Labriola, Kathy
Page 1 of 1

4/25/04

Dear Mr Grin,

1/04.01 I am writing to object to the Dept of Energy's recently released SWEIS (Site-Wide Environmental Impact Statement for Livermore Labs planned operations for the next 10 years.

2/33.01 I am outraged that the SWEIS calls for doubling the amount of plutonium allowed for Livermore Labs from 1540 pounds to 3300 pounds! One microscopic particle of plutonium, if inhaled, can cause lung cancer. And just a few pounds of plutonium can make more than 300 nuclear bombs.

3/37.01 In addition, the SWEIS plan makes Livermore Labs the primary test site for new technologies for manufacturing "plutonium pits" for nuclear weapons. A "plutonium pit" is a soft-ball-size piece of plutonium that sits inside a nuclear weapon + triggers its thermo-nuclear explosion. This is a threat to the health + safety of all of us living in the Bay Area, as well as a horrible danger to the world due to the creation of many additional nuclear weapons.

4/23.01

5/39.01 Last but not least, the SWEIS calls for Livermore to be the center of development of a new round of underground nuclear testing. This is a danger to health as well as to world peace.

1/04.01 cont. Please oppose this terribly misguided + dangerous SWEIS.

Sincerely,
Kathy Labriola

Kathy Labriola
1714 - 9th Street
Berkeley, CA 94710

Lang, Michael
Page 1 of 1

Berkeley, California
94704-2324
May 26th 2004

Thomas Grim, SWEIS Document Manager
U.S. Dept of Energy
National Nuclear Security Administration
Livermore Office
7000 East Avenue
Livermore, California 94550-9234
fax-copy: 925.422.1776

Dear Mr Grim,

1/03.01 The U.S. is already spending more than a billion dollars every 24 hours on defense.

2/07.01 I urge the Lawrence Livermore National Laboratory to devote its resources to developing the peaceful use of the atom.

For the sake of sanity,
MICHAEL LANG

cc: Spencer Abraham, Secretary, Dept of Energy
Michael Anastasio, Director, Lawrence Livermore Lab
Barbara Lee, U.S. Representative
Barbara Boxer, U.S. Senator

The above text reads as follows:

The U.S. is already spending more than a billion dollars every 24 hours on defense.

I urge the Lawrence Livermore National Laboratory to devote its resources to developing the peaceful use of the atom.

Larkin, Don
Page 1 of 4

Comments on the Draft Environmental Impact Statement for Lawrence Livermore National Laboratory

Don Larkin
May 27, 2004

Ongoing and proposed activities at the Lawrence Livermore National Laboratory have an environmental impact far beyond the immediate vicinity of Livermore.

An honest assessment of that impact must take into account at least:

1/01.01
- How weapons research and development at the lab affects the worldwide climate for nuclear weapons—in particular, how it affects the proliferation of nuclear weapons. (Some specific comments on this point are included below.)

2/02.01
- How the products that begin their life at the lab will affect the environment in which we live.

  The intention, of course, is to produce a new generation of nuclear weapons, including so-called "bunker busters" and "mini-nukes." It's clear that the government intends these weapons to be more "usable" than the ones currently in the arsenal. Their use is inherent in the missions for which they're being designed and the design requirements. For instance, the whole idea behind developing weapons with smaller yields is that it reduces one of the barriers to their use.

  Therefore, the likely environmental effects of these weapons in use must be included as part of the study.

3/31.04
The draft environmental impact statement omits these concerns and, therefore, is flawed. It should be redone to address these concerns. Or separate studies with public comment should be initiated to address them. No action should be taken until those studies are complete.

Proliferation

1/01.01 cont.
Research and development on nuclear weapons is the engine that drives proliferation. It's where proliferation begins.

There are several reasons why this is the case:

- First, and most obviously, without weapons R&D there would be nothing to proliferate. The technologies that we fear others may acquire and use against us are invented at the Lawrence Livermore National Laboratory. It all begins here.

  Some people say that if the United States didn't work on advancing nuclear weapons technology, others would and this country would fall behind. This is patently false. No other country has the inclination or the money to do this work. If the U.S. didn't do it, it wouldn't get done—and the world would be safer, now and in the future. We cannot use others as an excuse.

Larkin, Don
Page 2 of 4

1/01.01 cont.
- Moreover, weapons R&D legitimizes the possession of nuclear weapons. If it makes sense and is morally acceptable for the United States to develop these devices, then it makes sense and is morally acceptable for others to do the same.

  Current weapons R&D also legitimizes the use of nuclear weapons—especially given that the intention is to design more "usable" weapons and weapons tailored for specific, foreseeable functions, such as destroying underground bunkers.

- Weapons R&D creates curiosity and anxiety: Others wonder what you have learned and what you are inventing based on that knowledge. They engage in activities to compensate for the possibilities.

  Lately, the idea has been floating around that if the US just maintains overwhelming force, others will see how futile anything their poor societies might do to stand against us would be—and they won't try. The Nuclear Posture Review calls this "dissuasion" and says that "[t]he capacity . . . to upgrade existing weapons systems, surge production of weapons, or develop and field entirely new systems . . . can discourage other countries from competing militarily with the United States." Our might prevails because others know it is hopeless to stand against us. They give up without a fight.

  This is an idea grounded only in wishful thinking and thoughts of global empire. Nothing in history backs it up. Others may change their behavior in response to our armaments, but it is not to get rid of their own weapons, but to enhance them to counter ours.

- Weapons R&D also undermines the Non-Proliferation Treaty (NPT). That treaty obliges countries without nuclear weapons to forego acquiring them. In return, countries with nuclear weapons promise to negotiate the means they will use to get rid of them. Article VI of the treaty requires "negotiations in good faith on effective measures relating to cessation of the nuclear arms race at an early date and to nuclear disarmament, and on a Treaty on general and complete disarmament under strict and effective international control."

  If the United States continues to violate that article, other nations will not feel bound by their promise not to acquire nuclear weapons.

In sum, the research and development of nuclear weapons in the U.S. models and initiates the processes that lead to proliferation.

All technology proliferates—perhaps especially weapons technology, since its pursuit is motivated both by fear and dreams of power. Proliferation doesn't require espionage—though that occurs. Sooner or later, others figure out what you have done and retrace your steps. They note the direction of nonclassified research that might be informed by classified research. They see what hypotheses are being tested and which avenues are no longer being pursued. They discern what direction the technology is moving, they see the activity that surrounds what you're trying to keep secret, and they draw conclusions.

After the first atomic bombs were developed in 1945, scientists in the Manhattan project predicted that the Soviet Union would duplicate that feat within 5 or 6 years. They were close. Fifty-nine years later, the technology for fission bombs is widely understood and the world is awash in plutonium. We now worry about nuclear bombs in suitcases and car trunks, put there not by

Larkin, Don
Page 3 of 4

countries, but by nongovernmental groups like Al-Qaeda. Did anyone predict this in 1945? How long do lab scientists think it will take for this history (or something paralleling it) to be repeated for their current inventions? When do they think the technology behind the next generation of nuclear weapons will be commonplace?

Once a technology is invented, others can duplicate it with much less effort and for a small fraction of the original cost—for you will have found the path and paved the way for them. Does it make sense for the United States to devote so much of its talent and so many of its resources to develop these extremely dangerous, terrible technologies that will eventually, in time, target our grandchildren?

You can't fight terror with war and new weapons—especially weapons of terror like those designed at Lawrence Livermore National Laboratory.

And you can't end proliferation by creating more weapons to proliferate.

Proliferation Study

1/01.01 cont.

In 1995, the Department of Energy conducted hearings on whether the centerpiece of the Stockpile Stewardship program, the National Ignition Facility (NIF), posed a proliferation risk. The final report, titled "The National Ignition Facility and the Issue of Proliferation," came out in December of that year. Predictably, it concluded that NIF would not contribute to proliferation. It rested that conclusion on two main assertions:

- First, that the labs were not pursuing and NIF would not be used to pursue new weapons designs or advanced weapons concepts.

  If that was ever the case, it clearly isn't any longer. In contrast to 1995, the government has been very public about its intent to develop another generation of nuclear weapons. For example, the Nuclear Posture Review of December 2001 talks about the need to "design, develop, manufacture, and certify new warheads in response to new national requirements" (p. 30) and speaks of the hope that "it will not take 20 years or more to field new generations of weapon systems," including nuclear weapons (foreword).

- Second, that the Comprehensive Test Ban Treaty would be in place to prevent test explosions; and that test explosions were needed to actually verify a new design. In fact, the report claimed that the experiments at NIF would contribute to the test ban by making it possible to monitor the stockpile without testing. NIF made the test ban more acceptable to the nuclear weapons establishment.

  However, we now have the experience of warheads being designed without test explosions. Moreover, the United States has refused to ratify the Test Ban Treaty and the Nuclear Posture Review entertains the possibility of resuming full-scale underground testing (i.e., more than the "subcritical" tests now taking place).

Thus, the main pillars upon which the claim that NIF would not contribute to proliferation rested—extremely shaky pillars to begin with—have now collapsed. Other parts of the edifice have also crumbled. For example, the report asserted that openness at the lab would mitigate

27 May 2004 page 3 of 4

Larkin, Don
Page 4 of 4

1/01.01 cont.

against others being concerned about what the U.S. was up to. And it said that plutonium would not be used in NIF experiments. Neither assertion is valid today.

Therefore, the claim that activities at the lab won't contribute to proliferation no longer can be maintained. It is imperative that the issue of proliferation again be reopened in a comprehensive way—with public comment and independent analysis. This time, the study should concern not just NIF, but all ongoing and proposed activities at the lab.

We need more than just an assertion from the government that NIF experimentation and the lab enhancements won't contribute to proliferation (or, in the words of the 1995 study, that "proliferation concerns . . . can be successfully managed"). We need evidence, analysis, and argumentation. We need a comprehensive study and public input. We need independent evaluators. In the end, we need an explanation of why the technology developed at the lab is the exception to rule that all technology proliferates.

Risk Assessments

4/25.06

The past history of the laboratory shows that the optimistic risk assessments in the draft environmental impact statement are inaccurate and not to be believed. There are a number of reasons for the inaccuracies, including faulty initial assumptions about the probabilities of various events. Garbage in, garbage out.

A core problem is that aggregate and contingent risks are not appropriately taken into account. Suppose, for example, that three things (X, Y, and Z) must go wrong for, say, the release of radioactive material during particular kinds of experiments. The EIS assumes that the probability of the release is the product of the separate probabilities for X, Y, and Z occurring at the same time. Since X, Y, and Z each have low probabilities, the probability of them happening in concert is, mathematically, determined to be extremely low indeed.

This reasoning fails to take into account contingencies between events. X affects the probability of Y and Z. For example, the heat of a fire (X) may make it more likely for a particular piece of equipment to fail (Y) or for a human actor to do something out of the ordinary (Z). Overlooked wear and tear on a part (X) may make a short circuit (Y) more probable along with the failure of other systems (Z). I have a steady hand, so the probability of my spilling orange juice as I pour it in the morning is perhaps 1 in 150 (I spill some about twice a year). However, during an earthquake that probability shoots up to close to 1 in 1. It would be totally misleading to assume that the probability of orange juice being spilled is 1/150 times the probability of an earthquake occurring at that time. Yet this is equivalent to the reasoning on risk assessments in the EIS.

In addition, human error—everything from ordinary mistakes to the determined actions of a disgruntled employee—is not adequately taken into account. Illness (such as a cold or even the lack of sleep) can make someone more error prone.

The risk assessments in the EIS need to be redone.

27 May 2004 page 4 of 4

Lasciak, Valerie
Page 1 of 3

Dear Mr. Grim,
>
> Please consider this letter with my comments on the environmental and
> proliferation risks from proposed nuclear weapons development and new
> plutonium and tritium programs at the U.S. Department of Energy's
> (DOE) Lawrence Livermore National Laboratory (LLNL).
>
1/02.01 > I write to you because the DOE has prepared a draft Site Wide
> Environmental Impact Statement (SWEIS) that proposes to ramp up
> nuclear weapons activities at the Livermore Lab in Northern
> California. Livermore Lab is working on the design of a new,
> high-yield nuclear bunker-buster, called the "Robust Nuclear Earth
> Penetrator," and I oppose its development. Additionally, I oppose the
> development of so-called "mini-nukes" and other new nuclear weapons
> concepts being researched at Livermore Lab.
>
> Here are my comments on six dangerous new programs being proposed at
> Livermore Lab.
>
2/08.02 > 1. Storage of More Nuclear Materials: This plan will more than
> double the storage limit for plutonium at Livermore Lab from 1,540
> pounds to 3,300 pounds. It would increase the radioactive tritium
> storage limit from 30 grams to 35 grams. I join California Peace
> Action and the Livermore-based Tri-Valley CAREs group in calling on
> DOE to de-inventory the plutonium and tritium stocks at Livermore Lab,
> not increase them.
>
3/27.01, 33.01 > 2. Plutonium Atomic Vapor Laser Isotope Separation (AVLIS): This
> plan will revive a project that was canceled more than 10 years ago
> because it was dangerous and unnecessary. The project is Plutonium
> AVLIS. This is a scheme to heat and vaporize plutonium and then shoot
> multiple laser beams through the hot vapor to separate out plutonium
> isotopes. To do this, Livermore Lab plans to increase the amount of
> plutonium that can be used at one time in any one room from 44 pounds
> to 132 pounds a 3-fold increase. I join California Peace Action and
> the Livermore-based Tri-Valley CAREs in calling for cancellation of
> this project.
>
4/26.01, 26.03 > 3. Dangerous New Experiments in the National Ignition Facility
> Mega-Laser: This plan will add plutonium, highly-enriched uranium and
> lithium hydride to experiments in the National Ignition Facility (NIF)
> mega-laser when it is completed at Livermore Lab. Using these
> materials in the NIF will increase its usefulness for nuclear weapons
> development. It will also make the NIF more hazardous to workers and
> the environment. I join California Peace Action and the
> Livermore-based Tri-Valley CAREs in calling for a close out of the NIF

Lasciak, Valerie
Page 2 of 3

4/26.01, 26.03 cont. > project and termination of plans to use plutonium and other new
> materials in it.
>
5/37.01 > 4. New Technologies for Producing Plutonium Bomb Cores: This plan
> makes Livermore Lab the place to test new manufacturing technologies
> for producing plutonium pits for nuclear weapons. A pit is the
> softball-sized piece of plutonium that sits inside a modern nuclear
> weapon and triggers its thermonuclear explosion. DOE says these new
> technologies will then be used in a new bomb core factory, called the
> Modern Pit Facility (MPF). The Livermore Lab plutonium pit program
> will enable the MPF and production of 150 - 450 plutonium bomb cores
> annually, with the ability to run double shifts and produce 900 per
> year. This production capability would approximate the combined
> nuclear arsenals of France and China each year. I join California
> Peace Action and the Livermore-based Tri-Valley CAREs in calling for
> termination of this technology development project.
>
6/39.01 > 5. Enhancing Readiness to Resume Full-Scale Nuclear Tests: This
> plan calls for Livermore Lab to develop diagnostics to "enhance" the
> nation's readiness to conduct full-scale underground nuclear tests at
> the Nevada Test Site. This is a dangerous step back to the days of
> unrestrained nuclear testing and I join with California Peace Action
> and Tri-Valley CAREs to oppose any move to "enhance" U.S. readiness to
> conduct full-scale tests.
>
7/35.01 > 6. Mixing Bugs and Bombs: This plan mixes bugs and bombs at
> Livermore Lab. It calls for collocating an advanced bio-warfare agent
> research facility with nuclear weapons activities in a classified area
> at Livermore Lab. The DOE proposes genetic modification and
> aerosolization (spraying) with live anthrax, plague and other deadly
> pathogens on site at LLNL. This could weaken the international
> biological weapons treaty -- and it poses a risk to workers, the
> public and the environment here in the California. Interestingly, this
> program is listed as part of LLNL's "no action alternative" as though
> it were an existing program -- even though it is not yet constructed,
> Tri-Valley CAREs has brought litigation against it, and a federal
> Judge has issued a "stay" prohibiting the importation of dangerous
> pathogens into the facility while the lawsuit moves forward. I join
> Tri-Valley CAREs in opposing the operation of a bio-warfare agent
> facility at Livermore Lab.
>
8/04.01 > I believe the DOE plan to introduce new weapons programs into LLNL
> will promote a new arms race and escalate the nuclear danger. Further,
> the DOE proposal to double LLNL's plutonium storage limit to 3,300
> pounds and triple the amount held "at risk" in any one room increases
> the environmental threat LLNL poses to the people of California. The

Lasciak, Valerie
Page 3 of 3

8/04.01 cont.

9/07.01

> SWEIS propels Livermore Lab in exactly the wrong direction.
>
> Instead of proposing new weapons projects, DOE should enhance the
> peaceful, civilian scientific capabilities and mission at Livermore
> Lab by proposing new, unclassified programs in environmental cleanup,
> non-polluting and renewable energy, earth sciences, astrophysics,
> atmospheric physics and others. The alternative of a "green lab" in
> Livermore should be pursued instead of the dangerous nuclear weapons
> future proposed by the Site Wide Environmental Impact Statement.
>
> Sincerely,
>
> Name: Valerie Lasciak
>
> Address: 1555 Merrill St. 139
>
> State: CA 95062
>
>
> The Department of Energy has released a draft site-wide Environmental
> Impact Statement on Livermore Lab's planned operations for the coming
> t e n y e a r s . The law requires DOE to seek public input before
> moving forward. This is a once in a decade chance to make our voices
> heard.

Lea, Meri
Page 1 of 6

RE: Comments on the Department of Energy's Site-Wide Environmental Impact Statement (SWEIS) for Continued Operations at Lawrence Livermore National Laboratory (LLNL).

Dear Mr. Grim,

I had the opportunity to attend the public comment hearing held April 27th at the Double Tree Club Hotel in Livermore.

1/04.01

It is ABSOLUTELY critical for our very human survival, as well as all other living beings that we share this planet with that the Bush administration's policy of developing even more dangerous nuclearand biological weapons be stopped!!

The Lab is a leaky boat, built between 2 earthquake fault lines. There has already been leakage of nuclear materials into the immediate surrounding, including SF Bay. This information is a giant RED FLAG, don't you and the other commissioners think? And now it is being proposed that the lab handle twice as much plutonium and engage in the development of germ warfare programs.

Are you and your fellow commissioners conerned about this, for your self, your families, friends and all peoples of the world? How much longer do you think humanity has to survive? We have already changed our climate, polluted our vast oceans so much so that now even deep ocean water fish (swordfish) are too polluted to consume as food.

You and the other commissioners are in a position to require more control over the ecological threat that the weapons program at Lawrence Livermore Labs poses.

Thank you for your time and consideration of my comments.

I wholeheartedly support and stand with the other Americans who support the following letter:

2/31.04

Through this letter we are expressing our deep concern with the health and environmental risks posed by the

Lea, Meri
Page 2 of 6

2/31.04 cont.

expanded nuclear weapons mission for the Lawrence Livermore National Laboratory (LLNL) into the indefinite future. We appreciate your focused attention to this matter. Below, we have outlined a number of specific concerns that, taken cumulatively, lead us to the conclusion that the Site Wide Environmental Impact Statement (SWEIS) for the continuing operation of LLNL is so deficient in information and analysis that it must be fixed and re-circulated in draft form. This would allow the community, the regulators, and the legislators to have the opportunity to evaluate the new information that is requested in these comments. Our specific concerns are:

3/08.02

1. The same day of the public hearings for the SWEIS, April 27, 2004, the Congressional Subcommittee on National Security, Emerging Threats, and International Relations for the Committee on Government Reform held a hearing on the security of nuclear materials. The hearing highlighted potentially insurmountable problems with plutonium and highly enriched uranium at certain Department of Energy (DOE) sites, with a focus on the vulnerability of nuclear materials storage at LLNL. On May 7, 2004, Energy Secretary Spencer Abraham delivered a speech on the deficiencies in the security of nuclear materials at LLNL and other DOE sites. The Energy Secretary made a commitment to consider removing the special nuclear materials at LLNL by 2005. This recent acknowledgement by the DOE that security at LLNL is questionable makes it imperative that the SWEIS evaluate an alternative that would remove all special nuclear materials from LLNL. These acknowledgements make this not only a reasonable option, but one that should be evaluated because it is a foreseeable outcome within the next decade at LLNL.

2. Instead of reducing the amount of special nuclear materials on-site at LLNL, this plan proposes to more than double the limit for plutonium at Livermore Lab from 1,540 pounds to 3,300 pounds. Additionally, under the Proposed Action, the administrative limit for highly enriched uranium in Building 239 would increase from 55 pounds to 110 pounds. Seven million people live in surrounding areas, and residences are built right up to the fence. Plutonium is difficult to store

Lea, Meri
Page 3 of 6

3/08.02 cont.

safely because, in certain forms, it can spontaneously ignite and burn. Moreover, it poses a criticality risk when significant quantities are stored in close proximity. The amount of plutonium proposed for LLNL is sufficient to make more than 300 nuclear bombs. Because of the health risks, the proliferation dangers, storage hazards, and very serious security concerns, we believe it is irresponsible to store plutonium, highly enriched uranium and tritium at LLNL. We are calling upon the DOE to de-inventory the plutonium, highly enriched uranium and tritium stocks at LLNL rather than to increase them.

4/34.01 5/33.01, 25.01

3. The SWEIS proposes to increase the at-risk limits for tritium ten fold, from just over 3 grams to 30 grams. The SWEIS proposes to increase the at-risk limit for plutonium from 44 pounds to 132 pounds. We believe it is unsafe to increase the amount of tritium and plutonium that can be "in process" in one room at one time. LLNL has a history of criticality violations with plutonium and releases of both tritium and plutonium, making it evident that these amounts should be decreased, rather than increased.

6/27.01

4. This plan will revive a project that was canceled more than 10 years ago because it was dangerous and unnecessary. The project was called Plutonium - Atomic Vapor Laser Isotope Separation (AVLIS). Now it is called the "Integrated Technology Project"(ITP) and the "Advanced Materials Program"(AMP). This is a scheme to heat and vaporize plutonium and then shoot multiple laser beams through the vapor to separate out plutonium isotopes. The ITP / AMP is a health risk and a nuclear proliferation nightmare. We believe the ITP and AMP work should be cancelled as the Plutonium AVLIS was cancelled in 1990 - this time permanently.

7/37.01

5. This plan makes Livermore Lab the place to test new manufacturing technologies for producing plutonium pits for nuclear weapons. A pit is the softball-sized piece of plutonium that sits inside a modern nuclear weapon and triggers its thermonuclear explosion. DOE says these new technologies will then be used in a new bomb factory, called the Modern Pit Facility (MPF). Public and Congressional opposition to the MPF has caused its delay this year. The Livermore Lab

Lea, Meri
Page 4 of 6

7/37.01 cont. plutonium pit program goes full-speed ahead in the wrong direction. It will enable the MPF and production of 150 - 450 plutonium bomb cores annually, with the ability to run double shifts and produce 900 cores per year. This production capability would approximate the combined nuclear arsenals of France and China - each year. We call upon the DOE to halt all work on plutonium pit production technologies at Livermore Lab. We believe it is premature for the DOE to spend taxpayer dollars on this technology and the prudent and reasonable outcome is to delay or cancel this project.

8/26.01 9/26.03 6. This plan will add plutonium, highly-enriched uranium and large quantities of lithium hydride to experiments in the National Ignition Facility mega-laser when it is completed at Livermore Lab. Using these materials in the NIF will increase its usefulness for nuclear weapons development, including for the design of new types of nuclear weapons. It will also make the NIF more hazardous to workers and the environment. This is not only dangerous to people's health and safety, and a proliferation risk, but it is sure to result in an inordinate cost to the taxpayer. No cost estimate associated with this proposal has been released to date. We ask the DOE to cancel these dangerous, polluting, proliferation-provocative and unnecessary new experiments proposed for the NIF.

10/26.04 7. The SWEIS reveals plans to manufacture tritium targets at LLNL. The tritium-filled targets are the radioactive fuel pellets that the NIF's 192 laser beams will "shoot" in an attempt to create a thermonuclear explosion. Producing the targets will increase the amount of tritium that is used in any one room at Livermore Lab from the current limit of just over 3 grams to 30 grams - nearly 10-fold more. In the mid-1990's, LLNL stated that target fabrication was to occur off-site because of LLNL's proximity to large populations. Livermore Lab has a history of tritium accidents, spills and releases. The NIF will increase the amount of airborne radioactivity emanating from LLNL. We call on DOE to cancel plans to manufacture tritium targets for NIF at Livermore Lab. Further, we urge cancellation of the NIF megalaser. Cancellation

Lea, Meri
Page 5 of 6

10/26.04 cont. of NIF is a reasonable alternative that should be fully analyzed in the SWEIS.

