

DOE Plutonium Disposition Public Meeting  
Thursday, 8/13/98  
W. Barry Adams

Ladies and gentlemen, my name is Barry Adams. I am a banker, a life long resident of the CSRA, a board member of the Aiken Chamber of Commerce, and a concerned citizen.

Please know that I cannot testify to you today due to my understanding of nuclear technology and, in particular, my knowledge of plutonium disposition. While not beyond my interest these are subjects that I will never even pretend to understand.

I am positive though, that a number of specialists and engineers have and will present to you very qualified testimonies of why SRS is technically the best choice for the complete plutonium disposition mission.

Neither can I testify to you today concerning the economic issues involved in your selection process. The budgets involved are far more complex than the budgets with which I deal. Just as from the technical aspect however, I am positive that you have and will hear compelling arguments as to why the selection of SRS is the best choice for the pit assembly and conversion mission and will save taxpayers billions of dollars.

But I can testify to you today of the confidence that I and my family have in the scientists, engineers, technicians, accountants, and managers that operate SRS. And I will tell you publicly that we believe that there is no finer or better qualified group of men and women in the world to accept and successfully carry out this mission than these proven professionals.

This simple opinion, one that is shared throughout the CSRA, could be the most critical of all of the factors that will influence your decision. While it is true that SRS is the technical and financial leader of any potential site, it is also true that there is no other location in the United States where common citizens, such as me, have such faith and trust in the abilities of the operators of a DOE site. The communities of the CSRA overwhelmingly support SRS and its missions and this unprecedented community support has not, will not, and cannot be duplicated anywhere.

I encourage you to give high value to the 40 plus years of support that SRS and DOE have received from the citizens of South Carolina and Georgia and assign to SRS the pit disassembly and conversion mission.

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SCD03

**SCD03-1**

**Alternatives**

DOE acknowledges the commentor's support for siting the pit conversion facility at SRS. As indicated in the revised Section 1.6, SRS is preferred for the pit conversion facility because the site has extensive experience with plutonium processing, and the pit conversion facility complements existing missions and takes advantage of existing infrastructure. Decisions on the surplus plutonium disposition program at SRS will be based on environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input. DOE will announce its decisions regarding facility siting and approach to surplus plutonium disposition in the SPDEIS ROD.



# City of Aiken

South Carolina

Post Office Box 1177  
Aiken, S.C. 29802

**RESOLUTION**  
**SUPPORTING THE TEMPORARY STORAGE OF**  
**PLUTONIUM FOR THE PURPOSES OF PROCESSING AND VITRIFICATION**

WHEREAS, the handling and disposition of excess weapons plutonium is of grave concern to the national security of the United States;

WHEREAS, plutonium reprocessing represents one of the most certain future missions of the United States Department of Energy for the next 20 or 30 years;

WHEREAS, the Savannah River Site has produced approximately 40% of all U.S. weapons grade plutonium over the past 45 years and has safely handled plutonium and glove-box processing equipment with little or no adverse impact on workers, the public, or the environment;

WHEREAS, the Department of Energy and its record of decision recognizes the Savannah River Site as "a plutonium competent site with the most modern, state of the art storage and processing facilities...with the only remaining large-scale chemical separation and processing capability in the Department of Energy complex";

NOW, THEREFORE, BE IT RESOLVED BY THE COUNCIL OF THE CITY OF AIKEN THAT:

The City Council for the City of Aiken does endorse major plutonium missions for the Savannah River Site, and urges the Department of Energy to designate the Savannah River Site as its lead facility in plutonium management, processing, and temporary storage.

ADOPTED this 24th day of February, 1997, at Aiken, South Carolina.

*Fred B. Cavanaugh*  
Mayor

*Ron M. Boushade*  
Councilmember

*Beverly D. Clyburn*  
Councilmember

*Michael Chandler*  
Councilmember

*Jim H. Gandy*  
Councilmember

*Nathan K. King*  
Councilmember

*Leslie B. Price*  
Councilmember

City Attorney - (803)642-7654 Finance - (803)642-7600 FAX - (803)642-7646 City Manager - (803)642-7654  
Planning - (803)642-7608 Public Safety - (803)642-7600 U.L.P. Work - (803)642-7600

SCD102

## SCD102-1

## Alternatives

DOE acknowledges the commentors' support for siting the proposed surplus plutonium disposition facilities at SRS. As indicated in the revised Section 1.6, SRS is preferred for the proposed facilities because the site has extensive experience with plutonium processing, and these facilities complement existing missions and take advantage of existing infrastructure. Decisions on the surplus plutonium disposition program at SRS will be based on environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input. DOE will announce its decisions regarding facility siting and approach to surplus plutonium disposition in the SPDEIS ROD.

**DOE Hearing-Plutonium Disposition**

North Augusta, SC  
8/13/98

**Good afternoon. Mr./Ms. Chairman and Committee Members, my name is Fred B. Cavanaugh, Jr. and I'm very fortunate to be Mayor of the City of Aiken. As Mayor of Aiken, I'm proud to be representing our city's elected officials, staff and citizens when I tell you that we support the Pit Disassembly and Conversion mission at the Savannah River Site (SRS).**

**As we know, SRS has been selected as the preferred site for Mixed Oxide (MOX) Fuel and Immobilization missions because it has the expertise and infrastructure needed to bring the disposition of plutonium to successful completion.**

**The Savannah River Site, its dedicated employees, and the people in the Central Savannah River Area (CSRA) supported our nation's Cold War efforts for nearly fifty (50) years by helping to create our country's nuclear defenses. We are now prepared to complete the job President Truman entrusted to us so long ago...making our world a safer place to live.**

**When it comes to plutonium handling there is no safer facility than SRS, and as far as community support, there is no other site that enjoys as much support as SRS. Year after year on our CSRA trips (some 45 people strong) to visit our legislative delegations and the DOE in Washington, we hear DOE agree that SRS has the strongest community support.**

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SCD48

**SCD48-1**

**Alternatives**

DOE acknowledges the commentor's support for siting the pit conversion facility at SRS. As indicated in the revised Section 1.6, SRS is preferred for the pit conversion facility because the site has extensive experience with plutonium processing, and the pit conversion facility complements existing missions and takes advantage of existing infrastructure. Decisions on the surplus plutonium disposition program at SRS will be based on environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input. DOE will announce its decisions regarding facility siting and approach to surplus plutonium disposition in the SPDEIS ROD.

AIKEN

HONORABLE FRED B. CAVANAUGH

PAGE 2 OF 6

putting the new production reactor at the Savannah River Site. "I think we are the best location," said Georgia Democrat Sam Nunn, referring to SRS. "We have the best people, we have the most infrastructure to deal with it."

