March \_\_\_, 2023

By email to: SPDP-EIS@nnsa.doe.gov

Maxcine Maxted, 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: Public Comments about the Surplus Plutonium Disposition Program Draft Environmental Impact Statement (DEIS) to ship 34 Metric Tons (or more) of surplus plutonium pits from the **Pantex Plant** to **LANL** for processing into powdered plutonium for shipment to the **Savannah River Site** for additional processing before shipment to **WIPP** for disposal

SUMMARY OF MY COMMENTS

**The DEIS is Based on Outdated or Non-existent EIS Information, Data and Analyses**

**The Public Is Unable to Provide Informed Comments About the Potential**

**Public Health and Environmental Consequences of the DOE’s Proposal**

**Dates of Last NEPA EIS Coverage for the Four Proposed DOE Sites:**

* 1996 – Last EIS completed for Pantex Plant
* 2008 – Last EIS completed for LANL
* ? – Has an EIS ever been completed for SRS?
* 1990 – Last EIS completed for WIPP

**DOE Must Retract the DEIS and Complete New EIS Processes for the Four Sites**

Dear Ms. Maxted:

I am unable to provide informed public comments about the Surplus Plutonium Disposition Plan draft Environmental Impact Statement (SPSP DEIS) because it is based on outdated information, data and analyses for the four sites selected for the surplus plutonium disposition plan submitted by the Department of Energy (DOE) and the DOE’s semi-autonomous nuclear weapons agency, the National Nuclear Security Administration (NNSA). The four sites are:

* the Pantex Plant, located north of Amarillo, TX;
* Los Alamos National Laboratory (LANL), located in Northern NM;
* the Savannah River Site, located in SC; and
* the Waste Isolation Pilot Plant (WIPP), located in Southeastern NM.

DOE/NNSA must retract the SPSP DEIS and complete a new EIS process for each of the four sites where DOE plan to dilute the plutonium, turn it into powdered plutonium – the most dangerous form because it is easily inhaled - and dispose of 34 metric tons (MT), and ultimately up to 48.2 MT or more, of surplus plutonium.

I am reminded of the words of U.S. Senator Pete Domenici of New Mexico, a strong advocate of WIPP from its beginning. In 2002, he cautioned against burial of surplus plutonium at WIPP. He warned:

I want to ensure that high level … wastes can never be simply diluted in order to comply with criteria for WIPP disposal … [Such dilution] raises serious questions about our adherence to the same international controls on weapon-related materials that we expect other nations to follow.”

**In the current climate of heightened awareness of nuclear weapons and materials, compliance with international controls is required. But non-compliance is exactly what DOE proposes.**

Further, DOE/NNSA must consider alternatives, including

* dilution and storage of the plutonium at the Savannah River Site (SRS);
* immobilization (encasing the plutonium in glass or ceramic materials prior to disposal) and storage at SRS or sites other than WIPP; and
* consideration of another repository other than WIPP.

DOE/NNSA violates the social contract with the People of New Mexico regarding WIPP. That social contract limits the disposal of legacy transuranic (TRU) plutonium waste to no more than 6.2 million cubic feet and limits the operational disposal phase to 25 years followed by closure, which could take 10 years.

Finally, DOE/NNSA must conscientiously comply with international standards. It must conform to its own rules concerning the bringing the outdated or non-existent environmental impact statements current so that the public has the latest information to review the DOE/NNSA current plans for surplus plutonium disposition. And it must not cast aside long-standing commitments and promises to the People of New Mexico.

DOE/NNSA must retract the SPDP DEIS; must complete the required NEPA analyses for the four proposed sites; must consider all alternatives, including another repository other than WIPP and immobilization; and compliance must comply with the social contract with the People of New Mexico.

Sincerely,

Name and address: