pursue new warhead design or expanded military capabilities for the nuclear arsenal.

## The Nonproliferation Impacts of Expanded Warhead Production

121 1.E.1 The impact of the UPF decision on US efforts to constrain nuclear proliferation is perhaps more important than the local or regional environmental and socioeconomic impact analyzed in the SWEIS. The SWEIS does not address nonproliferation concerns in detail, a shortcoming which must be rectified in the final SWEIS—or addressed in a Supplemental EIS on Nonproliferation Impacts. The Y12 SWEIS refers instead to nonproliferation analysis prepared for the Stockpile Stewardship and Management PEIS in 1996, asserts the program is fully consistent with US obligations under the Nonproliferation Treaty, and further asserts the analysis remains valid.

1311.C The arguability of the 1996 assertion is obvious; it was not tested against the expectations or understanding of other NPT parties. The director of the International Atomic Energy Agency, Mohammed ElBaradei (recipient of the 2005 Nobel Peace Prize) referred to US continued weapons production activities when he said, in an article in the Financial Times, "The US government insists that other countries do not possess nuclear weapons. On the other hand, they are perfecting their own arsenal. I do not think that corresponds to the treaty they signed." Thomas Graham, leading US arms control negotiator for more than twenty years, has said, "In exchange for a commitment from the non-nuclear weapons states not to acquire nuclear weapons, the nuclear weapons states, in the Nonproliferation Treaty, undertook to engage in nuclear disarmament negotiations aimed at the ultimate elimination of their nuclear arsenals. But the nuclear weapons states have never really delivered on the disarmament part of this bargain."

## Hutchison, Ralph

## Page 5 of 14

13|1.C  
(cont) To assert that a program designed to extend the life of the US nuclear stockpile for the indefinite ~~WD-102~~ is in compliance with the NPT, in which the US promised to pursue in good faith complete disarmament at an early date defies common sense. The plain meaning of the words of the NPT contradict the DOE's 1996 assertion.

Arguments about whether the DOE's 1996 self-absolution was valid can be set aside, though. The context—indeed the entire landscape—for nuclear nonproliferation discussions has changed so dramatically and so fundamentally that no clear-thinking person can imagine an analysis prepared in 1996 would be anything more than historically interesting. Since 1996, US nonproliferation goals have changed—what were then fears are now realities—North Korea has the bomb, and Iran has a suspect nuclear program. Proliferation fears—unfounded, as it turned out—led the United States to invade a sovereign country. The Nonproliferation Treaty Reviews in 2000 and in 2005 made clear the dissatisfaction of non-weapons states with US and other nuclear states' foot-dragging.

In 2007, and again in 2008, former Secretaries of State Henry Kissinger and George Shultz, along with Admiral William Perry and Senator Sam Nunn, opined in the Wall Street Journal that US security requires aggressive leadership toward disarmament. The basis for their argument was a recognition that US security is directly linked to preventing the proliferation of nuclear weapons, and the US can not hope to achieve its goals if it continues to maintain a nuclear arsenal. In an article in the spring issue of the Yale Divinity School Journal Reflections, Shultz writes: "So far as the proliferation of nuclear weapons and their potential use is concerned, we are at a tipping point. The danger is all too real. The simple continuation of present practice with regard to nuclear weapons is leading in the wrong direction. We need to change the direction." More than 60 leaders from around the world, diplomatic and military, have joined the Gang of Four; Britain's prime minister, speaking in New Delhi in January 2008, pledged the UK to be "in the forefront of the international campaign to accelerate disarmament amongst possessor states."

14|1.E It is an undeniable fact that none of these people were saying these things in 1996. They are saying them now for two reasons: the nuclear geopolitical reality has shifted irreversibly since 1996, and with that shift comes a new understanding of the nuclear threat and the steps required of the US to successfully defuse the threat.

In other words, no analysis of nonproliferation concerns in 1996 can be relied upon with a straight face in 2010; to attempt to do so, as the Y12 SWEIS does, is either a demonstration of ignorance or a clumsy attempt to dodge the most serious and central concern attached to the proposal to build a new weapons production facility. Whichever of those explanations lies closer to the truth is not important—what is important is the necessity of a serious, thorough consideration of the nonproliferation impacts, circa 2010, of the proposal to build a new nuclear weapons production facility as part of a complex-wide effort to reconstitute full-scale warhead production capacity.

In December, 2009, Ambassador Robert Grey, formerly US Ambassador to the Conference on Disarmament and now director of the Bipartisan Security Group, addressed the issue directly in briefings on Capitol Hill saying, "If we modernize the weapons complex and develop new weapons, our credibility with the international community is zero."

US nuclear policy in the early days of 2010 has been likened to a puzzle being assembled from various pieces—renewal of the START Treaty, the Nuclear Posture Review, the Nonproliferation Treaty Review, decisions on modernization of the weapons complex, the effort to ratify the Comprehensive Test Ban Treaty, the 2011 budget—the picture that will emerge when these pieces are assembled is not yet clear. But US credibility with our negotiating partners is the table on which the puzzle will be put together. A decision to maintain or expand warhead production capacity beyond that needed for surveillance and maintenance of a diminishing

## Hutchison, Ralph

## Page 6 of 14

14|1.E  
(cont) stockpile—in other words, any action that may be perceived as a commitment to reconstitute ~~WD-102~~ warhead production capacity to maintain or expand the US nuclear arsenal for the indefinite future—will kick the legs out from under the Nonproliferation Table.

If the NNSA believes it can move forward with a UPF, or a UPF80, or even an "expandable" UPF5 without undermining US nonproliferation efforts in 2010, it has a responsibility to explain its rationale and subject it to external review.

## Purpose and Need Reality Check

15|1.B.1 The Y12 SWEIS contradicts itself with regard to current stockpile requirements. (p. S-16: "The Moscow Treaty...commits the US and Russia to deep reductions (i.e. 1,675 operationally deployed strategic nuclear warheads by 2012)." Next sentence: "As of May 2009, the US had cut number of operationally deployed strategic nuclear warheads to 2,126, which meets the limits set by the Treaty for 2012.")

16|1.A.1 According to the JASON study analyzing the Stockpile Stewardship Program completed in 2009, the US has a safe, secure, reliable stockpile. Since 1996, more than \$90 billion has been spent "modernizing" the nuclear weapons stockpile. By 2018 (the time a new UPF would come on-line) the US stockpile of refurbished "Life Extended" warheads will exceed the maximum number allowed by the START Treaty.

Since 1996, the Stockpile Stewardship and Management Program (SSMP) has been responsible for maintaining the US nuclear stockpile and assuring its safety, security and reliability. This has been achieved by modifying and/or refurbishing current weapons systems. For instance, the B-61 was modified in the mid-1990's and resulted in the B61-Modification 11. The modifications included, among other things, a hardened nose cone which gave the weapon an earth-penetrating capability. Since the late 1990's, modifications and refurbishments have been performed as part of the Stockpile Life Extension Program— the W87 warhead was refurbished with more than 500 "Life-extended" warheads reintroduced to the stockpile. Today, refurbishment and modification of the W-76 (resulting in the W76-Mod 1) are being conducted; according to the current schedule, approximately 2000 W76-1 warheads will be in the stockpile by 2018; a Federation of American Scientists/Natural Resources Defense Council fact sheet estimates 800 will be in the stockpile by 2012.

Add to this more than 400 W88 Trident (submarine-launched) warheads put in service in the late 1980's, and the total number of recent vintage warheads in the arsenal in 2012 is 1,786; by 2018, that number would swell to 2,986.

14|1.E  
(cont) At this point, it seems clear that the idea of a full-scale UPF, or any Alternative that would maintain a production capacity throughput of 125 warheads/year, stands outside the bounds of what is "reasonable." Construction of a \$3.5 billion warhead production facility when the US is attempting to regain its stature as an international leader in nonproliferation efforts, to assuage concerns of non-nuclear weapons states on the eve of the NPT Review, and to dissuade Iran from further developing its nuclear capability is not only not reasonable, it is not rational.

17|7.B The UPF125 is no longer NNSA's bomb plant of choice. Whether NNSA has abandoned its original proposal because it recognized the changing realities of US nuclear stockpile force structure or because it recognized a full-scale UPF would be a hard sell to Congress does not matter. What matters is the NNSA no longer needs to be able to build 125 secondaries and cases/year.

Hutchison, Ralph

Page 7 of 14

**WD102**

17|7.B (cont) By a not-so-remarkable coincidence, the warhead production capacity of the preferred alternative is 50/80 warheads per year—not 60/90 or 50/75—and 50/80 warheads per year matches the capacity of the Chemistry and Metallurgy Research Replacement-Nuclear Facility at Los Alamos. No explanation is given for this apparently arbitrary capacity or for the range of warheads rather than a target number.

Two points are worth noting. First, the range is meaningless—if the Capability-sized UPF has the capacity to produce 80 warheads/year, it is the UPF80. Second, the 50-80 capacity has no relationship to stockpile surveillance, stockpile stewardship, stockpile maintenance or Life Extension requirements—it reflects instead a commitment by the United States to reconstitute in toto production capacity for new nuclear warheads—pits at Los Alamos, secondaries at Y12, and nonnuclear components at Kansas City.

6|1.B (cont) Since taking office in January, 2008, President Barack Obama has made several public statements regarding the nuclear policy and commitments of the United States. In none of these statements has the President indicated the United States has a need for expanded warhead production capacity. To the contrary, the Administration has stated on several occasions that the United States expects to be a global leader in nuclear disarmament; President Obama has pledged the US to deep stockpile cuts while maintaining a safe, secure and reliable stockpile as we move to disarm. In a news report on January 13, 2010, undersecretary of state Ellen Tauscher, a key point person for the Obama Administration on nuclear weapons issues, said the NNSA will maintain the nuclear stockpile without adding to its capabilities, without testing and "without causing people to be concerned about what we are doing."

18|3.A At this point, it is clear that the equation of purpose and need has been significantly redrawn since the UPF was first proposed in 2005, and has continued to seek a new equilibrium since the Draft Y12 SWEIS was published in October 2009. The US has now disavowed new warhead production and significant modifications to the existing stockpile. As Tauscher indicates, this shift is an effort to demonstrate the seriousness of the US commitment to nonproliferation. As the US commitment to nonproliferation grows, the "need" for the UPF80 evaporates.

17|7.B 8.0 This leaves on NNSA's table three alternatives: No Action, Upgrade-In-Place, and the UPF5. Each of these is, according to the Y12 SWEIS, examined because it is reasonable. The UPF5 proposes a new facility, cost undeclared, sufficient to meet the needs of a Stockpile Stewardship program that provides passive surveillance and maintenance of the stockpile and can produce a limited number of replacements for components lost during destructive testing. What is most important about the UPF5 is the number—5. NNSA says this is the capacity needed to maintain the existing arsenal.

19|8.A NNSA identified the UPF80 as its preferred option in the SWEIS (pp. 3-41,42). OREPA notes that every single benefit of the UPF80 listed accrues equally to the UPF5. In other words, there is no distinguishing benefit of the UPF80 over the UPF5. On the other hand, the one distinctive difference—the UPF80 reconstitutes full-scale nuclear warhead production capacity—carries a profound liability; it undermines the President's commitment to demonstrate global leadership in disarmament efforts and it corrupts US nonproliferation goals. A policy of "do-as-we-say-not-as-we-do" is untenable on its face; it gives tacit permission to Iran and other states to develop nuclear capabilities, and is clearly provocative to nuclear weapons states. And since there is no need for an 80 warhead/year production capacity, it is unnecessarily provocative. (One test of the impact of the UPF80 argument in international nonproliferation discussions is simple: If Iran were proposing to build this facility outside Tehran, what would the US response be?)

Hutchison, Ralph

Page 8 of 14

20|16.A Since the stockpile can be maintained in a safe, secure and reliable state by the UPF5, or by a ~~WD102~~ed, down-sized 5-warhead/year production center in a upgraded existing facility, other factors may be determinative as NNSA makes its decision. In today's economic climate, cost must be a consideration. The safety of workers and the public is also an important consideration. Reliability of the facilities is a further consideration; history has shown us that operational interruptions for safety reasons are tolerable, so minor or temporary interruptions may be accommodated, but over the long-term facilities must be generally reliable. Ultimately, though, it is the changing mission of Y12 that should determine the direction the Y12 SWEIS sets out for the future.

Alternative 6: Dedicated Dismantlement Facility | Consolidate and Down-Size Production Capacity (5 warheads/year) in Existing Upgraded Facility

The Oak Ridge Environmental Peace Alliance proposes a sixth alternative to the five outlined in the Y12 SWEIS. OREPA believes its alternative most fully addresses Y12 mission requirements for the foreseeable future. It has the added virtue of maintaining more jobs than the UPF80 or the UPF5, and achieves the cost savings of a reduced security footprint.

21|9.A The future of Oak Ridge is in dismantling tens of thousands of nuclear weapons. Because this part of Y12's mission has been largely neglected for decades, there is a 12-15 year backlog of retired secondaries and subassemblies awaiting dismantlement and disposition. The backlog is large enough to create storage issues and, on more than one occasion, criticality safety violations.

10|9.D (cont) Y12 projects future dismantlement at a steady rate—but this is not enough to meet the country's needs and certainly not enough to persuade other nations we are aggressively acting to reduce our stockpile and meet our obligations under the NPT. Y12 should establish the capability to more than double its throughput for dismantling nuclear weapons; a new dedicated, single-use facility, with security, safeguards, and transparency designed in, should be built in Oak Ridge.

The current Y12SWEIS pays little attention to dismantlement operations, treating them as an adjunct to the production mission of the UPF. Over the course of the next decade, however, the need for production capacity will continue to diminish, and the demand for dismantlement/disposition capacity will balloon. While there is some overlap of operations and equipment used in production and dismantlement operations, DOE/NNSA documents also suggest Dismantlement operations can stand alone. (See The Future of Y12, attached, for a detailed analysis.)

22|9.B OREPA proposes construction of a new, single-purpose Dedicated Dismantlement Facility, equipped only with machines and equipment necessary for dismantlement. The DDF must avoid dual-use capabilities if it is to remain unprovocative. The facility design should incorporate verification and inspection protocols as they are developed.

21|9.A (cont) Production capacity for the purpose of stockpile surveillance and maintenance can be accomplished at a 5 warheads/year throughput capacity within an existing facility, a capacity now known to be "reasonable" according to the NNSA. In keeping with the goals of NNSA's Integrated Facilities Disposition Project, operations can be consolidated and downsized in an existing facility, mostly likely Building 9212, which is slated to receive more than \$100 million worth of upgrades in the next decade. Envisioning US participation in an international verification regime during disarmament, safeguard and transparency protocols should be

Hutchison, Ralph

Page 9 of 14

19|8.A (cont) incorporated into the upgrades as they are designed. Throughput capacity of five warheads is **WD-102** inadequate to assure the safety and security of the current stockpile as it awaits retirement.

22|9.B (cont) The location of the DDF should be determined by a balancing of mission, security efficiency, and environmental, safety, and health requirements.

21|9.A (cont) Under OREPA's Alternative, not currently included in the Y12SWEIS, the high security footprint could be reduced by as much as 60%. The new, dedicated dismantlement facility could be designed and built at considerable savings over the proposed UPF, and would provide the most efficient and effective technologies for this increasingly critical mission as well as safe working conditions for its workforce over its 50-60 year life span.

The currently operating production facilities can be upgraded to standards protective of worker and public health and safety as well as protective of nuclear materials themselves for \$100 million (NNSA's estimate)—a dramatic savings over the estimated \$3.5 billion cost of the UPF.

23|12.H Under NNSA's proposals, a new UPF would have a significant detrimental economic impact on the Oak Ridge community and surrounding regions. Workforce reductions range from 40% (nearly 2,600 jobs lost) in the UPF80 scenario to 48% (3,100 jobs lost at Y12, nearly 11,000 jobs lost in the region) under the UPF5 alternative. Compounding the regional negative economic impact: the jobs to be cut would belong-term, high-salary jobs (annual DOE median salary is \$54,000) rather than lower-paying short term construction jobs (industry average \$26,000).

22|9.B cont. Alternative 6 provides a win/win for the local workforce and regional economy. Construction of a new Dedicated Dismantlement Facility along with ES&H upgrades to existing facilities would preserve construction jobs and maximize job security for operational workforces—an increase in dismantlement jobs might be expected to mitigate the impact of any job losses experienced due to the inevitable reduction in Y12's production mission.

24|9.A In any scenario, the increase in security efficiency combined with a reduction in the high security area footprint will result in a decrease in security employment. Reduction of the high security footprint should permit acceleration of demolition and cleanup projects at Y12 which are currently hampered by security concerns—an aggressive effort by local leaders to secure funding for cleanup could offset losses in the security sector and minimize the regional economic impact. This is true for OREPA's alternative as well as NNSA's.

21|9.A (cont) OREPA's alternative is the only alternative that fully supports the nuclear policy goals of the current Administration: it supports maintenance of a safe, secure and reliable stockpile through passive surveillance and maintenance as the stockpile diminishes toward zero in a way that bolsters US nonproliferation efforts on the international stage by demonstrating leadership as called for by President Barack Obama in Cairo, Egypt. DOE's alternatives fail to walk this tightrope, sacrificing US nonproliferation/security goals on the altar of a reconstituted nuclear weapons production complex.

Finally, Alternative 6 has the potential to save billions of dollars, reducing the pricetag for new construction from \$3 billion for a new UPF, to funding for a new dismantlement facility (cost to be determined, but likely in the neighborhood of \$1 billion) and upgrades to existing facilities (NNSA estimate \$100 million). The Final Y12 SWEIS should fully analyze the economic impact of Alternative 6. Given the recent findings of the General Accounting Office that "The cost estimates of the four projects we reviewed [one of which was the UPF] lacked credibility because DOE did not sufficiently cross-check the projects' cost estimates with ICES, use best

Hutchison, Ralph

Page 10 of 14

5|10.C (cont) practices when identifying the level of confidence associated with the estimates, or sufficient **WD-102** project sensitivities," cost estimates for all alternatives should be subjected to a rigorous outside audit.

What's not in the SWEIS, but must be

Seismic events/Natural Phenomena

The Department of Energy's Safety Survey, circa 1993, identified seismic issues as a significant concern for the facilities at Y12.

According to an 1994 article in Science magazine, the East Tennessee seismic zone ranks second in the United States in seismic activity.

In the article, researchers at the University of North Carolina warned that the high frequency of low-level activity should not be taken as a sign that future activity would be low-level, but just the opposite—high frequency low-level activity could be expected to predict a significant seismic event in the future.

25|12.M.1 The SWEIS does not address seismic risks in detail. It asserts that, under the No Action alternative, there is no change in risk from earthquakes. In assessing the UPF, the SWEIS states new construction would incorporate protections into the design of the new facility that would reduce risks from seismic activity, but absent specific design information, the SWEIS says a full analysis of consequences of an earthquake are not possible. Nevertheless, the SWEIS declares a UPF designed to Performance Category 3 would be sustain damage "less frequently than in existing facilities."

This fact does not relieve the NNSA of its obligation to conduct a rigorous analysis of the effects of earthquakes, including but not limited to those that can be "reasonably" expected. Given the nature of work, the number of workers and the materials placed at risk at Y12, all alternatives, including OREPA's alternative, should be fully analyzed with regard to structural building performance in severe events that may exceed the "reasonably expected", including catastrophic failure of some or all structures. This analysis should also examine other complications that might arise in the event of a significant earthquake which could impact activities in Bear Creek Valley. For instance, if an earthquake or tornado damages the pipeline that currently adds Clinch River water to the outfall at East Fork Poplar Creek, bringing Y12 in noncompliance with its water permit, what will the impact be on operations that depend on water?

If an earthquake causes a breach in the concrete quilt and the cap covering old burial grounds and leads to a release of volatile or other toxic materials to air, soil or water that limits worker access to the valley, what will the impact be on ongoing operations?

While it is not necessary that Y12 production operations continue uninterrupted in the event of a natural phenomena event, it is crucial that building integrity be maintained for security purposes as well as for worker, environmental and public health protection. It is not clear from the description provided in the SWEIS, that a PC2 or even a PC3 designation provides that level of building integrity.

Similar analysis addressing risks from tornadoes and flooding must also be conducted; the location of Y12 in a narrow valley, combined with the naturally high water table in Bear Creek Valley, indicate a significant risk from floods. The immersion of HEU in water changes criticality calculations dramatically, adding a unique dimension to the analysis required in assessing risks from flooding.

Accident scenarios and risk analysis of release events

## Hutchison, Ralph

## Page 11 of 14

26 12. M.2	<p>The SWEIS evaluation of accident scenarios cites methodologies used to “evaluate the potential consequences associated with a release of each chemical in an accident situation.” (p. 5-91) This language suggests multiple materials were analyzed for risks to workers, the environment and the public from releases. But the actual accident scenario description says “the chemical analyzed for release was nitric acid,” suggesting only one chemical was used for computer modeling to evaluate consequences associated with a release. There is no indication that nitric acid is a reasonable or realistic substitute for all possible chemical releases—does it match anhydrous hydrogen fluoride, for instance in solubility, migration in soils, dispersion in air? Is nitric acid chosen as a representative of the worst possible chemical released?</p> <p>The SWEIS should analyze a range of accident/spill scenarios, including multiple contemporaneous excursion events due to catastrophic events. Chemicals and hazardous materials that represent the full range of risks posed by materials used at Y12 should be analyzed. “The purpose of a SWEIS is to provide...an analysis of potential individual and cumulative environmental impacts associated with ongoing and reasonably foreseeable new operations and facilities,” [Y12 Draft SWEIS, p.1-22] not a narrow look at one scenario involving one hazardous material or an evaluation of impacts associated with one new facility or operation.</p>
25 12. M.1 (cont)	<p>The bounding accident considered in the Y12 SWEIS is an aircraft crash/attack on the UPF. This may, in fact, be the bounding accident for the UPF, but it is not the bounding accident for Y12 site-wide, including the UPF. In the site-wide EIS, an earthquake of magnitude great enough to cause structural failure of several facilities—including the UPF and emergency response and security facilities (the CCC, if built, for instance), with ongoing or uncontrolled releases of hazardous materials—volatiles, fuels, toxic contaminants, uranium, lithium, beryllium, natural gas, mercury—into air and water, loss of material controls...this apocalyptic scenario is actually not outside the realm of probability given the confined and compact location of facilities at Y12. A detailed analysis of the cumulative and compounding impacts possible in a severe earthquake or tornado event should be analyzed in the SWEIS as a “bounding event.”</p>
27 12. M.3	<p>Impacts of the harm, potential or real, of releases of chemicals and materials are quantified in ways that evaluate risks to humans.</p> <p>Environmental impact statements are required to analyze risks to the whole environment; impacts in accident scenarios should also be calculated for other life forms known to populate Y12 and the immediately surrounding environs. Human beings are not the only forms of life with value. Endangered or protected species are not the only species impacted—though they lack legal protections, impacts on other species should be quantified and considered; a fundamental premise of NEPA is that, all things considered, options that limit harm to the environment are preferable to those which cause more harm and, in any event, decisions should be informed fully about the environmental consequences likely to flow from them.</p>
28 12.L	<p>The impact on waste streams</p> <p>Several of the alternatives proposed for the future of Y12—the UPF125, the UPF80, the UPF5, and the Dedicated Dismantlement Facility, will downsize the footprint of Y12’s controlled access area and will permit decommissioning and demolition of a number of facilities, some of which are contaminated with radioactive and hazardous wastes from past operations.</p> <p>The SWEIS must analyze the waste streams generated by accelerated D&amp;D; wastes must be characterized fully and quantified. Treatment, disposal and/or storage options for those wastes should be evaluated. In addition, the Y12 SWEIS should identify other cleanup operations which may have an impact on the environment that are likely to take place over the next five-seven years. In cases where waste streams might compete for limited storage or disposal space, the SWEIS should be clear about the criteria that will be used to</p>

## Hutchison, Ralph

## Page 12 of 14

	<p>make decisions. The use of off-site facilities, and the transportation hazards attendant to off-site releases, should be evaluated and compared to the benefits and hazards of on-site treatment, storage or disposal.</p>
1 2.F (cont)	<p>The Draft SWEIS acknowledges that massive waste streams will be generated during D&amp;D but does not analyze them, stating only that they “cannot be estimated without a detailed assessment of the facilities.” This is insufficient and does not meet the standard required of an EIS. It may be true that it is not possible to fully characterize exact quantities of waste with specificity, but that does not mean gross generalizations are the only thing that can be said [e.g. “D&amp;D activities would also cause health and safety impacts to workers (occupational and radiological), as well as potential health impacts to the public through the release of radiological materials...” p. 5-98] The Final SWEIS must do better—either attempt a thorough-going characterization of waste streams, or propose a timeline for preparing a Supplemental EIS on Waste Streams from D&amp;D.</p>
28 2.L (cont)	<p>At present, there is no other forum for a comprehensive analysis of environmental management activities at Y12. When OREPA attempted to obtain from DOE or the state of Tennessee a list of all cleanup/waste management projects at Y12 in the last five years, along with a simple indicator of the status of projects, we were told that no such list exists. This segmentation of cleanup projects has obvious disadvantages—the SWEIS provides a vehicle for at least identifying cross-cutting issues and establishing a minimal level of information that can be used to coordinate cleanup/waste management activities. Since no such vehicle exists otherwise, the SWEIS should be a site-wide environmental impact statement.</p>
29 12.P	<p>Risks from releases</p>
30 12.J.3	<p>The SWEIS treatment of potential releases to air and water is partial and deficient. It does not list materials/contaminants used at Y12, does not provide information about scenarios in which materials might be released, does not even use a probability/risk matrix to perform a cursory overview of risks posed by the various materials used in uranium processing operations at Y12. It may be true that some small fraction of these materials is classified, but the vast majority of materials have been documented elsewhere—in the Oak Ridge Health Agreement Steering Panel study, for instance. The SWEIS can provide detailed analysis of these materials and assessment of risks associated with release scenarios without disclosing their purpose.</p>
31 12.J.4	<p>In instances where releases are examined, the analysis must be complete and meaningful. With regard to Uranium discharged to the atmosphere, for instance, the amount of Uranium released is measured in curies. Uranium is also a toxic heavy metal which carries risks from its chemical properties; these risks must also be evaluated, along with an analysis that combines the biologic and radiologic risks. Use of curies as unit of measure gives no hint to the amount of material released.</p>
	<p>An example of the level of detail appropriate for analysis in the SWEIS can be found on pages 2-16 and 2-17 of the Draft SWEIS, where NNSA provides detailed descriptions, including quantities, of reductions in materials through the Pollution Prevention, Conservation and Recycling Programs.</p>
32 2.E	<p>[According to NNSA, “NEPA ensures that environmental information is available to public officials and citizens before decisions are made and actions are taken,” (Y12 Draft SWEIS, p. 1-22). This has not been the case during the preparation of the Y12 SWEIS. No formal opportunity for questions was provided during the public hearing—NNSA provided instead a stand-up poster session with select personnel, a setting decidedly un conducive to in-depth discussion of public concerns. Requests by the Oak Ridge Environmental Peace Alliance for an informal work session that would permit questions and answers in order to fill in gaps in the Draft SWEIS and enhance public understanding of operations and requirements was flatly denied.</p>

**Hutchison, Ralph**

Page 13 of 14

**WD102**

Water Quality

Water quality, particularly the negative impact of Y12's operations on East Fork Poplar Creek, continues to be a concern. The SWEIS indicates 70kg of Uranium was released to the offsite environment through liquid effluent in 2007 (apparently the most recent year for which numbers are available). The SWEIS also indicates NNSA has appealed for relief from water permits, and that mercury releases at Station 17 exceed Tennessee Water Quality Criteria 75% of the time.

As noted above, D&D, and likely new construction, has the potential to add to this burden, and the site-wide EIS is the starting point for an assessment of the characteristics of that additional burden.

Nuclear Materials from other Locations

Y12's mission includes support for the Global Threat Reduction Initiative. Y12's role is to support the retrieval, processing and disposition of Special Nuclear Materials. The SWEIS addresses this mission (p. 5-94ff) and refers to documentation prepared for previous shipments of materials to Y12.

The treatment in the SWEIS of materials received from foreign sources is inadequate. Impacts are assessed only for Special Nuclear Materials. In reality, special nuclear materials are often only part of the total material received. During Project Sapphire, for instance, more than 100 barrels of waste were received at Y12; the amount of Uranium was only 1,245 pounds, a miniscule fraction of the total amount of waste material imported to Y12. Environmental documentation ignored this other waste material. At the time the Project Sapphire EA was completed, and a Finding of No Significant Impact issued, DOE had not even fully characterized the accompanying materials to determine what hazardous or toxic materials might be present; it asserted that characterization of a random sampling was sufficient, though the contents of 100 barrels were not homogenous.

The analysis of impacts from the GTRI must be comprehensive and detailed; the impacts of all materials, not just the Special Nuclear Material, must be included. In some cases this will be a relatively easy project. In other cases, like Project Sapphire, it may require an intensive effort. In all cases, workers and the public should be assured ahead of time ("before decisions are made," p. 1-22) that Y12 has the capacity and the capability to safely manage and dispose of all material associated with shipments under the GTRI, not just special nuclear materials.

Work for others

The Work for Others Program at Y12 has continued to grow over the last nine years (since the last SWEIS). Work for Others Program activities should be described in detail in the SWEIS, along with the facilities in which the work takes place, materials used, waste streams generated, potential impacts of releases, etc.

=====

The above comments represent the concerns of the Oak Ridge Environmental Peace Alliance and its members. These comments will be supplemented by additional comments which may identify additional

**Hutchison, Ralph**

Page 14 of 14

**WD102**

concerns by members of OREPA who submit their comments directly as part of the formal commenting process.

Questions about these comments should be addressed to OREPA, c/o Ralph Hutchison, coordinator, P O Box 5743, Oak Ridge, TN 37831; communications by email should be sent to orepa@earthlink.net.

Supplementing these comments is The Future of Y12, also being submitted as part of the formal record.

Submitted 29 January 2010  
Ralph Hutchison, coordinator  
Oak Ridge Environmental Peace Alliance

finals=Final SWEIS Summary  
finalf=Final SWEIS Full Set  
rod=Record of decision

Hutchison, Ralph

Page 1 of 2

WD119

[Redacted]

From: Ralph Hutchison [mailto:orep@earthlink.net]
Sent: Wednesday, May 19, 2010 1:55 PM
To: Borgstrom, Carol
Cc: Gorman, Pamela (P1G)
Subject: Y12 SWEIS and wetlands disturbance

Dear Pam and Carol,

I am writing to call your attention to the current chain of events related to preparations for construction of the UPF and the Draft Y12 SWEIS.

On May 9 I became aware, through the posting of a public notice regarding an Aquatic Resource Alteration Permit application, of a proposal to build a haul road in support of UPF construction through a wetlands area—the haul road would require the fill of an acre of wetlands and the disturbance of two surface streams and Bear Creek. The permit notice states that impacts on fish and aquatic life were "not assessed."

112.F

The reason I am addressing this concern to you is two-fold. First, the Y12 Draft SWEIS makes no mention of wetlands disturbance in its analysis of environmental impacts resulting from construction and operation of the UPF. Second, the Y12 Draft SWEIS says: "Proposed construction sites would be surveyed for the presence of special status species before construction begins, and mitigation actions would be developed. (p. 5-61, Draft Y12 SWEIS, §5.8.6.)"

While I realize the DOE's regulations permit certain preparation activities related to permits and design to proceed prior to the completion of an EIS, it seems to me that this particular permit application, which includes wetlands disturbances not considered in the Draft SWEIS and which, in addition, directly contradicts an assurance in the Draft SWEIS, should be subjected to rigorous examination. On its face, the permit application calls into question DOE's commitment to proceed in ways both cognizant of and protective of environmental resources.

Since the potential for wetlands disturbance was not addressed forthrightly in the Draft Y12 SWEIS, OREPA retains the right to raise questions in the Final Y12 SWEIS about this issue and other related water issues that were not addressed in the Y12 SWEIS.

212.F

I do not know, and DOE/NNSA have not provided information that would enable me to know, what other activities are taking place in preparation for the construction of the UPF in advance of a decision to actually build a facility or even to determine the size of the facility. This instance, though, points to an inevitable lapse when a Site Wide EIS is prepared with the intention of providing NEPA coverage for a particular facility. In the case of the Y12 Draft SWEIS, the focus on the UPF to the exclusion of almost everything else at Y12 has given short shrift both to the non-UPF activities and operations at Y12 and, as we see here, to the more detailed considerations appropriate to a single-facility EIS.

312.E

OREPA has asked the state of Tennessee to hold a public hearing on the ARAP permit currently under consideration and we hope they will grant our request. Earlier in the SWEIS process OREPA asked DOE/NNSA for a public workshop that would allow for questions/answers and detailed discussion (modeled on successful workshops held in 1994) of issues that can not reasonably be covered in a stand up "poster session," or the one-way conversation of a public hearing. Had our request been granted (and it's still not too late!) these issues may well have surfaced and been dealt with at that time in an appropriate way. To have them dribble out one at a time to be dealt with as separate instances, serves no one's interest—it is neither efficient nor responsible.

Hutchison, Ralph

Page 2 of 2

WD119

312.E (cont.) OREPA has written to the state requesting a public hearing on DOE's permit application; it seems to me it would be in DOE/NNSA's interest to take advantage of a chance to explain the proposal and its implications to the public through this process.

Peace,
Ralph Hutchison, coordinator
OREPA

Hutchison, Ralph

Page 1 of 4

Comments of the Oak Ridge Environmental Peace Alliance  
on the Wetlands Assessment prepared by the  
Department of Energy/National Nuclear Security Administration

9 July 2010

General comments

Subsequent to the publication of the Draft Y12 Site-Wide Environmental Impact Statement, and after the close of the public comment period on the Draft Y12SWEIS, the Department of Energy/National Nuclear Security Administration has disclosed its intention to construct a haul road to facilitate construction of the Uranium Processing Facility; the purpose of the haul road is ostensibly to transport large quantities of soil excavated from the UPF site in preparation for construction. The proposed haul road will bisect and impact several wetlands areas; hence this proposal.

1. OREPA's comments on the Wetlands proposal are submitted to meet the deadline for comments. They should not be construed as an acceptance of this piecemeal consideration of environmental impacts associated with the construction of the UPF. OREPA believes the Department of Energy must meet its obligations under NEPA by either:

1|12.T.9

a) reissue a new Draft Y12 SWEIS with detailed plans on the environmental impacts associated with the UPF, including the excavation and relocation of massive amounts of soil, the construction of the haul road, the disruption of wetlands areas, and any other additional environmental impacts expected as a result of construction. The public should have an opportunity to provide full comments prior to the issuance of a Final SWEIS. Or,

b) issue the Final Y12 SWEIS based on the Y12 Draft SWEIS and prepare a separate, comprehensive Environmental Impact Statement specific to the Uranium Processing Facility which includes plans for massive excavation, characterization and disposal of soil, the construction of the haul road, the disruption of wetlands areas, and any other additional environmental impacts expected as a result of construction.

2|12.T.10

2. The wetlands proposal addresses only one small piece of the larger excavation/soil characterization/transport/disposal picture. The wetlands proposal lacks sufficient information on the excavation/soil characterization/transport/disposal plans to permit meaningful comment on those pieces of the UPF construction plans, and is an inappropriate vehicle for addressing issues tangential to the actual impact on wetlands of the haul road construction. OREPA recognizes the DOE/NNSA has an obligation to present the public with details on this major action that was not covered in the Draft Y12 SWEIS and to accept comment on those plans, either as part of a reissued Draft Y12 SWEIS or a separate EIS on the UPF.

Hutchison, Ralph

Page 2 of 4

3|12.T.11

3. As this wetlands proposal is apparently intended as an amendment to the Y12SWEIS (labeled Appendix G), it is appropriate and necessary that the federal government provide the proposal and an opportunity to comment to all those who submitted comments on the Draft Y12SWEIS.

4|12.T.12

4. The Wetlands proposal is difficult to understand; the descriptions of the haul road and the terrain through which it will pass and the wetlands it will impact are difficult if not impossible to understand from the narrative and poor quality photos included, some of which have illegible labels of sites referred to. Putting together a coherent picture of the proposed road, the route, the physical geography, and the proposed changes is impossible from the written description.

OREPA believes the public deserves to understand this proposed action and the potential impacts as well as a thorough discussion of alternatives, and we believe this can only happen in a public hearing/public workshop session. We are requesting the DOE/NNSA hold a public hearing to enable the public to clearly understand the nature of this proposal, to ask questions for clarification, and to submit appropriate comments.

