

Re: DOE/EIS-0573
Ms. Jade Fortiner
NEPA Document Manager
National Nuclear Security Administration
Office of Pit Production Modernization
U.S. Department of Energy
1000 Independence Ave. SW
Washington, DC 20585

Dear Ms. Fortiner,

I am submitting this comment on the National Nuclear Security Administration's (NNSA) draft Programmatic Environmental Impact Statement (PEIS) on the production of plutonium pits—the explosive cores of nuclear weapons. This comment points out areas that the PEIS falls short.

The Draft PEIS does not adequately analyze the impacts of the work at all sites involved in pit production. NNSA must “take a hard look” at the related impacts at these sites, including at the Lawrence Livermore National Lab (LLNL).

- The Draft PEIS says LLNL is important to the overall pit production program and receives plutonium ‘coupons’ for research, testing, and certification.
- For example, the Fiscal Year 2027 Budget Request for Livermore Lab includes \$166.7 million for “Enterprise Pit Production Support” and \$162 million was spent by the Lab on this budget line in the last two years. LLNL is spending significant amounts of taxpayer dollars on plutonium pit support work without clear explanation of the nature of that work or the risks it poses.
- The PEIS needs to define “plutonium coupons,” estimate the number of shipments of these “coupons” to LLNL, provide the weight range of “plutonium coupons,” describe the experiments and processes that will occur at LLNL with them, and whether these experiments and processes will create wastes.
- The PEIS must clearly disclose the amount of any new or increased radioactive, mixed, hazardous, or liquid waste caused by plutonium pit support work at LLNL.
- The PEIS transportation analysis currently focuses on major routes among LANL, SRS and others, but LLNL’s role is not clearly described in the waste and transportation tables. Nor is the route and level of shipment between LLNL and other sites, including the Nevada National Security Site (But it likely occurs I-580 over the Altamont Pass and I-80 over the Donner Pass.)

The Draft PEIS fails to clearly identify the extent to which pit production support work at LLNL is the driving force for its separately announced plan for “Enhanced Plutonium Utilization.”

- LLNL announced in a January 2025 Federal Register Notice (NOI) its plan to release a Supplemental EIS on “Enhanced Plutonium Utilization.” It is clear from the NOI that the “Enhanced Plutonium Utilization” is in large part driven by Livermore’s plutonium pit work which is directly connected to the national “Expanded Plutonium Pit Production” plan. NNSA decided not to publicly release the Draft SEIS on Enhanced Plutonium Utilization.
- LLNL will be raising its Security Category to protect the “Enhanced Plutonium Utilization” but the PEIS does not explain how the security will be changed, increased or improved.

Safety Risks and Accident History

- LLNL's plutonium facility has a troubling history of safety and security incidents including plutonium fires, leaking or "burst" glove-boxes, and plutonium releases to the sewer.
- LLNL's plutonium facility has failed security drills involving planned mock terrorist scenarios. The Draft PEIS has not explained to the public how LLNL intends to make increased plutonium utilization for LLNL's plutonium pit production support work safe for the almost 10K workers on site or the surrounding community. The Final must do so.
- More than 3200 former workers from LLNL have made claims for illnesses caused by on the job exposures to radiation and toxic chemicals. The Final PEIS should include an analysis of worker protections with these additional hazards onsite given the history of worker exposures at LLNL and across the nuclear weapons complex.
- LLNL is a Superfund site with ongoing environmental cleanup. The Final PEIS should address remediating existing environmental harm and be transparent about the cumulative risks associated with pit production support work at the site. NNSA should show the health risks over 10 years, 30 years, and 50 years, not just one year at a time. A small yearly exposure can still matter when workers face it over many years.
- The Final PEIS should analyze a "worst-case" accident scenario at LLNL's plutonium facility.

Nuclear and Hazardous Waste Analysis

- The Final PEIS should give a clear yes-or-no answer: will pit-production-related work create new or increased radioactive, hazardous, mixed, or liquid waste at LLNL? If yes, NNSA should say how much. If no, NNSA should explain why.
- The waste tables give estimates for Los Alamos and Savannah River, but not for LLNL. That leaves Livermore residents guessing whether there is no waste, a small amount of waste, or an increase in waste that has not been clearly shown.
- Pit production would create waste every year for decades, so NNSA should show the total waste burden over 10, 30, and 50 years, not just yearly snapshots.
- NNSA should clearly explain whether new pit-production waste could slow down cleanup of older nuclear weapons waste, since communities are still waiting for legacy contamination to be addressed.

In Addiiton:

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