11/39.01 8. This plan also calls for Livermore Lab to develop diagnostics to "enhance" the nation's readiness to conduct full-scale underground nuclear tests. This is a dangerous step back to the days of unrestrained nuclear testing. All work at LLNL to reduce the time it takes to conduct a full-scale underground nuclear test should be terminated immediately.

12/35.01 9. This plan mixes bugs and bombs at Livermore. It calls for collocating an advanced bio-warfare agent facility (BSL-3) with nuclear weapons activities in a classified area at Livermore Lab. The plan proposes genetic modification and aerosolization (spraying) with live anthrax, plague and other deadly pathogens. This could weaken the international biological weapons treaty -- and it poses a risk to workers, the public and the environment here in the Bay Area. The draft SWEIS does not adequately describe these programs, or the unique security, health and environmental hazards they present. Construction should be halted on the portable BSL-3 facility. All plans to conduct advanced bio-warfare agent (BSL-3) research on site at LLNL should be terminated.

13/14.01 10. There are 108 buildings identified at LLNL as having potential seismic deficiencies relative to current codes. The SWEIS should include a complete list of these buildings and an accounting of the ones that house or may house hazardous, radiological and biological research materials. LLNL is located within 1 kilometer of two significant earthquake faults, including the Las Positas Fault Zone less than 200 feet from the LLNL boundary. How can we mitigate harm done from an earthquake that damages these buildings before they are brought up to code? We urge the Livermore Lab to stop any work with hazardous, radioactive or biological substances that may be occurring in any building that does not comply with federal standards.

14/22.01 11. A contractor will be paid to package and ship more than 1,000 drums of transuranic and mixed transuranic waste to the WIPP dump in New Mexico, yet the SWEIS

Lea, Meri
Page 6 of 6

14/22.01 cont. says this is exempt from environmental review. This work in its entirety must be included in the review.

15/20.05 12. The DOE does not acknowledge in the SWEIS that the double-walled shipping containers described in the document may be replaced by less health - protective single-lined containers. We believe that no waste should be shipped in single-walled containers and the SWEIS should provide a guarantee to that effect.

16/01.01 13. The Purpose and Need statement in the SWEIS relies heavily upon the US Nuclear Posture Review, which calls for an aggressive modernization and manufacturing base within the US nuclear weapons complex. This stands in stark contrast to the binding legal mandate to shift "from developing and producing new weapons designs to dismantling obsolete weapons and maintaining a smaller weapons arsenal". We believe a revised Purpose and Need statement should accurately reflect the Livermore Lab's legal responsibility with regard to US law, including US obligations under the nuclear Non-Proliferation Treaty (NPT).

17/07.01 Further, the Purpose and Need statement in the SWEIS almost completely omits LLNL's important role in civilian science research. This omission fatally flaws the alternatives analysis in the SWEIS by neglecting to consider the expanded role that civilian science programs at the LLNL could play in the next decade.

The alternatives analysis should be revised to consider LLNL's role in light of the commitments in the NPT and the Livermore Lab's civilian science mission as well as the compelling case for removing special nuclear materials (i.e., plutonium and highly enriched uranium) from the LLNL site.

Sincerely,

Meri Lea
merilea@yahoo.com

Livermore Chamber of Commerce, Jim Ott, Chairman
Page 1 of 3

April 27, 2004

To: Tom Grin, NNSA
Via email

From: Jim Ott
Chairman, Livermore Chamber of Commerce

Subject: Livermore Chamber of Commerce perspective regarding the Site-wide Environmental Impact Statement for Continued Operation of Lawrence Livermore National Laboratory and Supplemental Stockpile Stewardship and Management Programmatic Environmental Impact Statement

Summary Statement

The Livermore Chamber of Commerce supports the proposed actions of NNSA relative to operations of the Lawrence Livermore National Laboratory.

Statement

1/04.01 While an ideal of humanity would be a world without nuclear weapons, we cannot un-invent these weapons. And while reduction of weapons and use of radioactive materials around the world and even here in the United States is an ideal worth pursuing, it is unrealistic at this time to curtail the research and important work of our national laboratories in ensuring the safety, maintenance, and efficiencies of our nuclear weapons stockpiles.