OREPA requested a public hearing from the state of Tennessee after reviewing the application submitted to the state which was woefully inadequate (impact on aquatic resources "not assessed"). Though the state has not formally responded to our request, we learned via the newspaper that our request was denied because the comment period had ended (we had learned about the proposal less than one week before the end of the comment period).

OREPA then reviewed the more detailed proposal submitted to the Army Corps of Engineers—this application more closely resembles the DOE/NNSA Wetlands Proposal; it provides much more information than the state permit but, as noted above, also suffers from shortcomings that make it difficult to understand the exact scope and impact of the proposed action. We requested a public hearing from the Army Corps; we were joined in our request by the Tennessee Clean Water Network and the Foundation for Global Sustainability; we have yet to receive a response from the Army Corps.

Specific comments

5|12.T.13

5. The Wetlands Proposal mentions (p.3) a concrete batch plant and the massive excavation of soils in preparation for construction of the Uranium Processing Facility. Neither of these issues appeared in the Draft Y12 SWEIS, and the Wetlands Proposal is not an appropriate vehicle for details comments (nor does the proposal provide detailed information). Consideration of the environmental impacts of massive excavation/soil characterization/transport and disposal as well as the construction of a concrete batch plant must be incorporated in a NEPA process which allows for informed public comment.

6|12.T.14

6. The haul road proposal indicates the designed of the road was modified to minimize wetlands impact, including increasing slope (p.3)s. It would seem this design would also increase pollution from large diesel trucks laboring up a steep hill. The wetlands proposal does not address pollution impacts from extensive and long-term heavy equipment traffic

## Hutchison, Ralph

## Page 3 of 4

6 12.T.14 (cont.)	through the wetlands. No mention is made of tailpipe emissions or oil or other fluid leaks which would impact wetlands.
7 12.T.15	7. The wetlands proposal says there will be a discharge of materials into wetlands or "other waterbody" (p.3) The proposal should be specific about any impacted water bodies.
8 12.T.16	8. The wetlands proposal describes a "buffer zone" to be constructed "when possible" (p.4). The proposal should make clear who decides what is "possible" as opposed to what is "feasible" and should make clear the factors being considered during the decision-making process.
9 12.T.17	9. The wetlands proposal says that work done within existing wetlands will be done with manual labor to minimize impacts (p.4). This strains credulity—will tons of soil be removed, fill dirt distributed, packed, and paved over using only manual labor? If not, the wetlands proposal should include a detailed description of what parts will be manual labor and what will be done with machines and equipment.
10 12.T.18	10. The wetlands proposal references dry soil "storage" on p.4. What does this mean? Is storage temporary or permanent?
11 12.T.19	11. The wetlands proposal describes the consideration of Bear Creek Road as an alternative (p.4), but the final statement of rejection does not match up with the considerations listed above.
12 12.T.20	12. The wetlands proposal includes a detailed description of the activities undertaken to characterize the wetlands soils (p.7) but does not contain, in narrative, summary or table form, the results of those characterization activities.
13 12.T.21	13. The wetlands proposal identifies two species of concern in the areas to be disrupted; roosting habitat for the Indiana bat (p.9), and habitat for the Tennessee dace (p.18). The proposal says nothing else about them—no description of efforts to address habitat issues or to mitigate impacts for these listed species.
14 12.T.22	14. The wetland proposal describes some areas as "primarily man-made" (p.17). It is important to note that "primarily man-made" does not equate to "therefore unimportant, inconsequential, or unnecessary." The document notes in other places that human made habitats have existed long enough to have been incorporated by wildlife as important habitat.
15 12.T.23	15. The wetland proposal references soil sample analysis and says "no contaminated soil is anticipated." Given the history of environmental surprises on the Oak Ridge Reservation, this statement is meaningless. What's more, it is unnecessarily meaningless. We don't have to guess what the samples might show—we can wait and see what the results are. The wetlands proposal provides insufficient information about the sampling process to allow the public to have confidence that the sampling is adequate.

## Hutchison, Ralph

## Page 4 of 4

16 12.T.24	16. The wetlands proposal says affected streams were checked for the presence of the Tennessee dace in February 2010 (p.18), which is the dead of winter. The streams must be checked again in summer (most preferable would be an accounting of the presence of dace in each season), and data must be incorporated into the wetlands proposal and made available to the public.
17 12.T.25	17. In describing mitigation efforts (p.19), the wetlands proposal notes that some mitigation efforts are expected to maximize the likelihood of successful mitigation of wetlands, but that others (60%) will not conform to the "important priority in defining appropriate wetlands mitigation" and are less likely to succeed. (You can lead a dace to water, but you can't make it thrive.) This concern should be addresses in detail in the wetlands proposal.
18 12.T.26	18. The wetlands proposal identified .51 acres of disturbed wetlands to "comprise valuable wetland and water quality functions for the streams of the Bear Creek watershed." The proposal should describe those functions in detail and also describe how the mitigation measures will sufficiently replace these valuable functions.
19 12.T.27	19. The wetlands proposal says (p.28) that portions of Bear Creek "could" be modified, and in the next sentence, that 70 feet of downstream channel "would" be modified. It is not clear what decision-process would determine if the initial could might be transformed to a would.
20 12.T.28	20. The wetlands proposal should include a description of "electrofishing. (p.28)
21 12.T.29	21. The wetlands proposal makes reference, in its conclusion, to "site access and perimeter modification is also unavoidable in the western footprint of the UPF complex." The antecedent for this reference is not clear, nor is the implication of the statement.
	Submitted on 9 July 2010 Ralph Hutchison, coordinator on behalf of the Oak Ridge Environmental Peace Alliance

James, Alan

Page 1 of 1



**Draft Y-12 Site-wide  
Environmental Impact Statement—  
U.S. Department of Energy  
National Nuclear Security Administration**

**Written Comment Form**  
*Must be received on or before January 29, 2010.*

OR2D03



115.0  
217.0 I support the alternative <sup>or</sup> 2A.

313.B  
UPF is needed as the existing facility needs to be replaced. Some of the key infrastructure systems are 60+ years old. Some of the equipment was not new when it was installed. Some of the equipment is 80 years old!

4112.J  
The DNFSB repeatedly writes up the existing facility as having significant safety issues.

5113.0  
It pays for itself in short order, with savings of \$200+ Million/year. It's a no-brainer!

ALAN JAMES  
713 FOX DALE LANE  
KNOXVILLE, TN 37934

Please use other side if more space is needed.

Comment forms may be mailed to:  
Ms. Pam Gorman  
Y-12 SWEIS Document Manager  
800 Oak Ridge Turnpike, Suite A-500  
Oak Ridge, TN 37830

Comment forms may be faxed to:  
(865) 483-2014  
or sent by email to:  
y12sweis.comments@tetratech.com

You may also submit comments through the project website which can be found at:  
<http://www.Y12sweis.com>

Johnson, Pete

Page 1 of 1

WD014

**From:** pete johnson [pjohnso6@wowway.com]  
**Sent:** Tuesday, November 17, 2009 3:08 PM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** Form Post from Firefox

firstName=pete  
 lastName=johnson  
 organization=  
[email=pjohnso6@wowway.com](mailto:pjohnso6@wowway.com)  
 address1=5682 great woods blvd  
 address2=  
 city=columbus  
 state=oh  
 zip=43231  
 country=usa  
 subject=Draft Y-12 SWEIS

1114.0 | comments=I am opposed to this nuclear plant

1

Joyner, Ann

Page 1 of 1

WD108

██████████

---

**From:** Ann Joyner [anjoy1@verizon.net]  
**Sent:** Friday, January 29, 2010 4:01 PM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** OREPA alternative 6

Attention Pam Gorman:

1|9.A We don't need or want nuclear bombs. The expense is unjustified wherever it is proposed they be manufactured. My husband and I have just today become aware of this possibility due to a letter in the Asheville newspaper. We would prefer OREPA alternative 6. From: Ann Joyner, Weaverville NC

1

Kapa, Don

Page 1 of 1

WD071

██████████

---

**From:** Don Kapa [hotjpepper@gmail.com]  
**Sent:** Friday, January 22, 2010 1:36 PM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** Oak Ridge Uranium Processing Facility

1|14.O I was disappointed to learn that the US government continues to produce nuclear weapons.

I especially oppose the construction of the Y12 Nuclear Weapons Complex in Oak Ridge, TN.

2|10.D The price to build this complex is \$3.5 million. I think spending this money on education, health research, and promoting peace would be a more prudent use of taxpayer funds.

As I learned of this proposal, I was reminded of a quote attributed to President U.S. Grant when he said after the end of the Civil War, " Let us have peace." After all these years, I think it's time for us to have peace.

Don Kapa

1

Kavanaugh, John

Page 1 of 4

WD092

From: John Kavanaugh [johnkavanaugh1@yahoo.com]  
 Sent: Wednesday, January 27, 2010 7:01 PM  
 To: DIV.Y12SWEIS.Comments  
 Cc: KIM JOY BERGIER; Sigrid/Ron Dale; McClatchy News; Teresa Maxwell Kelly; D. BUKOWSKI; Nancy Pelosi; DEMOCRATIC PARTY; GREEN PARTY; REPUBLICAN PARTY; ACORN; Color of Change; United Farm Workers  
 Subject: COMMENT ON: PROPOSED \$3.5 BILLION NEW URANIUM PROCESSING FACILITY:

**Ms. Pam Gorman**  
**Y-12 SWEIS Document Manager**  
**Y-12 Site Office, Suite A-500**  
**800 Oak Ridge Turnpike**  
**Oak Ridge, TN 37830**

**Ms. Gorman:**

**The single constant that seems to run through all recent Presidential Administrations is a weapons policy that I consider insane.:**

**Former President Dwight Eisenhower phrased it as a "Military-Industrial Complex".**

**That phrase embodies actual people:**

**My guess would be that the present strain was begun when President Woodrow Wilson appointed Herbert Walker to supply the Pentagon.**

**Mr. Walker allied with his son-in-law, Prescott Bush, in forming a company, Brown Brothers (i.e. the "B" in present day HBR) in Germany prior to World War II. It has been pointed out that Brown Brothers came to the aid of Adolph Hitler at a point when that "gentleman(?)" was having some problem.**

1

Kavanaugh, John

Page 2 of 4

WD092

**Brown Brothers was a part of the Harriman Empire. One of the Harriman's had set up shop in Russia. With Brown Brothers in Germany, the Harriman's, Walker, and Bush seemed set to make money off of the Second World War no matter which side won. And, indeed, the profits from that war were the base upon which the Bush family fortune was built.**

**I would suspect that the Bush family held onto their shares in Brown. So, I figure that the Bush family is still profiting from the wars they started.**

**There has been some talk recently (Daniel Ellsberg is one example) that we are now in a permanent state of war. That would not surprise me!**

**It did not surprise me, either, when George W. Bush spoke of putting Nuclear Weapons and radar equipment right at Russia's border. That is all the way within Russia's "area of influence."**

**By the same token, Russia could claim a right to place nuclear weapons in Venezuela and Cuba. We have no more right to "an area of influence" than Russia does. If we want to eliminate the safety valve of such cushions of nations between ourselves and other large powers we run the risk of our confusion of policies backfiring.**

**What bothers me is the vacillation of President Obama's policies: Moving back from Poland and Czechoslovakia with regard to nuclear weapons and radar equipment made a great deal of sense. His moving the weapons off**

2

Kavanaugh, John

Page 3 of 4

shore on ships was counter-productive to his earlier<sup>WD092</sup> move.

His reduction of weapons proposal is countered by the proposal of the new Uranium Processing Facility.

19.c

I get the impression that the hope embodied in the election of President Obama may be misplaced in the sense that it seems that the President no longer has the power to make decisions with regard to war and/or nuclear policy.

The question no longer seems to be what the President wants to do. Rather, the question seems to revolve around what the President can be forced to do.

Some journalist asked if the ten thousand troops sent to Haiti are intended to be permanent. That would amount to another base in the Mexican Gulf. That would amount to reinforcing an "area of influence" we no longer claim.

More basic: Are we still a Democracy?

It seems that elections are either bought, won through suppression, or even decided by Judicial Coup.

As I understand it, John McCain was slated to "win(?)" up until about a week before the election; until Carl Rove was threatened with having to face a judge; until that computer guy conveniently ran out of gas flying from Columbus to Cleveland.

3

Kavanaugh, John

Page 4 of 4

Between Republicans, kooks, and the Corporate Media<sup>WD082</sup>: It looks like the Democrats and Obama are being set up to lose in 2010 and 2012.

My bet is that the Bush family is pulling for Jeb!

214.0

I SEE THE "Y 12 SWEIS" AS EVIDENCE OF ARROGANCE OVER-REACHING ITSELF!:

MY RECOLLECTION OF THE GREEK CONCEPT OF THE CYCLE OF FATE MAY PORTEND THE CAT TRYING TO PLAY WITH ALL OF WE MICE TO A POINT WHERE THE CAT GETS CAUGHT UP IN THE CONFLAGRATION IT STARTED.

YOU KNOW HOW A SKITTISH CAT CAN KNOCK OVER A LANTERN ONTO THE HAY IN A BARN!

MY ONLY, PERHAPS MORBID, SATISFACTION IS KNOWING THAT THE SO-CALLED "MILITARY INDUSTRIAL COMPLEX" CANNOT KILL ALL OF U. S. WITHOUT COMMITTING SUICIDE!

John Kavanaugh

cc: A whole lot of folk.

PS: Sent blind copy to just under one hundred primarily activists, some friends, and a few family. jk

PPS: Anyone who wishes to unsubscribe from my e-mail lists may do so by sending me a clearly phrased request to that effect. jk

4

Keeton, Ricky

Page 1 of 1

<p>Ricky A. Keeton 2845 Baker Highway P.O. Box 180 Huntsville, TN 37756</p>	<p>Office of County Mayor</p> 	<p>MD019 (423) 663-2000 (423) 663-2355 Fax (423) 663-3803 scottexec@highland.net</p>
---	---	--

November 18, 2009

Ms. Pam Gorman  
Y-12 SWEIS Document Manager  
Y-12 Site Office  
800 Oak Ridge Turnpike, Suite A-500  
Oak Ridge, TN 37830

Dear Ms. Gorman,

I am writing to support the proposed Uranium Processing Facility (UPF) at the Y-12 National Security Complex in Oak Ridge. This facility will supplement the modernization initiative currently underway at Y-12. The draft Site-Wide Environmental Impact Statement (EIS) presents this as the preferred option from several alternatives.

1|13.0

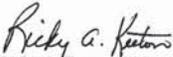
1|13.0  
(cont)

2|3.B

Scott County has several people employed by the DOE and NNSA as part of the regional workforce. Our county and region have always been strong supporters of the Oak Ridge complex. Our region has always been responsive to the safe conduct of the operations associated with these missions. We are prepared to continue to invest in regional workforce development that is required for these operations. We do believe that Y-12's continued role should be conducted in modernized facilities with cost effective and safety focused processes. The preferred option of a new UPF achieves this objective.

Thank you for your consideration of these comments.

Best Regards,

  
Ricky A. Keeton  
Scott County Mayor

Kelley, Marylia

Page 1 of 2

WD003

**From:** Marylia Kelley [marylia@earthlink.net]  
**Sent:** Friday, October 30, 2009 1:34 PM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** Y-12 Draft SWEIS initial comment

Dear DOE NNSA:

I have just received notice of the public comment period for the Y-12 Draft Site Wide Environmental Impact Statement. I have left a message on the document manager's phone line requesting a full copy of the Draft SWEIS.

This initial comment is regarding the length of the public comment period. I see that it is presently set to expire on January 4, 2010. This means that the public comment period runs through numerous holidays - Thanksgiving, Christmas/Chanukah/Kwanza (etc.) and New Years.

I am the Executive Director of Tri-Valley CAREs in Livermore, CA. I would like to prepare detailed, thoughtful comments on the Y-12 draft SWEIS.

In order to do so, and to simultaneously conduct other Tri-Valley CAREs activities and enjoy family holidays, I will need additional time, i.e., an extension of the public comment period.

I believe that my situation is not unique.

As I have yet to receive the full document, I cannot tell you in this initial comment how many pages it contains. But, you already know that. I suspect that the answer is that the draft SWEIS is long, dense and cumbersome -- as are all NNSA draft SWEIS documents that I have read over the years.

1|2.B

I point this out because as a member of the public who intends to offer comments, I want to emphasize the time commitment that commenting requires.

Further, the decisions that are to be made in the Y-12 draft SWEIS are among the most important that our Nation will make in the coming years. Thus, the draft document should be read and considered carefully by commentators, not skimmed like a romance novel (as I am sure you will agree).

For these reasons, on behalf of Tri-Valley CAREs, I formally request an extension of the public comment period through the end of January.

Moreover, on behalf our our colleagues, friends and group members in and around TN, I ask you to also extend the period of time between the release of the draft (which many folks have yet to receive) and the public hearings.

I have already heard from some people in and around TN that they had been assured of a 30-day period between the release of the draft SWEIS and the first public hearing (and also that they had been told there would be a 90-day public comment period overall).

1

Kelley, Marylia

Page 2 of 2

<sup>1</sup>2.B (cont) I am confident that you will receive more - and more thoughtful and complete - comments if ~~MD003~~ end the public response times. To do less hinders the public's ability to adequately comment under NEPA.

Thank you for your consideration of this important public issue. Please let me know the duration of any extension.

And, please expedite the mailing of the full document to the address I left on the document manager's voice mail, and which also follows my signature below.

Sincerely,

Marylia Kelley,  
Tri-Valley CAREs

Marylia Kelley,  
Executive Director

Tri-Valley CAREs  
2582 Old First Street  
Livermore, CA, USA 94551

Ph: (925) 443-7148

Fx: (925) 443-0177

Web: [www.trivalleycares.org](http://www.trivalleycares.org)

Email: [marylia@trivalleycares.org](mailto:marylia@trivalleycares.org) or [marylia@earthlink.net](mailto:marylia@earthlink.net)

"Stopping nuclear weapons where they start..."

Kelley, Marylia

Page 1 of 24

MD059

## Tri-Valley CAREs

Communities Against a Radioactive Environment

2582 Old First Street, Livermore, CA 94551 • (925) 443-7148 • [www.trivalleycares.org](http://www.trivalleycares.org)



Peace Justice Environment  
since 1983

January 29, 2010

Pam Gorman  
Y-12 SWEIS Document Manager  
Y-12 Site Office  
800 Oak Ridge Turnpike, Suite A-500  
Oak Ridge, TN 37830

**Re: Comments on Draft Site-wide Environmental Impact Statement for the Y-12 National Security Complex (DOE/EIS-0387) (Draft Y-12 SWEIS)**

Dear Ms. Pam Gorman,

Tri-Valley CAREs (TVC) is a non-profit organization founded in 1983 by Livermore, California area residents to research and conduct public education and advocacy regarding the potential environmental, health and proliferation impacts of the Department of Energy (DOE) nuclear weapons complex, including the nearby Lawrence Livermore National Laboratory.

Since its inception, TVC has participated in numerous National Environmental Policy Act (NEPA) administrative review processes involving the nuclear weapons complex, including Y-12. The group has also participated in federal litigation to uphold NEPA at Y-12 and other sites in the DOE National Nuclear Security Administration (NNSA) complex.

Due to concerns in our community about the implications of increasing the US nuclear weapon production capabilities, TVC submits the following comments on the Draft Site-wide Environmental Impact Statement (SWEIS) for the Y-12 National Security Complex (Y-12) at Oak Ridge, Tennessee.

There is a recognized need to increase the security and safety at Y-12, which has long been the NNSA's primary site for enriched uranium (EU) processing and storage. This stated purpose of this (SWEIS) is to analyze the potential environmental impacts of alternatives for ongoing and foreseeable future operations, facilities, and activities at Y-12. However, the document is limited almost exclusively to analyzing just one large construction project at Y-12, the Uranium Processing Facility (UPF). Though over \$100 million dollars has been earmarked for upgrading existing facilities at Y-12 through 2018, this SWEIS focuses all attention on justifying a UPF to enable the production of uranium secondaries and cases. We note the "preferred alternative" would build an oversized, unneeded and wrongly-missioned UPF to produce 50/80 nuclear weapons' secondaries and cases annually.

<sup>1</sup>3.B

This draft SWEIS document lacks sufficient analysis in a number of ways described below.

Kelley, Marylia

Page 2 of 24

**I. Lack of need for a UPF.**

The Obama Administration has communicated to the world that the US will be taking a leadership role in nuclear disarmament through various means, including shrinking the US nuclear weapons arsenal. In his April 2009 speech in Prague, President Obama declared the US will show global leadership in getting to zero nuclear weapons. In September 2009, the US presented a UN resolution, adopted by the security council, which calls on nuclear weapons states to renew their efforts to meet their obligation (in the Non-Proliferation Treaty) to "pursue in good faith...disarmament at an early date." It is also estimated that the follow on agreement to the START Treaty with Russia will reduce the US stockpile to 1,675 strategic nuclear warheads; when President Obama announced this, he also said it was the starting point for deeper cuts. It is clearly foreseeable that the size of the US stockpile will be going down in both the near and long term future.

Currently, the US has a safe, secure, reliable stockpile. Since 1996, more than \$90 billion has been spent on so called Stockpile Stewardship activities. By 2018 the US stockpile of refurbished "Life Extended" warheads will exceed the maximum foreseen in the new START Treaty. Yet if one includes all of the nuclear weapons in the US stockpile that have been refurbished since the late 1980s, by 2012 we will have 1,786 warheads of recent vintage and by 2018 that number will have grown to 2,986, and that is without a UPF or Chemistry and Metallurgy Research Replacement (CMRR) Nuclear Facility at Los Alamos National Lab.

With nearly 3000 nuclear weapons in the stockpile already refurbished by the time the UPF is constructed (2018), the need for a UPF of the scale proposed in the Preferred Alternative, or even one of the size proposed in the No Net Capability Alternative clearly does not exist.

Additionally, the existing facilities at Y-12 are already being upgraded to meet health, safety, security and environmental standards whether a new UPF is built or not. More than \$100 million will be spent on upgrades to existing facilities between now and 2018. These upgrades will not expire and ensure that the existing facilities can maintain the stockpile through 2018, giving ample time to allow for the planned reductions in the stockpile to become a reality. Indeed, those reductions should be the basis for planning the future of Y-12, as we will describe below. Instead, NNSA offers only production based alternatives.

It has repeatedly been found by the JASON and others that narrowly defined, careful surveillance and evaluation of the existing arsenal is sufficient (and essential) to assure its safety, security and reliability, as it awaits dismantlement.

These narrowly defined maintenance activities can be performed in existing facilities. For example, consolidating operations in a down-sized, upgraded existing facility (capable of performing 10 or fewer assessments a year, a number considered "reasonable" in the draft SWEIS) could provide mission confidence and send a powerful signal to the rest of the world that the US is not investing enormous amounts of money in new production capability.

Moreover, the draft SWEIS does not distinguish between the equipment "needs" for dismantlement of nuclear weapon secondaries at Y-12 and the equipment "needs" for their production, including the production of new and modified designs. While there is some crossover or dual use, it is nonetheless true that one can draw a line between equipment for dismantlement and equipment for production. They are not the same from a technical perspective. They are not the same from a NEPA

Kelley, Marylia

Page 3 of 24

compliance perspective. Further, the people of the US and the world can and do distinguish between disarmament and dismantlement of nuclear weapons and producing new ones. They are not the same in terms of policy and political impacts.

4|9.d  
cont.

The draft SWEIS is fatally flawed by its willful refusal to substantively distinguish between these two different activities (production and dismantlement). All of the UPF options presented, including the "preferred alternative" fail to analyze a dismantlement-missioned UPF and distinguish it from the production oriented UPF options. Thus, the alleged alternatives in the draft SWEIS are reduced to being mere variations on the same production theme with only a marginal difference in square footage between them.

**II. Improper segmentation/ failure to analyze cumulative impacts.**

This project is connected to the already completed HEUMF, both physically and in terms of its environmental impacts. In addition the Consolidated Manufacturing Complex (CMC) that is planned for the near term future at Y-12 will also be linked to these facilities. The DOE is required by NEPA to analyze connected actions together in one Environmental Impact Statement. By improperly segmenting the HEU storage (HEUMF), HEU processing (UPF), and the "production operation zone" upgrades, (which are envisioned as developing into a small complex or possibly a CMC) the required "hard look" at the cumulative impacts of these facilities together is avoided. Pursuant to the CEQ's NEPA regulations, "'Cumulative impact' is the impact on the environment that results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency or person undertakes such other actions." 40 C.F.R. §1508.7. The cumulative impacts section of the draft SWEIS unreasonably fails to include a look at the connected impacts of the three facilities in one NEPA review document.

5|12.n

While, ideally the cumulative impacts of the three projects should have been analyzed in the NEPA review for the HEUMF before any action was taken, a comprehensive "hard look" at their cumulative impacts should be taken in this SWEIS. Clearly additional information about the CMC will need to be developed and included for this analysis to meet NEPA's statutory requirements.

Additionally, the "preferred alternative" in this Draft SWEIS suggests that the UPF should produce 50/80 secondaries and cases per year, a figure that matches the number of pits to be produced in the preferred alternative for the proposed CMRR. These two projects are inextricably linked in that, together, they will produce the physics packages for nuclear weapons in the US arsenal. It is no coincidence that the CMRR project proposes this same 50/80 figure. Due to the connected nature of the projects, there should be an analysis into the cumulative impacts of the projects together, specifically regarding the proliferation and environmental contamination that these projects will cause.

**III. Failure to adequately prepare for upcoming nuclear posture review.**

The Draft SWEIS relies on the 2001 Nuclear Posture Review (NPR) as a principal national security policy for guidance on nuclear weapons policy. The draft SWEIS states conclusively that to achieve the goals in support of the Nuclear Posture Review of 2001, the continued operation of a facility such as Y-12 is necessary. However, the draft SWEIS fails to take into account the anticipated changes that will be implemented in the new NPR (due in March 2010). Drafting a SWEIS that relies on a document that, given the new administrations disarmament positions, is expected to drastically change in the upcoming months is unreasonable. The new NPR will provide guidance on the new nuclear weapons policy and as such, NNSA should not issue a draft SWEIS for public comment that relies

6|1.a

Kelley, Marylia

Page 4 of 24

entirely on national security policies that are likely to be rendered irrelevant in the near future, let alone in 2018 when the UPF is set to open.

The Y12 SWEIS has no urgent driver that compels a decision prior to the release of the NPR in March and the Non-Proliferation Treaty (NPT) Review Conference in May, since NNSA confirms that work is being done safely and responsibly now. Both the NPR and the NPT, along with the START follow on agreement and other measures are expected to clarify the nuclear terrain and will redefine "mission requirements" across the nuclear weapons complex, including at Y-12.

8|1.a  
cont.

The Congressional Bipartisan Commission on US Strategic Nuclear Posture said as much, as the SWEIS notes: delaying the process to allow clarification will allow for a better decision. Further, it will permit the public to better comment on alternatives.

In order to be timely and reasonable, the draft SWEIS should proceed on the basis of the 2010 NPR and its force structure, and the SWEIS should not proceed with a decision on the UPF based on an insider guess, however educated, when waiting six more months (after a four year delay) will offer significantly more certainty about the future.

Building a new bomb production plant now will corrupt President Obama's overall vision and negate any gains we might hope to make in nonproliferation efforts through the START follow on agreement, the Comprehensive Test Ban Treaty ratification, the NPT Review, or a Fissile Materials Cutoff Treaty, among other measures being considered.

7|1.e

The US is expending huge amounts of political capital to try to constrain the worldwide spread of nuclear weapons. Building a new bomb production plant will undermine these efforts to establish credibility on nonproliferation on the global stage.

It is not overreaching to say that building a new bomb plant in Y-12 will likely trigger nuclear proliferation in nations that believe they need to protect themselves from possible US aggression. At a minimum it will stymie progress toward a safer and more peaceful world without nuclear weapons.

A policy which attempts to discourage other nations from pursuit of nuclear capability while expanding our own capacity to proliferate our own arsenal is duplicitous and inconsistent.

#### IV. The analysis of the "preferred alternative" fails and is inadequate

The stated "preferred alternative" of the NNSA is the 'Capability-Sized UPF Alternative'. This veiled attempt to split the difference (between the full scale 125 warhead per year UPF and the No-Net Capability UPF alternatives) is not adequately analyzed in this SWEIS and fails on several counts:

- Building new production facilities with a 50-80 warhead/year capacity will be a provocative act that undermines US moral standing and credibility and, more practically, negates our nonproliferation efforts.

8|7.b

- Little detail is given to support the need for the production figures of the Capability-Sized UPF, nor is there any discussion of the fact that the "preferred alternative" here for new secondaries equals the production level for new pits at the CMRR nuclear facility and what the implication of that are for international nuclear proliferation.

Kelley, Marylia

Page 5 of 24

- Building a Capability-Sized UPF when the demand for production capacity is expected to decline to near-zero in the next decade is unacceptably wasteful. By the time any production facility is completed, it will no longer be needed, as US stockpile levels will, by treaty commitments, have declined to a level below that of the current Life Extended stockpile.

9|3.a

- Building a Capability-Sized UPF will require an investment in expensive technology that will cost Oak Ridge workers jobs and, ultimately, prove to be a waste as the demand for production operations diminishes and then disappears.

- The only conceivable motive for building a Capability-Sized UPF is transparent to other nuclear weapons, nuclear-capable, and nuclear wannabe states: to maintain an enduring nuclear arsenal far into the future and to pursue production of new or modified warhead designs.

- There is no reasonable or rational scenario under which a throughput capacity of 50-80 warheads/year would be required to maintain our current stockpile in its present safe, secure and reliable status.

10|7.c

- The draft SWEIS does not adequately provide information to support the square footage requirements asserted for the space in the preferred alternative, what amount of the UPF would be used for what stated purpose and what amount of the facility is set aside for future purposes. This failure to adequately describe space requirements for the individual operational requirements of UPF violates NEPA and prevents the public, elected officials and decision makers from their ability to comment on the analysis. A much more detailed and thorough description of space requirements for the each purpose of the project, the amount of space set aside for future purposes and other information relevant to analyzing the adequacy of the size and scale of the facility proposed in the preferred alternative is required by law.

#### V. Failure to analyze the impacts of increased uranium mining that would be necessary to meet the preferred alternative's uranium needs.

The exploration and mining of uranium causes significant destruction to the environment. Yet, the draft SWEIS fails to include an analysis of the environmental impacts that the increased demand caused by the "preferred alternative's" 50/80 secondaries a year production level will have on the sure to follow increase in uranium exploration and mining. The DOE already exerts significant pressures on ecosystems around the United States where there is uranium speculation, including a 42-square-mile uranium leasing program that threatens water and wildlife in the Dolores and San Miguel rivers in western Colorado and eastern Utah.

11|16.b

NEPA requires the indirect cumulative impacts of an action be analyzed in an EIS. Cumulative Impacts include indirect effects, which are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable. Indirect effects may include growth inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems. CEQ 1508.8(b). The increase in uranium exploration and mining caused by the preferred alternative are an indirect cumulative impact of the facility that must be fully analyzed in the SWEIS.

Kelley, Marylia

Page 6 of 24

**VI. Failure to adequately analyze special needs for likely increase in dismantlements above 2009 levels.**

12|9.d The future of Oak Ridge must include the dismantling of many thousands of nuclear weapons. Because this part of Y12's mission has been largely neglected for decades, there is a 12-15 year backlog of retired secondaries and subassemblies awaiting dismantlement and disposition. The backlog is large enough to create storage issues and, on more than one occasion, criticality safety violations, yet the dismantlement responsibility goes largely unmentioned in the Y-12 draft SWEIS.

Y12 projects future dismantlement at a steady rate—but this is not enough to meet the country's needs and certainly not enough to persuade other nations we are aggressively acting to reduce our stockpile and meet our obligations under the NPT.

13|9.b Y12 should establish the capability to more than double its throughput for dismantling nuclear weapons; a dedicated, single-use facility, with security, safeguards, and transparency designed in, should be constructed, in either a renovated or new building. A full assessment of dismantlement facilities and realistic future projections of dismantlement demand should be conducted as part of the SWEIS for Y12.

12|9.d cont. The SWEIS's treatment of the UPF fails to give exact figures and details about the extent of the dismantlement work that can be done under any of the alternatives, including the extent of the floor space, if any, that will be designated to dismantlement under each alternative and the number of dismantlements that can be accomplished under any of the alternatives.

**VII. Failure to adequately analyze costs.**

14|10.c The SWEIS does not provide sufficient cost figures for the alternatives for regulators and decision makers to make comparisons. The price tag for a new, full-blown UPF is \$3.5 billion. The price tag for the NNSA's preferred alternative, a "Capability-Sized UPF," which is 10% smaller than the full-size UPF, would likely approach \$3 billion. Even the "No Net Production" Alternative proposes a near-full size facility (same as Capacity-Size UPF).

It is irresponsible to spend billions on a bomb plant which, by the time it is completed in 2018, should no longer be needed due to forecasted weapons reductions. This is especially true considering that the existing facilities at Y12 will be upgraded to meet health, safety, security and environmental standards, whether a new UPF is built or not. Already, more than \$100 million is to be spent on upgrades to existing facilities between now and 2018; however it goes unmentioned in the draft SWEIS.

15|9.b A full assessment of dismantlement facilities and realistic future projections of dismantlement demand should be conducted and a responsible decision reached about the wisdom of building a dedicated single-purpose dismantlement facility in conjunction with the Highly Enriched Uranium Materials Facility already nearing completion.

16|10.c In addition, the recent GAO Report to the House Subcommittee on Energy and Water Development, Committee on Appropriations entitled "Actions Needed to Develop High-Quality Cost Estimates for Construction and Environmental Cleanup Projects" assessed the Cost-Estimating Criteria for the UPF and found that the NNSA did not meet the standards for credibility and used improper estimations for the "foundation for the cost estimate" for the facility that was submitted to Congress.

6

Kelley, Marylia

Page 7 of 24

16|10.c cont. Beyond just the costs associated with the UPF the SWEIS fails to analyze other site plans, including the costs of maintaining current facilities at Y-12 in a "ready-to-use" state as proposed in the "preferred alternative."

**VIII. Failure to adequately consider environmental risks posed by lithium and other hazardous materials used in Y12 operations.**

The draft SWEIS mentions lithium in numerous places but neglects to detail the forms in which it is used and the attendant environmental risks. Lithium hydride, for example, is "extremely hazardous" to health (requiring full protective suits); it is flammable, and reactive. In particular, it reacts violently with water (including human perspiration).

17|12.m.2 In general, lithium is corrosive to the eyes, the skin and the respiratory tract. It is corrosive on ingestion. Inhalation may cause lung oedema. Lithium may spontaneously ignite on contact with air when finely dispersed. Upon heating, toxic fumes are formed. It reacts violently with strong oxidants, acids and many compounds (hydrocarbons, halogens, halons, concrete, sand and asbestos) causing fire and explosion hazard. Lithium in various forms reacts violently with water, as noted.

Because little was said about it in the draft SWEIS, it is impossible to comment more fully on the specific hazards posed by lithium at Y-12 and how to mitigate them. We note, however, that the weapons activities at Y-12 that would use lithium generally would present all of the above-listed hazards. Therefore, a more complete analysis of lithium risks and mitigation measures must be included in the SWEIS. In this context, we note also the failure to include other hazardous materials used at Y-12 in this draft SWEIS.

**IX. Failure to adequately analyze and prioritize cleanup of existing contamination.**

18|12.0 In its February 2001 comment, Tri-Valley CAREs urged DOE to prioritize environmental justice and the cleanup of polluted areas near the Y-12 site in its SWEIS, including contamination around the community of Scarboro. The draft SWEIS does not comply. Thus, we repeat that comment here. Additionally, we have learned of other areas around Y-12 that are known or suspected of being contaminated. Groundwater to the west and east, and aquifers below Y-12 have reportedly been contaminated by radionuclides, metals, and hazardous chemicals such as TCE.

The draft SWEIS fails to adequately analyze the existing contamination and then compounds the failure by not properly prioritizing cleanup in considering the future of Y-12. Cleanup and dismantlement of secondaries are examples of two crucially important (and reasonable) future missions for Y-12 that must receive a more detailed consideration than given in the draft SWEIS.

**X. Failure to adequately and appropriately describe security considerations in a manner that would allow public comment.**

19|11.d The effects on the population surrounding Y-12 of a terrorist detonating an improvised nuclear device would be devastating. At the request of the Project on Government Oversight, the Natural Resources Defense Council (NRDC) performed a simulation of the effects of a 10-kiloton nuclear explosion at the approximate location of the HEU storage site at Y-12. NRDC's calculation concluded that the detonation of an improvised nuclear device at Y-12 could cause over 60,000 casualties, including nearly 5,000 fatalities, if the detonation occurred during the day. Casualties were calculated based on the residential population only. That does not include the 13,000 workers at Y-12 and ORNL,

7

Kelley, Marylia

Page 8 of 24

19|11.d  
cont.

who would be killed immediately. The total number of fatalities would likely be about 18,000 people. Because a disaster scenario of this magnitude at Y-12 exists, a thorough analysis of the terrorism risk in for any new actions at Y-12 should be included in the action's NEPA review.

In order for interested stakeholders to "take a hard look" at the safety and security of the new UPF and the significant changes and reduction to the high-security area and overall security that the project proposes, the SWEIS must make enough disclosures to enable interested stakeholders of information to "take a hard look" at the safety and security of the new project in the context of the overall facility.

However, the analysis of terrorism risks in the SWEIS relegates much of this information into a classified summary. An unclassified or declassified summary that particularly includes information regarding the potential health impacts and other information that does not disclose access or other security vulnerabilities must be made available for public review. It is neither appropriate nor legally adequate to tack on a classified appendix without first carefully analyzing what information can and should be disclosed in the body of the SWEIS. For example, an analysis of the risks to workers and nearby populations in the event of a terrorist attack can be accomplished without revealing specific security vulnerabilities. NEPA is a procedural statute, intended to inform elected officials, other stakeholders and the public and to involve them in decisions. Here, public comment on the risks and on possible mitigation measures to address the risks is stymied by excessive classification. This must be remedied.

#### XI. Failure to include a reasonable range of Alternatives.

##### a. Moving uranium processing activities into the HEUMF rather than constructing a stand-alone UPF.

20|9.f

Another reasonable alternative is the possibility of moving small-scale uranium processing activities, or a portion of thereof, into the existing HEUMF. Regarding production, it is reasonable to analyze whether the floor space needed for an annual throughput of approximately 5 secondaries a year, which is sufficient to provide assurances of the safety, security and reliability of the stockpile as it awaits dismantlement, is available in the large and already constructed HEUMF. The draft SWEIS goes into great detail to describe the rationale for placing the UPF in close proximity to the HEUMF, thus it is reasonable to examine the impacts of downsizing, re-missioning to dismantlement (as opposed to production) and constructing it into the existing building.

##### b. Alternative 6, the Curatorship Alternative

21|9.a

A reasonable Curatorship alternative should be added to the SWEIS. This Curatorship alternative would analyze management of the nuclear weapons stockpile to assure its existing safety, security and reliability. The implications for the Y-12 SWEIS include that a Curatorship alternative could reasonably be performed in a down-sized facility at Y12, with major activities reoriented to enhance surveillance and evaluation as well as dismantlements. The Y-12 facilities, under Curatorship, would not focus on producing new and modified secondaries (as is the case with the alternatives in the draft SWEIS). Under Curatorship, parts are replaced only if the safety or reliability of the weapon is compromised by the part's degradation (usually called an "actionable defect"). In such cases, parts are remanufactured as close to the original specifications as possible. Adding "new" and "modified" designs is avoided. In this regard, we note that the capacity to produce new and modified designs for secondaries and cases is central to the alternatives in the draft SWEIS, and to the "preferred alternative" in particular. Thus, the

8

Kelley, Marylia

Page 9 of 24

21|9.a  
cont.

Curatorship alternative is a truly different, albeit reasonable, approach. Included in a Curatorship alternative would be a new dismantlement area, with designed-in safeguards and appropriate transparency per foreseeable treaty requirements. To offer some parameters showing how the Curatorship alternative should be analyzed in the SWEIS, we provide the following details explicating this approach:

#### The Curatorship Path and Why it is a Reasonable and Better Alternative for Maintaining the Nuclear Weapons Stockpile as it Awaits Dismantlement

In 1992, the U.S. Congress cut off funding for nuclear test explosions unless certain conditions were met. This led the United States into negotiations on a Comprehensive Test Ban Treaty and an immediate moratorium on underground testing of nuclear weapons, which continues today. In 1993, Congress directed NNSA's predecessor, DOE's Office of Defense Programs to initiate a modest program, called "Stockpile Stewardship," for maintaining nuclear warheads in the absence of testing. Fearful that its traditional nuclear weapons research programs, which were heavily tied to testing and development of new warheads, would be cut drastically, Defense Programs defined Stockpile Stewardship as requiring it to replace nuclear testing with the enormously technically challenging goal of using computers to model precisely the behavior of exploding nuclear weapons. This new goal required vast new experimental and computational capabilities. As a result, rather than experiencing serious post Cold-War consolidation and funding cuts, the Defense Programs/NNSA weapons R & D complex actually prospered. Appropriations for nuclear weapons activities soared, from a low of \$3.2 billion in 1995 to over \$6.6 billion in FY 2005. While the growth has flattened out, NNSA spending on the activities and facilities of the nuclear weapons complex remains around \$6.4 billion per year.

While it has been enormously costly, NNSA has made considerable progress in its efforts to model nuclear weapons explosions. NNSA now claims its modeling and simulation capabilities are sufficient not only to maintain existing weapons, but also to design and certify certain new nuclear weapons, without underground nuclear testing.

There is a fatal flaw in this strategy. The more confident the weapons labs have become in their modeling capabilities, the more they have been tempted to modify the nuclear weapons in the stockpile. However, computer simulations cannot provide the same level of confidence in modified warheads that was provided for the original warheads through full-scale nuclear tests. Over time, if changes continue to be introduced into warheads, the level of confidence in the stockpile will inevitably diminish. NNSA officials themselves have repeatedly stated their concern that as changes accumulate in existing warheads, it will become increasingly difficult for the laboratories to certify their performance. However, instead of adopting a policy and process to scrupulously avoid changes, NNSA proposed designing a completely new, so-called "Reliable Replacement Warhead" (RRW), which would only compound the problem. Without nuclear testing, questions will always remain about the performance of any new warhead, particularly one that is outside of the existing "design envelope" of test-proven designs. Furthermore, designing and producing a new warhead is a provocative act that runs counter to U.S. commitments under the NPT.

22|9.a

We recommend a more conservative approach to maintaining the existing test-certified stockpile, which is based on adhering to the original design parameters and characteristics of the nuclear explosive package. A key to this approach is our conclusion that there is no need for the United States to design any new nuclear weapons or to make performance or safety-enhancing modifications to existing ones. Presidents Clinton and Bush, on the advice of their Secretaries of Defense and Energy, have repeatedly certified that the nuclear weapons in the current stockpile are safe and reliable. We would continue and

9

Kelley, Marylia

Page 10 of 24

strengthen that record by ensuring that those safe and reliable warheads are not changed in any way unless there is a well documented finding that corrective action is needed to fix a component or condition that could significantly degrade the performance or safety of the warhead and that no compensating measures are feasible.

22|9.a We call our methodology "Curatorship." Just as a museum curator maintains artistic treasures and occasionally restores them to their original condition, so too would NNSA and DoD maintain nuclear weapons to their original design and condition, with occasional restorations. NNSA's role in maintaining nuclear weapons would focus on scrupulous surveillance and examination of warheads to determine if any component has changed in any manner that might degrade the safety or performance of the warhead. If so, it would restore that part as closely as possible to its original condition when the warhead was first certified to enter the stockpile. If that were not possible, NNSA could craft a replacement part conforming as closely as possible to the performance specifications of the original component. With changes to warheads strictly controlled, confidence in the performance of the remaining warheads would be higher than under Stockpile Stewardship, but the financial cost and the loss of international credibility regarding nuclear proliferation would be much lower under Curatorship.

#### No New Nuclear Weapons or Changes to Existing Ones

The current U.S. nuclear weapons stockpile is diverse, resilient, and more than sufficient for any conceivable nuclear deterrent mission. Its broad range of capabilities could be preserved in our proposed 500-warhead stockpile. Depending on which weapons the Government chooses to keep, a 500-warhead stockpile could include as many as seven types of strategic warheads and four kinds of delivery vehicles -- land-based ballistic missiles; submarine-based ballistic missiles; aircraft; and cruise missiles. Such a stockpile would retain considerable flexibility for responding to new security demands should they arise. Warheads in the current stockpile have explosive yields that vary from 0.3 kilotons to 1,200 kilotons. None of that diversity need be lost at the 500-warhead level, but on cost-effectiveness grounds, some reduction in the number of warhead types retained in the stockpile may well be warranted. U.S. nuclear warheads can explode at various heights above the ground, on impact with the ground, with a delay after ground impact, and even after penetrating several feet into the ground to attack underground bunkers. With the exception of an improved earth-penetrating warhead, which Congress has emphatically rejected, the Defense Department has not identified any new capability that it proposes to add to the existing stockpile.

23|9.a It is impossible to conclude categorically that there will never be any new threat against which a new type of nuclear weapon might be useful. However, in a time when there is a political imperative for the U.S. and other nuclear nations to devalue nuclear weapons, as a precursor to their eventual elimination, it is very difficult to foresee a new threat that would compel the U.S. to respond by designing a new nuclear weapon. The Curatorship approach would not preclude designing a new warhead, should the President and the Congress decide to do so in the future. Rather, it would suspend research on new nuclear weapons technologies and efforts to develop new warheads, pending identification of a new threat justifying such activities.

Existing U.S. nuclear weapons are extremely safe, secure, and reliable. An accidental nuclear explosion of a U.S. weapon is precluded by its inherent design. To initiate a nuclear explosion, the chemical high explosive, which surrounds the weapon's plutonium pit, must first explode and compact the pit in a highly symmetrical manner. This requires the explosive to detonate in at least two specific places simultaneously. All U.S. nuclear weapons are certified to be "one-point safe." One-point safe

Kelley, Marylia

Page 11 of 24

means that if the chemical explosive were accidentally detonated, at the worst possible place, there would be no nuclear yield greater than the equivalent of two kilograms of high explosive. Designers conducted numerous underground tests of one-point safety in which they detonated weapons at their most sensitive points under a variety of conditions. Over the past decade, the weapons labs have repeatedly checked and verified the one-point safety of U.S. warheads using the modeling and simulation methods developed in the Stockpile Stewardship program. Even if a projectile is shot into a nuclear weapon or some other shock to the system initiates a chemical explosion, it is exceedingly unlikely that there would be any nuclear explosion.

The chemical explosive in most types of U.S. nuclear weapons is so-called "Insensitive High Explosive" (IHE). IHE can withstand severe shocks without exploding, which lowers the risk that a chemical explosion might disperse plutonium and other hazardous materials over a wide area. The only U.S. nuclear warheads without IHE are the W-76 and W-88 warheads on submarine-launched ballistic missiles (SLBM), and the W-78 on Minuteman III ICBMs. Little would be gained by redesigning those warheads to function with IHE. The SLBMs use a very energetic propellant, which is relatively easy to detonate. Any accident that causes the missile propellant to detonate would likely break the warhead apart and scatter plutonium, regardless of whether the warhead contains IHE. All W-78s could easily be replaced by the more modern W-87, which has IHE, as the stockpile is reduced in size. Furthermore, procedural changes, including the removal of all nuclear weapons from aircraft in peacetime and loading/unloading missiles without their warheads mounted aboard, have significantly reduced the risk from warheads that lack the most modern safety features.

24|9.a Proponents of developing new warheads have claimed that over time, as nuclear warheads age, their safety and reliability might degrade. However, safety can only improve with age. Extensive tests have shown that the chemical high explosive becomes more stable and predictable as it ages, further reducing the risk of accidental explosions. Surprisingly, key measures of performance, such as detonation-front velocities have also been shown to improve systematically with age.<sup>1</sup>

To prevent accidental or unauthorized initiation of a weapon's normal firing systems, U.S. nuclear weapons have so-called enhanced nuclear detonation safety (ENDS) systems. The ENDS system typically includes at least one "weak link" and two "strong links." All of them must be closed in order to arm and fire the warhead. The weak link is normally closed, but is designed to fail (open), like a circuit breaker, and prevent power from reaching the detonators in an abnormal environment, such as lightning, fire, or physical shock. The strong links generally isolate the systems that arm the warhead and fire the detonators from their power sources using devices such as motorized switches or mechanisms that physically interfere with the implosion until the proper arming sequence is followed. One strong link, called a Permissive Action Link (PAL), requires that the weapon receive properly coded electronic signals. Two different codes must be received simultaneously. This is the "two man rule," which ensures that an individual acting alone cannot arm a nuclear weapon. The other strong link can be closed only by a particular environmental event or sequence of events that would occur during the normal delivery of the warhead. Such events may be a deceleration force, a temperature, or a pressure that would normally occur only during delivery. Thus, if terrorists were somehow to obtain a U.S. nuclear warhead, they could not detonate it without first making complex internal adjustments. In the unlikely event that the terrorists were capable of making the necessary adjustments, the time required would provide a substantial opportunity for the U.S. to recover or destroy the weapon.

<sup>1</sup> "Science-Based Stockpile Stewardship," Dr. Raymond Jeanloz, *Physics Today*, December 2000, p. 5, [www.physicstoday.org/pdf/vol-53/iss-12/p44.html](http://www.physicstoday.org/pdf/vol-53/iss-12/p44.html)

Kelley, Marylia

Page 12 of 24

25/9.a

Even though nuclear weapons are extremely safe and secure, it is possible to do even better. The NNSA and the Department of Defense can and should make additional operational improvements in how nuclear weapons are handled and protected that would improve their safety and security. One significant measure would be to reduce the alert status under which the military maintains many nuclear weapons. If the alert status were reduced, the frequency of handling live weapons, including loading, unloading, and transporting them would be greatly reduced as would the opportunities for their exposure to accidents or hostile actions. And obviously, other things being equal, the fewer nuclear weapons there are, the less chance there is of a safety or security lapse.

Proponents of weapons development claim that they can design and fabricate new warheads that would be safer and more secure than existing weapons. That may be true, but the relevant question is whether the marginal improvements to safety and security, which NNSA may make through design changes, are worth the substantial negative effects that weapons development programs have on our national security. It is also worth noting that new warheads may just as well wind up being less safe and reliable than existing warheads. Designing and building new nuclear warheads without testing them is risky, even with the sophisticated models of the Stockpile Stewardship Program. As Hoover Institution fellow, Sidney Drell, and former U.S. Ambassador, James E. Goodby, have stated, "It takes an extraordinary flight of imagination to postulate a modern new arsenal composed of such untested designs that would be more reliable, safe, and effective than the current U.S. arsenal based on more than 1,000 tests since 1945."<sup>2</sup>

The latest argument from weapons designers is that we need to improve the "surety" of existing weapons. Surety is a single word that incorporates the safety, security, and control of nuclear weapons. Proposals that strive for near absolute surety designed into the weapon itself should be viewed with deep skepticism. We believe that surety is simply the justification *du jour* for more weapons development. Built-in surety mechanisms, such as a mechanism to destroy a warhead remotely on command, may have potential utility in some very low probability theft scenarios. On the other hand, they may have a higher probability for affecting the pit implosion process in unexpected ways. Such new systems could severely degrade confidence in reliability. Arguably, only a full-scale nuclear test could truly resolve confidence issues regarding some built-in surety measures. Moreover, when it comes to keeping U.S. nuclear weapons secure, there will always be a need for "guards, guns and gates" that should never be qualitatively diminished (although we do hope to dramatically lower security costs by having far fewer nuclear weapons and storage sites, less separated fissile material, and smaller areas to guard). Furthermore, development of new and potentially improved warheads, whether the improvement is limited to surety or includes new yields and missions, is counter to U.S. non-proliferation goals.

26/9.a

Behind the superficially appealing promise of higher levels of nuclear warhead "surety" lies a thinly disguised effort by weapons advocates to circumvent obligations inherent in the NPT and the CTBT to abandon the technological competition in nuclear armaments. Improved "surety" is but one of several technological trap doors leading to reinvigoration of the nuclear arms race, which would restore prestige and resources to the nuclear weapons laboratories, but only at the cost of diminishing national and international security.

<sup>2</sup> "What are Nuclear Weapons For? Recommendations for Restructuring U.S. Strategic Nuclear Forces," Sidney Drell and James Goodby, an Arms Control Association Report, October 2007, p. 20.

Kelley, Marylia

Page 13 of 24

#### How Would Curatorship Differ From Stockpile Stewardship?

Curatorship would fundamentally change how the weapons laboratories go about their business. The biggest difference would be that the numerous changes that NNSA makes to nuclear weapons each year would be strictly limited.

A key activity for maintaining nuclear weapons under Stockpile Stewardship is the so-called Life-Extension Program (LEP). NNSA, in cooperation with the DoD, has taken an aggressive approach to LEPs. In practice, "life extension" has become a misnomer for nearly complete rebuild and upgrade of a warhead system that is nowhere near the end of its life. Under the Life Extension Program, NNSA and DoD have jointly reexamined the performance features, specifically military characteristics and stockpile-to-target sequence requirements, of almost all U.S. weapons designs and reevaluated the design of every component in those weapons against revised requirements. The two agencies have authorized hundreds of changes to nuclear weapons, adding new components and modifying weapons' military characteristics. Few, if any, of the replacements were required to extend the life of aging components. Rather, NNSA and DoD have chosen to make weapons lighter, more rugged, more tamper proof, and more resistant to radiation. In addition, NNSA installed new components that improved design margins, added arming and fuzing options, improved targeting flexibility and effectiveness, and put in advanced tritium delivery systems.

27/9.a

Under LEPs, DOE is seeking to upgrade every type of nuclear warhead in the planned arsenal. Upgrades have already been done on the W87 and B61 warheads. NNSA is now ramping up the LEP for the most numerous weapon in the stockpile, the sub-launched W76, which it estimates will cost over \$3 billion. The planned modifications are so extensive that the weapon is being given a new number: the W76-1/Mk4A (the latter refers to its modified reentry vehicle). Under the W76 LEP, NNSA is replacing organics in the primary; replacing detonators; replacing chemical high explosives; refurbishing the secondary; adding a new Arming, Fuzing & Firing (AF&F) system, a new gas reservoir, a new gas transfer support system, a new lightning arrestor connector and making numerous other alterations to components that still function adequately.<sup>3</sup> The change to the AF&F system alone is creating a weapon with significantly improved military capability over the old version. While the old fuze permitted targeting of only soft targets via air bursts, the new AF&F system would add a ground burst capability, which delivers much greater damage to underground facilities. In addition, a new reentry body and other modifications would allow the W76 to be delivered by the D5 missile, which has much greater accuracy than the previous delivery vehicle. Taken together, these changes give the W76 a hard target kill capability against missile silos, command and control centers, etc. for the first time.

With the exception of replacing some organic adhesives, few, if any, of the changes under the W76 LEP address age-related problems that would require fixing under the Curatorship option. The Bush Administration planned to convert 2,400 W76 warheads to W76-1s.<sup>4</sup> Needless to say, the Obama Administration will have to clarify exactly how many W76s, if any, it plans to convert to W76-1's and how many it plans to retire and dismantle under its new proposal for bilateral reductions with Russia to reduce each nation's stockpile to 1,000 nuclear weapons. We recommend that the existing W76 LEP, and ongoing LEPs for other warheads, be suspended pending institution of the change control process described below that would constrain new Life Extension Programs to replace only components that demonstrably need to be replaced.

<sup>3</sup> "Administration Increases Submarine Nuclear Warhead Production Plan," Hans M. Kristensen, Federation of American Scientists, [www.fas.org/blog/ssp/2007/08/us\\_tripbles\\_submarine\\_warhead.php](http://www.fas.org/blog/ssp/2007/08/us_tripbles_submarine_warhead.php)

<sup>4</sup> *Ibid.*

Kelley, Marylia

Page 14 of 24

Recently, following the congressional rejection of funding for the RRW program, officials at the weapons laboratories and with the U.S. Strategic Command have called for expanding the Life Extension Program even further.<sup>5,6</sup> To date, NNSA has refrained from modifying or replacing plutonium pits during an LEP. Under a concept referred to as "extensive reuse LEP" (erLEP), also referred to as a "heavy LEP," that Rubicon would be crossed. NNSA would be allowed to reuse pits from retired warheads to provide "higher system margins" for warheads remaining in the stockpile. NNSA would make additional modifications to those warheads directed at improving their surety. Under the new erLEP concept, NNSA could also modify and reuse secondaries from retired warheads, recycle and reuse difficult to fabricate materials, such as fogbank,<sup>7</sup> and modify and add new electronic components using "modern technologies."<sup>8</sup> It is not clear what changes NNSA wants to make to warheads using these recycled or rebuilt components.

In contrast, Curatorship would take a very conservative approach to modifying warheads. Only if NNSA could present compelling evidence that a warhead component has degraded, or will soon degrade, and that such degradation could cause a significant loss of safety or reliability, would NNSA replace the affected parts. The replacements would be remanufactured as closely to their original design as possible.<sup>9</sup> These replacement parts would truly extend the life of the warhead, without modifying its performance. NNSA currently takes apart approximately eleven warheads of each type per year and examines them under its Surveillance and Evaluation Program. Under Curatorship, NNSA would increase the scope and importance of the Surveillance and Evaluation Program to assure that sufficient numbers of every component of every warhead design are scrupulously examined and tested each year. The Surveillance and Evaluation program would supplant the Life Extension Program as the predominant mechanism for determining when components are replaced.

28|9.a Scientists and engineers at the weapon labs are working to develop sensors that they can embed into existing warheads under NNSA's proposed erLEP program. The sensors would monitor each warhead's condition and identify if there is any degradation that might affect its performance. According to the laboratories, such sensors would allow NNSA to reduce its surveillance activities. We believe that reducing surveillance is the wrong way to go. Embedded sensors cannot possibly provide as much information as disassembling a warhead and examining and testing its components. Embedding sensors into existing, well-tested warheads could provide new opportunities for component failure. Even worse, it could affect the performance of the warheads in poorly understood ways. We prefer to minimize stringently any changes to the well-tested and certified safe and reliable warheads of the existing stockpile.

Stockpile Stewardship requires a massive R & D enterprise and the use of ever expanding modeling capabilities in a complex process to certify each year that the changing stockpile is safe and reliable. Under Curatorship, continued confidence in the stockpile would be based on an absence of

<sup>5</sup> "Military's RRW Alternative is Warhead Life Extension," Elaine Grossman, Global Security Newswire, Sept. 12, 2008, [www.gsn.net.org/ess](http://www.gsn.net.org/ess)

<sup>6</sup> "Stewarding a Reduced Stockpile," Bruce T. Goodwin and Glenn L. Mara, AAAS Technical Issues Workshop, April 24, 2008, Washington, DC.

<sup>7</sup> Fogbank is a codeword for a classified material that is believed to be an aerogel (somewhat like Styrofoam) used in some warheads as interstage material between a nuclear weapon's primary (i.e. the plutonium pit and surrounding high explosives) and its secondary.

<sup>8</sup> In some cases, current environmental regulations might not allow exact remanufacture of old components. In others, original specifications have been lost or are incomplete. In those cases, NNSA would attempt to match the performance of the old component as closely as possible. Those cases would require more analysis and testing than exact replacements, but would still be far less costly and introduce much less uncertainty than under the current approach, which allows for major modifications.

Kelley, Marylia

Page 15 of 24

change and reference to the extensive historical testing and certification activities that have already demonstrated existing warheads to be safe and reliable. Absent any observed physical changes to a warhead, or hidden changes in performance that may be inferred from nonnuclear test and evaluation activities, the warhead's continued safety and reliability would be assumed, because of its known testing pedigree. In other words, "If it ain't broke, don't fix it." The key to maintaining the stockpile would be determining whether significant degradation has occurred. NNSA would still need skilled engineers and designers, with good judgment, to examine warheads and to determine if components are degrading and when they must be replaced. NNSA would continue to operate state-of-the-art testing and engineering facilities to examine components. It would retain sufficient scientific and computing capabilities to apply analytical models to questions of weapon safety and reliability using all the knowledge that the NNSA has gained to date through the Stockpile Stewardship Program. NNSA would make use of evolutionary improvements in computing technology to better appraise problems with weapons systems, but it would no longer be the engine for making and funding such improvements.

On the other hand, NNSA would have no need to continue enhancing its understanding of weapons science or to maintain cutting edge research facilities in a wide range of technologies. Those capabilities are needed primarily to design and certify new components. Under Curatorship, most of NNSA's weapons-related research and experimentation programs would cease and numerous facilities would be closed.

The Curatorship approach to managing the nuclear weapons stockpile builds on an impressive lineage. It stands on basic concepts advocated by Norris Bradbury, Director of the Los Alamos Laboratory (LANL) from 1945-1970, J. Carson Mark, former head of the LANL's Theoretical Division, Richard Garvin, former nuclear weapon designer and current JASON, Ray Kidder, senior staff scientist and former weapons designer at Lawrence Livermore National Laboratory (LLNL) and others.

#### Curatorship is Better than Stockpile Stewardship

29|9.a The NNSA is currently engaged in a major effort to rebuild the nuclear weapons complex, the aforementioned Complex Transformation. According to the NNSA, the benefits it is seeking through Complex Transformation include, "improved safety, security, and environmental systems, reduced operating costs, and greater responsiveness to future changes in national security policy."<sup>9</sup> Curatorship would be more beneficial in all of these areas than any of the alternatives that NNSA considered under Complex Transformation.

Improved Safety – Under Curatorship, and particularly with the stockpile reduced to 500 warheads, there would be far less work involved in maintaining the nation's nuclear deterrent. Thus, NNSA would significantly reduce the scale of plutonium and enriched uranium operations associated with maintenance. By reducing worker exposures and the risks of accidents, a lower workload is inherently safer. In addition, studies of defects in nuclear weapons have shown that many more problems have occurred in new weapons and components than in weapons that have been in the stockpile for a considerable period. Thus, maintaining existing weapons much as they are today, under Curatorship, is more likely to keep them problem free than introducing new components through LEPs or designing new warheads under Stockpile Stewardship. This is a familiar effect common to products as diverse as computer software, automobiles, and nuclear power plants. The reliability of software most often improves with age, as frequent revisions and updates in response to operational experience

<sup>9</sup> Final Complex Transformation Supplemental Programmatic Environmental Impact Statement (SPEIS), DOE/EIS-0236-S4, NNSA, October 2008, p.S-1.

Kelley, Marylia

Page 16 of 24

progressively eliminate sources of error in the code. Similarly, with automobiles, if you want a problem-free vehicle, it is best not to rush out and buy the first year of any new model, particularly if it incorporates substantially new technology.

**Improved Security** – Security would be improved under Curatorship for the same reasons that safety would be better. Under Curatorship, the weapons complex would be more secure, simply because there would be fewer sensitive activities conducted at fewer sites. There would be fewer R & D facilities requiring protection and less new classified information to be safeguarded against espionage or inadvertent disclosure. There would be fewer contractor employees with access to sensitive facilities and classified information. There would also be fewer shipments of nuclear weapons and components around the country, which offer opportunities to terrorists. In addition, fissile materials would be consolidated to fewer and more secure facilities.

**Improved environmental systems** – Under the Curatorship approach, NNSA would close numerous facilities and in some cases entire sites that use high explosives, tritium, or other hazardous materials, such as Site 300 at LLNL. Those closures would produce significant environmental benefits and cost savings beyond the alternatives the NNSA is considering under Complex Transformation.

29]9.a  
cont.

**Reduced operating costs** – Operating costs would be dramatically reduced under Curatorship, well beyond the obvious savings from reducing the number of nuclear weapons. NNSA currently spends about fifty percent of the Weapons Activities budget on R & D. That is appallingly out of step with any industrial activity in the United States. Large companies in the most research-intensive industries, such as computers and electronics, chemicals, aviation, and biotechnology, spend less than twenty percent of their revenue on R & D. Most spend less than ten percent. With over sixty-five years of experience in designing, producing, and maintaining nuclear weapons, there is no reason for NNSA to spend such a large percentage of its funding on R & D. Under Curatorship, NNSA would devote no more than twenty percent of its Weapons Activities budget to R & D.

**Strengthen non-proliferation efforts** – Most importantly, Curatorship is superior to the Stockpile Stewardship Program, because it would more closely align with United States' responsibilities under the Non-Proliferation Treaty and the nation's non-proliferation goals. Strengthening non-proliferation is not one of NNSA's goals in Complex Transformation, but it certainly should be. The New Agenda Coalition (NAC), a diverse and influential group of signatory states to the NPT, has called upon the nuclear weapons states to stop modernizing their arsenals.<sup>10</sup> The NAC stated, "Any plans or intentions to develop new types of nuclear weapons or rationalization for their use stand in marked contradiction to the NPT, and undermine the international community's efforts towards improving the security of all states." Whether one agrees with the NAC that improving nuclear weapons is contrary to U.S. NPT obligations (and we believe it is), it is clearly detrimental to U.S. non-proliferation objectives. Stemming the proliferation of nuclear weapons requires the cooperation of all nations. To the extent that the NNSA's development of new and improved nuclear weapons alienates nations such as the New Agenda Coalition, it is undeniably contrary to U.S. non-proliferation goals.

#### Changes to Nuclear Weapons Should be Better Controlled

As noted above, NNSA and DoD have authorized hundreds of changes to nuclear weapons, the vast majority of which were not needed to extend the life of the weapon. The administrative control of nuclear weapon designs is currently under the auspices of the Nuclear Weapons Council (NWC). The NWC is a joint DoD/DOE organization established by Congress in 1987 to coordinate all joint activities

<sup>10</sup> The membership of the New Agenda Coalition includes: Brazil, Egypt, Ireland, Mexico, New Zealand, South Africa, and Sweden.

Kelley, Marylia

Page 17 of 24

regarding the nuclear weapons stockpile. The NWC is chaired by the Under Secretary of Defense for Acquisition, Technology, and Logistics. The other members are the Vice Chairman of the Joint Chiefs of Staff, the Under Secretary of Energy for Nuclear Security (NNSA Administrator), the Under Secretary of Defense for Policy, and the Commander of the U.S. Strategic Command (STRATCOM). Among its activities, the NWC coordinates, determines, and schedules all activities regarding the maintenance and refurbishment of nuclear weapons. Much of that coordination is done in Project Officers Groups (POGs), which are chartered by the NWC with cradle to grave responsibility for each type of nuclear weapon. POGs typically have as many as a dozen members from various DoD organizations, the military services, DOE, NNSA, and the nuclear weapons complex's laboratories and production plants.

The POGs, working with the NNSA laboratories, annually assess each warhead type with regard to its military characteristics (yield, reliability, safety in normal and abnormal environments, nuclear hardness, weight and balance, use control features, and a host of other factors) and its stockpile-to-target sequence requirements for withstanding extremes of temperature, pressure, acceleration and other conditions a warhead might have to withstand throughout its lifetime. These assessments have become forums for examining, not only whether the warhead continues to meet its existing requirements, but also for considering changes to warheads to improve performance, add new capabilities, or modify components for any reason. Unfortunately, there is little resistance to making changes to warheads in this process. The POGs are simply too immersed in the mission of enhancing their weapon systems and are unable to see the forest for the trees. They have an institutional bias, which leads them to magnify minor questions about warhead performance, to look for potential improvements (including surety improvements), and to recommend modifications, without realizing the long-term problems with that approach.

30]9.a

We believe that a more rigorous and formal change control process is needed. A rigorous change control process is the embodiment of the Curatorship approach. The Administration and the Congress must first declare support for the Curatorship approach of minimizing changes to existing warheads and then establish a change control process to enforce it. We recommend that President Obama issue a Presidential Decision Directive (PDD) prohibiting any change in the military characteristics or the stockpile-to-target sequence requirements of any nuclear weapon, unless the change is essential for maintaining the safety or reliability of the existing warhead. However, announcing a policy to limit changes to warheads, by itself, is not enough. Congress must establish an institutional mechanism to enforce that policy.

Independent experts should review any proposed change to a nuclear weapon (no matter how seemingly minor) and make recommendations to senior Administration officials, who then would have the final say. To further that end, we recommend that Congress establish through legislation a stringent change control process for nuclear weapons, including a requirement for outside review of all changes. Major changes, including any that would alter the military characteristics or the stockpile-to-target sequence of a nuclear weapon in any manner, should require authorization and funding by the Congress as a separate line-item.

The process for independent assessment of proposed changes could take many forms, but we believe it should include some form of review from outside the weapons laboratories. Independent review might be solicited from the JASON scientific advisory group, the National Academy of Sciences, or a new entity established solely for that purpose.

Kelley, Marylia

Page 18 of 24

31|9.a Final decisions, except those requiring separate funding from the Congress, could remain with the Nuclear Weapons Council (NWC), be made by a new Federal nuclear weapons change control board, or be made by an expanded NWC to include senior Executive Branch officials who bring a big picture view of national security. Potential additions to the NWC include the Under Secretary of State for Arms Control and International Security and the President's National Security Advisor. In any event, we recommend that Congress establish the change control process in legislation and require that both outside reviewers and the decision makers weigh the potential benefits of any proposed change against the adverse non-proliferation consequences and the likelihood that the change could, over time, contribute to reduced confidence in the performance the warhead.

#### 32|9.a | The Process for Assessing and Certifying Nuclear Weapons Should be Revised

When President Clinton submitted the Comprehensive Test Ban Treaty to the Senate for ratification in 1995, he enunciated a number of safeguards to assure the Congress that the nuclear stockpile could be maintained without testing. He announced, as "Safeguard F," that

*"if the President is informed by the Secretaries of Energy and Defense, advised by the Nuclear Weapons Council, the directors of the weapons laboratories, and the Commander-in-Chief of Strategic Command that a high-level of confidence in the safety or reliability of a weapon type critical to the nuclear deterrent could no longer be certified, the President, in consultation with the Congress, would be prepared to withdraw from the CTBT under the Supreme National Interest Clause in order to conduct whatever nuclear testing might be required."*

President Clinton also directed the DoD and DOE to conduct a rigorous annual certification process to determine the overall safety and reliability of the stockpile.

Congress formalized this process in section 3141 of the National Defense Authorization Act for Fiscal Year 2003 (P.L. 107-314), which specifies a number of assessments that must be performed each year leading to an annual report on the stockpile to the President and the Congress from the Secretaries of Defense and Energy. The nuclear weapons establishment has responded to these requirements with an elaborate system of technical investigations and the preparation of seven major series of reports, including:

- *Weapons Laboratory Annual Assessment Reports (AARs)*: Prepared for each weapon type by the technical staff of the weapons laboratory responsible for the nuclear explosive package (LANL or LLNL) and their engineering counterpart at SNL.
- *Weapons Laboratory Red Team Reports*: Prepared by a separate "red team" at each weapons laboratory that peer reviews the technical information contained in the laboratory's AARs.
- *Weapons Laboratory Director Reports*: An assessment of the safety, performance, and reliability of the nuclear stockpile to the NWC and the Secretaries of Energy and Defense by the director of each weapons laboratory, based on the AARs and the Red Team reports.
- *Strategic Advisory Group Stockpile Assessment Team (SAGSAT) Report*: Prepared for the STRATCOM Commander, which expresses the SAGSAT's confidence as to whether each warhead type will perform as designed.
- *Commander of STRATCOM Report*: The Commander of STRATCOM's assessment of the safety, performance, reliability and military effectiveness of the nuclear stockpile, submitted to the NWC and the Secretaries of Energy and Defense.

Kelley, Marylia

Page 19 of 24

- *POG Reports*: A technical assessment, submitted to the NWC, from each POG on the warhead type for which it is responsible.
- *Report on Stockpile Assessments*: The final package, prepared by the NWC on behalf of the Secretaries of Energy and Defense, which summarizes and transmits the above reports to the President and the Congress.<sup>11</sup>

The assessments in these reports, in actuality, have little to do with certification of the stockpile. According to NNSA and laboratory officials, "once a warhead is certified, it remains certified until it is either decertified or retired."<sup>12</sup> Furthermore, this convoluted process has nothing to do with notifying the President about the need for a nuclear test, which was ostensibly its original purpose. According to agency and congressional officials, "if an issue with a weapon were to arise that required a nuclear test to resolve, the Secretaries of Energy and Defense, the President, and the Congress would be notified immediately and outside of the context of the annual assessment process."<sup>13</sup> What the process has turned into is make-work for dozens of national laboratory scientists and technicians, as well as weapons specialists in NNSA, the NWC, the military services, STRATCOM, and other DoD agencies. It also serves as one more mechanism for the laboratories and the services to propose modifications to U.S. nuclear weapons.

