Central Valley Regional Water Quality Control Board, Susan Timm, Project Manager
Page 1 of 1

Grim, Tom

From: Susan Timm [timms@rb5s.swrcb.ca.gov]
Sent: Monday, May 24, 2004 9:43 AM
To: tom.grim@oak.doe.gov
Cc: nlf@2rb.swrcb.ca.gov; setian.kathy@epamail.epa.gov
Subject: SWEIS for LLNL

1/31.02 I am the project manager for the Regional Water Quality Control Board, Central Valley Region, for CERCLA cleanup or operations compliance with Board permits at Site 300. I have not received a copy of the Site-Wide EIS nor the public notice. I am requesting a 30-day extension to the review period, as I have been informed that the deadline is May 27, 2004. Please let me know how I can get a copy of the SWEIS and if you will grant an extension for review so that I will have time to do so.

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1

Citizens for Alternatives to Chemical Contamination, Kay Cumbow, Chairperson
Page 1 of 5

Dear Mr. Grim,

I am sending these comments on letterhead, (faxing), and I would like the comments to be posted officially with the letterhead. I am sending these by email just in case the fax does not work. Thank you. - Kay Cumbow, Citizens for Alternatives to Chemical Contamination.

tom.grim@oak.doe.gov
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:

Citizens for Alternatives to Chemical Contamination, a Statewide environmental group, is highly concerned and troubled by the health and environmental risks posed by an expanded nuclear weapons mission for the Lawrence Livermore National Laboratory (LLNL) into what appears to be the indefinite future. This kind of expansion needs serious review. We have listed some of our most serious concerns below. This is certainly not all of the concerns that we have. Due to these very grave concerns, we are convinced that the Site Wide Environmental Impact Statement (SWEIS) for 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, (including the extended U.S. tax-payer community who foots the huge bill), the regulators, and the legislators to have the opportunity to evaluate the new information that is requested in these comments. Our specific concerns are: 1/31.04

2/08.02 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 acknowledgment 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 acknowledgments 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.

Citizens for Alternatives to Chemical Contamination, Kay Cumbow, Chairperson
Page 2 of 5

2/08.02 cont.

2. Instead of reducing the amount of special nuclear materials on-site at LLNL, this plan would 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, 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.

3/34.01 4/33.01, 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.

5/27.01

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 canceled as the Plutonium AVLIS was canceled in 1990 - this time permanently.

6/37.01

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 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

Citizens for Alternatives to Chemical Contamination, Kay Cumbow, Chairperson
Page 3 of 5

6/37.01 cont.

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.

7/26.01 8/26.03

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.

9/26.04

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 of NIF is a reasonable alternative that should be fully analyzed in the SWEIS.

10/39.01

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.

11/35.01

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

Citizens for Alternatives to Chemical Contamination, Kay Cumbow, Chairperson
Page 4 of 5

11/35.01 cont. facility. All plans to conduct advanced bio-warfare agent (BSL-3) research on site at LLNL should be terminated.

12/14.01 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.

13/22.01 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 says this is exempt from environmental review. This work in its entirety must be included in the review.

14/20.05 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.

15/01.01 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).

16/07.01 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.

17/03.01 Although we live in the Midwest, these are our limited tax dollars!! When tax dollars are going to go for such big changes and expansion of purposes

Citizens for Alternatives to Chemical Contamination, Kay Cumbow, Chairperson
Page 5 of 5

17/03.01 cont. in national laboratories, it seems that there should be hearings in every state of the Union. It also is hypocritical that our United States Government should call other nations to heed disarmament, and nuclear non-proliferation and yet we ourselves do not lead the way.

Sincerely,

Kay Cumbow,
Chairperson, Citizens for Alternatives to Chemical Contamination
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