

Press Release: Lab Environmental Plan Increases Nuclear Danger and Airborne Releases

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The National Nuclear Security Administration has released the [Final Site-Wide Environmental Impact Statement for Continued Operations of Lawrence Livermore National Laboratory \(SWEIS\)](#) that purports to analyze all of the potential impact to the environment of the Lab for the next 15 years. The document was “scoped” in 2020 and released in draft form in November of 2022.

Tri-Valley CAREs participated in the public process on both the scoping and the draft. The group worked to engage members of the public to participate and submitted its own [technical comments on the Draft SWEIS](#).

“This final document ignores scores of comments received from the public as well as those received from other entities such as the federal Environmental Protection Agency,” charged **Scott Yundt**, Tri-Valley CAREs’ executive director, who served as the group’s staff attorney for more than a decade prior to becoming its leader.

Yundt continued, “The plans contained in the final Site Wide Environmental Impact Statement are truly alarming. For example, the document admits that its planned activities will increase airborne radioactive emissions. Further, the wholly new weapons facilities planned at the Lab’s Main Site in Livermore and Site 300 near Tracy will create more nuclear wastes and a higher danger from accidents, spills, and other releases.”

Marylia Kelley, the group’s senior advisor, noted that the document’s plans for new nuclear warheads and facilities to test them will also “contribute to global nuclear proliferation and arms racing.” She concluded, “Global dangers require the deep analysis that we requested and not the cursory brush off that we got.”

The final document includes a [Summary](#) and then three longer volumes, the third of which is entirely made up of the public comments received on the draft and the Agency’s responses to those comments.

The final plan includes new nuclear weapons facilities (75 new projects in total) at the Lawrence Livermore National Laboratory Main Site in Livermore and its Site 300 high explosives testing range near Tracy. It expressly increases the amount of airborne radioactive tritium that will be emitted from two facilities and likewise increases the amount of weapons-grade plutonium allowed in a third facility.

Here are a few key observations and quotes from the final document:

- Many commenters asked the Agency to analyze more alternatives that would look at lowering, limiting or changing the work at the Lab. However, the Final SWEIS continues to only analyze a

“No Action Alternative” and a “Proposed Action Alternative.” The “No Action Alternative” actually continues business as usual and in fact even adds, “ the construction of new facilities; modernization/upgrade/utility projects; and decontamination, decommissioning, and demolition (DD&D) of excess and aging facilities.” The “Proposed Action Alternative would include the “No Action Alternative” actions plus, “75 new projects, totaling approximately 3.3 million square feet... Of this, 61 projects, totaling approximately 2.9 million square feet, are proposed at the Livermore Site; 14 projects, totaling approximately 385,000 square feet, are proposed at Site 300. In addition... 20 types of modernization/upgrade/utility projects each involving several facilities... DD&D [of] about 150 facilities... operational changes that would increase the tritium emissions limits in the National Ignition Facility (Building 581) and the Tritium Facility (Building 331)... increase the administrative limits for plutonium-239 at Building 235, and revise the National Ignition Facility radioactive materials administrative limits.” The final draft did not alter the Alternative Analyses at all.

- The U.S. EPA asked in their comment for the Lab to add air monitors to the perimeter of Site 300, noting that one was not enough considering the encroaching of a large Tracy housing development called Tracy Hills. In response, the Agency flatly refuses.
- While the agency formally acknowledges in the Final SWEIS that it is currently not seeking to increase the limit to do larger high yield explosive blasting at Site 300, it gives the caveat that it is not seeking the increase “yet.”
- The Agency failed to elaborate on the details of the relationship to LLNL’s plutonium activities to the planned enhanced plutonium pit production at other sites in the nuclear weapons complex, stating, “NNSA agrees that LLNL conducts plutonium and pit-related R&D activities but does not think a “crosswalk” would be meaningful to “show the relationship of LLNL’s activities to expanded pit production.”
- The Agency failed to address the comment asking that it analyze the potential impact on international biological weapons proliferation that the proposed expansion of its defense related biological agent research with a newly built, double-the-size BioSafety Level -3 Laboratory might have. It responds, “While NNSA does not believe that defensive biological research work promotes biological weapons proliferation, actions of other countries are beyond the scope of this SWEIS.”

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[Click here for Vol. 3 of the full Final SWEIS \(Response to comments\)](#)