The annual assessment process is a major underpinning for much of the research and development work at the weapons laboratories, which is performed under Stockpile Stewardship. In order to prepare their Annual Assessment Reports, the laboratories use all of their testing and simulation capabilities to quantify estimates of the margins and uncertainties for a host of factors, which they use to determine whether the nuclear explosive package of a nuclear weapon would meet its military characteristics. The labs continue to investigate minute details of nuclear weapons technology, in order to produce new and improved bottom up assessments each year.

33|9.a This elaborate process of ever improving simulation capabilities and annual reviews is conceivably needed only if there are significant changes to the warheads each year. Under Curatorship, with few, if any, modifications to the well-tested designs in the stockpile, the laboratories would need only to analyze the potential effects of changes due to aging on components, which are identified under the upgraded surveillance program. Existing diagnostic, assessment, and modeling capabilities are sufficient for this task. As is the case now, if the surveillance program and subsequent analysis were to identify a problem that threatened the adequate performance of a weapon in the stockpile, the Nuclear Weapons Council, the Secretaries of Defense and Energy, and the President and Congress would all be informed promptly about the problem.

Thus, recurring annual assessments or certification of the safety and reliability of the stockpile should not be necessary. Nevertheless, to provide additional assurance that the weapons in the stockpile remain safe and reliable, the laboratories and the military services might update the assessment of each weapon system every five years. The assessments could be similar to those required under Section 3141, but would not be as elaborate since they would have to examine only the few changes that were produced by or made in response to aging. One change we recommend to the assessment process is to make the existing Red Teams at LANL, LLNL, and SNL truly independent. The Red Teams review the analyses of those laboratory scientists with direct responsibility for maintaining each warhead. The Red Teams consist primarily of other laboratory personnel who currently report to the same management

<sup>11</sup> From "Nuclear Weapons: Annual Assessment of the Safety, Performance, and Reliability of the Nation's Stockpile," U.S. Government Accountability Office (GAO-07-243R), February 2, 2007, p. 9.

<sup>12</sup> *Ibid.* p. 6.

<sup>13</sup> *Ibid.* p. 3.

Kelley, Marylia

Page 20 of 24

team as those performing the initial assessments. We recommend that the Red Team members be hired under a separate contract from the management contract of the laboratories at which they are situated and that they report their findings directly to the NNSA, rather than through their laboratory directors.

As is the case now, if any of the laboratory analyses find a significant problem with a weapons system, their report should include a discussion of the options available to resolve the problem. The options should include replacing one or more components with new versions of the original design, replacing components with modified versions, changing weapon handling procedures, changing the military characteristics or stockpile-to-target sequences, retiring specific warheads, replacing warheads with others, and any other compensatory measures that could enable accomplishment of the missions of the nuclear weapon types to which the assessments relate. Only if it concludes that none of those options is feasible, should a laboratory be allowed analyze whether conducting one or more underground nuclear tests might help NNSA resolve the problem.

34|9.a It is hard for us to imagine a circumstance in which one of the measures listed above could not resolve any problem, without a need to resort to nuclear testing. Nevertheless, to prepare for the remote possibility that a President might request authority from the Congress for NNSA to conduct a nuclear test, we recommend that Congress require any such request to be accompanied by independent analyses from the Central Intelligence Agency (CIA) and the State Department on the effects of a U.S. nuclear weapons test on the CTBT, the NPT, and all other nations possessing nuclear weapons or those which may be seeking to acquire them. Congress could then decide whether the benefits of a nuclear test outweigh the adverse national security consequences of withdrawing from the CTBT and/or breaking the current moratorium on nuclear weapons tests.

#### How Would Weapons Research, Development, and Testing Change Under Curatorship?

35|9.a This section provides an overview of the changes we recommend to research, development, and testing facilities and activities in the weapons complex in accordance with the Curatorship approach.

Under the Curatorship approach, we recommend that the NNSA de-emphasize nuclear weapons science and technology and cease its quest for more and more detailed simulations of exploding thermonuclear weapons. The existing codes are sufficient, in conjunction with limited use of hydrotesting, for the analyses needed to maintain the stockpile as it is. Improved codes have little use except for designing new types of nuclear weapons or verifying the impact of major changes to existing ones. Designing new nuclear weapons would run counter to U.S. commitments under Article VI of the NPT and would set a bad example for the rest of the world. President Obama has already declared that the United States will not design new nuclear weapons. The NNSA's claim that it needs better computer codes to maintain existing weapons is tantamount to Iran's claim that it needs a domestic uranium enrichment capability for nuclear power. Both claims may provide fig leaves for thinly-veiled nuclear weapons development programs.

We recommend that NNSA dramatically reduce its research efforts in several areas, including equation of states studies, dynamic modeling, studies of the physical and chemical properties of Pu and HBU, hydrodynamics experiments, and sub-critical tests. Most of this research has no purpose for anything except improving nuclear weapons. We recommend that NNSA continue validating its codes against existing test data and applying those codes to questions of relevance to the existing stockpile. We would expand the testing and analysis of components taken from actual warheads in the stockpile to assure that any changes to components due to aging are discovered and analyzed before they become detrimental to nuclear weapons performance. This empirical approach to stockpile surveillance and

Kelley, Marylia

Page 21 of 24

maintenance is far superior and should be prioritized over endless "nuclear weapons science." A simple way of putting it is that we recommend an "engineering" rather than a "science-based" approach to stockpile maintenance.

35|9.a cont. With significantly less weapons R & D under Curatorship, NNSA could shrink its R & D infrastructure. We recommend reducing the number of facilities and personnel dedicated to nuclear weapons research, development, and testing and consolidating the remaining efforts to LANL and SNL-NM. In particular, we recommend closing all nuclear weapons R & D facilities at LLNL or transferring them to other DOE programs for non-weapons research. Under our plan, LLNL would retain a small capability to examine surveillance issues and a "red-team" of experts to provide peer review for changes to nuclear weapons and for certification-related actions. The Red Team would report directly to NNSA rather than to LLNL management. Any related experimental investigation, which may be necessary to support that activity, would have to be performed elsewhere.

DOE would shift LLNL's primary mission from nuclear weapons research to basic science and energy research, while maintaining strong programs in non-proliferation, safeguards, transparency and verification of warhead dismantlement, intelligence, and nuclear emergency response.

In addition, we recommend that NNSA cease, or transfer to SNL-NM, all weapons-related activities at SNL-CA. All facilities at SNL-CA would be closed or transferred to other DOE offices or to other agencies.

36|9.a Furthermore, we recommend that NNSA cease all sub-critical testing and most other nuclear weapons-related tests and experiments at the Nevada Test Site (NTS) and transfer the landlord responsibility for the site to another DOE office or other appropriate entity. Operations at the U1A facility should be suspended and the facility closed. DOE or other agencies could continue to operate other research, development, and testing facilities at NTS, including the Big Explosives Experimental Facility (BEEF) and large gas guns, as user facilities. The NNSA weapons program could use those facilities infrequently, but only for tests that are necessary to resolve problems identified with weapons in the existing stockpile.

Following is a summary of our recommendations by major classes of research, development, and testing facilities.

Advanced Simulation and Computing (ASC) - One of the major initial goals of the Stockpile Stewardship program was to improve NNSA's computing capabilities to better model nuclear weapons performance. Today, fifteen years and billions of dollars later, NNSA has gone from one- and two-dimensional codes, which modeled all nuclear explosions as if they were perfectly symmetrical, to three-dimensional codes that can model real-world issues that might affect the performance of aging nuclear weapons, such as cracks and corrosion. NNSA has also incorporated a vast amount of new experimental data into the codes, which reflect observed material properties and more refined extrapolations based on such new observations, rather than ad-hoc assumptions. This is believed to have greatly improved the accuracy of the codes, as well as NNSA's confidence in their predictive results. Improved confidence in the codes has led some weapons designers to believe they are good enough to be used to design and certify new nuclear weapons, without full-scale underground nuclear weapons tests. Designers' ability to certify new nuclear weapons, without testing, is controversial. However, modeling existing weapons of the legacy stockpile is a much easier task. It is easier because the extensive results from nuclear testing of those weapons has been used to baseline the new sophisticated codes. In addition, this

Kelley, Marylia

Page 22 of 24

original test data had been augmented by an enormous amount of test data from recent hydrodynamic and other tests on the legacy designs.

Consistent with the Curatorship approach, we recommend that NNSA halt all systematic efforts to improve the computer codes it uses to model nuclear explosions. This action would be a major step in abiding by the commitment to halt the arms race under Article VI of the NPT. In addition, it would save hundreds of millions of dollars per year that is now spent developing new computer codes and acquiring ever more powerful computing platforms. Furthermore, it would allow NNSA to close numerous nuclear weapons research facilities, whose primary purpose is to feed results into code development.

36|9.a  
cont. We also recommend that NNSA cease its current practice of subsidizing development of new computer technology by continually upgrading its computer facilities to the fastest computers in the world through joint development programs with supercomputer manufacturers. DOE might continue to subsidize development of supercomputing in this manner via other programs with greater scientific and social merit (for example, meeting the immense computing needs of predicting global climate changes). However, development of supercomputers would not be a mission of the nuclear weapons program under Curatorship.

Under Curatorship, as improvements in computer technology become available in the commercial marketplace, NNSA could adapt its existing codes to run on those faster computers. NNSA could also continue to validate its computer codes by comparing new calculations to existing test data and could continue to apply its codes to better understand the behavior of the legacy stockpile under a variety of conditions.

36|9.a  
cont. High Energy Density and Pressure (HEDP) R & D - NNSA has numerous facilities it uses to create high pressures, densities, and temperatures for studying the behavior of materials under conditions similar to those in an exploding nuclear weapon. These facilities, including large lasers, pulsed power machines, and gas guns, are referred to collectively as HEDP facilities. HEDP facilities are used primarily to provide information on material properties in extreme conditions. NNSA primarily uses that information to improve the computer codes used to model exploding nuclear weapons. NNSA also uses HEDP facilities for integrated tests of those codes. Since NNSA would no longer seek to improve its modeling capabilities under the Curatorship approach, all HEDP facilities would be candidates for closure, unless they had some other legitimate scientific use.

36|9.a  
cont. Some of the HEDP facilities can produce X-rays or other effects, which NNSA may use in "environmental testing" to qualify replacement components or as part of the surveillance program. NNSA has numerous other facilities that produce similar effects, many of which would remain in operation under Curatorship (see Major Environmental Test Facilities below). Selected HEDP facilities might also remain in operation, if they are cost effective or crucial to environmental testing. In addition, some HEDP facilities might have applications in fields other than nuclear weapons, including fusion energy, astrophysics, and as sources of X-rays for research in numerous areas. Those facilities might be transferred to other DOE offices or other agencies and remain in operation. The remaining HEDP facilities would be closed.

Hydrodynamic Testing - Hydrodynamic Testing is sometimes used (in conjunction with computer modeling) to examine issues that are discovered during surveillance. It is more often used to perform weapons physics research, to improve modeling of nuclear weapons performance, to study new nuclear weapons geometries, to design and certify new nuclear weapons, and to evaluate the performance of new materials and components. Under Curatorship, it would be used for the first purpose only. That would require only a small fraction of the current testing rate.

Kelley, Marylia

Page 23 of 24

36|9.a  
cont. Under Curatorship, all hydrodynamic testing facilities would be closed, except for the *Dual-Axis Radiographic Hydrodynamic Test* (DARHT) facility at LANL. DARHT is the most modern of NNSA's hydrotest facilities. When DARHT becomes fully operational, it will be capable of performing tests with multiple shots from two different viewing angles on targets including full-scale mockups of any warhead in the current stockpile. About 100 hydrotests per year are performed at DARHT, which would be more than sufficient for all of the hydrotesting required under Curatorship. Under our plan, any planning for a follow-on Advanced Hydrotest Facility, part of NNSA's long-term vision for the Nevada Test Site, would end.

Sub-critical tests are a special class of hydrodynamic test, in which small amounts of Pu or HEU are compressed in ways that produce some fission, but cannot lead to a self-sustaining fast neutron chain reaction in the material. They are currently performed at the U1A underground test facility at the NTS. Sub-critical tests would cease under Curatorship and the U1A facility would be closed.

36|9.a  
cont. Major Environmental Test Facilities - NNSA's *Final Supplemental Programmatic Environmental Impact Statement (SPEIS) on Complex Transformation* identifies more than thirty "Major Environmental Test Facilities (ETFs)." NNSA uses those facilities for multiple purposes including R & D on new component and weapon designs and for certification of new components and weapons. Under Curatorship, there would be no development of new components or weapons and those uses would drop out. Some Environmental Test facilities have also been used to test and validate changes in computer models. Those uses would also drop out.

36|9.a  
cont. NNSA also uses many of the ETFs to test components from weapons randomly drawn from the stockpile as part of its surveillance program. That activity would expand under Curatorship. In addition, testing for certification and quality assurance of necessary replacement parts would also continue under Curatorship. Under Curatorship, NNSA would retain or replace only those ETFs that are essential to the surveillance program. Many of the facilities that are retained or replaced under NNSA's preferred alternative -- consolidate major environmental testing at SNL-NM -- appear to meet that criterion. There is, however, insufficient information in the SPEIS to determine whether each of those facilities would do so. Some ETFs are likely to have very limited roles under Curatorship and would be transferred to another DOE office, another agency, or closed.

36|9.a  
cont. High Explosives (HE) R & D - Most of the HE R & D that NNSA currently supports is focused on formulation of new explosives. This work would cease under Curatorship. Studies of aging of HE formulations in existing weapons and components could continue at Pantex. Surveillance activities and quality assurance (QA) studies of HE in existing components would be expanded.

36|9.a  
cont. Tritium R & D - NNSA performs R & D on tritium primarily to improve its understanding of mixing issues in imploding primaries or to design new gas handling systems. We recommend halting both of those activities under Curatorship. R&D at SNL-NM for production support and quality improvement of neutron generator production could continue.

Microsystems, Nanotechnology, and Advanced Electronic R & D - NNSA supports a substantial amount of R & D on microsystems, nanotechnology, and advanced electronics. This work is applicable only for designing and fabricating new nuclear weapon components. Under Curatorship, there would be little or no introduction of new components into nuclear weapons and little need for NNSA to perform such research. Research in microsystems, nanotechnology, and advanced electronics contributes to other missions, including fostering the competitiveness of US industry. However, unless

Kelley, Marylia

Page 24 of 24

NNSA's state of the art facilities for R & D on those technologies are supported by other programs or agencies, they would be closed under Curatorship.

(NOTE: Significant portions of this comment's Curatorship section first appeared as part of the report, *Transforming the U.S. Strategic Posture and Weapons Complex for Transition to a Nuclear Weapons-Free World*, published in April 2009. Its lead author was Dr. Robert Civiak, with contributing authorship by Marylia Kelley, Christopher Paine, Jay Coghlan, Peter Stockton and Ingrid Drake. Additions and changes from the report's original text to highlight its NEPA relevance to the SWEIS are the responsibility of Marylia Kelley and Tri-Valley CAREs.)

#### XII. Conclusion

NEPA requires that the proposed SWEIS fully analyze an alternative for Y-12 that offers the site a future that differs substantially from its past. Tri-Valley CAREs looks forward to seeing these alternatives comprehensively and thoroughly described in the next iteration of the SW EIS. The other deficiencies of the draft SWEIS noted above must likewise be remedied.

As there is a significant difference between the present draft SWEIS and a NEPA-compliant draft SWEIS, we further request that NNSA re-circulate an adequate draft document for public comment before finalizing it and publishing a Record of Decision based thereupon.

Thank you for your consideration.

Sincerely,

Marylia Kelley  
Executive Director, Tri-Valley CAREs  
2582 Old First Street  
Livermore, CA 94551  
Telephone: (925) 443-7148  
Email: [marylia@trivalleycares.org](mailto:marylia@trivalleycares.org)

Scott Yundt  
Staff Attorney, Tri-Valley CAREs  
2582 Old First Street  
Livermore, CA 94551  
Telephone: (925) 443-7148  
Email: [scott@trivalleycares.org](mailto:scott@trivalleycares.org)

Kelly, Bev

Page 1 of 1

WD013

**From:** bev kelly, ph.d. [bev@bevkellyphd.com]  
**Sent:** Tuesday, November 17, 2009 2:25 PM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** NO NUCLEAR WEAPONS PLANTS ANYWHERE

firstName=bev  
lastName=kelly, ph.d.  
organization=self  
[email=bev@bevkellyphd.com](mailto:bev@bevkellyphd.com)  
address1=248 La Verne  
address2=  
city=Long Beach  
state=ca  
zip=90803  
country=USA  
subject=Draft Y-12 SWEIS

114.0 | comments=Please!! for the sake of our environment and the safety of all beings, NO NUCLEAR WEAPONS  
PLANTS ANYWHERE--

Bev Kelly, Ph.D.

**Kemp, David**

Page 1 of 1

WD058

**From:** David Kemp [davidkemp21@gmail.com]  
**Sent:** Monday, December 28, 2009 11:43 PM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** Form posted from Windows Internet Explorer.

firstName=David  
 lastName=Kemp  
 organization=United States citizen  
[email=davidkemp@juno.com](mailto:davidkemp@juno.com)  
 address1=1854 Hoopes Street  
 address2=  
 city=Alcoa  
 state=TN  
 zip=37701  
 country=USA  
 subject=Draft Y-12 SWEIS

114.0 | comments=I do not support further nuclear armament by our nation. I am sorry it is part of your job to try to  
 | develop and build WMD's. Please use your talents more peacefully.

1

**Kuykendall, David**

Page 1 of 1

MD017

**To:**  
 Ms. Pam Gorman  
 Y-12 SWEIS Document Manager  
 800 Oak Ridge Turnpike, Suite A-500  
 Oak Ridge, TN. 37830

The need to maintain a reliable nuclear weapons production facility is more relevant today than in years past. From my personal view point, today's threats are far more dangerous and menacing than during the cold war. I need not go into the reasoning behind this view point, but rather stress the need to modernize the production facilities at Y-12.

1|3.B

The buildings, equipment and facilities for production are run down and out of date. When these production machines and buildings were built, the only hand held communication devices available were in the sci-fi movies. The calculating and computing power in today's cell phone exceeded the computing power in all of Y-12 when these same facilities, many being used today, were built and put in operation. Some of the same outdated buildings are currently being used with outdated production equipment. Band-Aids and paint can only go so far.

Consider the analogy, one can keep the old car running, as long as you keep spending a little here and some there, and then an engine rebuild every so many years. The car keeps breaking down time to time, but a bit more money will get it back on the road for another month or so. Much better to nickel and dime that "old car", keep it going, than spend the money on a new one, right? Would you, yourself, take your family or loved ones on a cross country trip in this car?

With something as important such as National Security, why would America not desire to maintain a reliable nuclear deterrent along with the facilities and infrastructure to assure reliability? The entire free world relies on America to have their backs, and maintain a reliable deterrent. I realize a perfect world without nuclear weapons is noble, but this is not a perfect world; not by a long shot, especially today.

1|3.B  
(cont)

In order to maintain a deterrent, required in today's world, we must maintain our facilities and infrastructure. The Y-12 Nuclear Weapons Complex is the place to continue this important mission. The extensive manufacturing technical expertise is already in place. The track record dating from many years shows that Y-12 is best suited to maintain this mission as needed well into the future. Y-12, as demonstrated in the past and present, is best suited to handle the special materials, safety and security required. Y-12's National mission and plant location is supported by the community, town and state in which it is currently located.

2|13.0

Thank you for considering my comments,  
 David Kuykendall

Larson, Jean

Lassiter, Mike

Page 1 of 1

Page 1 of 1



**Draft Y-12 Site-wide  
Environmental Impact Statement—  
U.S. Department of Energy  
National Nuclear Security Administration**

**Written Comment Form**  
*Must be received on or before January 29, 2010.*



MD070

---

19.B An upgraded facility that provides a safe workplace for those dismantling nuclear weapons is a priority. Any facility for producing new nuclear weapons should not be built. Producing more nuclear weapons will increase the likelihood of their use, which in turn would be devastating for the environment of our planet.

---

Thank you for considering all comments.

---

Jean Larson  
349 Clark Branch Rd  
Leicester, NC 28748

---

Please use other side if more space is needed.

Comment forms may be mailed to:  
Ms. Pam Gorman  
Y-12 SWEIS Document Manager  
800 Oak Ridge Turnpike, Suite A-500  
Oak Ridge, TN 37830

Comment forms may be faxed to:  
(865) 483-2014  
or sent by email to:  
y12sweis.comments@tetrattech.com

You may also submit comments through the project website which can be found at:  
<http://www.Y12sweis.com>



**Draft Y-12 Site-wide  
Environmental Impact Statement—  
U.S. Department of Energy  
National Nuclear Security Administration**

**Written Comment Form**  
*Must be received on or before January 29, 2010.*



MD037

---

113.0 Lest any confusion result from my ramblings, let me say up front that I support the Uranium Processing Facility project.

When I comment, I do so as a person that lives just down the road; not someone that comes here on a plane, bus, or train. I also work at Y-12 so I have a perspective that many others may not share.

To begin with, our country must determine whether or not we want to have nuclear weapons. I think we must. Unfortunately, there are some rather ambitious and unsavory characters in the world now that have or will soon have nuclear weapons. Without them we are extremely vulnerable. One of our forefathers once said, "Those who beat their weapons into plowshares will plow the fields of those who don't".

That said, Y-12 does some things to help maintain our nuclear capability that cannot, at the present time, be done anywhere else in our great country. Y-12 has done a miraculous job of meeting the needs of the country from the time the first shovel went into the ground in the Bear Creek Valley in the 1940s. That Mission has become increasingly difficult in recent years. The current facilities are a collection of buildings that have been added to and modified over the years as requirements have changed. They are old, have obsolete technology, and were designed to meet cold war requirements that no longer exist.

23.B My primary concerns are the safety of the people that work in these facilities, the security of the materials in these facilities, and the possibility that some piece of the aging process may fail resulting in some sort of release outside the plant. I remember the disaster in Bhopal, India in 1984. With these concerns in mind, I feel it is imperative that modernization go forward at Y-12 and that the Uranium Processing Facility be completed.

---

Mike Lassiter

---

Please use other side if more space is needed.

Comment forms may be mailed to:  
Ms. Pam Gorman  
Y-12 SWEIS Document Manager  
800 Oak Ridge Turnpike, Suite A-500  
Oak Ridge, TN 37830

Comment forms may be faxed to:  
(865) 483-2014  
or sent by email to:  
y12sweis.comments@tetrattech.com

You may also submit comments through the project website which can be found at:  
<http://www.Y12sweis.com>

Lentsch, Mary Dennis

Page 1 of 2

MD064

January 25, 2010

Pam Gorman  
 Y-12 SWEIS Document Manager  
 Y-12 Site Office  
 800 Oak Ridge Turnpike, Suite A-500  
 Oak Ridge TN 37830

Dear Ms. Gorman:

1|3a I consider myself a citizen of the United States as well as a citizen of the world, and believe we should be making every effort to move toward a nuclear free future. I believe nuclear weapons are instruments of death and massive destruction. They can cause physical death and also spiritual death. Spiritual death results when the funds used for the designing, production, testing and upgrading of nuclear weapons is not available for quality education, developmental childcare, safe and affordable housing, accessible health care, and nourishing food. From this perspective I present my comments on the Draft Y12 Site Wide Environmental Impact Statement.

2|10.b I received my copy of the Draft SWEIS and believe that that all reasonable alternatives are not presented as required by law. I reject the 5 alternatives described in the Draft SWEIS and urge that another reasonable alternative be considered. The exorbitant capital expenditures required for the "modernization program" presented in the 5 alternatives cannot be justified. They do not adequately address the demand for dismantlement and disposition of retired nuclear weapons and nuclear waste.

3|10.c As we strive to move toward a nuclear free future, I believe Alternative 6 should embody the following:

4|9.a ----Consolidate the current production facilities, and down-size into an existing facility, with upgrades as necessary to meet environmental, safety and health standards.

----Incorporate the protocols for safeguard and transparency into the upgrades as they are designed, in order for the US to participate in international verification during disarmament.

----Initiate a production capacity of 10 warheads a year or less that should be adequate to assure the safety and security of the current stockpile as it awaits retirement.

----Design and construct, at the same time, a new state-of-the-art single-purpose facility dedicated to dismantlement and staging for disposition of retired nuclear weapons (secondaries/cases).

----Ensure protective regulations of public and worker health and safety are carried out.

Lentsch, Mary Dennis

Page 2 of 2

----Provide for adequate security protection of nuclear materials themselves.

4|9.a  
 cont.

I urge NEPA to seriously consider Alternative 6 because it is more responsive to future nuclear requirements, more protective of the nation's security and more supportive of nonproliferation efforts. The high security footprint could be reduced by as much as 60%. The new, dedicated dismantlement facility could be designed and built at considerable savings over the proposed Uranium Processing Facility. Alternative 6 moves us in the right direction for a nuclear free future.

As we look forward, I believe the US should commit resources to pursue our stockpile security goals with the minimum investment necessary to maintain a safe and secure stockpile and a maximum commitment to full-capacity dismantlement and disposition.

Mary Dennis Lentsch PBVM  
 (Elizabeth Ann)  
 5818 General Diaz Street  
 New Orleans LA 70124

*Mary Dennis Lentsch PBVM*

**Lloyd-Sidle, Tricia**

**Page 1 of 1**

**WD096**

**From:** Tricia Lloyd-Sidle [revtjls@yahoo.com]  
**Sent:** Thursday, January 28, 2010 4:45 PM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** Form Post from Firefox

firstName=Patricia  
lastName=Lloyd-Sidle  
organization=  
[email=revtjls@aol.com](mailto:revtjls@aol.com)  
address1=197 N Bellaire Ave  
address2=  
city=Louisville  
state=KY  
zip=40206  
country=  
subject=Draft Y-12 SWEIS  
comments=

1|14.0 | I am opposed to the use of nuclear weapons; and thus to any project that builds elements related to those weapons. We must work to dismantle nuclear weapons -- not plan to build more of them!

**Lombardo, Dan**

**Page 1 of 1**

**WD117**

**From:** Dan Lombardo [dan@lomb.us]  
**Sent:** Saturday, January 30, 2010 11:26 PM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** No

Dear Sirs,

1|14.0 | No! to the "Uranium Processing Facility" and YES! to a world free of nuclear weapons.

Daniel Lombardo  
660 east Preda Dr.  
Waterford MI  
48328

Love, Andy

Page 1 of 1

WD084

**From:** Andy Love [a-love@charter.net]  
**Sent:** Wednesday, January 27, 2010 9:33 AM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** alternatifie to weapons factory

To whom it may concern,

1)9.A I am writing to express my strong preference for OREPA alternative 6. It is less costly and would eliminate building more nuclear weapons.

Thank you,  
Andy Love

1

Lovlace, Claire

Page 1 of 1

WD044

**From:** Claire Lovlace [clairejlovelace@embarqmail.com]  
**Sent:** Sunday, November 29, 2009 5:00 PM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** Form posted from Windows Internet Explorer.

firstName=Claire  
 lastName=Lovlace  
 organization=  
[email=clairejlovelace@embarqmail.com](mailto:clairejlovelace@embarqmail.com)  
 address1=113 Heritage Place Drive  
 address2=  
 city=Jonesborough  
 state=TN  
 zip=37659  
 country=  
 subject=Draft Y-12 SWEIS

1)9.A comments=I wish to support Alternative 6 of the SWEIS because it best reflects the current policy of the United States as expressed by President Obama. Assuring safety and security by means of consolidated, down-sized, upgraded existing facilities at Y-12 will meet the present need. We do not need a new uranium bomb plant.

2)9.C In view of the fact that the US presented a UN resolution, which was adopted by the security council, that calls on nuclear weapons states to "pursue in good faith . . . disarmament at an early date," it is obvious that a new bomb plant will not help the US abide by its own resolution.

Currently the US has a safe, secure, reliable stockpile. We have spent more than \$90 billion since 1996 "modernizing" the nuclear weapons stockpile. By the time a new bomb plant would come on-line (2018), the US stockpile of refurbished "Life Extended" warheads will exceed the maximum number allowed by the START Treaty which was recently renewed with Russia.

Please heed the desires of the citizenry in regard to the Environmental Impact Statement.

1

Lubthisophon, Ken

Page 1 of 1

WD068

From: Lubthisophon, Ken S (3GI) [lubthisophok@y12.doe.gov]
Sent: Thursday, January 21, 2010 9:13 AM
To: DIV.Y12SWEIS.Comments
Subject: Form posted from Windows Internet Explorer.

firstName=Ken
lastName=Lubthisophon
organization=
email=ken.lubt@gmail.com
address1=259 Dogwood Glen Lane
address2=
city=Powell
state=TN
zip=37849
country=
subject=Draft Y-12 SWEIS

1|3.B comments=No matter what the mission, the need to have the Uranium Processing Facility built is vital. The
2|10.D existing conditions of the current facilities, while operating safely, are in desperate need of replacement. To
be good stewards of the taxpayer's money, is part of the operating contractor and NNSA's
responsibility. Continuing to put money into aging facilities, maintain the current security footprint and still
meet the mission is not the right decision. Any concerns to having this facility are outweighed exceedingly by
these reasons for it:
- Cost savings by reducing the size of the protected area's footprint
- Upgraded safety features for both workers and the general public
1|3.B - External assessments agree that a replacement is needed just on potential safety issues alone (i.e.
(cont) DNFSB)
- More efficient processing to meet the nation's strategic goals
- Continued support of a skilled workforce and economic mainstay
- Flexibility to adapt to changing U.S. missions and/or policies
- The continuation to secure this highly desirable asset from adversaries in an increasingly dangerous
global environment.
These reasons are ones that should be considered as to why I firmly believe and support the need to build the
UPF is important to East Tennessee and this nation. Thank you.

finalcd=Final CD-Rom Only

Lynch, Rex

Page 1 of 1

MD010



ANDERSON COUNTY

REX LYNCH
COUNTY MAYOR

November 10, 2009

Ms. Pam Gorman
Y-12 SWEIS Document Manger
Y-12 Site Office
800 Oak Ridge Turnpike, Suite A-500
Oak Ridge, TN 37830

Dear Ms. Gorman,

1|13.0 I am writing you as the Anderson County Mayor in support of the proposed Uranium Processing Facility
(UPF) at the Y-12 National Security Complex in Oak Ridge. This facility will be another anchor to the
modernization initiative currently underway at Y-12. The draft Site-Wide Environmental Impact Statement
(EIS) presents this as the preferred option from several alternatives considered.

Prior to being elected Anderson County Mayor I worked inside the Y-12 plant and have a unique working
knowledge of its operation. Also the Y-12 Plant, as well as part of the City of Oak Ridge are in Anderson
County.

1|13.0 Our county and region have always been strong supporters of the uranium processing and nuclear related
(cont) missions of the Oak Ridge complex. Our Region has invested in the development of a highly skilled
workforce that has always been responsive to the safe conduct of the operations associated with these
missions for more than 60 years. We are prepared to continue to fully support such missions and to
continue to invest in regional workforce development that is required for these operations. We do believe
2|13.B that Y-12's continued role in manufacturing and disassembling nuclear warhead components should be
conducted in modernized facilities with cost effective and safety focused processes. We think this
preferred option of a new UPF achieves this objective.

Thank you for your consideration of these comments. Please include them in the official record of this EIS.

Best Regards,
Rex Lynch
Rex Lynch
Anderson County Mayor

cc: Ted Sherry
Congressman John Duncan
Congressman Lincoln Davis
Congressman Zach Wamp
Senator Bob Corker
Senator Lamar Alexander

**Malloy, Randall**

**Page 1 of 1**

**WD053**

**From:** Malloy, Randall S (7AQ) [malloyrs@y12.doe.gov]  
**Sent:** Wednesday, December 16, 2009 7:36 AM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** RE: Show Your Support for a New Uranium Processing Facility

15.0 | I support Alternative 2, Uranium Processing Facility Alternative.

*Randy Malloy*  
 UPF Process Design Group  
 Product Certification/ANSER Sub-Lead  
 1099COM, N56A, MS8116  
 Phone: 865-241-2257  
 Pager: 865-417-6766  
 Email: 7AQ or MalloyRS@y12.doe.gov

**From:** Pharis, Jeri L (J9J)  
**Sent:** Tuesday, December 15, 2009 4:09 PM  
**To:** UPF B&W; UPF BOA; UPF Staff Aug's; UPF YSO  
**Subject:** Show Your Support for a New Uranium Processing Facility

The NNSA is asking for input into its Draft Site-Wide Environmental Impact Statement (SWEIS) for the Y-12 National Security Complex.

NNSA held a public hearing on the SWEIS in November but is urging further input until January 29. Please view the attached sheet.

They left several of these flyers and some comment sheets, along with a collection box. They are on the small round table behind the seating area in the lobby of 1099. We will be bringing a box and some comment forms to OSTI as well.

If you choose to provide any comments please feel free to do so and deposit them in the box provided. They will come by a few times between now and January 29 to pick them up.

This is your chance to provide your opinion! Please take advantage of it!

Thank you.

<< File: UPF Show your support.pdf >>

*Jeri Pharis*  
 Office and Admin Services - UPF Project  
 Phone: 241-0249  
 Pager: 873-5595

**Martin, Mary Kay**

**Page 1 of 1**

*Nov. 16, 2009*

MD012

*Dear Mr. Gorman,*

*We do not not want or need and should not tolerate further production of nuclear weapons. They are not simply bigger bombs, are not useable, and are the means of ending all human and animal life on this planet. New nuclear weapons or new facilities should not be built. The Y 12 facility function should be dismantling of nuclear weapons in negotiated verifiable steps with other nuclear weapons countries.*

*Our nuclear weapon policy should renounce first strike use and abandon implicit threats of use against non-nuclear countries. We should end all actions that drive non-nuclear countries to seek nuclear weapons and begin finally to implement our obligations - long ignored - under the Nuclear Non Proliferation Treaty.*

*Sincerely,  
 Mary Kay Martin  
 43620 Via Antonio  
 Sterling Heights, Mi. 48314*

113.A

219.B

311.B

411.C

Mason, Robert and Marita

Page 1 of 1

WD050

From: ltahm@aol.com  
Sent: Thursday, December 10, 2009 2:22 PM  
To: DIV.Y12SWEIS.Comments  
Subject: comment for Y12sweis

1|14.0 We do not need to make more bombs.  
Period.  
We need to dismantle bombs.  
Period.  
We need to show the world we will stop proliferating bombs.  
Period.  
Thank You.  
Period.

Robert Mason and Marita Hardesty  
1235 Lonesome Pine Rd  
Kingston Springs TN  
37082

Do not postal mail us anything ..use this E address if you wish to respond...

Thank you,  
Marita

McCollum, Jr., William

Page 1 of 1

MD021



William R. McCollum, Jr.  
Chief Operating Officer

Tennessee Valley Authority  
1101 Market St  
Chattanooga, TN 37402

November 24, 2009

Ms. Pam Gorman  
Y-12 SWEIS Document Manager  
Y-12 Site Office  
800 Oak Ridge Turnpike  
Suite A-500  
Oak Ridge, Tennessee 37830

Dear Ms. Gorman:

1|13.0 The Tennessee Valley Authority fully supports the continued operation and modernization of the Y-12 National Security Complex. For more than 50 years, Y-12 has provided unique national security services, and TVA is proud to have contributed to Y-12's important mission.

2|3.B Construction and operation of a new, modernized Uranium Processing Facility (UPF) will result in increased security for the facility and improved health and safety for workers. A new UPF also means significant cost reductions and higher efficiency for Y-12. And those improvements will, in turn, provide benefits for East Tennessee and the Tennessee Valley as a whole.

We recognize Y-12's critical role in supporting national security, and TVA is committed to providing the power needed to support your operations.

Sincerely,

William R. McCollum, Jr.

McNally, Randy

Page 1 of 3

WD009

From: Debbie Martin [debbie.martin@capitol.tn.gov]  
 Sent: Monday, November 16, 2009 5:19 PM  
 To: DIV.Y12SWEIS.Comments  
 Cc: Keim, David M (DK1)  
 Subject: Letter of support  
 Attachments: 20091116161156323.pdf

Pam:

Attached is a letter of support for the upcoming hearings on the Site-Wide Environmental Impact Statement at Y-12.  
 <<20091116161156323.pdf>>

Please let me know if you can not open the attachment.

Thank you,

Deborah Martin  
 Legislative Executive Secretary to  
 Senator Randy McNally  
 615-741-6806

McNally, Randy

Page 2 of 3

WD009

RANDY McNALLY  
 SENATOR  
 5TH SENATORIAL DISTRICT  
 ANDERSON, KNOX,  
 LOUDON AND MONROE COUNTIES  
 307 WAR MEMORIAL BUILDING  
 NASHVILLE, TENNESSEE 37243-0205  
 (615) 741-6806  
 1-800-449-8366 ext. 16806  
 FAX (615) 253-0285



Senate Chamber  
 State of Tennessee  
 NASHVILLE

CHAIRMAN  
 FINANCE, WAYS AND MEANS  
 COMMITTEE  
 MEMBER OF COMMITTEES  
 GENERAL WELFARE, HEALTH & HUMAN  
 RESOURCES  
 RULES

November 16, 2009

To Whom It May Concern:

I am writing you in support of the construction and operation of a new uranium processing facility and the construction of a new complex command center at the Y-12 National Security Complex in Oak Ridge, Tennessee. It is imperative the operation and modernization of the Y-12 plant be continued and improved for numerous reasons including national security, energy technology, and the economic impact it has on our community and state.

The history of the Y-12 plant is a source of great pride for our community. It has played a vital role to help ensure our nation's freedom. With the goal of preventing the spread of weapons of mass destruction, the Y-12 plant continues to be just as important in making our world safer at this pivotal time in our nation's history as it was when the plant began operations in 1943. The continued operation of this plant is critical to our homeland security.

The Y-12 plant plays other roles which are also important to the future of this nation. The energy mission of this plant is crucial in meeting the growing demands to fuel America in this new age of worldwide technology. Clean, efficient energy is vital to America's future and the Y-12 plant is on the cutting edge with new technology to help us provide the power needed to compete with these growing demands.

The Y-12 plant has demonstrated a high commitment to environmental stewardship by continually working to improve their record with respect to safety and efficiency. It is obvious that those engaged in the operations of this plant live and work in our communities and care about the environmental legacy they will leave to their children and grandchildren. Incorporating sustainable design principles to minimize the impact to the environment will greatly help in those efforts.

McNally, Randy

Page 3 of 3

WD009

November 16, 2009  
Page 2

Y-12 is very engaged in Tennessee's future. Their efforts to reach out to area citizens continue to show our community that they are a good neighbor, committed to leaving this area a better place to live. This is evident in their complementary work for other government and private-sector entities, which has been a tremendous asset in helping to create new jobs for Tennessee.

3|12.H

As the 15<sup>th</sup> largest employer in our state, continuing Y-12 is critical to our state's overall well-being, especially in a time of high unemployment in our state. It contributes more than \$4 billion in direct and indirect economic impact to the East Tennessee area, and helps generate over 24,000 jobs.

2|13.0  
(cont)

The Y-12 plant is a national resource of tremendous benefit to our state and this nation. It has put our community on the map as the nexus of research and development in a new age of technology. I ask you to join me in support of their mission.

Sincerely,

*Randy McNally*

Randy McNally  
State Senator

RMc/dkm

Morner, David

Page 1 of 1

MD050



Draft Y-12 Site-wide  
Environmental Impact Statement—  
U.S. Department of Energy  
National Nuclear Security Administration



Written Comment Form

Must be received on or before January 29, 2010.

1|7.0

*I support Option 4 for continued growth and progress of Y-12 Complex.*

*David S. Morner*

Please use other side if more space is needed.

Comment forms may be mailed to:  
Ms. Pam Gorman  
Y-12 SWEIS Document Manager  
800 Oak Ridge Turnpike, Suite A-500  
Oak Ridge, TN 37830

Comment forms may be faxed to:  
(865) 483-2014  
or sent by email to:  
y12sweis.comments@tetrattech.com

You may also submit comments through the project website which can be found at:  
<http://www.Y12sweis.com>

Morris, Jim

Page 1 of 1

WD035

From: Jim Morris [jmorris@processengr.com]  
 Sent: Wednesday, November 18, 2009 4:37 PM  
 To: DIV.Y12SWEIS.Comments  
 Subject: Comments for the Draft Y-12 SWEIS

November 18, 2009

Ms. Pam Gorman  
 Y-12 SWEIS Document Manager  
 800 Oak Ridge Turnpike  
 Suite A500  
 Oak Ridge, TN 37830

Subject: Draft Y-12 SWEIS

Ms. Gorman,

I was unable to be present at the public hearing and would like to offer the following comments.

13.B Y-12 has done an admirable job meeting missions over the past couple of decades with little capital investment. However, today facilities are old and changes in the missions and in the health, safety, and environmental regulations since the cold war's end have highlighted facility inefficiencies.

I support the preferred alternative which will effectively address current inefficiencies and make necessary improvements that will lead to a reliable manufacturing infrastructure for the next 50 years.

27.0 Some detractors of the preferred alternative promote an alternative that would build only a new "smaller" dismantlement facility. What must be recognized is that if a decision were made to only dismantle our nuclear weapons stockpile, a significant investment is still required at Y-12 to ensure that every gram of uranium can be collected and accounted for, configured in a safe and secure configuration, and prepared for secure storage. This "smaller" facility would require 1) a significant secure facility, 2) weapons dismantlement equipment, 3) chemical laboratory space, and 4) chemical processing equipment. This "smaller" facility would be comparable in size and cost to the preferred alternative. Such a facility would not, however, provide any flexibility to maintain our weapons stockpile.

The world is too dangerous and our future is too uncertain to eliminate the capability to maintain our stockpile. The preferred alternative is the logical choice.

James S. Morris  
 436 Old Sweetwater Rd  
 Sweetwater, TN 37874  
 Email: [jmorris@processengr.com](mailto:jmorris@processengr.com)

1

Mueller, Heinz

Page 1 of 7

MD056



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
 REGION 4  
 ATLANTA FEDERAL CENTER  
 61 FORSYTH STREET  
 ATLANTA, GEORGIA 30303-8960

January 29, 2010

Ms. Pam Gorman  
 Y-12 SWEIS Document Manager  
 Y-12 Site Office  
 800 Oak Ridge Turnpike  
 Suite A-500  
 Oak Ridge, TN 37830

SUBJ: EPA Review and Comments on  
 Draft Site-Wide Environmental Impact Statement (DEIS)  
 Y-12 National Security Complex (DOE/EIS-0387) Project,  
 To Support the Stockpile Stewardship Program and to  
 Meet the Mission Assigned to Y-12, Oak Ridge, Tennessee  
 CEQ Number 20090368

Dear Ms. Gorman:

The U.S. Environmental Protection Agency (EPA), pursuant to Section 102(2)(C) of the National Environmental Policy Act (NEPA), and Section 309 of the Clean Air Act, reviewed the subject DEIS for the Y-12 National Security Complex. The purpose of this letter is to provide EPA's NEPA review comments regarding the proposed project.

This DEIS evaluates alternatives for proposed new actions and changes subsequent to the 2002 Y-12 EIS ROD. The alternatives support modernization of the Y-12 facility, which began construction during World War II, with the majority of the floor space constructed before 1950. The DEIS evaluated five alternatives: No action; Uranium Processing Facility (UPF); Upgrade-in-Place; Capability-sized UPF; and no net production/capability-sized UPF.

The Capability-sized UPF (Alternative 4) is the DOE's preferred alternative. This alternative will maintain a basic manufacturing capability to conduct surveillance and to produce and dismantle secondaries (nuclear weapons components) and cases (which contain secondaries and other components). It would also provide for laboratory and experimental capabilities to support the stockpile, including uranium work for other National Nuclear Security Administration (NNSA) and non-NNSA customers.

The Complex Command Center (CCC) is also part of this alternative and the other action alternatives. The CCC would consist of a new facility for housing equipment and personnel including plant management, Fire Department, and the Emergency Operations Center (EOC).

Internet Address (URL) • <http://www.epa.gov>

Recycled/Recyclable • Printed with Vegetable Oil Based Inks on Recycled Paper (Minimum 30% Postconsumer)

Mueller, Heinz

Page 2 of 7

2

Construction of the Capability-sized UPF and CCC would require approximately 39 acres; this would occur on previously developed industrialized land at the Oak Ridge facility, including a parking lot. Land uses at Y-12 would remain compatible with surrounding areas and with the existing land use plan.

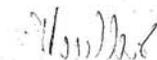
The DEIS states that radiation from normal operations would be below regulatory standards, with no statistically significant impact on the health and safety of workers and the public. Wastes generated from the facility would include liquid and solid low-level radioactive wastes (LLW), mixed LLW, hazardous and nonhazardous wastes.

There are inherent environmental concerns regarding storage, transportation and disposal of hazardous waste and radioactive wastes, and the DEIS notes the need for continuing radioactive and hazardous materials and waste management, environmental monitoring to prevent ecological impacts, emergency preparedness, and radiological monitoring to ensure safety for workers and the public. Long-term onsite storage and disposition of wastes will need to be addressed as the project progresses.

Based on EPA's review of the preferred alternative in this DEIS, the project received a rating of "EC-2," meaning that environmental concerns exist regarding aspects of the proposed project and some clarifying information is requested for the Final EIS (FEIS). (See enclosed *Summary Of Rating Definitions And Follow Up Action*.) The EC-2 rating is based on the selection of the Capability-sized UPF Alternative. However, if a different alternative is ultimately pursued that would result in increased impacts, then additional NEPA evaluation could be expected by EPA.

We appreciate the opportunity to provide these comments. If you have questions, please coordinate them with Ramona McConney (404/562-9615).

Sincerely,



Heinz J. Mueller, Chief  
NEPA Program Office  
Office of Policy and Management

Enclosures: EPA review comments  
Summary of Rating Definitions and Follow up Action

Mueller, Heinz

Page 3 of 7

3

EPA Review and Comments on  
Draft Site-Wide Environmental Impact Statement (DEIS)  
Y-12 National Security Complex (DOE/EIS-0387) Project,  
To Support the Stockpile Stewardship Program and to  
Meet the Mission Assigned to Y-12, Oak Ridge, Tennessee

#### General

1|2.L The proposed action will require continuing management of radioactive and hazardous materials and waste, environmental monitoring to prevent ecological impacts, emergency preparedness, and radiological monitoring to ensure safety for workers and the public. There are inherent environmental and worker safety concerns regarding storage, transportation and disposal of hazardous waste and radioactive wastes. Long-term onsite storage and disposition of wastes is a concern that will need to be addressed as the project progresses.

#### Purpose and Need

The DEIS describes the purpose and need for the action as modernizing the Y-12 facility to increase its cost-effectiveness and to supply future stockpile needs. The DEIS states that the majority of the existing floor space was constructed before 1950. Worker safety, protection, environmental and security concerns were cited, in addition to the need for increased flexibility and use of advanced technologies, while reducing costs and improving operating efficiencies.

#### Air Emissions

The DEIS states that all radiation doses from normal operations would be below regulatory standards. Consolidation and modernization of the facilities is expected to reduce accident risks. Ongoing radiological monitoring will be required at Y-12.

#### Water Resources

2|2.D Water supply for all the alternatives would come from the Clinch River, with no plans for withdrawal from groundwater. The site is expected to increase water usage during construction, with operational water use being approximately 1.2 billion gallons per year under the preferred alternative. Evaluation of potential water withdrawal impacts to the Clinch River during droughts should be evaluated in the FEIS.

Groundwater contamination from past activities onsite requires ongoing monitoring. The preferred alternative is not expected to impact groundwater quality.

3|2.D NPDES discharges from the Y-12 facility require ongoing monitoring. Regular monitoring and storm water characterization is required under the NPDES Permit. The Final EIS (FEIS) should include updated information regarding NPDES monitoring.

Mueller, Heinz

Page 4 of 7

4

Alternatives

The DEIS Summary document, page S-28, refers to Alternative 2 as the proposed action. Per our communication with the DOE, we understand that this statement is a misprint and that Alternative 4 is the DOE's preferred alternative/proposed action.

Ecological Impacts

The DEIS discusses the Agency for Toxic Substances and Disease Registry (ATSDR) fish consumption recommendation for the Clinch River, EFPC and Poplar Creek, based on the level of PCBs found in several local fish species, and associated with past Oak Ridge Reservation activities. The DEIS states that impacts from the new facilities to ecological resources are not anticipated, because the new facilities will be sited on previously developed land that does not contain habitats to support a biologically diverse species mix.

Waste Management

Under all the alternatives, Y-12 would continue to manage low-level radioactive waste (LLW), mixed LLW, polychlorinated biphenyl (PCB), hazardous wastes, and nonhazardous wastes. Three land disposal facilities are currently in operation at Y-12, and two more have been permitted and constructed. Hazardous waste sites at Y-12 are regulated under RCRA and CERCLA.

Environmental Justice (EJ)

Consistent with Executive Order 12898, potential EJ impacts were evaluated in this DEIS. The purpose of an EJ survey is to ensure equitable environmental protection regardless of the demographics, so that no segment of the population bears a disproportionate share of the consequences of environmental pollution attributable to a proposed project. The DEIS concludes that the project's short-term socioeconomic impacts would be positive, and that the project would not result in any disproportionately high and adverse effects to EJ populations.

Cultural Resources

The DEIS states that the Y-12 site includes a proposed National Register Historic District, consisting of buildings associated with the Manhattan Project, that are eligible for listing in the National Register of Historic Places. Preservation of these cultural resources is planned. Coordination with the SHPO should be ongoing, and documented as the project progresses. The DEIS states that the evaluation and cultural resource recovery would be guided by plans and protocols approved by the SHPO in consultation with Native American tribes. The FEIS should include updated information regarding these coordination activities.

4|12.G

Mueller, Heinz

Page 5 of 7

5

4|12.G  
cont.

If suspected cultural artifacts are encountered during the construction process for the proposed project, all construction activities should cease and the situation should be addressed in consultation with the SHPO.

Transportation

Transportation of radioactive materials and wastes is a concern. The preferred alternative would involve less radiological transportation impacts in comparison with the other alternatives. In addition, because of reduced production, less shipping of radioactive materials would take place and Y-12 would generate less radioactive wastes.

Threatened and Endangered Species

No federally-listed nor state-listed threatened or endangered species are known to be at the Y-12 site. EPA defers to the FWS regarding endangered species assessments, and encourages the DOE to continue coordination with the FWS as appropriate.

5|12.F

Construction Impacts

The DEIS notes that construction activities would result in temporary traffic and noise increases at the Y-12 site. Construction impacts related to exhaust emissions from construction vehicles, equipment, and fugitive dust are disclosed in the document. We suggest that DOE consider the use of diesel retrofit technologies, such as diesel oxidation catalysts, to reduce the air quality impacts of diesel-powered equipment during the construction phase. The FEIS should clarify the expected timeline of construction.

Diesel Exhaust

NIOSH has determined that diesel exhaust is a potential human carcinogen, based on a combination of chemical, genotoxicity, and carcinogenicity data. In addition, acute exposures to diesel exhaust have been linked to health problems such as eye and nose irritation, headaches, nausea, and asthma.

6|12.C

Although every construction site is unique, common actions can reduce exposure to diesel exhaust. EPA recommends that the following actions be considered for construction and operating equipment:

- Using low-sulfur diesel fuel (less than 0.05% sulfur).
- Retrofit engines with an exhaust filtration device to capture DPM before it enters the workplace.
- Position the exhaust pipe so that diesel fumes are directed away from the operator and nearby workers, thereby reducing the fume concentration to which personnel are exposed.
- A catalytic converter reduces carbon monoxide, aldehydes, and hydrocarbons in diesel fumes. These devices must be used with low sulfur fuels.

Mueller, Heinz

Page 6 of 7

6|12.C  
cont.

6

- Ventilate wherever diesel equipment operates indoors. Roof vents, open doors and windows, roof fans, or other mechanical systems help move fresh air through work areas. As buildings under construction are gradually enclosed, remember that fumes from diesel equipment operating indoors can build up to dangerous levels without adequate ventilation.
- Attach a hose to the tailpipe of a diesel vehicle running indoors and exhaust the fumes outside, where they cannot reenter the workplace. Inspect hoses regularly for defects and damage.
- Use enclosed, climate-controlled cabs pressurized and equipped with high efficiency particulate air (HEPA) filters to reduce operators' exposure to diesel fumes. Pressurization ensures that air moves from inside to outside. HEPA filters ensure that any air coming in is filtered first.
- Regular maintenance of diesel engines is essential to keep exhaust emissions low. Follow the manufacturer's recommended maintenance schedule and procedures. Smoke color can signal the need for maintenance. For example, blue/black smoke indicates that an engine requires servicing or tuning.
- Work practices and training can help reduce exposure. For example, measures such as turning off engines when vehicles are stopped for more than a few minutes; training diesel-equipment operators to perform routine inspection and maintenance of filtration devices.
- When purchasing a new vehicle, ensure that it is equipped with the most advanced emission control systems available.
- With older vehicles, use electric starting aids such as block heaters to warm the engine, avoid difficulty starting, and thereby reduce diesel emissions.
- Respirators are only an interim measure to control exposure to diesel emissions. In most cases an N95 respirator is adequate. Respirators are for interim use only, until primary controls such as ventilation can be implemented. Workers must be trained and fit-tested before they wear respirators. Personnel familiar with the selection, care, and use of respirators must perform the fit testing. Respirators must bear a National Institute of Occupational Safety and Health (NIOSH) approval number. Never use paper masks or surgical masks without NIOSH approval numbers.

Mueller, Heinz

Page 7 of 7

7

## SUMMARY OF RATING DEFINITIONS AND FOLLOW UP ACTION\*

**Environmental Impact of the Action**LO-Lack of Objections

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC-Environmental Concerns

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impacts. EPA would like to work with the lead agency to reduce these impacts.

EO-Environmental Objections

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU-Environmentally Unsatisfactory

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS site, this proposal will be recommended for referral to the CEQ.

**Adequacy of the Impact Statement**Category 1-Adequate

The EPA believes the DEIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collecting is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2-Insufficient Information

The DEIS does not contain sufficient information for the EPA to fully assess the environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the DEIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category 3-Inadequate

EPA does not believe that the DEIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the DEIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the DEIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised DEIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\*From EPA Manual 1640 Policy and Procedures for the Review of the Federal Actions Impacting the Environment

Mulvenon, Norman

Page 1 of 1

MD060



**LOC INC**  
Oak Ridge Reservation  
Local Oversight Committee

January 12, 2010

Ms. Pam Gorman  
Y-12 SWEIS Document Manager  
800 Oak Ridge Turnpike  
Suite A-500  
Oak Ridge, TN 37830

*Subject: Draft Site-Wide Environmental Impact Statement (SWEIS) for the Y-12 National Security Complex*

Dear Ms. Gorman:

The Citizens' Advisory Panel (CAP) of the Oak Ridge Reservation Local Oversight Committee (LOC) has the following comments on the draft SWEIS for Y-12.

17.0 After attending the public meetings and reviewing the document, the CAP supports the preferred alternative (Alternative 4) of a capability-sized Uranium Processing Facility (UPF). In particular, the CAP sees a major environmental benefit from moving out of the old facilities, which would allow them to be decommissioned and demolished and the underlying soils remediated. We also appreciate that a new UPF will be safer for the workers and for the community, as well as saving money during continued operations.

21.2 G The CAP had identified what appears to be an error in the document. Figure 5.1.1-2 does not indicate any significant excess or new construction facilities (for example, the UPF is not labeled as new construction) expected for 2018, and facilities that are planned to be replaced are still labeled as operating. Please review and correct this figure.

The CAP appreciates the opportunity to review the draft SWEIS for Y-12.

Sincerely,



Norman A. Mulvenon  
Chair, LOC Citizens' Advisory Panel

cc: LOC Document Register  
LOC Board  
LOC CAP  
John Owsley, Director, TDEC DOE-O  
Pat Halsey, FFA Coordinator, DOE ORO EM  
Ted Sherry, Manager, Y-12 Site Office, NNSA  
Amy Fitzgerald, City of Oak Ridge  
Ron Murphree, Chair, ORSSAB

---

**Anderson • Meigs • Rhea • Roane • City of Oak Ridge • Knox • Loudon • Morgan**

Munger, David

Page 1 of 1

WD082



**From:** Gorman, Pamela (P1G) [gormanpl@yso.doe.gov]  
**Sent:** Wednesday, November 25, 2009 9:40 AM  
**To:** Buenaflor, Delight; Rose, Jay  
**Subject:** FW: UPF Project Public Comment

**Importance:** High


---

**From:** Dave Munger [mailto:dave.munger@merrick.com]  
**Sent:** Tuesday, November 24, 2009 4:37 PM  
**To:** Gorman, Pamela (P1G)  
**Subject:** UPF Project Public Comment

Ms. Pam Gorman  
Y-12 SWEIS Document Manager  
800 Oak Ridge Turnpike  
Suite A-500  
Oak Ridge, TN 37830

Ms. Gorman:

13.B I would like to go on record as supporting the need for a new, consolidated Uranium Processing Facility (UPF) at the Y-12 National Security Complex. I have seen the condition of the current facilities and believe that the nation cannot afford to put in jeopardy our nuclear security by the continued long-term use of obsolete facilities. Please include me in the list of strong supporters of the project.

Regards,

David H. Munger  
795 Nichols Road  
Lenoir City, TN 37772

This transmission, which may contain confidential information, is for the intended recipient only. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon this information by persons or entities other than the intended recipient, is prohibited. If you received this in error, please contact the sender and delete the material from your computer and networks.

1

## Murphy, Jennifer

Page 1 of 1

WD088

**From:** Jennifer Murphy [Jennifer@jmurphyart.com]  
**Sent:** Wednesday, January 27, 2010 11:55 AM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** Draft Y-12 SWEIS

I am against any new projects at the Y-12 site who's purpose will be building nuclear weapons.

- 1|9.A I prefer the OREPA (Oak Ridge Environmental Peace Alliance) Alternative 6, which would cost 100 million and would not include the actual making of nuclear bombs at the facility.  
 2|3.A It is senseless and irresponsible to spend billions on a facility which, by the time it is completed in 2018, will no longer be needed because the US stockpile of "life extended" warheads will exceed the number allowed by the START treaty at that point.  
 3|12.H I am also very concerned about the 2,500 jobs that would be lost in Oak Ridge with the new facility, since it would be largely automated.

Thank you for your consideration of these points.

Jennifer Murphy  
 95 Blue Ridge Ave.  
 Asheville, NC 28806

Unlimited Disk, Data Transfer, PHP/MySQL Domain Hosting  
<http://www.doteasy.com>

1

## Myers, Stacy

Page 1 of 1

WD052

**From:** Stacy Myers [scmyers@msn.com]  
**Sent:** Friday, December 11, 2009 2:09 PM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** Modernization of Y-12

Dear Ms. Gorman,

- 1|3.B I am writing in support of the future modernization of the Y-12 plant in Oak Ridge, TN. Specifically I would like to speak in support of the construction and operation of a new uranium processing facility (UPF) that would have a reduced capacity while maintaining all enriched uranium processing capabilities. In addition I would like to speak in support of a new Complex Command Center (CCC).  
 2|13.0 Currently it is my understanding that even if we do not build any new nuclear weapons, we have a 20 year backlog of work in dis-assembly that would require a UPF. It seems obvious to me that the Y-12 facility is the most appropriate place to do that. We have the space, technology, and people that understand this vital work.  
 In addition, I would support the construction of a new emergency management facility generally referred to as the Complex Command Center (CCC). For many reasons that I am sure you have heard, this facility should be built on an easily accessible site, be on the public tax rolls, and capitalize on the sizable investment already made in emergency management on the Oak Ridge Reservations.

Thank you for your time and the opportunity to express this support.

Stacy C. Myers

Stacy C. Myers, Ph.D., President Advanced Management, Inc. 1936 Oak Ridge Turnpike Oak Ridge, TN 37830 Phone: 865-483-9500 Fax: 865-483-6655 Email: [scmyers@msn.com](mailto:scmyers@msn.com) Web: [www.ami-tn.com](http://www.ami-tn.com)

1

Nobles, Jim

Nobles, Jim

Page 1 of 2

Page 2 of 2

MD034



Draft Y-12 Site-wide  
Environmental Impact Statement—  
U.S. Department of Energy  
National Nuclear Security Administration



NNSA  
National Nuclear Security Administration

**Written Comment Form**  
*Must be received on or before January 29, 2010.*

113.0 *My name is Jim Nobles, a resident of Anderson County and the city of Clinton. I'd like to express my support for NNSA's preferred alternative — construction of a new UPF and a new CCC.*

213.B *A new UPF is needed for the continued protection of the environment, its citizens, our nation, and in fact, the world. The processes used to work with materials that have become foundational to the protection and position of our country have improved through advances in knowledge and technology. A new facility is required to maintain safety and security, while taking advantage of efficiencies that have not been available before.*

*The benefits of a new UPF will also be seen in the form of deterrence. Our country is where it is today, a recognized world leader, free, offering unlimited opportunities for all who would choose to reside here, largely because of the responsibility and commitment to develop certain resources and use them responsibly. To think that Oak Ridge, East Tennessee, or the USA would be better off with less capability in this area,*  
Please use other side if more space is needed.

Comment forms may be mailed to:  
Ms. Pam Gorman  
Y-12 SWEIS Document Manager  
800 Oak Ridge Turnpike, Suite A-500  
Oak Ridge, TN 37830

Comment forms may be faxed to:  
(865) 483-2014  
or sent by email to:  
y12sweis.comments@tetratech.com

You may also submit comments through the project website which can be found at:  
<http://www.Y12sweis.com>



Draft Y-12 Site-wide  
Environmental Impact Statement—  
U.S. Department of Energy  
National Nuclear Security Administration



NNSA  
National Nuclear Security Administration

**Written Comment Form**  
*Must be received on or before January 29, 2010.*

213.B (cont) *while optimistic, is impractical and somewhat naive. In fact, by having the opportunity to comment on this alternative, is a testimony to the value and importance of us maintaining an adequate nuclear capability. Consequently, it is not only necessary, but imperative, that we further develop our capabilities to safely and more efficiently process uranium and other materials required not only for the enduring security of the USA, but to ensure the continued quality of life that we all have come to enjoy and expect.*

*Jim Nobles*  
*105 Spynass Ct.*  
*Clinton, TN 37716*

Please use other side if more space is needed.

Comment forms may be mailed to:  
Ms. Pam Gorman  
Y-12 SWEIS Document Manager  
800 Oak Ridge Turnpike, Suite A-500  
Oak Ridge, TN 37830

Comment forms may be faxed to:  
(865) 483-2014  
or sent by email to:  
y12sweis.comments@tetratech.com

You may also submit comments through the project website which can be found at:  
<http://www.Y12sweis.com>

O'Neil, Kay

Page 1 of 1

WD075

**From:** Sisters Michelle & Kay [sistersmandk@mchsi.com]  
**Sent:** Monday, January 25, 2010 2:21 PM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** Form posted from Windows Internet Explorer.

firstName=Kay  
 lastName=O'Neil  
 organization=Presentation Sisters Justice [email=sistersmandk@mchsi.com](mailto:sistersmandk@mchsi.com)  
 address1=203 Swan Street  
 address2=  
 city=Le Sueur  
 state=MN  
 zip=56058  
 country=  
 subject=Draft Y-12 SWEIS

19.C comments=We are praying and begging you to halt new nuclear weapons projects. Our U.S. nuclear weapons policies appear to be running in contrary directions. President Obama has a vision for nuclear disarmament--so do we! These plans for Oak Ridge will not contribute to disarmament. We have visited Oak Ridge and have carefully studied and prayed about these plans!NO NO NO...As Dr. Martin Luther King said the night before his assassination: "It is no longer a choice between violence and nonviolence. It is nonviolence or non-existence!" Please put your energies in the new moment for nuclear disarmament, not nuclear advancement.  
 214.0 peace, Sister Kay O'Neil

1

Oehler, Susan

Page 1 of 1

MD027

December 7, 2009

Pam Gorman  
 Y-12 SWEIS Document Manager  
 Y-12 Site Office  
 800 Oak Ridge Turnpike, Suite A-500  
 Oak Ridge, TN 37830

Dear Ms. Gorman:

113.A I want to see a world free of nuclear weapons. I think all the children of the world have a right to live without fear or harm from nuclear weapons. In light of that goal, I think there is no need to build a new bomb plant at Oak Ridge. I also do not believe there is any need to refurbish old warheads or provide modifications to extend the life of current warheads.

219.A I would like to see you follow an alternative that reflects the current policy of the US as expressed by President Obama -- that is passive curatorship of the current stockpile to assure safety and security. This can be done in the same facilities currently at Y-12 by upgrading and consolidating the facilities.

311.E There is no need for a new uranium bomb plant. If we continue with building and updating nuclear weapons, then so will Russia, and nuclear proliferation will continue. A policy that attempts to discourage other nations from pursuit of nuclear capability while expanding our own capacity to proliferate our own arsenal is duplicitous and inevitably counterproductive.

419.B The future of Oak Ridge is in dismantling tens of thousands of nuclear weapons. I hope this is the path you choose to follow.

Thank you for your time.

Sincerely,



Susan Oehler  
 2605 Vineyard Blvd  
 Asheville NC 28805

Oliver, Ann

Page 1 of 1

MD006

Please consider my request for your endorsement of OREPA's Alternative 6.

I strongly object to war weapons in this day of no-win, over priced, high civilian casualty, in-humane, and arrogant-seeming conflicts.

Thank you for this opportunity to speak. Sincerely, Ann McCulloch Oliver

Ownby, Greta

Page 1 of 1



Draft Y-12 Site-wide Environmental Impact Statement— U.S. Department of Energy National Nuclear Security Administration



Written Comment Form

Must be received on or before January 29, 2010.

117.0

I support the preferred alternative (4) for the Uranium Processing Facility at the Y12 Plant in Oak Ridge, TN.

Greta Ownby 234 Park Meade Place Oak Ridge, TN 37830

Please use other side if more space is needed.

Comment forms may be mailed to: Ms. Pam Gorman Y-12 SWEIS Document Manager 800 Oak Ridge Turnpike, Suite A-500 Oak Ridge, TN 37830

Comment forms may be faxed to: (865) 483-2014 or sent by email to: y12sweis.comments@tetrattech.com

You may also submit comments through the project website which can be found at: http://www.Y12sweis.com

Owsley, John

Page 1 of 3



MD063

STATE OF TENNESSEE  
DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
DOE OVERSIGHT DIVISION  
761 EMORY VALLEY ROAD  
OAK RIDGE, TENNESSEE 37830-7072

January 25, 2010

Pam Gorman  
Y-12 Site Office  
800 Oak Ridge Turnpike  
Suite A- 500  
Oak Ridge, TN 37830

Dear Ms. Gorman

**National Environmental Policy Act (NEPA), Draft Site-Wide Environmental Impact Statement (SWEIS) for the Y-12 National Security Complex (DOE/EIS-0387)**

The Tennessee Department of Environment and Conservation, DOE Oversight Division has reviewed the above subject document in accordance with the NEPA-associated regulations of 40 CFR 1500-1505 and 10 CFR 1021, as implemented.

**General Comments**

17.0 DOE's preference for Alternative 4 seems reasonable.

Discussions of disposal of LLW and MLLW should include more potential options for disposing of this waste.

The status of down-blending operations at Y-12 is difficult to discern from the document. Will the proposed UPF include increased down-blend capacity?

**Specific Comments**

2|2.G **Section. 3.2.2.1.1**  
Is ARGUS an acronym? If so, please define.

**Section. 3.3.5**  
Is the area in which the construction is taking place contaminated with mercury (Hg)? Will soils excavated during construction require treatment?

**Page 4-84 Groundwater Treatment Facility paragraph**  
Please correct the sentence in the paragraph that reads as follows: "The Groundwater Treatment Facility treats wastewater from the Liquid Storage Facility at Y-12 seep water collected at East

Owsley, John

Page 2 of 3

Gorman Letter Page 2  
January 25, 2010

Chestnut Ridge waste piles to remove Volatile Organic Compounds (VOCs), non-VOCs, and iron and elsewhere." Please clarify the "and elsewhere" portion of this sentence.

**Table 5.12.2.2-4. Current Fish Advisories page 5-79**  
This table is not correct because the reservoirs do not match with the counties as listed. Please correct the information.

2|2.G cont.

**Section. 5.3**  
The power requirements are presented as annual usage in Table 5.1.1-1 but are presented as monthly consumption for Alt 2 and as a percentage of the No Action alternative usage for all the other alternatives. These numbers should be presented on a consistent basis to facilitate comparison between alternatives.

**Section. 5.7.2.2 Operation**  
This section states that the UPF operation would require 105 million gallons of water per year, about 5 percent of the 2 billion gallons required by Alt 1. It goes on to say that overall use would decrease from 2 billion gallons per year to 1.3 billion gallons per year. If overall use and operations for the No Action alternative are the same (2 billion gallons per year), how come the UPF alternative increases overall use by 1.2 billion gallons per year? If the UPF operation requires only 5 percent of the No Action Alternative water usage, will the discharges into East Fork Poplar Creek (EFPC) also be 5 percent of the current discharge? How will this affect the raw water addition from the Clinch and what will be the impacts of this on EFPC? The effects of reduced discharges also need to be evaluated for Alternatives 4 and 5.

**Table 5.13-1**  
Why would the document show the 2007 baseline waste generation as the construction waste for Alternative 1? The next table shows the same numbers as operations waste. If there is no construction involved in implementation of the No Action Alternative, then the column entries should say "None" rather than presenting the operations generated waste as construction generated.

**Page 5-16, Paragraph 4, Line 2**  
The number of monitored workers for the Capability-sized UPF Alternative given here (about 3,680) does not agree with the number of monitored workers for that alternative given in Table 3.2.4-1 on page 3-24 (i.e., 1,825).

**Page 5-16, Paragraph 6, Line 2**  
As above for the Capability-sized UPF Alternative, the number of monitored workers for the No Net Production/Capability-sized UPF Alternative (about 3,300) does not agree with the number of monitored workers for that alternative given in Table 3.2.5-1 on page 3-25 (i.e., 1,600).

Owsley, John

Page 3 of 3

Gorman Letter  
January 25, 2010

Page 3

**Page 5-57, Paragraphs 1, 3 & 4**

For the UPF Alternative, Capability-sized UPF Alternative, and No Net Production/Capability-sized UPF Alternative, it is indicated that "Water usage for operations would be the same as the No Action Alternative". This does not seem to be true as annual water usage at Y-12 for the three alternatives is significantly less than for the No Action Alternative.

2/2.G  
cont.

**Page 5-79, Table 5.12.2.2-4, Current Fish Advisories**

All the information provided for Melton Hill Reservoir is actually data for Fort Loudon Reservoir, which was not included in this Table. Fort Loudon Reservoir should be included here and the data for Melton Hill Reservoir corrected.

If you have any questions concerning these comments, please contact Chudi Nwangwa or me at 865-481-0995.

Respectfully

*John A. Owsley*  
John A. Owsley, Director

cc Chuck Head, TDEC  
Mary Parkman, TDEC

jao966

Patterson, Devin

Page 1 of 1



Draft Y-12 Site-wide  
Environmental Impact Statement—  
U.S. Department of Energy  
National Nuclear Security Administration

OR2D06  
**NNSA**  
National Nuclear Security Administration  
SUBMITTED BY:  
DEVIN PATTERSON  
100 UNION VALLEY  
OAK RIDGE, TN  
37830

**Written Comment Form**

Must be received on or before January 29, 2010.

DEVIN PATTERSON - NETGAIN CORPORATION.  
NETGAIN CORPORATION HAS APPROXIMATELY 150  
EMPLOYEES DISTRIBUTED ACROSS SEVERAL NNSA SITES  
INCLUDING THE NNSA SERVICE CENTER, Y-12, AND  
LAS VEGAS  
~~NETGAIN~~ NETGAIN SUPPORTS A LARGE OF  
PERSONNEL SECURITY, SUBSTANCE ABUSE TESTING,  
AND OCCUPATIONAL HEALTH SERVICES FOR THE  
NNSA AND PROTECTION OF SPECIAL NUCLEAR  
MATERIALS.  
NETGAIN CORPORATION WHOLLY SUPPORTS EFFORTS  
TO INCREASE NUCLEAR MATERIAL PROTECTION,  
NON PROLIFERATION, AND HUMAN RELIABILITY  
AND PERSONNEL SECURITY PROGRAMS FOR THE  
NNSA Y-12 SITE AND THE NNSA IN ITS ENTIRETY.

1113.0

-DEVIN PATTERSON

Please use other side if more space is needed.

