June \_\_\_, 2023

By email to: SNL-SWEIS@nnsa.doe.gov

Dr. Adria Bodour, NEPA Compliance Officer

National Nuclear Security Administration - Sandia Field Office

P.O. Box 5400

Albuquerque, NM 87185

Re: Comments about the Scope of Sandia National Laboratory

Site-Wide Environmental Impact Statement (SWEIS)

Dear Dr. Bodour:

I am concerned about on-going nuclear weapons work at Sandia National Laboratory (SNL) impacting the environment and diverting needed resources away from education, broadband, and health and wellness to mention a few.

I object to SNL’s plans for this new SWEIS to cover 15 years of operations. SNL must hold to a 10-year SWEIS cycle. Given the years that have passed since the “current” 1999 SWEIS and the related 2006 Supplement Analysis, some of the data cited below may not be current.

Waste. The SWEIS is important for the public to understand SNL’s environmental role as a key facility in the Department of Energy (DOE) nuclear weapons complex. SNL generates and stores extremely large amounts of hazardous and radioactive wastes.

In the draft SWEIS, SNL must present its plan for reducing the more than 120,000 pounds of hazardous waste produced annually just at the Albuquerque site. Decontamination, decommissioning and demolition of contaminated facilities are ongoing.

The draft SWEIS must include the annual production volumes of waste from DD&D operations, from operationally generated wastes, as well as from biohazardous and nanotechnology waste-generating operations and include the disposal pathways.

The toxic, hazardous and radioactive wastes from SNL operations are contaminating the groundwater that serves Albuquerque drinking water wells and pose great threats to public health and the environment. This is true for operations at TA-V (Annular Core Research Reactor), the Tijeras Arroyo, the Mixed Waste Landfill, the Chemical Waste Landfill, and other locations that SNL must fully identify.

Groundwater. SNL has increased its consumption of groundwater and disposes of more than one million gallons per day of “waste” water into the Albuquerque city sewer system. SNL must identify the sources of “waste” water and consider whether reclamation and reuse is possible.

Air. SNL’s ambient air monitoring for radionuclides, including tritium, is far less than at other DOE sites even though emissions at those sites may be far less than emissions from SNL. For example, there are only four locations at SNL that monitor alpha and beta radioactivity.

SNL must provide a comprehensive monitoring system to accurately measure radionuclide concentrations. SNL must provide a complete inventory of all radioactive releases from all SNL facilities. Specific isotope analysis for strontium-90, americium-241 and plutonium-238/239/240 must be provided in the draft SWEIS.

I oppose open burning and open detonation (OB/OD) of explosives and other hazardous materials. There are alternatives to OB/OD of hazardous waste. The National Academies of Sciences, Engineering, and Medicine and the Environmental Protection Agency (EPA) recognize safe alternatives to OB/OD that capture and treat emissions prior to release. EPA is considering revising regulations to promote these safer alternatives. The draft SWEIS must include information about the number of pounds of materials that are OB/OD at SNL as well as disposal pathways for ash and unburned materials. The draft SWEIS must include a new alternatives analyses for OB/OD operations along with a timeline for implementation of alternatives to OB/OD.

A comprehensive SWEIS is essential to the safe operation of SNL and the protection of the public and the environment.

Thank you for your careful consideration of my comments. Please acknowledge receipt of my comments.

Sincerely,