1991 - Another article from the Augusta Herald printed a statement from U.S. Representative Butler Derrick, Dem.-S.C., saying, " This is the friendliest place in the country to further development in nuclear production. The people want it. The people in the area feel comfortable with it. As the DOE consolidates nuclear facilities, I think SRS will become one of those consolidation sites."

During the same time frame then Governor Campbell of S.C. sent a letter to the Chief of Staff of President George Bush stating, "I express my support for locating the NWCRS at SRS. The SRS is the optimum location for several reasons..." "All ingredients for a successful relocation of the NWCRS to SRS are in place. My office is ready and willing to work closely with you to this end." And the S.C. Congressional Delegation unanimously endorsed locating the NWCRS at SRS, stating, "The objective of the National Defense Authorization Act is to create Complex-21, a facility more compact, less diverse, and less expensive to operate than the complex of today. We feel these objectives will best be achieved in a timely and cost efficient manner at the Savannah River Site."

These are but a few of the earlier endorsements of the SRS, and it is quite obvious that the support continues to be strong. As a more recent indication I'd like to read the Resolution from the Aiken City

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SCD48

Since moving to Aiken in 1953, I've seen the community support grow. To show that we are not a 'Johnny come lately' when we talk about support, I'd like to share just a few examples of support dating as far back as 1980.

1980 - An Oak Ridge National Laboratory and Oak Ridge Associated Universities poll was positive toward SRS.

1987 - A joint resolution passed by the SC General Assembly stated, "Be it resolved by the Senate, the House of Representatives concurring, that the U.S.Department of Energy is hereby requested to designate its Savannah River Plant as the site for the New Production Reactor."

1988 - A University of South Carolina at Aiken Survey Research Services poll was positive toward SRS.

1990 - An editorial from the Aiken Standard Newspaper stated, "While Savannah River has not been free from environmental problems, it has handled them expeditiously and has enjoyed friendly relations with the surrounding communities, which actively support its continued operation. As taxpayers and citizens we believe SRS should occupy a key position in the implementation of Complex 21 ( this had to do with the Nuclear Weapons Complex Reconfiguration initiative).

1991 - An article from the Augusta Herald stated, "Nunn joins backers of the new reactor at SRS." Georgia's senior U.S.Senator said that he favors

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SCD48

Council on August 10th, 1998 (resolution attached for the record).

In closing I'd just like to say that all we want is the best for our country and we think the best place for the Pit Disassembly and Conversion mission to be successful is the SRS.

Thank you,



Fred B. Cavanaugh



# City of Aiken

Post Office Box 1177  
Aiken, S.C. 29802

RESOLUTION

SUPPORTING THE PIT DISASSEMBLY AND CONVERSION MISSION  
BEING LOCATED AT SAVANNAH RIVER SITE



1997

WHEREAS, the Savannah River Site has demonstrated a continued strong leadership role in this nation's national security since the inception of the site; and

WHEREAS, the professional management team and employees of the Savannah River Site have the proven experience for continuing in this leadership role; and

WHEREAS, the Department of Energy has recognized the importance of and demonstrated their faith in the Savannah River Site by its decisions to locate the MOX and immobilization missions there; and

WHEREAS, the location of the third element of the plutonium disposition mission, pit disassembly and conversion, is now being reviewed by the Department of Energy; and

WHEREAS, the Savannah River site is the only site being considered with the on site experience of processing plutonium and with the necessary infrastructure required for this critical mission;

NOW, THEREFORE BE IT RESOLVED by the Mayor and City Council in meeting duly assembled and by the authority thereof, and on behalf of the citizens of the City of Aiken, that the Department of Energy is urged to select the Savannah River Site for its pit disassembly and conversion mission.

BE IT FURTHER RESOLVED that the citizens of Aiken are encouraged to attend the Department of Energy's public meetings scheduled for Thursday, August 13, 1998, at 1:00 P.M. or 6:00 P.M. in the North Augusta Community Center and to voice their support for locating the pit disassembly and conversion mission at the Savannah River Site.

DONE, RATIFIED AND ADOPTED by the Mayor and City Council of the City of Aiken, South Carolina, on this 10th day of August, 1998.

*Fred B. Cavanaugh*  
Mayor

*Michael Amador*  
Councilmember

*Ken M. ...*  
Councilmember

*Beverly ...*  
Councilmember



*...*  
Councilmember

*Leslie B. Price*  
Councilmember

*Robert ...*  
Councilmember

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Public Safety - (803)642-7620 • Public Works - (803)642-7610 • Recreation - (803)642-7630 • FAX - (803)642-7646  
<http://www.aiken.net>

SCD48

*Augusta Herald 8-13-98*

## Rally for SRS mission

Today on Page 5A, you can read the Amarillo, Texas, newspaper's call for residents to show up at public hearings to support new missions for the Pantex nuclear weapons plant. Despite what the editorial says, these missions are clearly better suited for the Savannah River Site.

The Department of Energy has already chosen SRS as the preferred site to convert waste plutonium into mixed oxide fuel (MOX) to power commercial nuclear reactors or into a form suitable for disposal in high-level waste canisters.

The plutonium disposition project, which the Amarillo editorial addresses, goes hand-in-glove with missions the DOE is already recommending for SRS. Locating it in Am-

arillo might be great for the economy there — but a net loss for national taxpayers who would save millions if SRS hosts all three projects.

The expensive basic infrastructure for this work already exists at the Aiken area plant but would have to be built from scratch at Pantex.

But, as noted before in this space, politics, not common sense or taxpayer savings, will decide where the pit disassembly project goes.

This is why it's important for people on both sides of the Savannah River to rally behind SRS in DOE-sponsored public hearings slated today at 1 and 6 p.m. at the North Augusta Community Center on the corner of East Buena Vista Avenue and Brookside Drive.

SCD48

**DOE PLUTONIUM DISPOSITION  
PUBLIC MEETING  
August 13, 1998  
North Augusta, SC Community Center**

*Statement by:* Teresa H. Haas  
Chairperson, Aiken, SC Chamber of Commerce  
Board of Directors

- My name is Teresa Haas and I am Chairperson of the Aiken Chamber of Commerce Board of Directors.
- During the public meeting at Pantex, We understand that you heard a great deal of SRS bashing.
- We don't do business that way and prefer to take the high road.
- We'll focus our comments on the reasons why this mission should be located at SRS.
- We are here in behalf of 5 Chambers of Commerce from SC & GA.
- Collectively we represent over 3000 businesses and some 1/2 million people.
- This past April, over 50 individuals and elected officials from our Chambers of Commerce traveled to Washington.
- We were pleased to meet w/Secretary Peña, Deputy Secretary Moler, and other DOE officials to discuss several issues pertaining to the Savannah River Site.
- The Plutonium Disposition Mission, and in particular, the Pit Disassembly and Conversion component, was a primary topic of our discussion with the Secretary.

