## Citizen's Watch



## Government Tries to Avoid Full Analysis of Plutonium Bomb Plans Your Comment Will Help Compel Important Review

The National Environmental Policy Act (NEPA) was one of the first U.S. laws ever written that establishes a broad national framework for protecting our natural world. NEPA requires that all branches of government give proper consideration to the environment prior to undertaking any major federal action that could have a significant effect on it. NEPA also has strict guidelines that incorporate public comment into a federal agency's decision-making structure.

Tri-Valley CAREs is a vigorous proponent and defender of NEPA. The Department of Energy and its National Nuclear Security Administration (NNSA) are not. In fact, the agencies' NEPA motto

appears to be "how little can we do?" Witness NNSA's current plan to massively expand plutonium pit (bomb core) production by fragmenting its NEPA analyses to avoid conducting a full Programmatic Environmental Impact Statement.

The Plan: NNSA announced last year that it intends to more than quadruple the authorized limit for U.S. plutonium pit production. The current limit is production of up to 20 pits per year at the Los Alamos National Lab (LANL) in NM. LANL has had this authorization since a Programmatic Environmental Impact Statement decided it in 1996. LANL has never manufactured 20 pits per year. LANL's highest mark was 11 pits one year. Some years were zero. In recent years, pit production has been on hold due to criticality safety issues. Put simply, the nation has not needed many plutonium pits.

Now, however, NNSA proposes to expand production to 80 or more plutonium pits per year by 2030 and to use not one but two sites. The new plan would "repurpose" the unfinished, scandal ridden MOX (mixed oxide fuel) facility at the Savannah River Site (SRS) in SC to produce 50 or more pits per year. SRS has never had a mission to produce plutonium pits for the stockpile. The workers there do not have the expertise or experience for that highly specialized task. Further, the unfinished MOX facility is reportedly hiding substandard parts in its ductwork and walls. Meanwhile LANL with its major plutonium safety violations is expected to increase its output from the 20 pits per year it never achieved to 30 or more pits per year by 2030. What could possibly go wrong?

**The Detractors:** Tri-Valley CAREs has staunchly opposed expanded pit production. We discussed it with Congress during



DC Days in May. The House committees that deal with nuclear weapons each took a bite out of NNSA's request for expanding plutonium pit production. However, the Senate committees passed bills that enabled activities the House had cut, and so the matter will go to conference committee later this year.

This past spring, Tri-Valley CAREs obtained the unclassified summary of a report commissioned by the Defense Department that echoes our concerns. The Institute for Defense Analyses (IDA) looked at NNSA's plans and advised DoD, "No available option can be expected to provide 80 ppy [pits per year] by 2030." It continued, "DoD should

evaluate how to responds to this requirement shortfall." In plain language, the IDA's main finding was that NNSA is likely to fail. For its part, NNSA seems oblivious to criticism and allergic to reflection. Instead the agency is charging ahead.

**The "Hard Look":** The courts have consistently found that NEPA requires a "hard look" at environmental impacts and at alternatives, including reasonable options the agency may not favor. Here it's instructive to look at what's behind NNSA's push for expanded plutonium pit production.

New plutonium pits are actually for new warhead designs with novel features that require pits that are different from anything in the stockpile, thereby driving a "need" for fresh production. Right now, Livermore Lab is developing such a warhead.

Livermore is choosing to completely redesign the W78 warhead that sits in silos atop ground-based missiles. The new weapon with new features, formerly known as the Interoperable Warhead 1, is now being called the W87-1. In a report to Congress late last year, NNSA stated that its new-design plutonium pit will be "based on" a well tested design. It's not the same pit. And the difference is important.

A technical publication, Weapons Complex Monitor, noted on June 4, 2019 that the NNSA's desired 80 pits per year "are all for the W87-1-style warheads that will top Ground Based Deterrent Missiles." It's clear that expanded pit production is not to maintain the safety and reliability of existing warheads in the stockpile. And new nuclear weapons come with serious proliferation risks; indeed their design at Livermore is already adding fuel to the fire of a dangerous global arms race.

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