

## Tri-Valley CAREs Talking Points



### *Public Hearing for the Scoping of the Supplemental Environmental Impact Statement (SEIS) on the plan to Enhance Plutonium Utilization at Lawrence Livermore National Laboratory's (LLNL) Plutonium Facility*

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The 1/29 public hearing will include a short presentation from Livermore Lab where they will mostly go over the [Notice of Intent](#). That document provides a brief description of the plan and a list of the areas the Draft SEIS will analyze when it is prepared. There will be an opportunity for short public comments. An effective public comment at this stage of the process will address the “scope” of the contents of the Draft SEIS, for example, what kinds of alternatives should be analyzed other than the proposed alternative, or making sure that the document includes analysis of site-specific conditions. Comments are usually limited to 1-3 minutes. Here are some possible talking points

1. **Improving Public Involvement in the Draft EIS public Comment Process.** In order to improve both the volume and depth of public involvement in this scoping process on the SEIS, the public comment period should be extended to at least 60 days, until March 16. Additionally, due to what is sure to be a voluminous and complex Draft SEIS, its public comment period should be extended to at least 90 days from the document’s release. This expanded period should also allow for multiple public hearings on the Draft SEIS, including an in-person hearing for community members who do not have access to technology or prefer an in-person option. In order to accommodate community members who prefer Spanish, we request that the Draft EIS include at least a Spanish translation of the summary.
2. **Security Infrastructure.** In 2008, while Livermore Lab was still under Security Category I/II, it failed a scheduled force-on-force security drill designed to test the security of the nuclear weapons usable amounts of plutonium stored at the Plutonium Facility inside the Lab’s “Superblock” at the time. The drill was conducted by the DOE Office of Health, Safety, and Security as part of a seven-week audit of the Lab. The mock attack was not a surprise to the Lab, although a real attack would not be scheduled. Nevertheless, the mock terrorists were able to gain entry into the Superblock, obtain the nuclear material they sought, and hold their ground long enough to detonate a simulated nuclear “dirty bomb.” Additionally, a DOE team removed some of the plutonium material, demonstrating that in a real terrorism event, it could have been transported and detonated elsewhere. The Draft SEIS must explain how larger quantities of plutonium will be protected from potential intentional acts, and explain how the new security measures will be developed and tested before the material is in place. It should also require that similar drills to those failed in 2008 be conducted again, along with other potential scenarios. No new Special Nuclear Material should be allowed until the Lab passes those tests.
3. **Alternatives Analysis.** The “No Action” alternative should be well-explained in the Draft SEIS, including a detailed explanation of the extent of the current plutonium activities, and the potential to increase those activities while maintaining Security Category III and staying within the current Administrative Level of plutonium.

An alternative should be analyzed that minimizes the increase in plutonium quantity to the bare minimum required by expected programmatic needs, ensuring that as minimal an amount of plutonium as possible is on-site at any given time to meet those needs.

An alternative should be analyzed that explores using the full capacity of Livermore Lab’s existing supercomputing technology, the National Ignition Facility, and other high-tech machines to use less dangerous surrogate materials or smaller quantities of plutonium for R&D, as well as expanding these existing tools or developing new tools to do needed programmatic work without Special Nuclear Material.

The Proposed Action Alternative should specify the proposed administrative limit for plutonium and any other Special Nuclear Material allowed under the new security category.

4. **Plutonium-Contaminated Waste.** The proposed alternative in the PEIS should analyze the associated increase in production of radioactive waste at LLNL and the capacity of the Waste Treatment Facility to handle, store, treat, and ship that waste. This should include an analysis of the destinations for the waste, including assurances that the Waste Isolation Pilot Plant in New Mexico can handle the increase in radioactive waste from Livermore. The accident-scenario analysis performed on the waste treatment facility area in the Site-Wide Environmental Impact Statement should be re-done to take into account the increase in radioactive waste resulting from the proposed alternative.
5. **Upcoming Programmatic Environmental Impact Statement on Plutonium Pit Production.** The NNSA will likely initiate a Programmatic EIS for *Expanded Plutonium Pit Production* sometime over the next year as a result of a litigation settlement in which the judge found fault with the earlier segmented approach to the NEPA review. Livermore Lab is deeply involved in the purpose and need for Expanded Plutonium Pit Production. It is designing two new warheads that will require new plutonium pits, the W87-1 and the W93. It is also supporting pit production; evidenced by the \$97.3 million it received this fiscal year for "Enterprise Pit Production Support" work. It is clear from the NOI that the "Enhanced Plutonium Utilization" is in some large part driven by Livermore's Plutonium Pit work which is directly connected to the national "Expanded Plutonium Pit Production" plan.

Why is this NEPA review being conducted separately? Shouldn't this plan be part of the Programmatic EIS for Expanded Pit Production? If not, the SEIS should clearly state why it is not part of the PEIS and clarify the percentage of new plutonium coming to LLNL under the Proposed Alternative for pit production related program. This would include whether full plutonium pits or hemishells (half-pits) are planned to be shipped to Livermore Lab and in what approximate quantities.

6. **Impact to workers.** To date, 3,113 former LLNL employees have filed claims for federal medical benefits and compensation due to illnesses caused or contributed to by exposure to radiation and toxic chemicals on the job. The Draft SEIS should include the potential impacts to health of workers in the Plutonium Facility and the Waste Treatment Facility from Enhanced Plutonium Utilization, as well as the potential for exposure to unprotected nearby employees in the case of an accident, release, spill or intentional destructive act.
7. **Transportation of Plutonium.** The SEIS should analyze ways to mitigate the danger of transporting plutonium in and out of Livermore Lab for the Enhanced Plutonium Utilization Plan. The transportation route for the material includes the infamously dangerous I-580 Altamont Pass. A frequent site of high speed accidents, the congested Altamont pass has over 160,000 trips per day taking place, many of which are large semi-trucks. The SEIS should study ways to minimize the number of shipments that go in and out of the Livermore Lab, scheduling the shipments so that trucks are using the road at times of lower congestion, such as later in the evening, very early in the morning or on weekends.
8. **Superfund cleanup.** Livermore Lab has been listed on the US EPA's National Priorities List of most contaminated sites in the country since 1990. Cleanup of contaminated soil and groundwater, including an off-site groundwater plume, has already taken decades and will take many more under current funding levels. Plutonium was found in nearby Big Trees Park in the 1990's. The Draft SEIS needs to analyze how the new quantities of plutonium will not be released into the environment by using the best available technologies to prevent accidents, criticalities, fires, spills, releases, and intentionally destructive acts.

*(This is not meant to be an exhaustive list of potential comments. Feel free to make your own comments, these are just some topics Tri-Valley CAREs has flagged so far.)*