Comment forms may be mailed to:  
Ms. Pam Gorman  
Y-12 SWEIS Document Manager  
800 Oak Ridge Turnpike, Suite A-500  
Oak Ridge, TN 37830

Comment forms may be faxed to:  
(865) 483-2014  
or sent by email to:  
y12sweis.comments@tetrattech.com

You may also submit comments through the project website which can be found at:  
<http://www.Y12sweis.com>

Peterson, Allan

Page 1 of 1

WD010

From: [REDACTED]  
 Sent: Allan Peterson [apeterson71@mchsi.com]  
 Tuesday, November 17, 2009 3:34 PM  
 To: DIV.Y12SWEIS.Comments  
 Subject: No New Bomb Facility for Oak Ridge

firstName=Allan  
 lastName=Peterson  
 organization=  
[email=apeterson71@mchsi.com](mailto:apeterson71@mchsi.com)  
 address1=5397 Soundside Drive  
 address2=  
 city=Gulf Breeze  
 state=FL  
 zip=32563  
 country=United States  
 subject=Draft Y-12 SWEIS  
 comments=I am against the building of an enormous and enormously expensive facility that will spur another  
 13.A pointless arms race.  
 We hardly need a larger arsenal and "streamlining" is no rationale.  
 No more bombs no more militaristic solutions to everything.  
 21.E Building more nuclear capability while decrying other country's attempting to do the same is  
 counterproductive and hypocritical.

Phillips, J.L.

Page 1 of 1

MD054



Draft Y-12 Site-wide  
 Environmental Impact Statement—  
 U.S. Department of Energy  
 National Nuclear Security Administration



Written Comment Form

Must be received on or before January 29, 2010.

15.0 I would like to support option #2.  
 It would be vital to the economic  
 health of our area. We (Y-12) are the  
 most qualified site for UFT.

Thank you  
 J.L. Phillips # 51359

Please use other side if more space is needed.

Comment forms may be mailed to:  
 Ms. Pam Gorman  
 Y-12 SWEIS Document Manager  
 800 Oak Ridge Turnpike, Suite A-500  
 Oak Ridge, TN 37830

Comment forms may be faxed to:  
 (865) 483-2014  
 or sent by email to:  
[y12sweis.comments@tetratech.com](mailto:y12sweis.comments@tetratech.com)

You may also submit comments through the project website which can be found at:  
<http://www.Y12sweis.com>

Pomerat, Dixie

Page 1 of 1

WD089

**From:** D Pomerat [pommill@bellsouth.net]  
**Sent:** Wednesday, January 27, 2010 1:07 PM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** Build Jobs Not Bombs

19.A | Don't build a costly, high-maintenance nuclear facility here. Build the OREPA alternative 6, which would cost 100 million and would not include the actual making of nuclear bombs in Oak Ridge.

Dixie Pomerat

Price, Jr., James

Page 1 of 1

MD038

To whom that will take the time to read with an open mind.

1|13.B | I am very proud of this country and feel we have things here under control with the technology and the ability to protect her and all she stands for. The infrastructure required to maintain the stability of this country is becoming weathered and out dated. The need to reinforce the security and technology for these processes will require us to move forward to insure we not only continue to grow and maintain stability for our own but for the others around this ever changing world that depend on us having the ability to protect freedom. We as others do not ever want to make the decision to deploy equipment that has the ability to devastate others. But in the world as it is today the need to have if only as a deterrent is a necessity. My father once told me a man that wants a war in most cases has never been in one. I feel the United States having the ability to defend from major aggression has played a large part in keeping this country free. We cannot turn our backs on all that have served and defended and gave their lives for this county and many other countries. The thing that keeps us going is, when we look behind us America is there. I would hate to think how it would have all turned out if we had not used this technology to defend ourselves and all that was saved from the aggression in WWII.

2|13.0 | I hope I have addressed the issue at hand and the need for this country to go forward and continue to maintain the ability to defend. The need is now, process facilities and infrastructure are becoming obsolete, costly to maintain and unsafe. The Y12 team has been working on an approach to takes us into the future needs of this process. Help us continue our progress and allow this project to move forward.

We have elected all of you as our voice and as our protectors. Give us the ability to contribute to the protection of those that live and choose to live in Freedom and Democracy.

Just one more team of proud Americans doing the best we can. Signed: James H. Price Jr.

Ragsdale, Michael

Page 1 of 1

MD009



**OFFICE OF COUNTY MAYOR MIKE RAGSDALE**

---

400 Main Street, Suite 615, Knoxville, TN 37902

November 12, 2009

Ms. Pam Gorman  
Y-12 SWEIS Document Manager  
Y-12 Site Office  
800 Oak Ridge Turnpike, Suite A-500  
Oak Ridge, TN 37830

Dear Ms. Gorman,

I am writing you in support of the proposed Uranium Processing Facility (UPF) at the Y-12 National Security Complex in Oak Ridge. This facility will be another anchor to the modernization initiative currently underway at Y-12. The draft Site-Wide Environmental Impact Statement (EIS) presents this as the preferred option from several alternatives considered. This letter documents Knox County's full support of this preferred capability based option.

Knox County with a population of 420,000 currently is home to about 45% of the DOE and NNSA regional workforce. Our county and region have always been strong supporters of the uranium processing and nuclear related missions of the Oak Ridge complex. Our region has invested in the development of a highly skilled workforce that has always been responsive to the safe conduct of the operations associated with these missions for more than 60 years. We are prepared to continue to fully support such missions and to continue to invest in regional workforce development that is required for these operations. We do believe that Y-12's continued role in manufacturing and disassembling nuclear warhead components should be conducted in modernized facilities with cost effective and safety focused processes. We think this preferred option of a new UPF achieves this objective.

Thank you for your consideration of these comments. Please include them in the official record of this EIS.

Best Regards,



Mayor Ragsdale  
Knox County Mayor

MRR.krm

cc: Ted Sherry  
Congressman John Duncan  
Congressman Lincoln Davis  
Congressman Zach Wamp  
Senator Bob Corker  
Senator Lamar Alexander

Reaves, Candance

Page 1 of 1

WD012

**From:** Candance Reaves [bardgirl@mac.com]  
**Sent:** Tuesday, November 17, 2009 2:06 PM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** conformation

firstName=Candance  
lastName=Reaves  
organization=  
[email=bardgirl@me.com](mailto:bardgirl@me.com)  
address1=1451 Ellejoy Rd.  
address2=  
city=Seymour  
state=TN  
zip=37865  
country=USA  
subject=Draft Y-12 SWEIS

comments-I am very opposed to ANY new weapons involving nuclear power. The world is a fragile enough place right now for more of this madness to continue. I vote. I speak out, and I will oppose this project.  
drafts=Draft SWEIS Summary

1

Reiter, Jendi

Page 1 of 1

WD015

From: Jendi Reiter [JBReiter@aol.com]  
Sent: Tuesday, November 17, 2009 3:47 PM  
To: DIV.Y12SWEIS.Comments  
Subject: Form Post from Firefox

firstName=Jendi  
lastName=Reiter  
organization=  
email=[JBReiter@aol.com](mailto:JBReiter@aol.com)  
address1=351 Pleasant St.  
address2=PMB 222  
city=Northampton  
state=MA  
zip=01060  
country=USA  
subject=Draft Y-12 SWEIS

1|10.D | comments=I am writing to oppose the proposed nuclear weapons complex in Oak Ridge, TN. Especially during  
2|14.0 | this time of fiscal crisis, we should spend our taxpayer dollars on healthcare and adequate food and shelter for  
the poor, not on stockpiling more weapons that could wipe out life on earth.

Rickenbach, Nancy

Page 1 of 1

WD091

From: wrtavi@charter.net  
Sent: Wednesday, January 27, 2010 3:23 PM  
To: DIV.Y12SWEIS.Comments  
Subject: Draft Y-12.SWEIS

1|14.0 | Don't build anymore weapons of mass destruction. Convert Y12 to peaceful purposes. We already have  
enough bombs. Stop the madness. President Obama supports the push toward greater nuclear disarmament.  
2|9.c | This proposal is going against this sentiment. We Americans have so many problems to solve, people to help,  
peace to achieve. Stop the bombs.  
Nancy Rickenbach  
1144 N. Panther Creek Rd.  
Sevierville, TN 37876

Rimel, George

Page 1 of 1

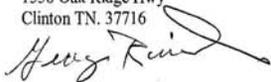
OR2D05

11/18/09

For the record, my name is George Rimel I live within six miles of the Y-12 plant .I spend most of my paycheck within twenty miles of Y-12 plant Oak Ridge TN. I have spent the Last (34) years proudly making BOMBS not to be used, but as a deterrent.

Freedom is not free and whatever the price of Option # 4 is it is cheap. I witnessed many religious and emotional appeals as to the Evils of the bomb making business and those who work in the trade that we cause harm to the environment and that little children to have nightmares. The truth is that option # 4 will maintaine the Status-Quo in World politics and in defense Of the UNITER STATES of AMERICA to who I freely give my total support. I have been inside most of the buildings in Y-12 and will testify under oath that the workforce does a superb job with resources allotted to them. Since 1977 when I started, the workforce Health/Safety and environmental issues have risen to the top and exceed any other place that I have worked. The need for a new and modern facility is paramount to the mission of National Defense, Environmental clean up and cost effectiveness of private business model. As we debate this issue, men, women, children, and the environment is dying not from Nuclear Bombs but at the hands of evil men who plan the same for us. The Nuclear deterrent is the gate keeper to freedom of this nation and entire world. I believe we have demonstrated good stewardship of our arsenal as (0) used since Japan.

Thank you,  
George Rimel  
1538 Oak Ridge Hwy  
Clinton TN. 37716



Roberts, Stan

Page 1 of 1

WD001

**From:** Roberts, Stan L (XRT) [robertssl@y12.doe.gov]  
**Sent:** Wednesday, October 28, 2009 5:25 PM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** Form posted from Windows Internet Explorer.

firstName=Stan  
lastName=Roberts  
organization=  
[email=roberts616@comcast.net](mailto:email=roberts616@comcast.net)  
address1=510 Melton Hill Dr  
address2=  
city=Clinton  
state=TN  
zip=37716  
country=  
subject=Draft Y-12 SWEIS

comments=As a resident of Anderson County, I strongly support the recommendations made in the Draft SWEIS related to Y-12 and its future operations, including building the UPF at Y-12.

**Roberts, Stan**

**Page 1 of 1**

**WD005**

**From:** Roberts, Stan L (XRT) [robertssl@y12.doe.gov]  
**Sent:** Thursday, November 12, 2009 1:05 PM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** sweis-in favor of alternative 2

1|5.0 | I am an Anderson County resident and I fully support Alternative 2- build the UPF and the CCC.

Stan Roberts  
510 Melton Hill Dr  
Clinton TN 37716

**Roe, Donald**

**Page 1 of 2**

**WD046**

**From:** Don Roe, Attorney [roelaw@bellsouth.net]  
**Sent:** Tuesday, December 01, 2009 1:55 PM  
**To:** DIV.Y12SWEIS.Comments  
**Cc:** williamssmf@y12.doe.gov  
**Subject:** Y-12 Site Wide Environmental Impact Statement  
**Attachments:** Public Comment on Y12 Site Wide EISStatement in Support of.pdf

I am submitting the attached comments regarding the subject EIS.

Donald B. Roe, Attorney

Roe, Donald

Page 2 of 2

WD046

**Public Comment on Y-12 Site Wide EIS  
Statement in Support of UPF**

**Donald B. Roe**

I am a resident of Oak Ridge, Tennessee, and have lived here since 1947. I am an attorney currently in private practice in Oak Ridge. I have previously worked during the 1970's at the Y-12 Plant and the K-25 Plant. Therefore, I have some knowledge of the work at these plants.

I fully support Alternative 4, "Capability-Sized UPF Alternative" for the following reasons:

1. Y-12 has been in operation dealing with highly enriched uranium and production of related parts for nearly 67 years. This plant has extensive experience in working with enriched uranium processing and has been a safe and secure location for those activities.
2. The community in Oak Ridge is experienced with enriched uranium processing, understands from a layman's point of view this type of operation, and has confidence in the process.
3. The community is supportive of the nation's nuclear energy and defense programs.
4. The nation needs, and will continue to need, the technology and expertise connected with enriched uranium processing. The Y-12 Site is the most logical and economic site for these facilities. Nearby ORNL will enhance the research activities that may be connected with Y-12.
5. Construction of a new Complex Command Center to house Y-12's site and emergency management operations is essential. Modernization of these activities will provide better security and safety.
6. Maintaining all enriched uranium processing capabilities is crucial to our country. Failure to keep these capabilities would result in technology being developed in other parts of the world that would render us dependant on foreign countries.
7. The Y-12 Plant was the first to provide enriched uranium processing, and should continue to be the leader in this field.

Respectfully submitted,

\_\_\_\_\_  
Donald B. Roe  
14 Kentucky Ave  
Oak Ridge, TN 37830

Rohlf, Gerard

Page 1 of 1

WD017

**From:** Rohlf, Gerard [gerard.rohlf@fiserv.com]  
**Sent:** Tuesday, November 17, 2009 5:59 PM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** Form posted from Windows Internet Explorer.

firstName=Gerard  
lastName=Rohlf  
organization=  
[email=gerard.rohlf@fiserv.com](mailto:gerard.rohlf@fiserv.com)  
address1=503 Greendale Avenue  
address2=  
city=Pittsburgh  
state=PA  
zip=15218  
country=Allegheny  
subject=Draft Y-12 SWEIS

1|3.A |comments=Don't do it! We are trying to reign in the proliferation of nuclear weapons. That is what needs to be done. Building a new facility to fabricate more of these monstrous creations is like an insane vision dreamed by a lunatic. Just don't do it!

Roquemore, Wayne

Page 1 of 1

WD081

From: Wayne Roquemore [wroquemore@lawlerwood.com]  
 Sent: Tuesday, January 26, 2010 9:38 AM  
 To: DIV.Y12SWEIS.Comments  
 Subject: Y-12 SWEIS

Ms. Pam Gorman:  
 Y-12 SWEIS Document Manager  
 800 Oak Ridge Turnpike  
 Suite A-500  
 Oak Ridge, TN 37830

Dear Ms. Gorman:

17.0 On behalf of Lawler-Wood Y-12, LLC and myself, I am writing to express support for the Capability-Sized UPF Alternative. I have heard many of the comments for and against a new UPF. The arguments against a new UPF, while admirable in their intent, are not grounded in facts or reality. Nuclear weapons will be a part of the international landscape for many, many years. As long as the U.S. maintains a nuclear arsenal, we need a capability-sized UPF. If we continue to reduce the stockpile, we need a capability-sized UPF. If we eliminate all nuclear weapons from the arsenal, we need to maintain the capability to enrich uranium. The current facilities are old, unsafe, inefficient, expensive to operate and maintain and very expensive to secure.

213.B Having a uranium processing capability is essential for national security. I believe a new capability- sized UPF is the best option to meet our national security goals. I strongly recommend modernization of Y-12 to support the Stockpile Stewardship Program and the construction of a Capability-Sized UPF.

Thank you for the opportunity to express my opinion and that of Lawler-Wood Y-12, LLC.

/signed/  
 J. Wayne Roquemore, President  
 Lawler-Wood Y-12, LLC

Wayne Roquemore  
 Lawler-Wood, LLC  
 865-549-7475  
[wroquemore@lawlerwood.com](mailto:wroquemore@lawlerwood.com)

Ross, Ann

Page 1 of 1

MD015



Draft Y-12 Site-wide  
 Environmental Impact Statement—  
 U.S. Department of Energy  
 National Nuclear Security Administration



Written Comment Form

Must be received on or before January 29, 2010.

1|13.0 I support bringing the Y-12 Uranium  
 Processing Facility to Oak Ridge, TN.  
 2|12.H I think it will be a huge asset  
 to our area, our economic development &  
 would match up well with the other  
 1|13.0 programs, research & development already  
 (cont) taking place in the Oak Ridge  
 area.

Ann Ross

Please use other side if more space is needed.

Comment forms may be mailed to:  
 Ms. Pam Gorman  
 Y-12 SWEIS Document Manager  
 800 Oak Ridge Turnpike, Suite A-500  
 Oak Ridge, TN 37830

Comment forms may be faxed to:  
 (865) 483-2014  
 or sent by email to:  
[y12sweis.comments@tetratex.com](mailto:y12sweis.comments@tetratex.com)

You may also submit comments through the project website which can be found at:  
<http://www.Y12sweis.com>

Rugh, Jim

Page 1 of 1

WD080

From: Jim Rugh [jimrugh@mindspring.com]  
 Sent: Tuesday, January 26, 2010 7:43 AM  
 To: DIV.Y12SWEIS.Comments  
 Subject: Form Post from Firefox

firstName=Jim  
 lastName=Rugh  
 organization=  
 email=[jimrugh@mindspring.com](mailto:jimrugh@mindspring.com)  
 address1=451 Rugh Ridge Way  
 address2=  
 city=Sevierville  
 state=TN  
 zip=37876  
 country=USA  
 subject=Draft Y-12 SWEIS  
 comments=America's hypocrisy -- preventing other countries from acquiring nuclear weapons while expanding our own arsenal -- will backfire. It will only encourage others to expand their own capacities to resist US hegemony.

Sabbe, Michael

Page 1 of 1



Draft Y-12 Site-wide  
 Environmental Impact Statement—  
 U.S. Department of Energy  
 National Nuclear Security Administration



Written Comment Form

Must be received on or before January 29, 2010.

1/13.0 I fully support the urgent  
 need to proceed with construction  
 of the UPF and ECC at the  
 Y12 plant.

Michael A. Sabbe  
 M.A. Sabbe

Please use other side if more space is needed.

Comment forms may be mailed to:  
 Ms. Pam Gorman  
 Y-12 SWEIS Document Manager  
 800 Oak Ridge Turnpike, Suite A-500  
 Oak Ridge, TN 37830

Comment forms may be faxed to:  
 (865) 483-2014  
 or sent by email to:  
 y12sweis.comments@tetrattech.com

You may also submit comments through the project website which can be found at:  
<http://www.Y12sweis.com>

Schilken, Rege

Page 1 of 1

WD020

██████████

---

**From:** RegeHSchilken@aol.com  
**Sent:** Tuesday, November 17, 2009 6:05 PM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** Stop nuclear facilities and experimentation!

11.E | Please do unto others as you'd be done to!  
 How dare we tell others to stop building nuclear facilities or experimenting with nuclear weapons when our country continues to increase its technology.  
 One nation under God -- This must have been meant as a joke from our founding fathers.

Let's not make a sham of it!

Schroeder, Helen

Page 1 of 1

WD002

██████████

---

**From:** Robert & Helen Schroeder [hero89@charter.net]  
**Sent:** Thursday, October 29, 2009 10:50 AM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** Form Post from Firefox

firstName=Helen  
 lastName=Schroeder  
 organization=Pax Christi  
[email=hero89@charter.net](mailto:hero89@charter.net)  
 address1=1502 9th Ave, NE  
 address2=  
 city=Rochester  
 state=MN  
 zip=55906  
 country=USA  
 subject=Draft Y-12 SWEIS

114.0 | comments='I'm strongly opposed to the building of this plant. It seems so wrong when we are trying to work toward nuclear disarmament. Think what other countries will think. No wonder they want nukes themselves!  
 | drafts=Draft SWEIS Summary

Scobie, Jill

Page 1 of 1

WD031

**From:** Jill Scobie [jill@scobie.net]  
**Sent:** Wednesday, January 27, 2010 8:26 AM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** Please use OREPA alt 6

1|9.A The last thing we need is a nuclear bomb making facility upgrade at Oak Ridge TN. PLEASE choose OREPA alternative 6.

Thank you,

Jill Scobie  
 248 John Tate Dr  
 Fletcher, NC 28732

1

Sellers, Cynthia

Page 1 of 1

WD095

**From:** CJ S [c.j.sellers.v07@gmail.com]  
**Sent:** Thursday, January 28, 2010 4:06 PM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** Draft Y-12 SWEIS Comments

Draft Y-12 SWEIS comments by Cynthia Sellers, P.O. Box 290, Rutledge, TN 37861

Thank you for the opportunity to comment on the environmental impact of the Y-12 SWEIS. My comments are to the impact of these changes on humans, not just locally but around the world. Many of the proposed changes to Y-12 as shown in the Draft SWEIS take us in the wrong direction at this point in time. Adopting those options would be bad domestically as American citizens are hurting from the recession, lack of insurance coverage, loss of manufacturing jobs and unemployment is high. We still have a rough road ahead toward recovery. This expenditure will not produce more jobs. To spend this much money when Y-12's practical needs could be addressed much more cheaply and effectively and in harmony with President Obama's efforts to reduce the nuclear stockpile, seems like an abuse of the public trust. Further, it sends the wrong message to the world at a time when our image is finally starting to improve due to President Obama's stance regarding nuclear proliferation.

2|1.E We have an opportunity in President Obama to make a clean break from Bush-era militarism and improve our friendship with other countries, allies and potential allies alike. The amount of money spent on this project could be put to much better use. OREPA has put forth a more economical solution in Alternative 6 and it should be fully analyzed in the SWEIS:

3|9.A "Passive curatorship of the current stockpile to assure safety and security can be performed in consolidated, down-sized, upgraded existing facilities at Y-12. An annual throughput of 5 secondaries a year or less is sufficient to provide assurances of the safety, security and reliability of the stockpile as it awaits eventual dismantlement. A new dismantlement facility, with designed-in safeguards and transparency, should be built to accommodate the increased throughput of retired warhead secondaries and cases; the new facility should be sized to accommodate a throughput of the current backlog in 5-7 years and dismantlement of the entire US arsenal in 35-40 years." ~[www.stopthebombs.org](http://www.stopthebombs.org)

Alternative 6 is the only Alternative that reflects the policy goals expressed by the President of the United States:

"In the middle of the last century, nations agreed to be bound by a treaty whose bargain is clear: All will have access to peaceful nuclear power; those without nuclear weapons will forsake them; and those with nuclear weapons will work towards disarmament. I am committed to upholding this treaty. It is a centerpiece of my foreign policy. And I'm working with President Medvedev to reduce America and Russia's nuclear stockpiles."

-President Barak Obama

[http://nobelprize.org/nobel\\_prizes/peace/laureates/2009/obama-lecture\\_en.html](http://nobelprize.org/nobel_prizes/peace/laureates/2009/obama-lecture_en.html)

1

Shelton, Ronald

Page 1 of 1

WD111

From: sheltonron@comcast.net  
 Sent: Friday, January 29, 2010 5:26 PM  
 To: DIV.Y12SWEIS.Comments  
 Cc: sheltonron@comcast.net  
 Subject: Draft y-12 SWEIS Comments

To: Ms. Pam Gorman, Y-12 SWEIS Document Manager

1|7.0 I am writing to voice my complete support for NNSA's preferred alternative - the number 4 Capability-Sized UPF Alternative.

As a mechanical engineer, I have spent a wonderful career in aerospace and manufacturing. I am retired from Oak Ridge National Laboratory and continue to live in Oak Ridge. I maintain a strong interest in the engineering world, mentoring and supporting young people with an interest in science and technology.

Since 1995, the infusion of new Y-12 managerial talent and the creation of NNSA has brought about the highest level of competent workforce and forward looking vision. The successful completions of the Jack Case Center, New Hope Center, and HEUMF are a tribute to that vision and hard work. The brain drain has ended, the ability to competitively hire young staff has been created.

The UPF project is critical to the US. It modernizes nuclear manufacturing operations and reduces operations cost for the nuclear complex. There is not one other major project that so dramatically demonstrates responsible stewardship by the US government.

2|13.0 Most importantly, this project goes to the core of freedom and security for this country. In the absence of a viable nuclear manufacturing capability the US puts itself at risk as a free and secure nation. If this project is not carried forward the US will become vulnerable to those nations that do have such capability.

The UPF project has been thoroughly planned, researched, and critiqued. It is vital to the best interests of this nation and must go forward with the highest level of support.

Best Regards,  
 Ronald L. Shelton, PE  
 29 Riverside Dr.  
 Oak Ridge, TN 37830

1

Shults, Wilbur

Page 1 of 2

MD026

### Coalition of Oak Ridge Retired Employees (CORRE)

P. O. Box 4266  
 Oak Ridge, Tennessee 37831-4266

December 17, 2009

Ms. Pam Gorman  
 Y-12 SWEIS Document Manager  
 Y-12 Site Office, NNSA  
 800 Oak Ridge Turnpike, Suite A-500  
 Oak Ridge, Tennessee 37830

Dear Ms. Gorman:

#### Resolution in Support of Proposed Uranium Processing Facility at Y-12

I submitted a statement supporting the proposed Uranium Processing Facility at Y-12, i.e., Alternative Four: the Capability-Sized UPF, during the public meeting at the New Hope Center on October 18, 2009. That statement was an expression of my support as an individual.

1|13.0 The attached formal resolution is an expression of similar support from the Board of Directors, hence the membership, of the Coalition of Oak Ridge Retired Employees. CORRE is comprised of approximately 12,000 former employees of Department of Energy facilities in Oak Ridge, Tennessee.

Please include this resolution in the appropriate document database.

Sincerely,



Wilbur D. Shults, PhD  
 President

#### Information Copies:

Gerald G. Boyd, DOE-ORO  
 Ted Sherry, NNSA  
 Darrel Kohlhorst, B&W Y-12  
 Thom Mason, ORNL

**Working for Fair and Equitable Retirement Benefits for Former Employees of K-25, Y-12, and ORNL, and Grandfathered Employees of Bechtel Jacobs and Wackenhut**

Shults, Wilbur

Page 2 of 2

**COALITION OF OAK RIDGE RETIRED EMPLOYEES**  
**P.O. Box 4266**  
**Oak Ridge, Tennessee 37831-4266**

RESOLUTION supporting construction of a new uranium processing facility (UPF) at the Y-12 National Security Complex (NSC), Oak Ridge, TN.

WHEREAS, maintaining the security, safety, and reliability of the nation's nuclear stockpile is the responsibility of the National Nuclear Security Administration (NNSA); and

WHEREAS, the Y-12 National Security Complex in Oak Ridge, Tennessee, is a critical facility within the NNSA and the Department of Energy; and

WHEREAS, the chemical processing of uranium is central to the programmatic operations assigned to the NSC; and

WHEREAS, current facilities for chemical processing of uranium at the NSC are World War II vintage, expensive to operate and maintain, and inconsistent with modern equipment and methodology; and

WHEREAS, five separate alternatives for addressing the needs for appropriate chemical processing facilities at NSC have been developed, evaluated, and presented in public hearings; and

WHEREAS, the preferred alternative ("Alternative Four: The Capability-Sized Alternative") will provide the necessary capabilities at minimal cost, in modern facilities, and with optimized security and safety; and

WHEREAS, the Coalition of Oak Ridge Retired Employees (CORRE) is an organization comprised of approximately 12,000 retirees of DOE's Oak Ridge facilities, many of whom are intimately familiar with chemical operations at NSC; now, therefore:

BE IT RESOLVED BY THE BOARD OF DIRECTORS OF THE COALITION OF OAK RIDGE RETIRED EMPLOYEES that the membership of this organization does hereby express strong and sustained support for Alternative Four as the best option for providing chemical processing facilities (and hence capabilities) at the NSC, and we urge the NNSA and DOE to:

1113.0  
(cont)

- (a) adopt the Capability-Sized Alternative as proposed in the draft Site-Wide Environmental Impact Statement presented in a public hearing on October 28, 2009; and
- (b) construct a new Complex Command Center (CCC) as proposed in Alternatives 2-5 of the draft Site-Wide Environmental Impact Statement presented in public hearing on October 28, 2009.

APPROVED by the Board of Directors, December 5, 2009.

*Wilbur D. Shults*  
 Wilbur D. Shults, PhD  
 President

Shults, Wilbur

Page 1 of 1

OR2D09

1113.0 My name is Wilbur D. Shults. I am a retiree from ORNL and currently the president of the Coalition of Oak Ridge Retired Employees, aka CORRE. I anticipate that CORRE will submit a written statement of support for locating the UPF at Y-12, but I speak now as a supporting individual. For many years, I was Director of the Analytical Chemistry Division at ORNL. Most of the work of my division was located at X-10, but I had a Section of approximately 30 technical people stationed at Y-12. Accordingly, there was much interaction and cooperation between my people and the chemists at Y-12. They helped us at times and we helped them at times. Our missions were different, but our technical fields had much in common and that fact paid off for both parties many, many times.

1113.0 (cont) There are many reasons for locating the UPF at Y-12 and those reasons will be iterated repeatedly during these hearings. The point I want to make is that there are terrific technical reasons for locating the UPF at Y-12 because it will be within easy collaborating distance of ORNL. It is always helpful to be able to go to another person who works in the same discipline, or a parallel discipline, for technical discussions and sometimes even for light experimentation. It is always helpful to have a wide array of instrumentation and expertise close at hand. There is a natural synergism that benefits both parties. The benefits accrue in the present tense when there are difficult problems to solve and they accrue in the future tense as science advances.

I strongly support the Capability-Sized UPF Alternative. I believe it offers the best option for the country, both now and in the decades ahead.

*Submitted by Wilbur D. Shults, PhD  
 in lieu of verbal input during the  
 public hearing of Nov. 18, 2009.*

Sizemore, Sara

Page 1 of 1

WD067

██████████

---

**From:** Sara Sizemore [sara@southernsafety.com]  
**Sent:** Wednesday, January 20, 2010 12:11 PM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** Support of UPF

To Whom It May Concern:

1113.0 | This is to place our support of the UPF at the Y-12 NNSA facility in Oak Ridge, Tennessee. After following the goals and desires of Y-12 over several decades, it is evident that they are on track to make significant reductions in their post-Cold War footprint while increasing efficiency and lean operations. It seems at great odds to hinder a program that has such great potential, such lengthy reviews and studies, and such a concrete plan to achieve this goal. In comparison, you have ETTP (formerly K-25) which is a huge problem as evidenced by multiple contractors being unable to perform the desired outcome due to poor planning, little insight, and no cohesive effort.

Thank you in advance for consideration of our comments and hope to see this site's goals realized within our lifetime.

Sincerely,

*Sara Sizemore*

President

Southern Safety Supply, LLC

[www.southernsafety.com](http://www.southernsafety.com)

865.673.0140

1.865.673.0145

Toll Free: 1.866.417.7963

"A democracy will continue to exist up until the time that voters discover they can vote themselves generous gifts from the public treasury. From that moment on, the majority always vote for the candidates who promise the most benefits from the public treasury, with the result that every democracy will finally collapse due to loose fiscal policy, which is always followed by a dictatorship." -- Alexander Tyler, University of Edinburgh, 1787

1

Smathers, Linda

Page 1 of 1

WD106

██████████

---

**From:** Linda Smathers [lindasmathers@hotmail.com]  
**Sent:** Friday, January 29, 2010 2:57 PM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** Prefer OREPA Alternative 6

119.A | Pam Gorman, I would like to go on record urging that the OREPA alternative 6 be implemented at Oak Ridge. This country is drowning in debt and we certainly don't need to waste \$3.5 billion on a new nuclear bomb facility in Oak Ridge. \$100 million for alternative 6 is much more palatable especially when we don't need to add "life extended" warheads to our stockpile.

Thank you.

Linda Smathers  
 14 Trevor's Trail  
 Asheville, NC 28806  
 828-667-9439

1

Smick, Charles

Page 1 of 1

MD036



**Draft Y-12 Site-wide  
Environmental Impact Statement—  
U.S. Department of Energy  
National Nuclear Security Administration**



**NNSA**  
National Nuclear Security Administration

**Written Comment Form**  
*Must be received on or before January 29, 2010.*

15.0 I believe that alternative #2 - build a new Uranium Processing Facility and Complex Command Center. I have worked at the USEC facility in Paducah, and expect the current facilities at Y-12 are in as bad a shape, or worse, than the one in Paducah.

213.B From an economic, safety and environmental standpoint the new facility makes the best sense. From a National Security Standpoint, the new upgraded facility is critical for the welfare of the United States. It would also be a great benefit to the country, to build a similar down sized facility at the PGDP, once the facility at Oak Ridge is complete.

315.0

Charles Smick, CI, HM, OHS, CHST  
Sr. Safety Engineer  
MAJ, TN, AON,  
USAR - Ret. Reserves

Please use other side if more space is needed.

Comment forms may be mailed to:  
Ms. Pam Gorman  
Y-12 SWEIS Document Manager  
800 Oak Ridge Turnpike, Suite A-500  
Oak Ridge, TN 37830

Comment forms may be faxed to:  
(865) 483-2014  
or sent by email to:  
y12sweis.comments@tetrattech.com

You may also submit comments through the project website which can be found at:  
<http://www.Y12sweis.com>

Smith, Michelle

Page 1 of 1

WD104

**From:** Michelle Smith [themichellesmith@gmail.com]  
**Sent:** Friday, January 29, 2010 2:53 PM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** prefer the OREPA alternative 6

Dear Ms. Gorman,

119.A I strongly prefer OREPA alternative 6 which will cost far less money and will not include the actual making of nuclear bombs near my home in Asheville. I strongly oppose the making of nuclear bombs in any case and by the time nuclear bomb-making plan in Oakridge was actually complete it will be obsolete.

Thank you,  
Michelle Smith  
Asheville, NC

1

Smith, Robin

Page 1 of 1

OR1D08

**ROBIN SMITH**  
**CONGRESS**

November 16, 2009

Ms. Pam Gorman,  
Y-12 SWEIS Document Manager  
800 Oak Ridge Turnpike, Suite A-500  
Oak Ridge, TN 37830

Dear Ms. Gorman,

Please accept this writing as documented support of the Uranium Processing Facility (UPF) proposed at the Y-12 National Security Complex. The missions of Y-12 continue to modernize and serve our nation's security and energy needs with efficiency and the highest level of security and integrity.

1|13.0

The proposed UPF, in tandem with the Uranium Storage Facility onsite at Y-12, will provide expertise and excellence that are both mandatory in pursuit of non-proliferation of nuclear weapons, converting weapons-grade uranium to a diluted fuel source and stand ready, at a moment's notice, to supply America's military with the critical enriched uranium for weapons. The National Security Complex of Y-12 stands alone as a superior site with a trained and superior workforce readied for this mission.

Among the alternatives considered, the draft Site-Wide Environmental Impact Statement (EIS) appears as the preferred option.

Once elected to serve as the U.S. Representative for the 3<sup>rd</sup> Congressional District as the successor to Congressman Zach Wamp, it will be my priority to support the imperative missions at the Y-12 Complex because of their very nature, the unquestionable devotion of Oak Ridge to these missions and our nation's need for such a facility.

I ask that you please include these statements of support in the official record of the EIS. I also encourage you to contact me directly with any pursuit of additional comments or questions.

With Sincerest Regards,

  
Robin Smith  
3<sup>rd</sup> Congressional District Candidate

Paid for by Robin Smith for Tennessee  
P.O. Box 23805, Chattanooga, Tennessee 37422  
Robin@RobinForTennessee.com

Smith, Rodney

Page 1 of 1

WD008

**From:** Smith, Rodney Bruce (BSR) [smithrb@y12.doe.gov]  
**Sent:** Monday, November 16, 2009 5:05 PM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** SWEIS Input

I would like to put in my opinion:

- 1|5.0 | To do nothing but continue operations as we are is not realistic nor is it affordable. What we have is in dire shape and very inefficient. That our operations personnel are able to perform their mission and do it safely is an indication of what heroes they are.
- 2|7.0 | What make sense is the UPF options 2 or 4. We must be capable of replacing stockpile components in the way they were originally manufactured so that we can ensure they will perform as designed. We must maintain a credible stockpile in deliverable form.
- 3|13.0 | Nations such as Iran will seek and develop nuclear weapons and only the threat of retaliation has any hope of countering their aims. We must be prepared to defend against an enemy who does not think the way we do, value what we value, and may feel it is their duty to start such a conflict and it is their hope to die trying.
- It is to our own peril to do nothing.

