Date:

By email to: [SPDP-EIS@nnsa.doe.gov](mailto:SPDP-EIS@nnsa.doe.gov)

Mr. Jeffrey Galan, NEPA Document Manager

NNSA Office of Material Management and Minimization

Savannah River Site

P. O. Box A, Bldg. 730-2B, Room 328

Aiken, SC 29802

Re: Scoping Comments for the Environmental Impact Statement (EIS) for the Surplus Plutonium Disposition Program

Dear Mr. Galan:

I oppose the proposal to send 34 metric tons (MT), and ultimately up to 48.2 MT, of surplus plutonium to the Waste Isolation Pilot Plant (WIPP). If the Department of Energy/National Nuclear Security Administration (DOE/NNSA) proceeds with the EIS process, it must consider alternatives, including dilution and storage at the Savannah River Site (SRS), immobilization and storage at SRS or sites other than WIPP, disposal at sites other than WIPP, and use of some or all of the surplus plutonium in the DOE proposed Versatile Test Reactor.

As a New Mexican, I object to DOE/NNSA violating the social contract with the People of New Mexico regarding WIPP. Provisions of that social contract include no more than 6.2 million cubic feet of legacy transuranic (TRU) waste and a limited operational lifetime of 25 years and then begin closure, which could take 10 years.

In its 2020 report, the National Academy of Sciences (NAS) determined:

**FINDING 5-4: By virtually any measure, the proposal to dilute 48.2 metric tons of surplus plutonium and dispose at the Waste Isolation Pilot Plant (WIPP) represents a substantial technical and “social contract” change for WIPP and the State of New Mexico.**

DOE/NNSA should not proceed with the proposed Draft EIS. If there is a Draft EIS, it must describe what DOE/NNSA will do to comply with recommendations of that NAS Report. The Draft EIS should specifically address why DOE/NNSA is not following the NAS recommendation for a programmatic EIS. The Draft EIS should also specifically discuss why DOE/NNSA is not following the NAS recommendations for independent technical experts, increased transparency, and stakeholder engagement with state officials and citizens.

Sincerely,

Name and address: