



SAVANNAH RIVERKEEPER®

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July 25, 2019

Ms. Jennifer Nelson
NEPA Document Manager
NNSA Savannah River Site Field Office
P.O. Box A
Aiken, SC 29802

Email to: NEPA-SRS@srs.gov

Re: Scoping comments for the National Nuclear Security Administration's (NNSA's) draft Environmental Impact Statement for plutonium "pit" production – for unjustified nuclear weapons - at the proposed Plutonium Bomb Plant at the Savannah River Site

Dear SRS EIS NEPA Document Manager,

These comments are submitted and supported by Savannah Riverkeeper, South Carolina Wildlife Federation, and Waterkeeper Alliance. Savannah Riverkeeper is a 501(c)3 organization that serves as the primary guardian of the Savannah River striving to respect, protect, and improve the entire river basin through education, advocacy, and action. The South Carolina Wildlife Federation's mission is to conserve and restore South Carolina's wildlife and wildlife habitat through education and advocacy. Waterkeeper Alliance strengthens and grows a global network of more than 300 grassroots leaders to preserve and protect the right to drinkable, fishable, swimmable water.

We respectfully submit these comments as provided for by the National Environmental Policy Act (NEPA) on the scope of issues that the NNSA must address in its draft environmental impact statement for plutonium pit production at the Savannah River Site (SRS) in the former Mixed Oxide Fuel Fabrication Facility (MFFF).

We oppose the expansion of any production missions at the Savannah River Site. Pit plutonium production potentially means more plutonium and more waste streams without proper local consent, government regulation, or environmental assessment.

We support the "No Action Alternative" and no repurposing of the MFFF for manufacturing new plutonium pits. Pit production means the already heavily radioactive area along the Savannah River in South Carolina will continue to house waste and radioactive material on a long-term basis, risking waterways, groundwater, wildlife, neighboring communities, and millions of people who depend on the river for drinking, industry, agriculture, and more, including the fourth-largest port in the United States. More than 600,000 people rely on drinking water below the Savannah River Site. New waste streams would exacerbate an already existing problem of waste being left at the site with no clear true repository outside of the basin in any conceivable future.

Under NEPA, a federal agency must prepare an EIS prior to any major federal action that significantly affects the quality of the human environment. 42 U.S.C. § 4332(2)(C). To ensure that an EIS fulfills the purposes underlying NEPA it "shall provide a full and fair discussion of significant environmental impacts and shall inform decision-makers and the public of the reasonable alternatives which would avoid or minimize adverse impacts or enhance the quality of the human environment." 40 C.F.R § 1502.1. A full and fair discussion of environmental impacts includes a thorough discussion of direct, indirect, and cumulative impacts for a given project. *Id.* § 1508.25(c)(3). The agency's preparation of an EIS also requires multiple opportunities for meaningful public involvement in the permit process. *Id.* §§ 1501.7(a)(1), 1503.1(a)(4), 1506.6(c). It is imperative that the NNSA's NEPA analysis include full consideration and disclosure of all the significant impacts of this proposed action.



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The scope of the review process fails to consider the entire state of Georgia. The Savannah River basin and connected groundwater systems do not follow state borders and assessments when potentially contaminating those waterways further with radioactive waste. Any assessment must not follow arbitrary lines, but true geographical ones. Savannah River Site currently identifies a tritium-affected community in Georgia from its RMOP program, but those same communities are left out of this assessment.

There were formerly 13 metric tons of weapons-usable plutonium housed in K-Area at the Savannah River Site. 6 metric tons were tagged for downblending and 7 were left for MFFF processing in accordance with the Plutonium Management and Disposition Agreement with Russia in the year 2000. After the breakdown of that agreement, following the NNSA's decision to defund MOX, one of those 7 tons was moved to Nevada in accordance with Federal Law. The remainder of that material has no designation, and is housed on the coastal plain with no clear repository in sight. The opening of a new pit production facility could not only result in that material staying at SRS but could also result in that material being designated for downblending. That means even more plutonium could be brought to the site for this new pit production plan.

The Environmental Management mission at the Savannah River Site is currently managing the closure and long-term disposal of more than fifty 1-million gallon tanks of radiological waste. One of the most contaminated places on the planet is only separated from our communities by tank walls. Its primary mission must remain just that, with an emphasis on the removal of existing stored waste.

Adding another mission means 10,000 plus years that our home will remain contaminated, risking the health and wellness of the people who live here. We are asking our government to be transparent and provide full information to the community to the best of their ability, given valid national security exemptions. NNSA should properly and thoroughly conduct environmental assessments even beyond the current scope of the law in the best interest of the people by taking advice from stakeholders, citizens, and functioning advisory groups like the CAB. We expect thorough environmental assessments and honest compliance with state, federal, and local laws as well as informed consent of the local communities.

We are also concerned by the risk posed by a new production mission in regards to increased terrorism threats to our area. The Savannah River Site sits adjacent to the only nuclear power plant to expand in the United States since the 1980s, and the soon-to-be largest nuclear facility at Plant Vogtle, and within 20 miles of the Army Cyber Center and Signal Corps at Fort Gordon. Our communities' vitality is dependent on these two important installations and risks to them must be considered by the public. Our communities should not have to carry the burden of the increased waste stream and security threat without truly knowing what that risk is.

We understand the need for maintaining national security, but if we injure our own people through continued contamination then we are in a self-defeating process that will cost American lives and potentially billions more in tax dollars that could be more efficiently spent elsewhere. It is imperative that the federal government honestly weigh its options and not risk the lives and well-being of our state and the very residents it aims to protect. The risks of plutonium pit production do not outweigh the benefits, especially in a long-term timeline.

At present, there has been no clear investigation into the mismanagement of the MFFF construction and project management, both by the contract company and the NNSA. To take a proposed project that would remove nuclear material and ship it out of our area, which is already encumbered by nuclear waste, and exchange it for a production mission that will bring new material in, is unwise, dangerous, and not consistent with goals and needs of the community. It is a clear violation of our right to a clean and healthy environment. We implore the Department of Energy to accept the "No Action Alternative."



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All documents related to this decision must be made publicly available so the people at the highest risk in the surrounding communities are able to provide honestly informed consent, in compliance with current Department of Energy policies.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tonya Bonitatibus'. The signature is fluid and cursive, with a large loop at the end.

Tonya Bonitatibus, Executive Director, Savannah Riverkeeper

South Carolina Wildlife Federation

Waterkeeper Alliance

CC: GA Rep. Jon Burns, GA Rep. Gloria Frazier, GA Rep. Wayne Howard, GA Senator Harold Jones, GA Rep. Brian Prince, GA Senator Jesse Stone, SC Rep. Bill Hixon, SC Senator Brad Hutto, SC Senator Shane Massey, SC Rep. Bill Taylor, SC Senator Tom Young