

How to Stop a Bombplex

Raise Your Voice to Oppose "Revitalizing" the Nuclear Weapons Complex

Coming Soon, Your Chance to Stop Bombs and Pollution
Public Hearings in Tracy & Livermore March 18 and 19, 2008

Just before Christmas 2007, the Department of Energy (DOE) National Nuclear Security Administration (NNSA) held a press conference to announce the latest in a series of deadly, irresponsible schemes to "revitalize" and rebuild the U.S. nuclear weapons research, development, testing and production complex of the future.

The DOE calls the plan "Complex Transformation" (it was formerly known as "Complex 2030"). Tri-Valley CAREs and other groups continue to call it "Bombplex," a more true and accurate title. The proposed plan is described in a multi-volume draft Supplemental Programmatic Environmental Impact Statement (PEIS), which has just been released. It is available on line at <http://www.complextransformation.com/project.html>.

"Complex Transformation" involves 8 DOE locations across the country, including Livermore Lab. The plan, if implemented, will result in new capabilities and new infrastructure (meaning new facilities) to make new nuclear weapons.

Why our future is at stake, and we must act

The most important thing to know about "Complex Transformation" is that fundamental decisions about our nation's nuclear weapons policies are at stake here: Will U.S. behavior continue to scream out "nuclear weapons forever," resulting in a further escalation of global proliferation and danger? Or, will we (finally) turn toward full adherence to the nuclear Non-Proliferation Treaty (NPT) and the greater safety of a nuclear weapons free world?

The DOE's "Complex Transformation" is about continuing, entrenching and enshrining for decades to come the Bush Administration's aggressive nuclear posture. "Complex Transformation" does this by creating a "capability-based" infrastructure to carry out the R & D,

maintenance and production of new and "modified," as well as existing, nuclear weapons. The language of "Complex Transformation" is lifted verbatim out of Bush's Nuclear Posture Review.

To accomplish the "mission" of building the infrastructure at sites across the country, the DOE has laid out various options in the draft PEIS. Many of them involve questions of where to put facilities; not whether to build them. In this community guide, we will detail the main points in DOE's favored option. But, we want to emphasize up front that DOE's "options" in no way encompass a true range of reasonable possibilities. Instead, they amount to showcasing differing quantities and layouts for arranging deck chairs on the Titanic while locking the rudder in place and steaming more quickly ahead.

Should we be arguing about where this or that chair goes, or should we be discussing where the ship is headed? Instead of changing course, the "Complex Transformation" plan locks in nuclear weapons as permanent U.S. tools of fear, oppression and empire.

If you can tell the DOE that "Complex Transformation" takes us all in the "wrong direction," you already have a profound comment ready for the upcoming public hearings (*see page 4 for the hearing schedule*).

Please know that **your voice**, when used to speak truth to power, is significant and makes a difference. When the DOE held public hearings in 2006 on the scope of "Complex 2030," more than 33,000 people spoke or submitted written comments against it.

We believe that this public outcry is the number one reason why DOE was stymied and forced to regroup — and has suddenly changed the title of the plan. DOE is hoping the switcheroo to "Complex Transformation" will baffle you. We trust that you are figuring it out — and that you will continue to oppose the "Bombplex" by whatever new name the DOE chooses to assign it.

Now, in 2008, we have a fresh opportunity to use our voices (and pens) to prevent the Bombplex from ever becoming a reality. According to our nation's most fundamental environmental law, the National Environmental Policy Act, DOE must solicit public comment – and answer to it. As Mahatma Gandhi and others have told us, the change we seek in the world begins with each of us. Is there anything more important and crucial to our common survival than stopping nuclear weapons?

The DOE's story: big rhetoric, small adjustments

The DOE claims that the "Complex Transformation" plan is their "vision for a smaller, safer, more secure and less expensive nuclear weapons complex that leverages the scientific and technical capabilities of [its] workforce and meets national security requirements."

First there is the obvious: We don't accept a somewhat smaller nuclear weapons complex refurbished with new capabilities and new facilities in order to more efficiently develop and produce nuclear bombs (as in more nukes per square foot). Moreover, the most safe, secure and least expensive nuclear weapons are the ones we don't build at all.

Second, in laying out its "Complex Transformation" plan, the DOE takes credit for proposing to demolish old buildings that, at least in some cases, are already in the queue to be torn down and decontaminated. That's not really progress.

Third, the removal of some nuclear materials from facilities that are most vulnerable to terrorist attack may be laudable, but can and should occur solely for safety and security reasons. For example, by artificially tying the consolidation of nuclear materials to "Complex Transformation," the DOE is attempting to ensure that Livermore Lab's plutonium continues to be used in service of nuclear weapons research.

Tri-Valley CAREs has long noted that the plutonium at Livermore Lab is uniquely vulnerable to a catastrophic release in either a terrorist attack or a major earthquake, with 7 million people crowded into a 50-mile radius around the Lab.

However, it has also long been our position that this plutonium should never be used in nuclear weapons experiments. We will be advocating this (again) at the upcoming hearings.

Let us list for you the major features (the good, the bad and the really ugly) that would be part of the nuclear

weapons complex of the future under DOE's "preferred alternative" in "Complex Transformation." The DOE would:

- Close or transfer about 600 mostly old buildings or structures, many by 2010.
- Reduce the square footage of buildings and structures supporting weapons missions, going from about 35 million square feet today to about 26 million square feet.
- Consolidate plutonium and highly enriched uranium at five sites by the end of 2012 — Los Alamos Lab in NM, the Nevada Test Site, the Pantex Plant in TX, the Savannah River Site in SC, and Y-12 in TN — with reduced square footage within those sites by 2017.
- Build a larger plutonium complex at Los Alamos Lab, with a new Chemistry and Metallurgy Research buildings Replacement project, or CMRR, (notice how often DOE calls new facilities and weapons "replacements"; who do they think they're fooling?) — with the capability of producing up to 80 new plutonium bomb cores per year.
- Build a new uranium processing facility for weapons at Y-12.
- Cease DOE NNSA operations at the Tonopah Test Range in Nevada, and move operations to another location.
- Eventually end bomb blasts at Livermore Lab's Site 300 high explosives testing range after building new facilities elsewhere in the complex. (Yet, possibly, still conducting bigger, open-air bomb blasts at Site 300 "for hire" to the Dept. of Homeland Security and Dept. of Defense, according to what Livermore Lab officials have told us.)
- Employ 20-30% fewer workers directly supporting nuclear weapons missions consistent with "Complex Transformation's" vision of a smaller, more efficient complex.

**Coming in your next newsletter
from Tri-Valley CAREs:**

**A special focus on Livermore Lab's
role in the Bombplex, more on the
new nukes-Bombplex connection,
plus additional "talking points" for
the public hearings.**

- Dismantle weapons at a faster pace. (This is the one part of the proposal we support wholeheartedly. In fact, many more resources could be put toward dismantlement if DOE foregoes the new bomb facilities it proposes.)

The real story, part one: DOE aims to prejudice impending policy changes

- In the "Complex Transformation" draft PEIS, DOE should not be allowed to dismiss alternatives that it claims fall outside the current scope of nuclear policy, which it defines as the 2001 Nuclear Posture Review. The NPR is not a law, it is merely a policy statement developed by the Bush Administration. Changes in policy are possible and imminent with end of the Bush era fast approaching.
- DOE claims that it merely implements the national security policy established by the President and Congress, rather than developing its own policy. However, the "Complex Transformation" plan would lock the nuclear weapons complex into a path that entrenches the current nuclear policy, preempting a full and complete policy debate. "Complex Transformation," as some in Congress have noted, seeks to put the "cart before the horse."
- The U.S. should, instead, adopt a new nuclear policy geared toward nonproliferation, disarmament, and the worldwide abolition of nuclear weapons.
- "Complex Transformation" seeks to rebuild the nuclear weapons complex, essentially creating a new complex to meet the claimed needs of the future, including the development of new nuclear weapons. However, there has been no national debate or Congressional input on the future U.S. nuclear policy, and there is legislation pending in Congress (S. 1914) to force such a debate and require the development of a Nuclear Policy Review and a Nuclear Posture Review. Moreover, the omnibus spending bill that passed Congress in December mandates the beginning part of that process. Until this work is complete, it is unreasonable and premature for DOE to make such important and long-lasting decisions regarding the nuclear weapons complex of the future. These decisions made now will prejudice options for decades into the future.

- Although the draft PEIS does include some rhetoric about making the weapons complex responsive to an evolving national security policy, it is only responsive within a narrow scope. The "Complex Transformation" plan does not seriously address substantial changes in nuclear policy such as a "Curatorship" approach, which would maintain the safety and reliability of the existing nuclear weapons stockpile without military enhancements until such time as they are dismantled, or the even more immediate active disarmament option.

The real story, part two: DOE fails to prioritize safety and security

DOE clearly has a goal in mind for "Complex Transformation" -- the creation of a new nuclear weapons complex. Unfortunately, DOE first set out what the agency wanted to do, and then it attempted to address safety and security within that framework. A more rational approach would have been to make safety and security organizing principles for the future complex, and then develop a plan that embodies them.

