Sultar, Joanne
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Joanne Sultar
2911 Deakin St
Berkeley, CA 94705

May 18, 2004

Mr. Tom Grim
DOE, NNSA L-293
7000 East Ave.
Livermore, CA 94550

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.

2/03.01 We don't need more nukes - we need to put our money where people's basic needs are served (housing and health, food and education). I oppose any increase in defense budgeting.

Sincerely,

Joanne Sultar

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----Original Message-----
From: Amber Coverdale Sumrall [mailto:ambers@sasquatch.com]
Sent: Wednesday, May 12, 2004 11:28 AM
To: tom.grim@oak.doe.gov
Subject: Livermore Expansion

Dear Mr Grim:

1/01.01 The proposed expansion at Livermore is frightening and truly hard to believe at this juncture in history - it is time for this nation to take responsibility for stopping the proliferation of weapons of all kinds, and especially WMD, and for beginning a true path of disarmament

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).

2/02.01 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 ³Robust Nuclear Earth Penetrator,² and I oppose its development. Additionally, I oppose the development of so-called ³mini-nukes² 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.

3/08.02 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.

4/27.01, 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.

5/26.01, 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

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5/26.01, 26.03 cont. 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 project and termination of plans to use plutonium and other new materials in it.

6/37.01 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.

7/39.01 5. Enhancing Readiness to Resume Full-Scale Nuclear Tests: This plan calls for Livermore Lab to develop diagnostics to ³enhance² the nation¹s 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 ³enhance² U.S. readiness to conduct full-scale tests.

8/35.01 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 LLNL¹s ³no action alternative² 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 ³stay² 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.

9/04.01 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 SWEIS propels Livermore Lab in exactly the wrong direction.

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10/07.01 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 ³green lab² in Livermore should be pursued instead of the dangerous nuclear weapons future proposed by the Site Wide Environmental Impact Statement.

Sincerely,
Amber Coverdale Sumrall
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Soquel, CA 95073
(831) 477-4375

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May 26, 2004

Mr. Thomas Grim, L-293
U.S. Department of Energy,
National Nuclear Security Administration
Livermore Site Office, SWEIS Document Manager
7000 East Avenue
Livermore, CA 94550-9234

Via Email: tom.grim@oak.doe.gov

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

Dear Mr. Grim:

I am a public health professional deeply concerned with the local, national, and global health risks posed by the expanded nuclear weapons mission for the Lawrence Livermore
1/04.01 National Laboratory (LLNL) into the indefinite future. I strongly oppose DOE's proposed plans. Below, I have outlined a number of specific concerns that, taken cumulatively, lead me to the conclusion that the Site Wide Environmental Impact Statement (SWEIS)
2/31.04 for the continuing operation of LLNL is so deficient in information and analysis that it must be fixed and re-circulated in draft form. My specific concerns are:

3/08.02 • It is imperative that the DOE evaluate an alternative that would remove all special nuclear materials from LLNL. This is a reasonable option and a foreseeable outcome within the next decade at LLNL. I have spent the past two decades addressing the public health legacy of the DOE's nuclear weapons program. This legacy has been characterized by Bernard Lown, MD, Co-Founder of the Nobel-Peace Prize winning organization, International Physicians for the Prevention of Nuclear War as "a kind of secret, low-intensity radioactive warfare [that] has been waged against unsuspecting populations ..." The public health legacy of LLNL's
4/23.01 operations have not been addressed by even the most minimal standards. Locally, LLNL's operations have left a potentially wide-swath of plutonium-contaminated sludge throughout the area. Yet even simple matters such as DOE providing funding for unsuspecting residents to identify and remedy the problem languish or are otherwise repudiated by DOE. Nationally, LLNL served a critical research and development role for nuclear weapons production. By DOE's own estimates, it will take billions of dollars over many decades to "clean-up" the environmental consequences of these DOE activities. Even if all due diligence is applied to these issues, the National Research Council has stated that radioactive and toxic
5/01.01 contamination will remain long into the future. Globally, the U.S.' continued commitment to the development of nuclear weapons, as exemplified in the LLNL SWEIS, fuels the proliferation of nuclear weapons by other state and non-state

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actors. Therefore, I find the DOE's plans to increase the environmental burden of highly toxic materials in the service of planetary annihilation to be outrageous.

6/08.02 * Under its proposed plan, DOE will 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 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, it is irresponsible to store plutonium, highly enriched uranium and tritium at LLNL. The DOE should de-inventory the plutonium, highly enriched uranium and tritium stocks at LLNL rather than increase them.

7/34.01 8/33.01, 25.01 * The DOE proposes to increase the at-risk limits for tritium ten fold, from just over 3 grams to 30 grams. The DOE proposes to increase the at-risk limit for plutonium from 44 pounds to 132 pounds. 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.

9/37.01 * The DOE's 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 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. DOE should halt all work on plutonium pit production technologies at Livermore Lab.

10/26.01, 26.03 * The DOE's plan will add plutonium, highly-enriched uranium and large quantities of lithium hydride to experiments in the National Ignition Facility mega-laser

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10/26.01, 26.03 cont. 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. The DOE should cancel these dangerous, polluting, proliferation-provocative and unnecessary new experiments proposed for the NIF.

11/26.04 * The DOE's 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. The DOE should cancel plans to manufacture tritium targets for NIF at Livermore Lab. Further, the NIF megalaser should be cancelled. Cancellation of NIF is a reasonable alternative that should be fully analyzed in the SWEIS.

12/39.01 * The DOE's 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.

13/35.01 * The DOE's plan 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. These activities will undermine international efforts to prevent the proliferation of biological weapons such as under the Biological Weapons Convention. The DOE's plans also pose 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.

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14/22.01 * 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 says this is exempt from environmental review. This work in its entirety must be included in the review. The DOE does not acknowledge in the

15/20.05 SWEIS that the double-walled shipping containers described in the document may be replaced by less health - protective single-lined containers. No waste should be shipped in single-walled containers and the SWEIS should provide a guarantee to that effect.

16/01.01 * 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 obligations of the U.S. under Article XI of the Nuclear Non-Proliferation Treaty to proceed with efforts that lead to the global abolition of nuclear weapons. 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.

Sincerely,

Patrice Sutton, M.P.H.
311 Douglass Street
San Francisco, CA 94114

CC:

Senator Dianne Feinstein
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Washington, DC 20510
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