1

Southcorvo, Robin

Page 1 of 1

WD066

From: Frank Southcorvo [fsorso@bellsouth.net]  
 Sent: Wednesday, January 13, 2010 10:01 AM  
 To: DIV.Y12SWEIS.Comments  
 Subject: Form posted from Windows Internet Explorer.

firstName=Robin  
 lastName=Southcorvo  
 organization=  
[email=fsorso@bellsouth.net](mailto:fsorso@bellsouth.net)  
 address1=20 Friendly Hollow  
 address2=  
 city=Asheville  
 state=NC  
 zip=28806  
 country=  
 subject=Draft Y-12 SWEIS

11.C | comments=President Obama renewed the Start Treaty to reduce warheads. This means we will have less  
 weapons. He commented to zero in the future. We need the nonproliferation treaty. We do not need a new  
 bomb plant at Oak ridge TN. It is dangerous,non productive and too expensive. Having a new plant will only  
 21.E | encourage more nuclear weapons through out the world. If we,the USA, build more waeapons everyone will  
 !!! The countrys we do not want to have nuclear weapon will definently get them !!! Please do not open a new  
 bomb plant at Oakridge,TN.  
 Thank you  
 Robin Southcorvo

1

Speciale, Samuel

Page 1 of 1

WD105

From: Sam Speciale [sgspeciale@yahoo.com]  
 Sent: Friday, January 29, 2010 2:55 PM  
 To: DIV.Y12SWEIS.Comments  
 Subject: OREPA alternative 6

I only recently was made aware of possible plans to build more nuclear materials processing facilities in nearby  
 11.E | OAK RIDGE, Tennessee. At a time when our federal government is trying to reduce the global spread of  
 nuclear weapons, such efforts would, at best, be problematic and deter real negotiations. Furthermore, nuclear  
 212.L | waste disposal, such as from nuclear power plants continues to grow and remains without a viable solution.  
 39A | I support efforts such as the OREPA alternative 6(<http://www.stopthebombs.org/news/orepa-statement-on-y12-draft>).

Thank you for your consideration.  
 Samuel Speciale, PhD  
 14 Trevors Trail  
 Asheville, NC 28806

1

Stevenson, David

Page 1 of 1

WD083

**From:** David Stevenson [david@davidsguitar.com]  
**Sent:** Wednesday, January 27, 2010 9:26 AM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** Orepa alternative 6 preferred

19.A | Stating my preference for OREPA alternative 6.

David Stevenson  
Mars Hill NC 28754

Sent from my iPhone

1

Stockton, Peter

Page 1 of 4

WD107

**From:** Ingrid Drake [idrake@pogo.org]  
**Sent:** Friday, January 29, 2010 3:32 PM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** Pls confirm receipt of the attached  
**Attachments:** POGO Y-12 Letter 1-29-10.pdf

Thanks!

--  
Ingrid N. Drake  
Investigator and Director of the Congressional Oversight Training Series (COTS)  
Project On Government Oversight (POGO)  
1100 G Street, NW, Suite 900  
Washington, DC 20005-3806  
Phone 202-347-1122  
Fax 202-347-1116  
Web <http://www.pogo.org>  
[pogoblog.typepad.com/](http://pogoblog.typepad.com/)  
[twitter.com/POGOBlog](http://twitter.com/POGOBlog)

-----  
Founded in 1981, the Project On Government Oversight (POGO) is an independent nonprofit that investigates and exposes corruption and other misconduct in order to achieve a more effective, accountable, open, and ethical federal government.

1

Stockton, Peter

Page 2 of 4

**Project On Government Oversight**  
 Exposing Corruption Exploring Solutions www.POGO.org

WD107

January 29, 2010

Ms. Pam Gorman  
 Y-12 SWEIS Document Manager  
 Y-12 Site Office  
 800 Oak Ridge Turnpike, Suite A-500  
 Oak Ridge, TN 37830

Submitted via e-mail: [Y12sweis.comments@tetrattech.com](mailto:Y12sweis.comments@tetrattech.com)

Re: POGO's Comments on the Site-Wide Environmental Impact Statement for the Y-12 National Security Complex

To Whom It May Concern:

The Project On Government Oversight (POGO) is an independent nonprofit that investigates and exposes corruption and other misconduct in order to achieve a more effective, accountable, open, and ethical federal government. POGO believes that this Y-12 Site-Wide Environmental Impact Statement (SWEIS) process is flawed and a bit presumptuous, because the National Nuclear Security Administration's (NNSA) decision to take action on the Uranium Processing Facility (UPF) comes before the 2010 Nuclear Posture Review is complete. That said, POGO did review the alternatives outlined in the Draft Y-12 SWEIS and found that they do not reflect the reality of the Administration's vision and plan for nuclear weapons. POGO is opposed to the five alternatives, and is proposing a sixth alternative, which will not only save taxpayers' money but will also improve the security of nuclear materials.

POGO's alternative requires that the NNSA design an aggressive plan for downblending the approximately 300 Metric Tons (MT) of highly enriched uranium (HEU) stored at Y-12. Currently, DOE is planning to store this HEU inventory at the newly constructed Highly Enriched Uranium Materials Facility (HEUMF). However, the material could instead be declared excess because it's not needed for naval reactor fuel—the Navy could have priority on HEU from dismantled canned subassemblies from the stream of weapons in the dismantlement queue to fuel its nuclear powered submarine fleet.

11.A  
 2|14.0  
 3|9.E

1100 G Street, NW  
 Suite 900  
 Washington, DC  
 20005-3806  
 Phone: 202-347-1122  
 Fax: 202-347-1116

[www.pogo.org](http://www.pogo.org)  
[pogo@pogo.org](mailto:pogo@pogo.org)  
 1811 1122 347 1116

Stockton, Peter

Page 3 of 4

WD107

3|9.E (cont) Declaring Y-12's 300 MT of HEU as excess and downblending it has several benefits: it would eliminate the perceived need to construct the multi-billion dollar UPF; it would reduce the cost of storing un-needed weapons-grade material while simultaneously creating the revenue-generating low enriched uranium (LEU); and it would significantly reduce the security risk inherent in storing HEU.

4|3.B Regarding the UPF, NNSA failed to build a strong case for the need for the facility in either the *Complex Transformation* and the UPF SWEIS. NNSA states the purpose for the proposed UPF as R&D and producing HEU secondaries for weapons. However, the specifics of what R&D entails is not clear, and since there are thousands of secondaries in storage, there is no established need to manufacture new ones. A recent report by the respected JASON group regarding the Lifetime Extension Program (LEP) states that "today's nuclear warheads could be extended for decades, with no anticipated loss in confidence," which also confirms that there is no need to manufacture additional secondaries.

3|9.E (cont) But even if the UPF were needed for those functions, downblending Y-12's HEU would free up enough space at HEUMF to accommodate the limited R&D and manufacturing functions currently planned for the UPF. Combining functions into one facility is not unprecedented. For example, the PF-4 facility at Los Alamos National Lab does R&D and manufacturing, and stores tons of weapons-grade plutonium. Moving the functions planned for the UPF into HEUMF would eliminate the need to build the UPF, thus saving an estimated \$3.5 billion in new construction costs, plus operations and security costs for a new facility. In addition, UPF will likely have soaring construction costs and overruns, as did the HEUMF, for which costs ballooned from \$97 million to \$549 million. The National Ignition Facility (NIF) project also experienced dramatically increased costs and delayed completion dates. The Department of Energy sold the NIF to Congress in the early 1990s with a reported cost estimate of \$700 million and an original completion date of 2002, yet its most recent cost estimate is \$5.6 billion with a completion date of 2010—more than 600 percent over budget and at least 8 years behind schedule. Thus, investment in UPF is not a wise decision and that those funds should be spent to facilitate downblending.

3|9.E (cont) POGO's alternative not only saves money by eliminating construction costs, it will generate revenue by creating LEU. If Y-12's HEU was downblended into LEU, it would be worth an estimated \$72 million per MT, totaling in excess of \$18 billion.<sup>1</sup> Globally, LEU is increasingly in demand as fuel for nuclear power reactors, which provides 19 percent of U.S. electricity.

3|9.E (cont) Perhaps most importantly, POGO's alternative provides the most security, as opposed to NNSA's plan to indefinitely store the dangerous and valuable HEU. Unlike HEU, LEU is not weapons-usable, and therefore does not pose serious security risks or require expensive security systems to guard it. The primary goal of nuclear terrorists is to get their hands on HEU. Using

<sup>1</sup> The \$18 billion amount is determined by the formula that each MT of HEU would be worth over \$72 million, as stated in: "Expanded and Accelerated HEU Downblending: Designing Options to Serve the Interests of all Parties," written by Harvard University's Matthew Bunn for the Institute of Nuclear Materials Management 49th Annual Meeting. [http://www.nti.org/c\\_press/Bunn%20INMM%20July%202008%20logo.pdf](http://www.nti.org/c_press/Bunn%20INMM%20July%202008%20logo.pdf). The price of LEU fluctuates with the market ranging from \$7/lb. to \$55/lb. <http://www.moneyweb.co.za/mw/view/mw/en/page66?oid=241290&sn=Detail>. These revenues would be combined with the savings of storing and securing HEU minus the costs associated with the process to determine the net value.

2

Stockton, Peter

Page 4 of 4

WD107

only approximately 100 pounds of HEU, terrorists could create an improvised nuclear device that has the potential for a blast as large as 10-kilotons—one that has the same yield as the nuclear bomb used on Hiroshima.<sup>2</sup> As Nobel Prize-winning physicist Luis Alvarez explained:

319.E (cont) With modern weapons-grade uranium, the background neutron rate is so low that terrorists, if they had such material, would have a good chance of setting off a high-yield explosion simply by dropping one half of the material onto the other half. Most people seem unaware that if separated U-235 [highly enriched uranium] is at hand, it's a trivial job to set off a nuclear explosion. ... Given a supply of U-235 ... even a high school kid could make a bomb in short order.<sup>3</sup>

Terrorists have less interest in LEU because reactor-grade LEU contains less than 20 percent U-235 and cannot sustain an explosive nuclear chain reaction.<sup>4</sup>

We appreciate the opportunity to submit these comments.

Sincerely,



Peter Stockton  
Senior Investigator



Ingrid Drake  
Investigator

<sup>2</sup> An Improvised Nuclear Device (IND) explosion is qualitatively different from a "dirty bomb," also known as a dispersal device: detonating plutonium or highly enriched uranium with an explosive would cause a major dispersion of highly radioactive materials. The explosion from the nuclear bomb dropped on Hiroshima was created using a "gun type" method (firing a piece of highly enriched uranium at another piece to create a chain reaction). Using the same theory, terrorists could create a crude IND by taking two pieces of HEU and slamming them together with conventional explosives, or by simply dropping one plate of HEU from a certain height onto another. See: Bunn, Matthew and John P. Holdren. "A Tutorial on Nuclear Weapons and Nuclear-Explosive Materials: Nuclear Weapons Design and Materials." *Securing the Bomb 2006*. Managing the Atom Project, Harvard University. September 6, 2006. [http://www.nti.org/e\\_research/cnwm/overview/technical2.asp](http://www.nti.org/e_research/cnwm/overview/technical2.asp). This nearly happened accidentally at Y-12 several years ago. (The HEU was not dropped from a significant height, and the scientist was able to kick away the piece that was dropped before a reaction could take place.) According to Princeton University physicist Frank von Hippel, "a 100-pound mass of uranium dropped on a second 100-pound mass, from a height of about 6 feet, could produce a blast of 5 to 10 kilotons." Wald, Matthew L. "Suicidal Nuclear Threat Is Seen at Weapon's Plants." *The New York Times*, January 23, 2002. By comparison, the blast from the Hiroshima bomb was 13 kilotons. It killed over 200,000 people. *WMD 411*. Center for Nonproliferation Studies at the Monterey Institute of International Studies, 2004. [http://www.nti.org/f\\_wmd411/1a4\\_1.html](http://www.nti.org/f_wmd411/1a4_1.html); and "The Destructive Power of Nuclear Weapons: Hiroshima and Nagasaki." Nuclear Terrorism Tutorial: Center for Nonproliferation Studies at the Monterey Institute of International Studies, 2005. Chapter 2. [http://www.nti.org/h\\_learnmore/nuctutorial/chapter02\\_08.html](http://www.nti.org/h_learnmore/nuctutorial/chapter02_08.html).

<sup>3</sup> Alvarez, Luis W. *Adventures of a Physicist*. Basic Books: New York, 1987. p 125.

<sup>4</sup> POGO was one of the first groups to raise awareness about this possibility with the publication of its investigative report *U.S. Nuclear Weapons Complex: Security At Risk*, October 1, 2001. <http://www.pogo.org/pogo-files/reports/nuclear-security-safety/security-at-risk/>.

3

Stockwell, Jim

Page 1 of 1

MD013



11.21.09

Dear Pam Gorman, Y-12 SWEIS Document Manager  
Public comment.

I know there are a lot of inside language to define what it is the DOE/NNSA want to do at the Y-12 Complex: Bomb Nuclear Weapons manufacturing, reassembling, disassembling, modernization, modification plant. We the people believe nuclear weapons are obsolete. And the Nuclear Powers of the World have all agreed to dismantle all their nuclear warheads until zero is their number in existence. Let them become extinct.

So the impact being considered at the Oak Ridge NNSA facility should be to upgrade its current operations to standards protective of workers, public health, and safety as well as safe-guarding and protecting nuclear fissionable materials. And be part of the over-all national plan to reduce nuclear warheads to zero.

The rest of what is being considered needs to be annulled to: no new bombs, no new triggers, no new LEP's, no new secondaries, no new pits, Only disassemblies, dismantles, dispositions, and secure and safe storage.

Thank you for taking my comments and I hope we can fulfill an agreement President Obama has made with the World. *Lu Pierce James E Stockwell*

119.B

211.C

119.B

(cont)

Swan-Dass, Yol

Thompson, Betty Jo

Page 1 of 1

Page 1 of 1

WD085

WD113

**From:** Yol Swan-Dass [yol@sacred-jewelry.com]  
**Sent:** Wednesday, January 27, 2010 10:32 AM  
**To:** www.y12sweis.comments@tetratech.com; DIV.Y12SWEIS.Comments  
**Subject:** I prefer the prefer the OREPA alternative 6

**From:** MorrThomps@aol.com  
**Sent:** Friday, January 29, 2010 8:06 PM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** nuclear proposal

To Whom It May Concern,

I am writing to voice my concern about the idea to spend 3.5 billion dollars on a new nuclear bomb facility in Oak Ridge Tennessee, which is vasically our backyard.

1|3.A It is senseless and irresponsible to spend billions on a facility which, by the time it is completed in 2018, will no longer be needed.

Plus, the US stockpile of "life extended" warheads will exceed the maximum number allowed by the START treaty at that point.

2|12.H| And 2,500 jobs would be lost in Oak Ridge with the new facility, since it would be largely automated.

3|9.A I strongly urge you to implement the OREPA Alternative 6 instead, which would cost 100 million and would NOT include the actual making of nuclear bombs in Oak Ridge.

Thank you for your attention to this important matter.

Sincerely,

Yol Swan-Dass  
59 Terrace Dr.  
Weaverville, NC 28787  
--

1|9.A I wish to register my preference for OREPA alternative 6 . We do need to be making new nuclear bombs. It absolutely senseless , wasteful and irresponsible. How can we insist on any other not making nuclear bombs and the USA even consider such a path. This is utter folly.

Betty Jo Thompson

**Underwood, Mary Lou**

**Page 1 of 1**

**WD029**

**From:** Underwood, Mary Lou (MU2) [underwoodml1@y12.doe.gov]  
**Sent:** Wednesday, November 18, 2009 12:41 PM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** I am a citizen here in Oak Ridge and I am a supporter of the UPF Project here at Y-12

1|13.0 | I am a citizen here in Oak Ridge and I am a supporter of the UPF Project here at Y-12.

Mary Lou Underwood  
 107 Creek View Court  
 Oak Ridge, TN 37830

**Underwood, Scott**

**Page 1 of 1**

**WD025**

**From:** Underwood Jr, R Scott (RUI) [underwoodrs@y12.doe.gov]  
**Sent:** Wednesday, November 18, 2009 6:39 AM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** Support of Y-12 and UPF Project

1|13.0 | I am a long-time resident of Oak Ridge, Tennessee and a long-time employee at the Y-12 Plant. I want to make it known that I am in support of the modernization of Y-12 and the construction of Uranium Processing Facility(UPF) and the other aspects of the modernization plan for the Site. Y-12 has played, and will continue to play a vital role in the defense of this great country. The surrounding area has been and will continue to be a strong supporter of Y-12 and the mission it serves. Y-12 (and the contractors that have operated it over the years) and the DOE/NNSA have been an integral part of this area for over 60 years and have made a positive impact in all aspect of this region. The NNSA will not find a any stronger support for this important mission (not only the weapons work, but all aspects of the work done at Y-12) than the communities of East Tennessee. I strongly support the UPF project and Y-12 and would whether I worked there or not.

R. Scott Underwood Jr.  
 107 Creek View Court  
 Oak Ridge, TN, 37830

## Waddell, Tim

Page 1 of 1

WD032

**From:** Tim Waddell [twaddell@energysolutions.com]  
**Sent:** Wednesday, November 18, 2009 3:07 PM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** Form posted from Microsoft Internet Explorer.

firstName=Tim  
 lastName=Waddell  
 organization=  
[email=elthunter@bellsouth.net](mailto:elthunter@bellsouth.net)  
 address1=110 Newport Drive  
 address2=  
 city=Oak Ridge  
 state=TN  
 zip=37830  
 country=  
 subject=Draft Y-12 SWEIS

113.0 | comments=The idea that the world is moving in a direction that will make it free of nuclear weapons is a nice one. However, with nations such as Pakistan and India already having nuclear weapons, and others such as Iran and North Korea working to possess them, it is not realistic to believe that a nuclear free world will happen any time soon. The U.S. must maintain a nuclear deterrent for the foreseeable future, and facilities such as the UPF and CCC are required to carry out that mission safely and efficiently.

1

## Walker, Hazen

Page 1 of 1

WD030

**From:** Robert Walker [hazenrw@verizon.net]  
**Sent:** Wednesday, November 18, 2009 1:09 PM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** No to making more nuclear weapons

firstName=Hazen  
 lastName=Walker  
 organization=  
[email=hazenrw@verizon.net](mailto:hazenrw@verizon.net)  
 address1=1306 Hillcrest Dr.  
 address2=  
 city=Blacksburg  
 state=VA  
 zip=24060  
 country=United States  
 subject=Draft Y-12 SWEIS

110.B | comments=The last thing the US or the world needs is a factory to make nuclear weapons. The money would be better spent on helping people—the unemployed, the hungry, the sick—or on repairing the nation's infrastructure. Do not support a war economy but an economy of peace.  
 rod=Record of decision

1

Wamp, Zach

Page 1 of 1

<p>APPROPRIATIONS COMMITTEE</p> <p>SUBCOMMITTEES:</p> <p>MILITARY CONSTRUCTION AND VETERANS' AFFAIRS <small>RANKING MEMBER</small></p> <p>ENERGY AND WATER</p>	 <p><b>ZACH WAMP</b> UNITED STATES CONGRESS THIRD DISTRICT OF TENNESSEE November 17, 2009</p>	<p>OR1D09</p> <p>WASHINGTON OFFICE: 1436 LONGWORTH HOUSE OFFICE BUILDING WASHINGTON, DC 20515 (202) 225-3771 (202) 225-3494 Fax</p> <p>DISTRICT OFFICES:</p> <p>200 ADMINISTRATION ROAD, SUITE 100 P.O. BOX 2001 OAK RIDGE, TN 37830 (865) 576-1976 (865) 576-3221 Fax</p> <p>FEDERAL COURTHOUSE, SUITE 126 900 GEORGIA AVENUE CHATTANOOGA, TN 37402 (423) 756-2342 (423) 756-6613 Fax</p>
--	--	--

The Honorable Thomas P. D'Agostino  
Administrator, National Nuclear Security Administration  
U.S. Department of Energy  
1000 Independence Avenue, SW  
Washington, DC 20585-0001

RE: Comments for Record - NNSA Public Hearing Oak Ridge, Tennessee  
Y-12 National Security Complex Draft Site-Wide Environmental Impact Statement

Dear Administrator D'Agostino:

Thank you for an opportunity to comment on the National Nuclear Security Agency's analysis for current and future operations, facilities and activities at the Y-12 National Security Complex. Engaging the community and surrounding area of Oak Ridge, Tennessee, who proudly carry the banner of the Manhattan Project, is a fundamental step in making our nuclear weapons complex more responsive, secure and cost effective.

1|13.0 Construction of UPF is key to the viability and future success of the Y-12 National Security Complex. Since first proposed, I have actively supported modernization efforts, including the construction of the Highly Enriched Uranium Manufacturing Facility, (HEUMF) the Uranium Processing Facility (UPF), and the accelerated cleanup of the World War II and Cold War legacies. As the Uranium Center of Excellence, Y-12 leads the Department of Energy in the transformation of a more efficient, agile and state-of-the-art nuclear complex.

2|3.B The Uranium Processing Facility is essential to maintain our weapons reliability; fuel our nuclear Navy fleet; down blend enriched uranium in support of our nation's nonproliferation goals, and also accomplish a 90% reduction in Y-12's footprint while realizing substantial cost savings. I will continue to aggressively make this a primary focus in NNSA's plan to transform the complex to meet our national security needs for the next century.

Thank you again for the opportunity to communicate the importance of this project. It is an honor to work with the men and women of Y-12, the NNSA, and the Oak Ridge community.

Sincerely,

  
Zach Wamp  
Member of Congress

<http://www.house.gov/wamp/>  
PRINTED ON RECYCLED PAPER

Weston, Julie

Page 1 of 1

	<p><b>WD011</b></p> <hr/> <p><b>From:</b> WestmorJW@aol.com <b>Sent:</b> Tuesday, November 17, 2009 1:44 PM <b>To:</b> DIV.Y12SWEIS.Comments <b>Subject:</b> Draft Y-12 SWEIS</p>
--	---

Dear Director:

1|9.C I understand that the United States is planning to invest two or three billion dollars to build more bombs. This is appalling! Our President Obama has declared a firm commitment to a world free of nuclear weapons. To build a plant to build more bombs is simply preposterous and indeed perilous in this day and age. IF we do this, other countries will follow suit and we'll be in a new arms race. Is anyone involved in this old enough to remember the arms race? the cold war? the threat of annihilation?

2|1.E

3|1.C Who's making policy in the United States these days? What we need in Oak Ridge is a realistic plan to maintain our nuclear arsenal in a safe and secure manner while the stockpile is reduced to zero. Building a new bomb plant now, under the guise of "modernization," corrupts the President's vision and negates all our efforts to constrain nuclear proliferation. That's not modernization, it's throwback—and it's clearly the wrong direction for the country.

4|14.0 Tell me, will the environmental impact statement include the danger of nuclear annihilation of the whole planet? Please stop this madness now.

Julie Weston  
105 Hopi Drive  
Hailey ID 83333

1

Wilburn, Bill

Page 1 of 1



Draft Y-12 Site-wide  
Environmental Impact Statement—  
U.S. Department of Energy  
National Nuclear Security Administration

**Written Comment Form**  
*Must be received on or before January 29, 2010.*

OR2D07



Submitted by  
*Bill Wilburn*  
108 Handel Co  
OAK RIDGE, TN 37830

---

To whom it may concern:

---

I support the preferred alternative (Alternative 4) of a capability-sized Uranium processing facility (UPF) at the Y-12 national security complex.

---

The UPF will improve operational reliability because it will eliminate the need to rely on 60 year old facilities and equipment that pose continuity issues with reliability.

---

117.0 It will improve the security posture for special nuclear material.

---

It will improve health & safety protection for workers and the public.

---

It will provide a significant return on investment by reducing operational costs by 33% and by reducing the size (and therefore the cost) of the high security ~~creations~~ by an average of \$200 million per year.

*Bill Wilburn*

Comment forms may be mailed to:  
Ms. Pam Gorman  
Y-12 SWEIS Document Manager  
800 Oak Ridge Turnpike, Suite A-500  
Oak Ridge, TN 37830

Comment forms may be faxed to:  
(865) 483-2014  
or sent by email to:  
y12sweis.comments@tetratech.com

You may also submit comments through the project website which can be found at:  
<http://www.Y12sweis.com>

Wilkin, Frances

Page 1 of 1

MD066

January 2, 2010

Dear Pam Gorman:

I received a brochure from a member of the Oak Ridge Environmental Peace Alliance stating that the National Nuclear Security Administration prepared a study of the new bomb plant they plan to build in Oak Ridge instead of preparing a Site Wide Environmental Impact Statement for Y12 as the law requires them to do. The presented plan indicates the Uranium Processing Facility will manufacture thermonuclear secondaries out of highly enriched uranium, lithium deuteride, beryllium, depleted uranium and a host of other materials.

111.c With such plans, I feel as though NNSA is undermining President Obama's commitment to a world free of nuclear weapons and infringing upon our right to such a world.

How can NNSA claim consideration for our security by actions that not only violate the law requiring them to prepare a SWEIS but also undermine our credibility to preach abstinence to other nations?

Yours truly,

*Frances Wilkin*

Frances Wilkin  
186 S. Wood Street  
Wilmington, Ohio 45177

Williams, Bill & Betty

Page 1 of 2

Jan. 29, 2010 2:30PM TN BANK MAIN OFFICE No. 3831 P. 1 FD003



**Draft Y-12 Site-wide Environmental Impact Statement—**  
**U.S. Department of Energy**  
**National Nuclear Security Administration**



**Written Comment Form**  
*Must be received on or before January 29, 2010.*

1-29-10

Ms. Gorman

Please see attached comments

Thank you

Betty Williams

Please use other side if more space is needed.

Comment forms may be mailed to:  
 Ms. Pam Gorman  
 Y-12 SWEIS Document Manager  
 800 Oak Ridge Turnpike, Suite A-500  
 Oak Ridge, TN 37830

Comment forms may be faxed to:  
 (865) 483-2014  
 or sent by email to:  
 y12sweis.comments@tetrattech.com

You may also submit comments through the project website which can be found at:  
<http://www.Y12sweis.com>

Williams, Bill & Betty

Page 2 of 2

Jan. 29, 2010 2:30PM TN BANK MAIN OFFICE No. 3831 P. 2

Ms. Pam Gorman  
 Y-12 SWEIS Document Manager  
 800 Oak Ridge Turnpike, Suite A-500  
 Oak Ridge, TN 37830

Jan. 28, 2010

The Y-12 Site-wide Environmental Impact Statement discusses at length how Y-12 will reduce in size as it moves toward its Modernization goals. However, very little is said about what resources will remain. The EIS process should include a thorough study of cultural resources important to the public.. The recent visit to Oak Ridge by the National Park Service reminded us all that Y-12 played a major role in history, that it holds a storehouse of history in its buildings and artifacts, and it is time to commit on which of these public resources will be preserved in accordance with the National Historic Preservation Act.

1|12.G  
 (cont)

News articles on the Y-12 Complex have reported that over two hundred buildings have been demolished, and that hundreds more are slated for demolition. Many of these buildings are eligible for listing in the National Register of Historic Places. The SWEIS should be discussing how Y-12 will offset the loss of these historic structures.

1|12.G  
 (cont)

I support a modern Y-12 Complex, and believe it can be achieved while preserving it's important history. Oak Ridge Historian Bill Wilcox has presented a plan that calls for Y-12 to save three buildings that are eligible for listing in the NRHP. They are Beta-3 and the calutrons, 9731, the original pilot plant, and 9706-2, original medical building, and best example of Y-12's Corps of Engineers style buildings. I support Mr. Wilcox's plan, and suggest it be made a part of Y-12's modernization plan.

Please address this issue in the SWEIS, and make a commitment regarding these cultural resources for which you are stewards.

Sincerely,

Bill and Betty Williams  
 451 East Drive  
 Oak Ridge, TN 37830

Wilson, Doug

Page 1 of 1

WD100

**From:** Doug Wilson [tdwilson@mwbavl.com]  
**Sent:** Friday, January 29, 2010 1:33 PM  
**To:** DIV.Y12SWEIS.Comments  
**Cc:** 'heath.shuler@shuler.congressnewsletter.net'

19.A | Dear Sir/Madam: I am against the nuclear bomb facility being considered for Oak Ridge, TN. I prefer the OREPA alternative 6. We do not need any more nuclear bombs and certainly do not need to spend \$3.5 billion dollars on such a wasteful project. Sincerely, Doug Wilson

T. Douglas Wilson, Jr.  
 Attorney

**McGuire, Wood & Bissette, P.A.**  
 48 Patton Ave., Asheville, NC 28801  
 P.O. Box 3180, Asheville, NC 28802  
 Office: 828-254-8800  
 Fax: 828-252-2438

[tdwilson@mwbavl.com](mailto:tdwilson@mwbavl.com)  
[www.mwbavl.com](http://www.mwbavl.com)

 Please consider the environment before printing this email.

CONFIDENTIALITY NOTICE: THIS ELECTRONIC MAIL TRANSMISSION IS PRIVILEGED AND CONFIDENTIAL AND IS INTENDED ONLY FOR THE REVIEW OF THE PARTY TO WHOM IT IS ADDRESSED. IF YOU HAVE RECEIVED THIS TRANSMISSION IN ERROR, PLEASE IMMEDIATELY RETURN IT TO THE SENDER. UNINTENDED TRANSMISSION SHALL NOT CONSTITUTE WAIVER OF THE ATTORNEY-CLIENT OR ANY OTHER PRIVILEGE.

TAX ADVICE DISCLOSURE: PURSUANT TO INTERNAL REVENUE SERVICE CIRCULAR 230, WE ARE REQUIRED TO ADVISE YOU THAT IF THERE IS ANY TAX ADVICE CONTAINED HEREIN OR IN ANY ATTACHMENTS HERETO, IT IS NOT INTENDED TO BE USED, AND CANNOT BE USED, BY THE ADDRESSEE OR ANY TAXPAYER, FOR THE PURPOSE OF AVOIDING PENALTIES THAT MAY BE IMPOSED UNDER THE INTERNAL REVENUE CODE.

Wilson, Rickey & Yulonda

Page 1 of 1

OR1D03



Draft Y-12 Site-wide  
 Environmental Impact Statement—  
 U.S. Department of Energy  
 National Nuclear Security Administration



**Written Comment Form**

Must be received on or before January 29, 2010.

113.0 I believe the Y-12 Complex is the best choice  
 FOR THE NEW UPF, Y-12 ALWAYS EMPHASIZES  
 SAFETY AS THE NUMBER 1 PRIORITY. THE  
 21.E UPF NEEDS TO BE BUILT SO WE CAN CONTINUE  
 TO DECREASE OUR ARSENAL WHILE SUPPLYING  
 MUCH NEEDED MATERIAL FOR MEDICAL, ENERGY,  
 OTHER NEEDS GLOBALLY,  
 113.0 Y-12 IS AN ESTABLISHED ENTITY THAT HAS  
 (cont) THE ABILITY WITH THE MANPOWER TO PERFORM  
 THE WORK IN A SAFE COST EFFECTIVE  
 MANNER. WE HOPE TO CONTINUE TO SUPPORT OUR  
 COUNTRY IN PEACE AS WE HAVE IN TIMES OF  
 WAR, WE WANT TO DO THE WORK AND WE CAN  
 DO THE WORK. THANK YOU!

Rickey & YULONDA WILSON  
 401 SCANDLYN HOLLOW RD  
 OLIVER SPRINGS TN 37840

Please use other side if more space is needed.

Comment forms may be mailed to:  
 Ms. Pam Gorman  
 Y-12 SWEIS Document Manager  
 800 Oak Ridge Turnpike, Suite A-500  
 Oak Ridge, TN 37830

Comment forms may be faxed to:  
 (865) 483-2014  
 or sent by email to:  
 y12sweis.comments@tetratech.com

You may also submit comments through the project website which can be found at:  
<http://www.Y12sweis.com>

Wismer, Amber

Wurgel, Marge

Page 1 of 1

Page 1 of 1

WD093

WD023

From: Amber [findamber@verizon.net]  
 Sent: Thursday, January 28, 2010 12:26 PM  
 To: DIV.Y12SWEIS.Comments  
 Subject: orepa alt 6

From: Marge Wurgel [margewur@cox.net]  
 Sent: Tuesday, November 17, 2009 11:12 PM  
 To: DIV.Y12SWEIS.Comments  
 Subject: y12swies

I would like to express my deep concern regarding the proposed nuclear Oak Ridge facility in TN. As a neighbor of TN I am definitely opposed to this idea. As a country we have so many important things to spend money on. Please consider the following information...

114.0 Please drop plans to build the weapons complex in Oak Ridge, TN. It will unleash a new upward spiral in the arms race on an already dangerous world. We need to learn to communicate with one another, not make more weapons. Thank you.

- 19.A I prefer the OREPA (Oak Ridge Environmental Peace Alliance) alternative 6, which would cost 100 million and would not include the actual making of nuclear bombs in Oak Ridge
- 23.A It is senseless and irresponsible to spend billions on a facility which, by the time it is completed in 2018, will no longer be needed because the US stockpile of "life extended" warheads will exceed the number allowed by the START treaty at that point.
- 312.H 2,500 jobs would be lost in Oak Ridge with the new facility, since it would be largely automated.

Thank you for your time  
 Amber Wismer

Yager, Ken

Page 1 of 1



MD068

**Senate Chamber**  
State of Tennessee  
NASHVILLE

**KEN YAGER**  
STATE SENATOR

TENNESSEE SENATORIAL DISTRICT 12  
CAMPBELL, FENTRESS, MORGAN, RHEA,  
ROANE AND SCOTT COUNTIES

LEGISLATIVE OFFICE

10A LEGISLATIVE PLAZA  
NASHVILLE, TENNESSEE 37243-0212  
TELEPHONE: 615.741.1449  
TN (TOLL-FREE): 1.800.449.8366, Ext. 11449  
E-MAIL: sen.ken.yager@capitol.tn.gov

January 27, 2010

Ms. Pam Gorman  
Y-12 SWEIS Document Manager  
Y-12 Site Office  
800 Oak Ridge Turnpike, Suite A-500  
Oak Ridge, TN 37830

RE: Draft Site-Wide Environmental Impact Statement (SWEIS) for the Oak Ridge Y-12 National Security Complex

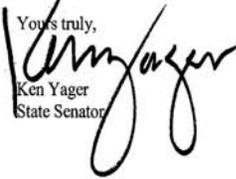
Dear Ms. Gorman:

113.0 I understand that the National Nuclear Security Administration (NNSA) has offered a Site-Wide Environmental Impact Statement (SWEIS) for the Oak Ridge National Security Complex (Y-12). Please accept and enter this letter of support into the record.

27.0 It is my understanding that five alternatives are covered in the SWEIS for the operation of current and future operations at Y-12. I support the preferred alternative which is the "capability-sized UPF."

313.0 The Oak Ridge community has always been a strong supporter of the uranium processing and nuclear related missions of the Oak Ridge complex. Y-12's continued role in manufacturing and disassembling nuclear warhead components should be conducted in modernized facilities with cost-effective and safety-focused processes. The preferred option of a new UPF achieves this objective.

I support the preferred option, because it is in the best interest of national security, worker and community safety, and economic impact on the entire Oak Ridge region.

Yours truly,  
  
 Ken Yager  
 State Senator

Zonar, James

Page 1 of 1

WD006

**From:** Zonar, James P (ZOC) [zonarjp@y12.doe.gov]  
**Sent:** Thursday, November 12, 2009 3:24 PM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** Comment

115.0 I will be out of town on the days of the meetings, however I would like to offer my support for the approval of alternative 2. This alternative offers the best value and safety for the country and the community. No one knows where the world is heading with respect to nuclear arsenals, however, we must be poised to respond if necessary. We will not be able to respond if we remain in the existing facilities. Alternative 2 will also provide the community and nation with the best safety and security option. Once all special materials are put up in UPF and HEUMF, the materials will be safe for generations.

Thanks for accepting my comment.

Jim Zonar  
 1104 Winterberry Lane  
 Knoxville, Tn 37932

1

## Multiple Signatory Letter 1

Page 1 of 3

WD057

**From:** Gorman, Pamela (P1G) [gormanpl@yso.doe.gov]  
**Sent:** Tuesday, December 22, 2009 7:35 AM  
**To:** Rose, Jay; Buenaflor, Delight  
**Cc:** Boltz, Jackie  
**Subject:** FW: Y12 SWEIS Comment Period Extension Request

**Importance:** High

**From:** Nickolas Roth [mailto:nroth@ananuclear.org]  
**Sent:** Monday, December 21, 2009 5:53 PM  
**To:** Gorman, Pamela (P1G); Mary.martin@nnsa.doe.gov; casey.ruberg@nnsa.doe.gov  
**Subject:** Y12 SWEIS Comment Period Extension Request

Dear Administrator D'agostino:

1|2.B We write to request that the public comment period for the Draft Y12 Site Wide Environmental Impact Statement (SWEIS) be extended to the end of February. Although the current comment period has already been extended through January 29, 2010, it still does not provide adequate time for informed public comment.