In this regard, we support the primary purpose of operations of LLNL, to provide support for the National Nuclear Security Administration's (NNSA's) nuclear weapons stockpile stewardship missions.

Lawrence Livermore National Laboratory is a premier science and research facility that has called Livermore home for more than 50 years. The lab is active in the city of Livermore and in the Tri-Valley region. Lab employees are involved in numerous civic and charitable organizations, as well as in our schools and local government.

2/15.01 The Livermore Lab is the largest employer in the city of Livermore, with an annual budget of $1.6 billion. Of its roughly 8500 employees, more than 3800 live in the Livermore Valley. This equates to some $352 million in payroll earned by Livermore Valley residents—funds that find their way into our local businesses, into our schools, even into our arts community.

Along with payroll, our local and regional economy is also boosted by how the Lab buys things. In 2003, some $153 million was spent on the purchase of goods and services here

Livermore Chamber of Commerce, Jim Ott, Chairman
Page 2 of 3

in the Bay Area. And this doesn't include the hundreds of millions of dollars that are invested into our state and national economy through the Lab's purchases.

Livermore's original purpose was national security. That remains its primary focus, but it has developed expertise in other science and research areas such as biology, chemistry, lasers, high-speed computers, studies of the environment, and improving human health. That science and research has aided our local business community through partnerships and collaborations:

2/15.01 cont.

- Livermore Lab's **Small Business Program Office** helps a variety of small businesses understand how to negotiate and enter into LLNL subcontracts. Firms that benefit from this assistance include disadvantaged businesses, woman-owned businesses, veteran-owned businesses, and others. The Lab participates in numerous small business related outreach efforts, which include:

- Small Business Administration (SBA)
- U.S. Army Corp of Engineers Veterans Small Business Conference
- Women's Business Enterprises National Conference
- California Hispanic Chamber of Commerce Conference
- California Black Chamber of Commerce Conference
- U.S. Department of Commerce, Minority Enterprise Development Week

- Livermore Lab's **supplier management program** includes a database of hundreds of small businesses from the local area as well as nationally. In support of DOE's policy to fully integrate small businesses into the DOE's core mission and programs, the Lab negotiates annual goals in proscribed socioeconomic categories. About $220 million in annual procurements go to small firms such as those noted previously.

- Livermore Lab's **Industrial Partnerships and Commercialization (IPAC) Office** helps Laboratory programs enter into partnerships with industry and transfer Lab technology on behalf of the UC and the DOE. The Lab is a leading DOE lab in collaborating with small business receiving, and has won awards under the DOE Small Business Innovation Research (SBIR) and Small Business Technology Transfer (STTR) Programs. Over 40 percent of its industrial partnerships are with small businesses and start-up companies.

Livermore Lab technologies have been utilized to establish a number of high-tech Bay Area companies, some of which are located in the East Bay. A few examples are PowerStor® Corporation in Dublin; Ocellus Technologies in Livermore; Cepheid in Sunnyvale; and MicroFluidic Systems, Inc. in Pleasanton.

Another successful technology transfer is with Metal Improvement Company, Inc. of New Jersey using the Lab's laser peening technology. In 1997, Metal Improvement, which is an established provider of conventional shot peening services to industry, entered into an agreement with Livermore Lab to develop a commercially viable laser

Livermore Chamber of Commerce, Jim Ott, Chairman
Page 3 of 3

peening process based on a high-energy and high-pulse rate laser. The collaboration was successful, and now metals can be laser peened effectively and economically, resulting in stronger metals. MIC has established a laser peening facility here in Livermore.

The Lab is also a valuable partner with Las Positas College, and the collaboration between the college and the Lab over the years has provided a number of opportunities to enhance the education of local residents and students. This contributes to higher education, economic vitality, and greater quality of life experiences here in Livermore and the Tri-Valley.

2/15.01 cont.

In summary, the Livermore Chamber of Commerce supports the proposed actions of NNSA relative to operations of the Lawrence Livermore National Laboratory.

It is our hope that the Lab will not just continue to remain in Livermore, but to expand its contributions, to evolve and grow. The Lab is a tremendous asset, benefiting our local quality of life, our local and regional economies, and our state economy. Both in its efforts to create and transfer valuable science and technology to benefit humanity and in its mission to help ensure the security of the United States, we are proud that the Lab calls Livermore its home.