SCD36

- As we stated then, we strongly support the location of this mission at SRS. The Board of Directors of these Chambers have passed numerous resolutions supporting the Pit Disassembly and Conversion mission at SRS.
- Our support for this particular mission is based upon several reasons:
  - 1) SRS' unique expertise and experience in handling plutonium;
  - 2) SRS' unmatched safety record in the DOE Complex; and,
  - 3) From a business standpoint, we are highly interested in saving dollars for the taxpayers of this country.
- We understand there is a cost savings of at least \$60 million by locating Pit Disassembly and Conversion at SRS. By our standards, that's a lot of money.
- Simply stated, SRS has demonstrated its technical and human resource leadership. That expertise combined with unequalled regional support from 2 states is a powerful combination which can benefit DOE in addressing critical, non-proliferation, material disposition, clean-up and national security challenges for our nation.

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SCD36

### SCD36-1

### Alternatives

DOE acknowledges the commentor's support for siting the pit conversion facility at SRS. DOE believes that all the candidate sites are suitable from an operational, community support, and safety standpoint. As indicated in the revised Section 1.6, SRS is preferred for the proposed facilities because the site has extensive experience with plutonium processing, and these facilities complement existing missions and take advantage of existing infrastructure.

Although cost will be a factor in the decisionmaking process, this SPD EIS contains environmental impact data and does not address the costs associated with the various alternatives. A separate cost report, *Cost Analysis in Support of Site Selection for Surplus Weapons-Usable Plutonium Disposition* (DOE/MD-0009, July 1998), which analyzes the site-specific cost estimates for each alternative, was made available around the same time as the SPD Draft EIS. This report and the *Plutonium Disposition Life-Cycle Costs and Cost-Related Comment Resolution Document* (DOE/MD-0013, November 1999), which covers recent life-cycle cost analyses associated with the preferred alternative, are available on the MD Web site at <http://www.doe-md.com> and in the public reading rooms at the following locations: Hanford, INEEL, Pantex, SRS, and Washington, D.C. Decisions on the surplus plutonium disposition program at SRS will be based on environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input. DOE will announce its decisions regarding facility siting and approach to surplus plutonium disposition in the SPD EIS ROD.



**Aiken Chamber of Commerce**

400 Laurens Street, Northwest • P.O. Box 852 • Aiken, South Carolina 29802

(803) 641-1111 • FAX (803) 641-4174

JUNE MURFF  
President

**RESOLUTION**

WHEREAS the handling and disposition of excess weapons plutonium is of grave concern to the national security of the United States; and

WHEREAS plutonium disposition represents one of the most certain future missions of the DOE for the next 20 to 30 years; and

WHEREAS the Department of Energy has decided to pursue a dual path for plutonium disposition and has named the Savannah River Site as a candidate site for both options; and

WHEREAS the Savannah River Site has produced approximately 40 percent of all US weapons grade plutonium over the last 45 years and has safely handled plutonium in glovebox processing equipment with no adverse impact on workers, the public or the environment; and

WHEREAS the Department of Energy in its Record of Decision recognizes the Savannah River Site as "a plutonium competent site with the most modern, state-of-the-art storage and processing facilities...with the only remaining large-scale chemical separation and processing capability in the DOE complex", and

WHEREAS the regional community in the Central Savannah River Area (CSRA) of South Carolina and Georgia strongly supports continued plutonium missions for the Department of Energy's Savannah River Site;

NOW BE IT RESOLVED that the Aiken Chamber of Commerce strongly endorses major plutonium missions for the Savannah River Site and urges the Department of Energy to designate the Savannah River Site as its lead facility in plutonium management and disposition.

APPROVED this 19<sup>th</sup> day of February 1997 at Aiken, South Carolina, by the Aiken Chamber of Commerce.

Chairman

President

*The Partner Every Business Needs!*



SCD83

**SCD83-1**

**Alternatives**

DOE acknowledges the commentors' support for siting the proposed surplus plutonium disposition facilities at SRS. As indicated in the revised Section 1.6, SRS is preferred for the proposed facilities because the site has extensive experience with plutonium processing, and these facilities complement existing missions and take advantage of existing infrastructure. Decisions on the surplus plutonium disposition program at SRS will be based on environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input. DOE will announce its decisions regarding facility siting and approach to surplus plutonium disposition in the SPDEIS ROD.

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**AIKEN CHAMBER OF COMMERCE**  
**JEFF SPEARS**  
**PAGE 1 OF 3**

Good afternoon, my name is Jeff Spears and I am here representing the Greater Aiken Chamber of Commerce as its Vice Chairman for Economic Development. Additionally, I am a Senior Vice President with NationsBank with responsibilities in Augusta, Aiken, North Augusta, Barnwell, Allendale, Edgefield, and Orangeburg; in essence all the towns and communities that have supported the mission of SRS for now almost 50 years. As a graduate of the Aiken County Public School System and a resident of this community for nearly 25 years, I have grown to respect the Savannah River Site as a dedicated, well managed, and safe DOE facility that has the respect and confidence of the 450,000 citizens that live in this area. As a businessman traveling throughout the areas bordering SRS and with my recent work with Aiken's Chamber of Commerce, I am also respectful of the economic viability that SRS brings to this region.

I must confess that where I know a lot about banking I fall well short when it comes to standing before you and discussing Plutonium Disassembly and Conversion of Plutonium. But as a business

SCD35

person and a tax paying citizen of the United States I would like to (make or reiterate) a few important point.

1. It is my understanding that Plutonium Disposition Mission at SRS could save tax payers 1.6 billion in avoided cost verses locating this mission at another DOE facility.

2. Additionally I understand that the third element; Pit Disassembly could save at least 60 million dollars if located at SRS.

3. I have also learned that DOE has acknowledged SRS's history and expertise in handling Plutonium verses that of other DOE sights making SRS the site of chose for all elements of Plutonium Disposition.

4. By living here so many years I am also knowledgeable of SRS's safety record and DOE's recognition of SRS as one of their safest sites of all DOE complexes.

5. And last I am sure you are impressed with the community support that both SC and GA has given to SRS for nearly 50 years that will continue with new missions in the future.

So, with cost saving to the US government, historical expertise in

SCD35

### SCD35-1

### Alternatives

DOE acknowledges the commentor's support for siting the proposed surplus plutonium disposition facilities at SRS. DOE believes that all the candidate sites are suitable from an operational, community support, and safety standpoint. As indicated in the revised Section 1.6, SRS is preferred for the proposed facilities because the site has extensive experience with plutonium processing, and these facilities complement existing missions and take advantage of existing infrastructure.

Although cost will be a factor in the decisionmaking process, this SPD EIS contains environmental impact data and does not address the costs associated with the various alternatives. A separate cost report, *Cost Analysis in Support of Site Selection for Surplus Weapons-Usable Plutonium Disposition* (DOE/MD-0009, July 1998), which analyzes the site-specific cost estimates for each alternative, was made available around the same time as the SPD Draft EIS. This report and the *Plutonium Disposition Life-Cycle Costs and Cost-Related Comment Resolution Document* (DOE/MD-0013, November 1999), which covers recent life-cycle cost analyses associated with the preferred alternative, are available on the MD Web site at <http://www.doe-md.com> and in the public reading rooms at the following locations: Hanford, INEEL, Pantex, SRS, and Washington, D.C. Decisions on the surplus plutonium disposition program at SRS will be based on environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input. DOE will announce its decisions regarding facility siting and approach to surplus plutonium disposition in the SPD EIS ROD.

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handling Plutonium, an unprecedented safety record at SRS, and  
the overwhelming community support for past and future  
missions, I feel DOE has a relatively easy chose in selecting SRS  
as the recipient of the third element of Plutonium Disposition  
being Pit Disassembly and Conversion.

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Thank you for your time.

SCD35



Aiken County Commission for Technical Education  
Post Office Box 686 Aiken, South Carolina 29802

**RESOLUTION IN SUPPORT OF THE PLUTONIUM MISSION AT  
THE SAVANNAH RIVER SITE**

WHEREAS, the Department of Energy has already chosen the Savannah River Site as the site for MOX Fuel Fabrication and Immobilization because of the site's capabilities as the Department of Energy's only operating plutonium processing site; and,

WHEREAS, plutonium disposition represents one of the most certain future missions of the U.S. Department of Energy for the next 20 to 30 years; and,

WHEREAS, the safe production and handling of plutonium has been a hallmark of the work performed at the Savannah River Site for many years; and,

WHEREAS, consolidating all three of the new plutonium disposition facilities, including the Pit Disassembly and Conversion Facility, at the Savannah River Site would save at least \$1.6 billion, compared to establishing and maintaining the required capabilities at other sites; and,

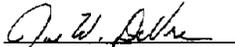
WHEREAS, the Savannah River Site has produced approximately 40 percent of all U.S. weapons grade plutonium over the last 45 years and has safely handled plutonium in glovebox processing equipment with no adverse impact on workers, the public, or the environment; and,

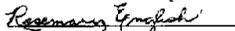
WHEREAS, no site in the Department of Energy Complex can claim a higher level of productivity or a more outstanding safety record than the Savannah River Site;

THEN BE IT RESOLVED: that the Aiken County Commission for Technical and Comprehensive Education strongly endorses major plutonium missions for the Savannah River Site and urges the Department of Energy to designate the Savannah River Site as its lead facility in Mixed Oxide Fuel Fabrication, Immobilization, and Pit Disassembly and Conversion; and,

BE IT FURTHER RESOLVED: that the Aiken County Commission for Technical and Comprehensive Education will commit its resources through Aiken Technical College to the successful development of a skilled workforce and a community capable of supporting this important mission for the nation.

APPROVED this 10<sup>th</sup> day of August 1998 at Aiken, South Carolina, by the Aiken County Commission for Technical and Comprehensive Education.

  
Joe W. DeVore, Chairman

  
Rosemary English, Secretary

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SCD79-1

Alternatives

DOE acknowledges the commentors' support for siting the proposed surplus plutonium disposition facilities at SRS. As indicated in the revised Section 1.6, SRS is preferred for the proposed facilities because the site has extensive experience with plutonium processing, and these facilities complement existing missions and take advantage of existing infrastructure.

Although cost will be a factor in the decisionmaking process, this SPD EIS contains environmental impact data and does not address the costs associated with the various alternatives. A separate cost report, *Cost Analysis in Support of Site Selection for Surplus Weapons-Usable Plutonium Disposition* (DOE/MD-0009, July 1998), which analyzes the site-specific cost estimates for each alternative, was made available around the same time as the SPD Draft EIS. This report and the *Plutonium Disposition Life-Cycle Costs and Cost-Related Comment Resolution Document* (DOE/MD-0013, November 1999), which covers recent life-cycle cost analyses associated with the preferred alternative, are available on the MD Web site at <http://www.doe-md.com> and in the public reading rooms at the following locations: Hanford, INEEL, Pantex, SRS, and Washington, D.C. Decisions on the surplus plutonium disposition program at SRS will be based on environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input. DOE will announce its decisions regarding facility siting and approach to surplus plutonium disposition in the SPD EIS ROD.

SCD79

**AIKEN COUNTY COMMISSION ON HIGHER EDUCATION  
GASPER L. TOOLE, III  
PAGE 1 OF 1**

**AIKEN COUNTY COMMISSION ON HIGHER EDUCATION  
RESOLUTION WITH REGARD TO PLUTONIUM MISSION  
AT THE SAVANNAH RIVER SITE**

WHEREAS, the Savannah River Site has been an integral part of the nation's nuclear defense mission since its inception in 1954; and,  
WHEREAS, the safe production and handling of plutonium has been a hallmark of the work performed at SRS for many years; and,  
WHEREAS, the proven plutonium-handling experience of the professionals at the Savannah River Site is unmatched by any other site under consideration for this mission; and,  
WHEREAS, the decision to place the "Pit Disassembly and Conversion" Mission at the Savannah River Site can save the Federal budget as much as \$1.6 billion as a result of existing facilities and infrastructure; and,  
WHEREAS, no site in the Department of Energy Complex can claim a higher level of productivity or a more outstanding safety record than the Savannah River Site;  
THEN BE IT RESOLVED: that the Aiken County Commission for Higher Education hereby endorses the addition of the "Pit Disassembly and Conversion" Mission to the MOX Fuel Facility and Plutonium Immobilization Mission approved for the Savannah River Site; and,  
BE IT FURTHER RESOLVED: that the Aiken County Commission will commit its resources through the University of South Carolina Aiken campus to the successful development of a skilled workforce and a community capable of supporting this important mission for the nation.

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Gasper L. Toole, III  
Chairman

August 13, 1998  
Date

SCD92

**SCD92-1**

**Alternatives**

DOE acknowledges the commentors' support for siting the pit conversion facility at SRS. As indicated in the revised Section 1.6, SRS is preferred for the pit conversion facility because the site has extensive experience with plutonium processing, and the pit conversion facility complements existing missions and takes advantage of existing infrastructure.

Although cost will be a factor in the decisionmaking process, this SPD EIS contains environmental impact data and does not address the costs associated with the various alternatives. A separate cost report, *Cost Analysis in Support of Site Selection for Surplus Weapons-Usable Plutonium Disposition* (DOE/MD-0009, July 1998), which analyzes the site-specific cost estimates for each alternative, was made available around the same time as the SPD Draft EIS. This report and the *Plutonium Disposition Life-Cycle Costs and Cost-Related Comment Resolution Document* (DOE/MD-0013, November 1999), which covers recent life-cycle cost analyses associated with the preferred alternative, are available on the MD Web site at <http://www.doe-md.com> and in the public reading rooms at the following locations: Hanford, INEEL, Pantex, SRS, and Washington, D.C. Decisions on the surplus plutonium disposition program at SRS will be based on environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input. DOE will announce its decisions regarding facility siting and approach to surplus plutonium disposition in the SPD EIS ROD.

**Comments for DOE**

**I am Ronnie Young, Chairman Aiken County Council. On behalf of the Aiken County Council I would like to offer a few comments. I am here as someone who was born and raised right here in Aiken County. I am also here because so many of my neighbors here in Aiken County work at the Savannah River site. In fact, more SRS workers live in Aiken County than any where else.**

**I've watched the developments at the Savannah River Site for my entire life (well, its entire life). I've learned that the people who work at the Site are dedicated to the safe operation of the facility. I guess knowing the people so well has taught me to respect the importance of having the right people taking care of such a vital mission. These people have a long history of handling plutonium and this experience can not be replicated without an immense investment of time and money.**

**Why would the DOE consider another facility when the Savannah River Site is prepared to take on the Pit Disassembly and Conversion mission. This preparation has been taking place for nearly fifty years.**

**On behalf of the Aiken County Council, I would like to re-enter into the record the resolution passed by our Council on March 5, 1997 in support of the plutonium disposition missions at the Savannah River Site.**

*Ronnie Young  
Chairman  
Aiken County Council*

SCD12

**SCD12-1**

**Alternatives**

DOE acknowledges the commentor's support for siting the pit conversion facility at SRS. As indicated in the revised Section 1.6, SRS is preferred for the pit conversion facility because the site has extensive experience with plutonium processing, and the pit conversion facility complements existing missions and takes advantage of existing infrastructure. Decisions on the surplus plutonium disposition program at SRS will be based on environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input. DOE will announce its decisions regarding facility siting and approach to surplus plutonium disposition in the SPDEIS ROD.

**AIKEN COUNTY COUNCIL  
HONORABLE RONNIE YOUNG  
PAGE 2 OF 2**

Sponsor(s) : County Council  
Committee Referral : N/A  
Committee Consideration Date: N/A  
Committee Recommendation : N/A  
Effective Date : March 5, 1997

RESOLUTION NO. 97-3-52

COUNCIL ADMINISTRATOR FORM OF GOVERNMENT FOR AIKEN COUNTY

(To Support and Endorse the Designation of the Savannah River Site as the Lead Facility for the Management and Disposition of Plutonium Within the Department of Energy.)

WHEREAS:

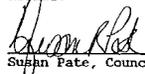
- .. The handling and processing of excess weapons plutonium is of grave concern to the national security of the United States; and
- 2. Plutonium disposition represents one of the most certain future missions of the Department of Energy for the future; and
- 3. The Department of Energy has decided to pursue a dual path for plutonium disposition and has named the Savannah River Site as a candidate site for both options; and
- 4. The Department of Energy in its Record of Decision recognizes the Savannah River Site as "a plutonium competent site with the most modern, state-of-the-art storage and processing facilities ... with the only remaining large-scale chemical separation and processing capability in the DOE complex"; and
- 5. Aiken County has steadfastly supported the Savannah River Site and Department of Energy during its long association.

NOW THEREFORE BE IT RESOLVED BY THE AIKEN COUNTY COUNCIL THAT:

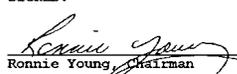
- 1. The Aiken County Council strongly endorses major plutonium missions for the Savannah River Site and urges the Department of Energy to designate the Savannah River Site as its lead facility in plutonium management and disposition.
- 2. The Aiken County Council strongly encourages the Department of Energy to designate a facility for the permanent disposition for the nuclear waste materials to enhance the security and final disposition of these materials.

Adopted at the regular meeting of Aiken County Council on March 4, 1997.

ATTEST:

  
Susan Pate, Council Clerk

SIGNED:

  
Ronnie Young, Chairman

IMPACT STATEMENT:

RES0220/AGNDA

COUNCIL VOTE: Unanimous

SCD12

**AIKEN COUNTY, SOUTH CAROLINA LEGISLATIVE DELEGATION  
HONORABLE THOMAS BECK ET AL.**

**PAGE 1 OF 1**

**A RESOLUTION**

Whereas, the handling and disposition of excess weapons plutonium is of grave concern to the national security of the United States; and

Whereas, plutonium disposition represents one of the most certain future missions of the Department of Energy for the next twenty to thirty years; and

Whereas, the Department of Energy has decided to pursue a dual path for plutonium disposition and has named the Savannah River Site as a candidate site for both options; and

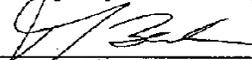
Whereas, the Department of Energy's Surplus Fissile Materials Disposition Program will result in the production of qualified disposal forms and the eventual removal of these materials from the State of South Carolina; and

Whereas, the Savannah River Site has produced approximately forty percent of all United States weapons grade plutonium over the last forty-five years and has safely handled plutonium in glovebox processing equipment with no adverse impact on workers, the public, or the environment; and

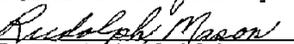
Whereas, the Department of Energy in its Record of Decision recognizes the Savannah River Site as "a plutonium competent site with the most modern, state-of-the-art storage and processing facilities...with the only remaining large-scale chemical separation and processing capability in the DOE complex"; and

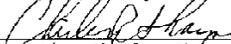
Whereas, the regional community in the Central Savannah River Area (CSRA) of South Carolina and Georgia strongly supports continued plutonium missions for the Department of Energy's Savannah River Site. Now, therefore,

Be it resolved that the Aiken County, South Carolina Legislative Delegation strongly endorses major plutonium missions for the Savannah River Site and urges the Department of Energy to designate the Savannah River Site as its lead facility in plutonium management and disposition.

  
Representative Thomas Beck

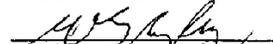
  
Representative William Clyburn

  
Representative Rudolph Mason

  
Representative Charles Sharpe

  
Representative Roland Smith

  
Senator Thomas Moore

  
Senator W. Greg Ryberg

SCD82

SCD82-1

Alternatives

DOE acknowledges the Senators' and Representatives' support for siting the proposed surplus plutonium disposition facilities at SRS. As indicated in the revised Section 1.6, SRS is preferred for the proposed facilities because the site has extensive experience with plutonium processing, and these facilities complement existing missions and take advantage of existing infrastructure. Decisions on the surplus plutonium disposition program at SRS will be based on environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input. DOE will announce its decisions regarding facility siting and approach to surplus plutonium disposition in the SPD EIS ROD.



As Chief Executive Officer of Aiken Regional Medical Centers in Aiken, South Carolina I would like to extend my full support for the Pit Disassembly and Conversion at the Savannah River Site.

Obtaining the third element of the plutonium disposition mission is a winning proposition for both the Department of Energy and the CSRA (Central Savannah River Area). By choosing Savannah River Site DOE could save US Taxpayers approximately \$1.6 billion based on avoided costs of new structures and equipment. Savannah River Site has demonstrated competency in processing plutonium and have in place the necessary infrastructure for the processing along with comprehensive medical surveillance programs.

As a business person I see the importance of the Savannah River Site to the economic vitality of our area. Job stability along with the creation of new jobs is the backbone of any healthy community. Savannah River Site employees have proven over the years their commitment to safety and to the community at large. I have been a lifelong resident of the area and have no reservations in bringing the Pit Disassembly and Conversion to our region.

*Richard H. Satcher*  
RICHARD H. SATCHER  
8/13/98

**SCD06-1**

**Alternatives**

DOE acknowledges the commentator's support for siting the pit conversion facility at SRS. As indicated in the revised Section 1.6, SRS is preferred for the pit conversion facility because the site has extensive experience with plutonium processing, and the pit conversion facility complements existing missions and takes advantage of existing infrastructure.

Although cost will be a factor in the decisionmaking process, this SPD EIS contains environmental impact data and does not address the costs associated with the various alternatives. A separate cost report, *Cost Analysis in Support of Site Selection for Surplus Weapons-Usable Plutonium Disposition* (DOE/MD-0009, July 1998), which analyzes the site-specific cost estimates for each alternative, was made available around the same time as the SPD Draft EIS. This report and the *Plutonium Disposition Life-Cycle Costs and Cost-Related Comment Resolution Document* (DOE/MD-0013, November 1999), which covers recent life-cycle cost analyses associated with the preferred alternative, are available on the MD Web site at <http://www.doe-md.com> and in the public reading rooms at the following locations: Hanford, INEEL, Pantex, SRS, and Washington, D.C. Decisions on the surplus plutonium disposition program at SRS will be based on environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input. DOE will announce its decisions regarding facility siting and approach to surplus plutonium disposition in the SPD EIS ROD.

RESOLUTION

WHEREAS the handling and disposition of excess weapons plutonium is of grave concern to the national security of the United States; and

WHEREAS plutonium represents a significant energy source for the United States when used as fuel in nuclear reactors for the production of electricity; and

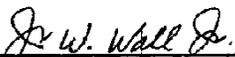
WHEREAS plutonium disposition represents one of the most certain future missions of the Department of Energy for the next 20 to 30 years; and

WHEREAS the Savannah River Site has produced approximately 40 percent of all U.S. weapons-grade plutonium over the past 45 years and has safely handled plutonium in glovebox processing equipment with no adverse impact on workers, the public or the environment; and

WHEREAS Allendale County of South Carolina strongly supports continued plutonium missions for the Department of Energy's Savannah River Site;

NOW BE IT RESOLVED that the Allendale County endorses major plutonium missions for the Savannah River Site and urges the Department of Energy to designate the Savannah River Site as its lead facility in plutonium management and disposition.

APPROVED this 12<sup>th</sup> day of February 1997, by the Allendale County Council.

  
Chairman

SCD86

SCD86-1

Alternatives

DOE acknowledges the commentor's support for siting the proposed surplus plutonium disposition facilities at SRS. As indicated in the revised Section 1.6, SRS is preferred for the proposed facilities because the site has extensive experience with plutonium processing, and these facilities complement existing missions and take advantage of existing infrastructure. Decisions on the surplus plutonium disposition program at SRS will be based on environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input. DOE will announce its decisions regarding facility siting and approach to surplus plutonium disposition in the SPDEIS ROD.



United States  
Department  
of Energy

*Comment Form*

NAME: (Optional) Allendale County Chamber of Commerce  
ADDRESS: PO Box 517 Allendale, SC 29810  
TELEPHONE: (803) 584-0032  
E-MAIL: \_\_\_\_\_

The Allendale County Chamber of Commerce supports  
The disposition of Surplus Plutonium being managed by  
Savannah River Site. We feel this could have  
a positive Economic impact on this Area.

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FD202

**FD202-1**

**Alternatives**

DOE acknowledges the commentor's support for siting the proposed surplus plutonium disposition facilities at SRS. As indicated in the revised Section 1.6, SRS is preferred for the proposed facilities because the site has extensive experience with plutonium processing, and these facilities complement existing missions and take advantage of existing infrastructure. Decisions on the surplus plutonium disposition program at SRS will be based on environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input. DOE will announce its decisions regarding facility siting and approach to surplus plutonium disposition in the SPDEIS ROD.

AMERICAN NUCLEAR SOCIETY - SAVANNAH RIVER SECTION  
STATEMENT REGARDING PLUTONIUM DISPOSITION  
ENVIRONMENTAL IMPACT STATEMENT

My name is John Dewes and I am representing the Savannah River Section of the American Nuclear Society. Our local section consists of some 800 scientists and engineers in the Central Savannah River Area. On behalf of the Section, I would like to make a statement concerning Plutonium Disposition Environmental Impact Statement.

We strongly support the selection of the Savannah River Site for the pit disassembly and conversion mission. It is the only operating site in the DOE complex that has the supporting infrastructure in place to deal with this mission, including the safe management of wastes generated by the process. The site has been safely handling and processing plutonium for many years, and locating these missions at the same site will minimize future decommissioning costs. The biggest assets of the site, however, are the capable, experienced personnel who have proven that they can handle these materials in a safe manner.

We are encouraged by the progress made by the Department of Energy towards fulfilling the Plutonium Disposition Mission, and would like to see similar progress made on the ultimate disposition of wastes generated by these processes, as well as taking responsibility for commercial spent nuclear fuel.

Thank you for the opportunity to provide comment on this important issue.

SCD89

SCD89-1

Alternatives

DOE acknowledges the commentator's support for siting the pit conversion facility at SRS. As indicated in the revised Section 1.6, SRS is preferred for the pit conversion facility because the site has extensive experience with plutonium processing, and the pit conversion facility complements existing missions and takes advantage of existing infrastructure. Decisions on the surplus plutonium disposition program at SRS will be based on environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input. DOE will announce its decisions regarding facility siting and approach to surplus plutonium disposition in the SPDEIS ROD.