2|1.A In particular, the Obama administration is preparing to release its Nuclear Posture Review (NPR) on February 1. The NPR is intended to provide a comprehensive, coherent policy direction for U.S. nuclear policy, including the number and types of nuclear weapons in the stockpile and the role played by the nuclear weapons complex. Obviously, this will significantly impact the size, mission, and necessity of certain facilities analyzed in the Draft Y12 SWEIS.

It is worth noting that the lack of just such a coherent policy direction generated the Congressional opposition to many of the National Nuclear Security Agency's recent plans for the arsenal and the complex. Incorporating time to include consideration of the outcome of the NPR in the Draft Y12 SWEIS comment period may increase support for the latter's goals.

1|2.B (cont) Also, the public comment period runs through numerous holidays including Thanksgiving, Christmas, Channukah, Kwanzaa, and New Year's. As organizations that have participated in numerous Environmental Impact Statements processes and have, for decades, been engaging nuclear weapons issues, we believe a comment period spanning several holidays is inadequate to allow a thorough analysis of the document, review of the supporting materials and preparation of comprehensive comments. The National Environmental Policy Act recognizes the value added by public participation is significant. Public outreach, education, and generation of input in a responsible and comprehensive manner require more time than now allocated.

For these reasons, we formally request an extension to the Y12 SWEIS public comment period until the end of February. We also ask that this letter be made part of the Environmental Impact Statement record. Thank you for your consideration of this important public issue.

If you have any questions concerning this request, please direct them to Nickolas Roth at [nroth@ananuclear.org](mailto:nroth@ananuclear.org) on our behalf. Thank you for your consideration of our request; we look forward to hearing of your response at

1

## Multiple Signatory Letter 1

Page 2 of 3

WD057

the earliest possible time.

Signatures

Susan Gordon  
 Director  
 Alliance for Nuclear Accountability

Leonor Tomero, JD MA  
 Director of Nuclear Non-Proliferation  
 Center for Arms Control and Non-Proliferation / Council for a Livable World

David Culp  
 Legislative Representative  
 Friends Committee on National Legislation (Quakers)

Christopher Paine  
 Director, Nuclear Program  
 Natural Resources Defense Council

Jon Rainwater  
 Executive Director  
 Peace Action West

Peter Wilk  
 Executive Director  
 Physicians for Social Responsibility

Danielle Brian  
 Executive Director  
 Project On Government Oversight

Stephen Young  
 Senior Analyst and Washington Representative  
 Union of Concerned Scientists

Local Organizations

Mary Davis  
 Director  
 EcoPerspectives, a project of Earth Island Institute

Ann Suellentrop M.S.R.N.  
 KC Plant Project Coordinator  
 Kansas City, Missouri

Tom Clements  
 Southeastern Nuclear Campaign Coordinator  
 Friends of the Earth  
 Columbia, SC

2

Multiple Signatory Letter 1

Page 3 of 3

Joni Arends  
Executive Director  
Concerned Citizens for Nuclear Safety  
New Mexico

WD057

Alice Slater  
Nuclear Age Peace Foundation  
New York

Joni Arends  
Executive Director  
Concerned Citizens for Nuclear Safety  
New Mexico

Jay Coghlan  
Executive Director  
Nuclear Watch New Mexico

Lisa Crawford  
President  
FRESH  
Ohio

Mavis Belisle  
Director  
JustPeace  
Texas

Ralph Hutchison  
Coordinator  
Oak Ridge Environmental Peace Alliance  
Tennessee

Multiple Signatory Letter 2

Page 1 of 2

MD065



日本山妙法寺

The Most Venerable Nichidatsu Fujii, Founder and Preceptor

January 3, 2010

Ms. Pam Gorman  
Y-12 SWEIS Document Manager  
800 Oak Ridge Turnpike  
Suite A500  
Oak Ridge, TN 37830

Dear Ms. Gorman,

Please include our comments for consideration of the final Y-12 SWEIS.

1|14.0 To the Dept. of Energy and the National Nuclear Security Administration:

Having reviewed a summary of the Draft Y12 Site Wide Environmental Impact Statement, we wish to state our unequivocal opposition to all alternatives suggested by the NNSA for the Y-12 nuclear weapons facility and suggest an alternative more in keeping with the spirit of the Nuclear Non-Proliferation Treaty and with the words of the President of the United States.

2|9.c

"It's naive for us to think that we can grow our nuclear stockpiles, the Russians continue to grow their nuclear stockpiles, and our allies grow their nuclear stockpiles, and that in that environment we're going to be able to pressure countries like Iran and North Korea not to pursue nuclear weapons themselves." These words of President Barack Obama would be made hollow and meaningless should any of the NNSA's alternatives become policy. We are at a tipping point in history where nations of the world need to make a collective decision: either everyone is going to have nuclear weapons or no one will have them. If the United States fails to assert political and moral leadership towards global nuclear disarmament and instead pursues expanded nuclear weapons production as envisioned by the Draft SWEIS, then convincing other nations to forgo these weapons will be an exercise in futility since leadership requires actions, not empty words. As a nation, the US must take concrete steps towards disarmament, as suggested by President Obama, in order for others to trust and follow.

3|1.e

As you know, Y-12 produces thermonuclear secondaries for every nuclear bomb in the US arsenal. The NNSA prefers an option that would enable Y-12, in an upgraded facility, to produce between 50-80 secondaries a year. But continued production will indicate to other countries that despite the words of a president, there is no shift in US policy. The end result will be global proliferation. What needs to happen instead is for Y-12 to focus on the 12-15 year backlog of secondaries and subassemblies that are waiting to be dismantled. Only then will the US win the trust of other countries and will steps toward disarmament become possible.

4|10.b

The price tag for the proposed alternatives ranges from \$3 billion to \$3.5 billion. It is irresponsible to spend billions on a bomb plant which, by the time it is completed, will no longer be



Multiple Signatory Letter 3

Page 2 of 2

TO WHOM IT MAY CONCERN, WE THE  
 UNDERSIGNED HEREBY DECLARE  
 THAT ~~THE~~ Y12 UPP PROJECTS  
 ARE NECESSARY ENTITLES IN  
 ACCOMPLISHING AND ENSURING  
 PROTECTION OF OUR RIGHTS OF  
 FREEDOM. THESE COMPLEXES ARE  
 ENVIRONMENTALLY FRIENDLY  
 WHILE BEING SAFE AND SECURE.

*David A. Hill*  
*Andy Green*  
*Sean Hise*  
*Curtis Smith*  
*Young Truman*

Multiple Signatory Letter 4

Page 1 of 5

WD114

---

**From:** Ralph Hutchison [orep@earthlink.net]  
**Sent:** Friday, January 29, 2010 8:25 PM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** Y12 SWEIS comment letter  
**Attachments:** final SWEIS letter.pdf

Attached please find a letter commenting on the Y12SWEIS in pdf format.

Problems accessing this file should be addressed to Ralph Hutchison, [orep@earthlink.net](mailto:orep@earthlink.net)

1

Multiple Signatory Letter 4

Page 2 of 5

Ms. Pam Gorman  
 Y12 SWEIS Document Manager  
 800 Oak Ridge Turnpike, Suite A-500  
 Oak Ridge, TN 37830

Via e-mail

29 January 2010

We are writing to comment on the Draft Y12 Site Wide Environmental Impact Statement (SWEIS). This letter is not a detailed analysis of the Draft, but instead highlights several significant issues that the SWEIS fails to adequately address.

1|1|E.1 | 1. The Draft Y12 SWEIS fails to address the impact of construction of the proposed Uranium Processing Facility on US efforts to constrain the proliferation of nuclear weapons and nuclear weapons capability around the world. The Department of Energy's 1996 Programmatic Environmental Impact Statement for Stockpile Stewardship and Management, its first post-Cold War public consideration of reconfiguring its nuclear weapons complex (the need for which had to be enforced by a citizen litigation), concluded that the Stockpile Stewardship program is "fully consistent with the NPT."

In the fourteen years since that self-absolving conclusion, the landscape of nuclear nonproliferation discussions has changed radically. Recognition of these changes has led former diplomatic, military and arms control experts to call for US leadership in the effort to rid the world of all nuclear weapons, a call echoed in the commitment of President Barack Obama. The world in 2010 is profoundly different than the world of 1996—North Korea has joined the ranks of nuclear weapons states; Iran is believed to be developing a nuclear capability; the United States invaded Iraq on the mere suspicion of possession of nuclear weapons of mass destruction. The attacks of September 11, 2001 demonstrated the capacity and determination of non-state actors to commit acts of terror against civilian populations, raising concerns about potential nuclear attacks. Non-weapons states at the Nonproliferation Treaty Review Conferences in 2000 and 2005 called for weapons states to deliver on their Article 6 commitment to pursue disarmament. The fundamental elements of any analysis of nonproliferation impacts have changed dramatically, rendering an analysis performed in 1996 obsolete on its face.

2|7|B | 2. Four of the five alternatives determined to by NNSA to be "reasonable" would maintain a capability to produce at least 80 warheads/year, consistent with plans to build a new plutonium pit manufacturing facility at Los Alamos with a 50/80 warhead per year capacity. Expanding US warhead manufacturing capacity at this time is an unnecessarily provocative act. The actual manufacturing capacity required to maintain the current arsenal in a safe, secure and reliable status is represented by the fifth alternative—5 warheads per year—also determined to be "reasonable" by NNSA. Given the recent finding by expert independent scientists known as the JASON that the existing US stockpile is safe, secure and reliable and can be confidently and indefinitely maintained, no \$3.5 billion investment in the UPF for new warhead production capacity is warranted.

3|8|A | Nor is it needed. The existing US stockpile contains 1,786 warheads that have been produced or refurbished since 1988; each of these has a shelf life of at least 30 years. Ongoing modification/upgrades of the W76 warhead involving Y12 and the Kansas City and Pantex Plants will bring the total number of recent-vintage warheads to 2,986. At the same time, the ceiling for operationally deployed strategic nuclear weapons set by the START Treaty is 1,675. Some time in 2012—six years before the UPF could be completed—the number of warheads in the US stockpile will exceed the number of warheads allowable under the new START Treaty.

4|1|A.1 | Relevant to the UPF's mission as currently planned, the NNSA assumes that every existing nuclear weapon refurbished during a Life Extension Program needs to have a newly rebuilt secondary. Since that underpins the fundamental rationale for the UPF, the final Y12 SWEIS should explain why that is necessary or not. Additionally, the Bush Administration planned wide-scale Life Extension Programs, with ~2,000 W76 warheads (out of an estimated existing 3,200 warheads) slated for refurbishment. It remains to be seen whether the pending Nuclear

Multiple Signatory Letter 4

Page 3 of 5

6|9|D | Posture Review will require anywhere near that scale. In any event, the UPF, if it is to proceed at all, should have its mission redirected toward the dismantlement of secondaries rather than their rebuilding, and the downblending of an estimated 350-400 metric tons of weapons-grade highly enriched uranium at Y-12. The final Y12 SWEIS should examine that re-missioning, including the added possibility that a separate UPF is not needed at all, but that needed dismantling and downblending could occur within the newly built \$600 million-plus HEU Materials Facility.

3. The Y12 SWEIS does not address the dismantlement mission of Y12 in any detail; dismantlement operations are treated as an adjunct to production operations. By 2016, however, dismantlement and disposal of warheads materials should and likely will be the central mission of Y12. Existing dismantlement facilities are already taxed beyond capacity; there is a backlog of retired warheads awaiting dismantlement of at least 10 years. This backlog is destined to grow as more than 500 additional warheads are retired as Strategic Offense Reduction Treaty ("Moscow Treaty") and START stockpile levels are attained.

7|9|A | The Y12 SWEIS should fully develop and analyze the alternative proposed by the Oak Ridge Environmental Peace Alliance and others—construction of a new, single-purpose Dedicated Dismantlement Facility in Oak Ridge to meet the growing requirement for dismantlement capacity. Residual production mission requirements, which can be expected to diminish significantly, can be met by consolidating and down-sizing current operations to a 5 warhead/year capacity in an existing facility. Already scheduled upgrades (currently proposed as interim steps during a UPF construction phase) should be made semi-permanent, extending the life of Y12's production operations by 20-25 years.

The Dedicated Dismantlement Facility alternative, combined with the consolidated, down-sized upgrade-in-place alternative, has several virtues that recommend it above other alternatives. It permits the United States to maintain its existing stockpile without undercutting US nonproliferation efforts. It maximizes jobs in Oak Ridge. It saves two billion taxpayer dollars in capital expenses. It addresses a growing critical need for expanded Dismantlement capacity. It demonstrates leadership consistent with the US commitment to disarmament as articulated by President Obama. It reduces the high-security footprint of Y12 by at least sixty percent, permitting accelerated demolition of old buildings and reducing security costs. It can incorporate new, state-of-the-art dismantlement technologies and more rapidly retire the backlog that currently plagues Y12.

8|12|M.1 | 4. It is also important to note that the current Draft Y12 SWEIS does not, in fact, provide a site-wide analysis of environmental impacts of Y12 operations. There is inadequate discussion of seismic concerns surrounding current and future buildings; there is inadequate assessment of potential impacts from releases of materials and compounds used at Y12 in manufacturing and other processes; there are no realistic cost projections that would enable a reliable socio-economic impact analysis for any alternative. Instead, the Y12 SWEIS has been hijacked to provide National Environmental Policy Act documentation leading to official sanctioning for the UPF.

13|2|F | In order to complete a credible Final SWEIS for the Y12 Nuclear Weapons Complex, the NNSA must address these concerns and incorporate appropriate responses into the Final SWEIS, including a rigorous and thorough analysis of the Dedicated Dismantlement Facility alternative.

14|9|B | 5. In its May 2009 report the Bipartisan Congressional Commission on the Strategic Posture of the United States suggested delaying a decision on the UPF in order to "tailor the plan to new arms control agreements and their implications for future long-term requirements." NNSA instead chose to push the Y12 SWEIS forward, and worked to secure funding in the FY 2010 budget for detailed design of the UPF (\$94,000,000 would permit 90% of the design to be completed in 2010 according to one member of the design team.) In January 2010, the Alliance for Nuclear Accountability requested an extension of the public comment period for the Y12 SWEIS because common sense and fiscal responsibility suggest that NNSA would be wise to pause and await the release of the pending Nuclear Posture Review before moving forward with any decision. We strongly believe that NNSA seriously erred in not granting that request. NNSA can not credibly mount an argument of urgency given the four year delay between the Notice of Intent for the Y12

**Multiple Signatory Letter 4****Page 4 of 5**

SWEIS and the release of the Draft SWEIS. NNSA can and should wait until after the expected release of the new Nuclear Posture Review so that the need for the UPF can be more fully and soberly assessed.

For the above reasons, we find the draft Y12 SWEIS to be deficient in substance (both by commission and omission) and timing. We urge NNSA in the strongest possible terms to rectify these gross deficiencies in the final Y12 SWEIS, and to fully respond to our concerns.

Sincerely,

Jay Coghlan, Executive Director  
Nuclear Watch New Mexico  
Santa Fe, NM

Tom Clements  
Southeastern Nuclear Campaign Coordinator  
Friends of the Earth  
Columbia, SC

Lisa Crawford, President  
Fernald Residents for Environmental Safety & Health, Inc.  
Harrison, OH

Alice Slater  
Nuclear Age Peace Foundation, NY  
New York, NY

Glenn Carroll  
Coordinator  
Nuclear Watch South  
Atlanta, GA

Joni Arends, Executive Director  
Concerned Citizens for Nuclear Safety  
Santa Fe, New Mexico

Susan Gordon, Director  
Alliance for Nuclear Accountability  
Santa Fe, NM

Jon Rainwater, Executive Director  
Peace Action West  
Oakland, CA

Mavis Belisle  
JustPeace  
Amarillo, TX

Judith Mohling, Coordinator  
Nuclear Nexus Program  
Rocky Mountain Peace and Justice Center  
Boulder, CO

Mary Davis  
EcoPerspectives  
a project of Earth Island Institute  
Lexington, KY

**Multiple Signatory Letter 4****Page 5 of 5**

Don Hancock  
Southwest Research and Information Center  
Albuquerque, NM

CD001

Page 1 of 1

Dear Ms. Gorman: CD001 Date: 1-21-10

Thank you for being willing to read and listen to U.S. citizen's comments from all perspectives on the draft SWEIS for the Y-12 National Security Complex, by January 29, 2010.

1|14.0 | I oppose the plan to continue to build a new Uranium Processing Facility at Y12, as  
 2|3.A | nuclear weapons are immoral, profoundly dangerous, illegal, too expensive and  
 3|1.C | unnecessary. We need to truly abide by the Non-Proliferation Treaty, by dismantling  
 nuclear weapons, keeping nuclear waste secure and not build new nuclear weapons.

4|9.A | Though others have written letters to you explaining these reasons in greater depth,  
 I sign this card so you know I too support the "Alternative 6" as proposed by the Oak  
 Ridge Environmental Peace Alliance.

As Jesus Christ taught us in the Beatitudes, "Blessed are the Peacemakers for they shall be called the children of God."

Thank you,  
*Edward Sayers*

CD002

Page 1 of 1

CD002

**From:** Robert G. Ward [robert.ward@bullrun-metal.com]  
**Sent:** Saturday, January 23, 2010 8:01 AM  
**To:** DIV.Y12SWEIS.Comments  
**Subject:** Letter of Support "Alternative 4" SWEIS

Ms. Pam Gorman  
 Y-12 SWEIS Document Manager  
 Oak Ridge, TN 37830

Ms. Gorman:

1|13.0 | I would like to go on record as supporting Alternative 4, Capability-Sized UPF Alternative to construct and operate a new UPF at the  
 Y-12 National Security Complex that would have a reduced capacity while maintaining all enriched uranium processing capabilities.  
 2|12.P | In addition, I support the construction of an emergency management Complex Command Centre . These two key components of  
 modernization of Y-12 are essential to the future of the site. Finally, I believe that the Integrated Facilities Disposition Project needs  
 to be more fully incorporated into the final SWEIS and the subsequent Record of Decision.

Sincerely,

Bull Run Metal Fabricators and Engineers  
 Robert G. Ward  
 125 East Centre Stage Business Park,  
 Clinton, TN. 37716 USA  
 Telephone: +1 865.457.7377  
 Toll Free [USA]: 888.853.6146  
 Facsimile: +1 865.457.7374

1

CD003

Page 1 of 1

CD003

Pam Gorman, Y-12 SWEIS Document Manager  
 Y-12 Site Office  
 800 Oak Ridge Turnpike  
 Suite A-500  
 Oak Ridge, TN 37830

Re New U.S. Nuclear Weapons

Dear Ms. Gorman:

While President Obama has called for abolition of nuclear weapons and initiatives to be taken by nuclear weapons countries and the final review of the nuclear Non Proliferation Treaty will convene in May 2010, there are other voices and actions that undermine these goals and processes.

The US. Department of Energy announced plans for a new nuclear weapons bomb plant in Oak Ridge, TN that will cost 3.5 billion dollars. It will be a full-scale nuclear weapons production facility capable of producing 50-80 secondaries a year. The "secondary" is the thermonuclear part of the nuclear weapon which ignites the massive thermonuclear fusion reaction in the bomb. The Y-12 National Security complex has produced the secondary for every nuclear weapon in the U.S. arsenal.

- 1|14.0 We can no longer tolerate further production of nuclear weapons. They are not simply bigger bombs, are not useable, and are the means of ending all human and animal life on the planet. New nuclear weapons and new nuclear weapons facilities should not be built. Rather, I support the Oak Ridge Environmental and Peace Alliance's (OREPA) Alternative #6, which advocates revamping the Y-12 facility to function primarily in *dismantling* nuclear weapons in negotiated verifiable steps with other nuclear weapons countries. Furthermore, 2|9.A our nuclear weapons policy should unequivocally renounce first strike use and abandon implicit threats of use against non-nuclear countries. We should 3|1.B end all actions that drive non-nuclear countries to seek nuclear weapons and begin finally to implement our obligations---long ignored---under the Nuclear 4|1.C Non Proliferation Treaty.

Sincerely,

*Eleanor Rooney, Ph.D.*  
 1300 E. Lafayette, #2102  
 Detroit MI 48207

CD004

Page 1 of 2

CD004

Vic and Gail Macks  
 20318 Edmunton  
 St. Clair Shores, MI 48080-3748  
 586 779-1782  
 vicmacks3@gmail.com  
 November 9, 1009

Pam Gorman, Y-12 SWEIS Document Manager

Y-12 Site Office  
 800 Oak Ridge Turnpike  
 Suite A-500  
 Oak Ridge, TN 37830

Re New U.S. Nuclear Weapons

Dear Ms. Gorman:

While President Obama has called for abolition of nuclear weapons and initiatives to be taken by nuclear weapons countries and the final review of the nuclear Non Proliferation Treaty will convene in May 2010, there are other voices and actions that undermine these goals and processes.

The US. Department of Energy announced plans for a new nuclear weapons bomb plant in Oak Ridge, TN that will cost 3.5 billion dollars. It will be a full-scale nuclear weapons production facility capable of producing 50-80 secondaries a year. The "secondary" is the thermonuclear part of the nuclear weapon. Warheads in the U.S. arsenal are triggered by a relatively small fission bomb, the primary, which in turn ignites the massive thermonuclear fusion reaction in the secondary. The Y-12 National Security complex has produced the secondary for every nuclear weapon in the U.S. arsenal.

" At the Y-12 plant...the work performed on secondaries...called Life Extension...is not merely maintaining the U.S. arsenal in its current state, but...making substantive changes to it... The modifications include, among other things, the installation of a new arming, fusing and firing mechanism,..."[www.anuclear.org](http://www.anuclear.org). This results in a new weapon with new ground burst capabilities.

The Y-12 plant will receive \$94 million in fiscal 2010 for work on the proposed new Uranium Processing Facility.

Secretary of Defense Gates has called for the passage of the twice rejected Reliable Replacement Warhead program. Current nuclear weapons are expected to be reliable for up to 85 years.

While the U.S. and Russia are negotiating the extension of the Comprehensive Test Ban Treaty, it will require the approval of 67 senators and will not result in one nuclear weapon being dismantled.

CD004

Page 2 of 2

1|1.D We do not want, do not need, and should not tolerate further  
 2|9.B production of nuclear weapons. They are not simply bigger bombs, are not  
 3|1.B useable, and are the means of ending all human and animal life on the  
 4|1.C planet. New nuclear weapons and new nuclear weapons facilities should not  
 be built. The Y-12 facility function should be *dismantling* of nuclear weapons  
 in negotiated verifiable steps with other nuclear weapons countries.  
 Furthermore, our nuclear weapons policy should unequivocally renounce  
 first strike use and abandon implicit threats of use against non-nuclear  
 countries. We should end all actions that drive non-nuclear countries to seek  
 nuclear weapons and begin finally to implement our obligations---long  
 ignored---under the Nuclear non Proliferation Treaty.

Sincerely,

*Vic Macks*

Vic Macks

*Gail Macks*

Gail Macks

copy to:

President Barack Obama  
 The White House  
 1600 Pennsylvania Avenue  
 Washington, DC 20500

Senator Carl Levin  
 269 Russell Office Building  
 U.S. Senate  
 Washington, DC 20410-2202

Senator Debbie Stabenow  
 133 Hart Senate Office Building  
 Washington, DC 20510

Congressman Sander Levin  
 1236 Longworth House Office Building  
 Washington, DC 20515

CD005

Page 1 of 1

Nov 23, 2009 10:32AM

CD005



Draft Y-12 Site-wide  
 Environmental Impact Statement--  
 U.S. Department of Energy  
 National Nuclear Security Administration



Written Comment Form

Must be received on or before January 29, 2010

1|13.0

Dear Ms. Gorman,  
 I am in support of bringing the  
 Uranium Processing facility to Oak Ridge, TN.

*Jillie Utterback*

Please use other side if more space is needed.

Comment forms may be mailed to:  
 Ms. Pam Gorman  
 Y-12 SWEIS Document Manager  
 800 Oak Ridge Turnpike, Suite A-500  
 Oak Ridge, TN 37830

Comment forms may be faxed to:  
 (615) 483-2014  
 or sent by email to:  
 y12swiscomments@ornl.gov

You may also submit comments through the project website which can be found at:  
<http://www.y12swis.com>

CD006

Page 1 of 1

CD006

SOMETIMES YOU ONLY GET ONE CHANCE TO CHANGE THE FUTURE...

THE FUTURE IS CALLING. THIS IS OUR CHANCE TO CREATE THE WORLD WE WANT TO LIVE IN. WE, THE UNDERSIGNED, SAY NO! TO THE CONTINUED PRODUCTION OF NUCLEAR WEAPONS IN OAK RIDGE, TENNESSEE.

11.D The November 17 public hearing for the Draft Y12 Site Wide Environmental Impact Statement will be our only chance to say NO! to continued nuclear weapons production in Oak Ridge, Tennessee. Despite President Obama's commitment to pursue a world free of nuclear weapons, the National Nuclear Security Administration is proposing a new bomb plant in Oak Ridge to make thermonuclear secondaries for nuclear weapons—the secondary is the fusion part of the bomb that turns an atomic bomb into a thermonuclear holocaust. Y12 is the only place in the US that makes them. We believe Y12 must not corrupt the President's vision. Y12 should commit itself to the dismantlement of nuclear weapons. There is currently a 15 year backlog of retired weapons in Oak Ridge awaiting dismantlement, with more to come. Former Secretary of State George Shultz says, "We are at a tipping point. The simple continuation of present practice with regard to nuclear weapons is leading in the wrong direction. We need to change the direction."

Signature      Printed name      Address

- 1 [Signature]      GAYLORD BAKER      26 CHESTNUT RD., BLACKMOUNT, NC 28711
- 2 [Signature]      Leah R. Kappan      400 Charlotte St. Asheville 28801
- 3 [Signature]      Steven L. Gilman      P.O. Box 18572, Asheville, NC 28814
- 4 [Signature]      Mary Olson      P.O. Box 7506 Asheville, NC 28802
- 5 [Signature]      BRITA L. CLARK      10 CHESTNUT CREEK RD  
CANDLER, NC 28715  
622 Rugby View Place
- 6 [Signature]      Stanley G. Dienst      Wendersonville NC 28791
- 7 [Signature]      DON RICHARDSON      577 Windover, Brentwood 28712
- 8 [Signature]      John Teague      387 Woodview Dr. Asheville 28804
- 9 \_\_\_\_\_
- 10 \_\_\_\_\_

CD007

Page 1 of 1

CD007

With our signatures signed on this statement we declare our opposition to construction of a new nuclear bomb plant. We believe that the US must stop planning to kill people. Democracy is not learned by killing people.

114.0 Reducing the square footage of facilities in the high security area, and in the total building is simply a cosmetic gesture to facilitate continuing to make bombs, weapons to kill. Developing smaller more lethal weapons is not the answer. The hard truth is that mass destruction weapons are designed to kill indiscriminately and to condemning vast numbers of survivors to incredible suffering.

21.E You threaten Korea and Iran for efforts to develop nuclear power, while you continue to build death weapons, poison the earth, air, and streams causing suffering, disease and death pretending to keep the peace. First take the log out of your own eye. Then you will be better able to help your neighbor.

312.F A Chinese scientist studying radioactivity in animals living near Y-12 found that of 100 area deer bagged every one tested radioactive, unfit for man or beast. Animals, birds, water fowl cannot read signs posted by the stream along the Y-12 perimeter warning "stay out of the water". Wherever they go their radioactive feces, urine and carcasses poison other living beings. This monstrous practice fails to consider what is good for life on the planet. Victims of blind greed become ill, suffer and die.

Were this the only objection it would still justify rejecting any new nuclear bomb plant construction. Cleaning up this 50-yr. poisoning of our land will cost huge amounts of financial and human resources:

410.B Billions of dollars could finance a national health care plan or a housing construction that could put all our citizens in decent housing and eliminate sleeping under bridges and hungry people begging for food. It could finance scholarships for indigent students. The Y-12 nuclear program robs the nation of resources needed to provide a better life for our own citizens. You have been aiding and abetting this robbery. Streams poisoned by your mercury dumping make the fish unfit for human consumption. It would appear that no one has attempted to determine how many years it will take to cleanse this poison so carelessly dumped.

My signature here affirms my opposition to all construction of any new nuclear bomb plant.

- |                    |                            |
|--------------------|----------------------------|
| <u>[Signature]</u> | <u>Asheville, NC 28801</u> |
| <u>[Signature]</u> | <u>Asheville NC 28804</u>  |
| <u>[Signature]</u> | <u>Asheville NC 28804</u>  |
| <u>[Signature]</u> | <u>Asheville NC, 28804</u> |
| <u>[Signature]</u> | <u>Asheville NC 28804</u>  |
| <u>[Signature]</u> | <u>Asheville NC 28806</u>  |

**PUBLIC HEARING—OAK RIDGE, TN****November 17, 2009-Evening Session**

- 13.0 Commentors support the Capability-sized UPF Alternative.
- 13.0 Commentors support the UPF.
- 13.0 Commentors support the continued operations at Y-12.
- 3.B Commentors state there is no need for the UPF.
- 3.A Commentors state there is no need for continued life-extension work or new weapons production.
- 1.E Commentors state that the most critical mission need that we have in pursuit of nonproliferation goals is the safe, secure, and verifiable capacity for increased dismantlement and disposition of warheads.
- 9.A Commentors state that there is a need for passive curatorship of the current arsenal and that need can be achieved through consolidation, downsizing, and upgrading-in-place the current facility, which is already in the plan. A sixth alternative should be added to the SWEIS and considered by NNSA. Alternative 6 recognizes a need for a Stockpile Stewardship mission that can be achieved through an upgrade in place to existing facilities. It recognizes the increasing demand for a verifiable safeguarded dismantlement capacity which must be addressed. Current facilities should be analyzed. And if there is a need, [NNSA] can construct a new dismantlement facility. The benefits of such an alternative include workforce retention and the reduction of the high-security area.
- 14.0 Commentors are opposed to the construction of any facility in Oak Ridge or anywhere else that could now or, through modifications, in the future produce new nuclear weapons.
- 9.B Commentors support the construction of a facility that can expedite dismantlement. This new facility must be a strict single-use plant for dismantling weapons with no possibility of being modified into a plant that produces new nuclear warheads.
- 10.D Commentors are opposed to the use of taxpayer's money and resources on nuclear weapons.
- 12.L Commentor is concerned with the wastes that will be generated through nuclear weapons operations.
- 10.B Commentors stated that money could be better spent on other social purposes.

- 3.A Commentors stated that there is no moral justification, no moral rationale for the acquisition of more nuclear weaponry.
- 1.C Commentors stated that the U.S. must demonstrate to the rest of the world and to ourselves our commitment to reducing our stockpile of nuclear weapons to zero; leading the world in the right direction.
- 12.E Commentor expressed concern with potential earthquakes at Y-12.
- 11.A Commentors expressed concern over potential terrorist attacks at Oak Ridge.
- 2.B Commentor registered complaint that the hearings are being held in the middle of the week and had to lose three days of paid work to be able to attend. Commentor added that there were some people who wanted to come but couldn't because of the inconvenience.
- 1.E Commentor stated that the UPF decreases the United States' credibility in being able to convince Iran and North Korea and other countries that they cannot have nuclear weapons.
- 15.A Commentor stated that the consequences of using the nuclear weapons must be assessed.
- 12.J.1 Commentor expressed concern over cancer to workers.
- 1.A Commentor stated that the SWEIS was proceeding based on the 2001 Nuclear Posture Review without waiting for the President's new Nuclear Posture Review.
- 12.J.2 Commentor expressed concern over the impacts to health from the Oak Ridge environment.
- 13.0 Commentors support NNSA's commitment to national security.
- 13.0 Commentors support modernization at Y-12.
- 12.G.1 Commentor urges NNSA to maintain and preserve just three of the World War II era buildings, each of which meet the National Register criteria and are needed to tell Y-12's story to future generations. These buildings are 9204-3, 9731, and 9706-2. Each of them meets the requirements of the National Historic Preservation Act as historic properties and should be preserved for future generations.
- 14.0, 10.D Commentors are opposed to nuclear weapons and spending taxpayer money on anything but dismantling them.

- 1.F Commentors stated that it would be globally dangerous for the United States to construct the proposed facility which would produce secondaries and other nuclear weapons components.
- 3.A Commentors stated that nuclear bombs are immoral.
- 9.C Commentors stated that the SWEIS doesn't include any alternative that supports and that's consistent with the President's foreign policy but, indeed, would undermine it.
- 12.O Commentor stated that the SWEIS does not mention the past 60 years of contamination and pollution that has occurred due to the processing of uranium and nuclear matter here; and so, therefore, there's no mention on really how to keep that from occurring or continuing to occur.
- 1.C Commentors stated that in order for non-proliferation to work, there must be dismantling of nuclear weapons and a plan to reduce those weapons to zero in a reasonable period of time.

**PUBLIC HEARING—OAK RIDGE, TN****November 18, 2009-Morning Session**

- 13.0 Commentors expressed support for the continued operations at Y-12 and modernization.
- 13.0 Commentors support the Capability-sized UPF Alternative.
- 13.0 Commentors support the UPF.
- 12.P Commentors stated that the Integrated Facilities Disposition Project is key to Y-12 modernization efforts and must be fully incorporated into the SWEIS and Record of Decision.
- 13.0 Commentors support the Complex Command Center.
- 13.0 Commentors opposed the No Action Alternative (Alternative 1).
- 2.A Commentor thinks the SWEIS assessment is thorough and accurate.
- 9.A Commentor contends that the dismantlement option is already embodied in UPF.
- 4.0, 8.0 Commentor stated that Alternatives 1 and 5 do not provide long-term capability to execute our necessary mission.
- 6.0 Commentor stated that Alternative 3 will not solve the underlying issues with existing facilities.
- 2.B Commentor stated that the timing of this hearing, 12 working days after the Federal Register Notice of Availability, embarrasses the Department of Energy's commitment to meaningful public participation. Commentor added that DOE reneged on its promise of a 30-day period to allow review of the document before the public hearing.
- 9.D Commentor stated that the proposals for a UPF, whatever size, fail to address the growing need for dismantlement capacity. There is no discussion of the overlap of dismantlement and production operations. There is no discussion of the backlog of secondaries awaiting dismantlement which already present a problem for Y-12. This critical mission need for the United States is absent in the SWEIS.
- 2.F Commentor stated that the Site-Wide EIS should provide a comprehensive analysis of the environmental situation at Y-12 so the public can understand the nature of potential impacts by all proposed activities at the site.

- 2.F Commentor stated that DOE violated its own regulations to prepare a SWEIS every 5 years by delaying the Site-Wide EIS and by using the SWEIS to analyze the UPF.
- 1.E.1 Commentor stated that the Site-Wide EIS does not address proliferation concerns inherent in the proposal to build a new weapons production facility. Commentor added that past NEPA analyses have included proliferation concerns.
- 1.A Commentor stated that the SWEIS does not consider studies which have not yet appeared, but which will have a profound impact on the very premise of the Site-Wide EIS. Commentor expressed the opinion that these reports and events over the next seven months are likely to further erode the power of arguments for the UPF. Commentor offered an example of the JASON Report (which commentor said was released the morning of November 18), which will state there is no evidence that the stockpile is at risk, refuting the primary arguments being put forward for new production capacity as part of the modernization discussion.
- 1.A Commentor stated that NNSA must incorporate the JASON Report, the Nuclear Posture Review, the START Treaty renewal, and the actions of the U.S. leading up to and during the Nonproliferation Treaty review.
- 2.A Commentor stated that the Site-Wide EIS is being asked to bear a burden that Side-Wide EIS's are not designed to bear, it fails to provide the comprehensive analysis a Site-Wide EIS should present. There is insufficient depth and breadth in the analysis of activities and their impacts at Y-12.
- 3.A Commentor stated that there is no need for a new uranium bomb plant because the renewal of the START Treaty with Russia will reduce the nuclear warhead stockpile and it will continue to go down.
- 9.A Commentor stated that the SWEIS needs Alternative 6, which includes passive curatorship of the current stockpile to assure safety and security performed in consolidated, downsized, and upgraded existing facilities at Y-12, and construction of a new dismantlement facility with designed-in safeguards and transparency to process the current backlog and accommodate increased retirement of warheads and the eventual dismantlement of the entire U.S. arsenal.
- 1.E Commentor stated that building the UPF will trigger nuclear proliferation, and that the U.S. is hypocritical when it attempts to discourage other nations from pursuit of nuclear capability while expanding our own capacity.