The real story, part three: DOE ignores alternatives

Consideration of alternatives to the action the agency proposes is "the heart" of any PEIS. It's the law, and it's not supposed to be an empty exercise through which the agency (in this case DOE) merely justifies the action it intends to take. This section of the draft PEIS **should** present the environmental impacts of the proposal and the alternatives in comparative form, thereby sharply defining the issues and providing a clear basis for choice among the alternatives by decision-makers and the public. The "Complex Transformation" draft PEIS fails utterly to do this.

For example, "Curatorship," which was first suggested by Tri-Valley CAREs, was among the alternatives supposedly considered by DOE, but it was eliminated from further study in the draft PEIS. This alternative is based upon reliance on the surveillance and nonnuclear testing program to determine when repairs might be called for. Only if there is compelling evidence that components have degraded, or will soon degrade, and could cause a significant loss of safety or reliability, would DOE replace the affected parts with new ones that would be remanufactured as closely to their original designs as possible. In other words, no new nukes.

Yet, DOE claims that Curatorship was eliminated from detailed study "because it does not define a programmatic alternative distinctly different from the range of alternatives analyzed in [the draft] PEIS."

Apparently DOE mistakes its stockpile stewardship program to be the functional equivalent of Curatorship, despite the fact that nuclear weapons systems are not only being refurbished but modernized with new components -- and new military capabilities -- under the stockpile stewardship program. All such changes would be forbidden under "Curatorship."

We believe that DOE is deliberately misunderstanding the implications of moving to a less aggressive Curatorship approach to the arsenal in order to avoid analyzing it. For Curatorship would not require the new capabilities and new facilities that DOE wants. Moreover, under a Curatorship program, DOE could close down a large percentage of its existing nuclear weapons infrastructure. We will also be challenging DOE on this issue at the public hearings.

The real story, part four: DOE sidesteps treaties

As with Curatorship, strict adherence to U.S. treaty obligations to disarm is a viable alternative that must be examined in the draft PEIS. Thirty-three thousand people demanded just such an alternative during the public "scoping" process. The DOE mentions the comments, but sidesteps their substance.

Under Article VI of the nuclear Non-Proliferation Treaty, the United States is obligated "to pursue negotiations in good faith on effective measures relating to cessation of the nuclear arms race at an early date and to nuclear disarmament, and on a Treaty on general and complete disarmament under strict and effective international control." The "Complex Transformation" plan -- and the Reliable Replacement Warhead effort to build new nuclear

weapons (which we expect to reemerge in the next budget request) -- undermine the Treaty. If the U.S. is truly committed to the NPT and the elimination of nuclear weapons, one wonders why the nuclear weapons complex needs to be revitalized in such a dramatic fashion.

What is the public's role?

NEPA gives everyone the opportunity to express their opinions concerning government actions that may affect the environment. Your voice is important, and it needs to be heard. While the government has selected its preferred alternative as part of "Complex Transformation," that decision is not final and this is your opportunity to help shape the future of nuclear policy and the weapons complex.

Specifically, there are a number of reasons to comment on NEPA documents: (1) to influence federal agencies to minimize environmental impacts, (2) to convince the agency to deny the proposed action, (3) to improve the documents by adding different perspectives or additional information, and (4) to lay the groundwork for future litigation. (Simply stated, if people don't bring up an issue during the hearings and comment period, then DOE cannot be sued later for not considering it. So, do not hesitate to bring up issues you think are important.)

Tips on how to comment

Your oral comments should be a summary of your major concerns, emphasizing the most important points. It is a good idea to write down what you plan to say. You should also submit your comments in written form. At the hearing, you may hear others' comments and want to incorporate them. An issue gains additional political and legal force if it is submitted by many people.

1. **Introduce yourself:** State your name and what special relationship you bring (local resident, trained as a scientist, grew up here, have kids, teach kids, care about the environment, etc.).
2. **Introduce your group:** If you're affiliated with a group such as Tri-Valley CAREs, state it.
3. **State the problem:** In this case, talk about DOE, the Bombplex ("Complex Transformation"), nuclear weapons proliferation, economic waste, environmental harm, plutonium, sick nuclear workers, etc.
4. **State the solution:** Discuss what you envision as a better outcome, including alternatives to the proposed action such as a "green lab" in Livermore, or "Curatorship" and no new nuclear weapons, or compliance with the NPT, etc.

PUBLIC HEARINGS

**Tracy – Tue, March 18th, 6 – 10 pm,
Holiday Inn Express,
3751 N. Tracy Blvd**

**Livermore – Wed, March 19th,
11 am – 3 pm and 6 – 10 pm,
Robert Livermore Community Center,
4444 East Avenue**

Tri-Valley CAREs ♦ 2582 Old First Street, Livermore, CA 94551 ♦ www.trivalleycares.org