SCD89-2

Repositories

After irradiation, the MOX fuel would be removed from the reactor and managed with the rest of the spent fuel from the reactor, eventually being disposed of at a potential geologic repository. This SPD EIS, for the purposes of analysis, assumes that Yucca Mountain, Nevada, would be the final disposal site for all immobilized plutonium and MOX spent fuel. As directed by the U.S. Congress through the NWPA, as amended, Yucca Mountain is the only candidate site currently being characterized as a potential geologic repository for HLW and spent fuel. DOE has prepared a separate EIS, *Draft Environmental Impact Statement for a Geologic Repository for the Disposal of Spent Nuclear Fuel and High-Level Radioactive Waste at Yucca Mountain, Nye County, Nevada* (DOE/EIS-0250D, July 1999), which analyzes the environmental impacts from construction, operation and monitoring, related transportation, and eventual closure of a potential geologic repository.



United States  
Department  
of Energy

*Comment Form*

NAME (Optional) \_\_\_\_\_  
ADDRESS: \_\_\_\_\_  
TELEPHONE: ( \_\_\_ ) \_\_\_\_\_  
E-MAIL: \_\_\_\_\_

*Given the information contained within the Summary Document of  
the Draft EA, I cannot understand why DOE would entertain  
the possibility of selecting any sites other than SRS for plutonium  
disposition alternatives. SRS is clearly the most cost effective,  
the most protective of the environment and human health and the  
most safe facility within the DOE Complex for performing  
this work. Pl deassembly and conversion operations should be  
located at SRS.*

1

SCD69

SCD69-1

Alternatives

DOE acknowledges the commentor's support for siting the proposed surplus plutonium disposition facilities at SRS. As indicated in the revised Section 1.6, SRS is preferred for the proposed facilities because the site has extensive experience with plutonium processing, and these facilities complement existing missions and take advantage of existing infrastructure. Decisions on the surplus plutonium disposition program at SRS will be based on environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input. DOE will announce its decisions regarding facility siting and approach to surplus plutonium disposition in the SPDEIS ROD.

 **United States  
Department  
of Energy** *Comment Form*

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NAME: (Optional) \_\_\_\_\_  
ADDRESS: \_\_\_\_\_  
TELEPHONE: ( \_\_\_\_ ) \_\_\_\_\_  
E-MAIL: \_\_\_\_\_

*Plant does not correctly handle plutonium wastes. They  
do not have the facilities, processes, controls, etc  
to do this safely. EIS done.*

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SCD72

**SCD72-1**

**Alternatives**

DOE acknowledges the commentor's support for siting the proposed surplus plutonium disposition facilities at SRS. As indicated in the revised Section 1.6, SRS is preferred for the proposed facilities because the site has extensive experience with plutonium processing, and these facilities complement existing missions and take advantage of existing infrastructure. Decisions on the surplus plutonium disposition program at SRS will be based on environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input. DOE will announce its decisions regarding facility siting and approach to surplus plutonium disposition in the SPDEIS ROD.



United States  
Department  
of Energy

Comment Form

NAME: (Optional) RICHARD BALSER  
ADDRESS: 704-23F ALKER, SC  
TELEPHONE: (803) 952-4254  
E-MAIL: RICHARD\_BALSER@SRS.GOV

SUMMARY: PANTEX DOES NOT APPEAR TO HAVE AN ADEQUATE INFRASTRUCTURE FOR CONTAMINATION CONTROL TO PERFORM PIT DISASSEMBLY AND CONVERSION

I AM CURRENTLY INVOLVED IN BACKGROUND RESEARCH AT SRS. I REVIEWED OCCURRENCE REPORTING STATISTICS FOR THE PANTEX PLANT. THERE WAS A CONSISTENT ABSENCE OF REPORTS OF CONTAMINATION INSES AT PANTEX. ONE PANTEX REPORT IN 1993 DID REPORT A CONTAMINATION CASE. ON REVIEWING THE REPORT, I FOUND THAT THEY (PANTEX) WERE DISMISSING CONVEYORS FOR PERSONNEL CONTAMINATION CONTROL. AN ADDITIONAL BURDEN TO DEVELOP RADIOLOGICAL CONTROL PROCEDURES, CONTAMINATED LAUNDRY PROCESSES, EXPERIENCED RADIOLOGICAL CONTROL PERSONNEL, AND ASSOCIATED INFRASTRUCTURE WOULD BE NECESSARY AT PANTEX. THE SWANANAH RIVER SITE HAS THE EXPERIENCE AND INFRASTRUCTURE TO ADEQUATELY CONTROL CONTAMINATION THAT WILL BE AN INTEGRAL PART OF THE PLUTONIUM PIT DISASSEMBLY AND CONVERSION. ALTHOUGH NOT IDEAL, IT WOULD BE DIFFICULT TO ESTABLISH BRANCH PHASES FACILITIES AND SUPPORT TO PROVIDE PROTECTION TO THE WORKERS AND ENVIRONMENT COMPARABLE TO WHAT ALREADY EXISTS AT SRS.

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SCD90

SCD90-1

Alternatives

DOE acknowledges the commentor's support for siting the pit conversion facility at SRS. As indicated in the revised Section 1.6, SRS is preferred for the pit conversion facility because the site has extensive experience with plutonium processing, and the pit conversion facility complements existing missions and takes advantage of existing infrastructure.

All of the DOE candidate sites, including Pantex, are considered suitable from a safety and conduct of operations standpoint and all sites would comply with applicable Federal, State, and local laws and regulations governing radiological and hazardous chemical releases. Therefore, Pantex may need to modify or develop appropriate procedures and plans to ensure protection of the workers, public, and environment should a proposed surplus plutonium disposition facility be sited there since the site's current operations do not include plutonium processing. Decisions on the surplus plutonium disposition program will be based on environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input. DOE will announce its decisions regarding facility siting and approach to surplus plutonium disposition in the SPD EIS ROD.

THANK YOU, MR. MODERATOR

MY NAME IS JASPER VARN AND I AM THE CHAIRMAN OF THE  
BAMBERG COUNTY COUNCIL AND I ALSO SERVE AS VICE-CHAIRMAN  
OF THE TRI-COUNTY ALLIANCE REPRESENTING THE THREE COUNTY  
REGION OF ALLENDALE, BARNWELL, AND BAMBERG.

MY PURPOSE TODAY, IS TO SPEAK ON BEHALF OF THE 1500 PEOPLE  
THAT LIVE IN OUR THREE COUNTY AREA AND WORK AT THE  
SAVANNAH RIVER SITE. AND TO ALSO SPEAK ON BEHALF OF THE  
MORE THAN 500 PEOPLE WHO HAVE LOST THEIR JOBS FROM  
DOWNSIZING AND CHANGING MISSIONS IN WHICH THE SITE HAS  
UNDERGONE.

THESE PEOPLE ARE SOME OF THE MOST DEDICATED AND LOYAL  
PEOPLE I HAVE EVER KNOWN. THEY HAVE SERVED THEIR COUNTRY  
DURING THE COLD WAR AND PLAYED A TREMENDOUSLY IMPORTANT  
ROLE IN GETTING TO THE POINT WE ARE TODAY.  
IN AN EVER-CHANGING ATMOSPHERE, THE SITE AND ITS PEOPLE

1

SCD40

**SCD40-1**

**Alternatives**

DOE acknowledges the commentor's support for siting the proposed surplus plutonium disposition facilities at SRS. As indicated in the revised Section 1.6, SRS is preferred for the proposed facilities because the site has extensive experience with plutonium processing, and these facilities complement existing missions and take advantage of existing infrastructure. Decisions on the surplus plutonium disposition program at SRS will be based on environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input. DOE will announce its decisions regarding facility siting and approach to surplus plutonium disposition in the SPDEIS ROD.

**BAMBERG COUNTY COUNCIL  
HONORABLE JASPER VARN  
PAGE 2 OF 2**

HAVE ADJUSTED AND PERFORMED.

THE PROSPECT OF NEW MISSIONS COMING TO THE SITE IS A WELCOME CHANGE FROM HAVING JOBS DRY UP. THE NEW PLUTONIUM OPPORTUNITIES MEAN A BRIGHTER FUTURE FOR THE SRS EMPLOYEES WHO HAVE DONE THIS WORK FOR SO MANY YEARS.

I BELIEVE THE DEPARTMENT OF ENERGY AND THE ADMINISTRATION WILL REWARD THIS SITE AND THESE PEOPLE BY ASSIGNING THIS MOST IMPORTANT MISSION TO SOUTH CAROLINA.

THE SAVANNAH RIVER SITE HAS THE INFRASTRUCTURE, IT HAS THE SUPPORT OF THE COMMUNITY, IT HAS THE EXPERIENCE, AND MOST IMPORTANTLY, IT HAS THE PEOPLE.

THANK YOU.

1

SCD40

THANK YOU MR. MODERATOR

**MY NAME IS DENNIS HUTTO, AND I AM THE PRESIDENT OF THE BARNWELL COUNTY CHAMBER OF COMMERCE.**

I, TOO WOULD LIKE TO THANK YOU FOR THIS OPPORTUNITY TO SPEAK ON BEHALF OF THE SAVANNAH RIVER SITE AND THE FINE PEOPLE WHO WORK THERE.

AS HAS BEEN POINTED OUT, THERE IS NO QUESTION AS TO WHERE THE ENTIRE PLUTONIUM DISPOSITION MISSION SHOULD BE AND WHO SHOULD MANAGE IT.

THE QUESTION SEEMS TO BE "WILL THE SECRETARY OF ENERGY MAKE THE DECISION ON PIT CONVERSION LOCATION BASED ON TECHNICAL CRITERIA OR POLITICAL EXPEDIENCY?"

WE ALL KNOW, TEXAS HAS A BIGGER CONGRESSIONAL DELEGATION, WE ALL KNOW, TEXAS HAS MORE ELECTORAL VOTES, BUT WE ALSO KNOW, TEXAS DOES NOT HAVE THE INFRASTRUCTURE OR EXPERTISE THAT SOUTH CAROLINA HAS IN HANDLING, STORING, AND PROCESSING PLUTONIUM.

1

SCD38

**SCD38-1**

**Alternatives**

DOE acknowledges the commentor's support for siting the proposed surplus plutonium disposition facilities at SRS. As indicated in the revised Section 1.6, SRS is preferred for the proposed facilities because the site has extensive experience with plutonium processing, and these facilities complement existing missions and take advantage of existing infrastructure. Decisions on the surplus plutonium disposition program at SRS will be based on environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input. DOE will announce its decisions regarding facility siting and approach to surplus plutonium disposition in the SPDEIS ROD.

LAST YEAR, YOU SAID THAT THE SAVANNAH RIVER SITE WAS “A PLUTONIUM-COMPETENT SITE WITH THE MOST MODERN, STATE-OF-THE-ART STORAGE AND PROCESSING FACILITIES” IN THE DEPARTMENT’S COMPLEX. IF THAT WAS TRUE THEN,, THEN IT IS TRUE NOW.

BARNWELL COUNTY, ALLENDALE COUNTY, BAMBERG COUNTY, AND THE REST OF THE REGION HAVE SUPPORTED THE SITE FOREVER. AND YOU KNOW THE ECONOMIC IMPACT THE SITE HAS ON OUR REGION. AND YES, YOU KNOW WE WANT THE MISSION BECAUSE IT MEANS MORE JOBS FOR OUR AREA. BUT IT IS MUCH BIGGER THAN THAT.....THIS IS A DECISION THAT SHOULD BE BASED ON EXPERIENCE, ON COST TO TAXPAYERS, ON EFFICIENCY, ON SITE CAPABILITIES, AND ON WHO CAN DO THE JOB SAFELY. IF THE SECRETARY WILL MAKE THE DECISIONS CONCERNING PLUTONIUM BASED ON THESE CRITERIA, AND LEAVE POLITICS TO THE POLITICIANS, THEN THE SRS COMMUNITIES AND THE NATION ARE BETTER OFF.

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THANK YOU!!

SCD38

**RESOLUTION**

WHEREAS the handling and disposition of excess weapons plutonium is of grave concern to the national security of the United States; and

WHEREAS plutonium represents a significant energy source for the United States when used as fuel in nuclear reactors for the production of electricity; and

WHEREAS plutonium disposition represents one of the most certain future missions of the Department of Energy for the next 20 to 30 years; and

WHEREAS the Savannah River Site has produced approximately 40 percent of all U.S. weapons-grade plutonium over the past 46 years and has safely handled plutonium in glovebox processing equipment with no adverse impact on workers, the public or the environment, and

WHEREAS Barnwell County of South Carolina strongly supports continued plutonium missions for the Department of Energy's Savannah River Site;

**NOW BE IT RESOLVED** that the Barnwell County endorses major plutonium missions for the Savannah River Site and urges the Department of Energy to designate the Savannah River Site as its lead facility in plutonium management and disposition.

APPROVED this 12<sup>th</sup> day of February 1997, by the Barnwell County Council.

  
Chairman

SCD85

**SCD85-1**

**Alternatives**

DOE acknowledges the commentor's support for siting the proposed surplus plutonium disposition facilities at SRS. As indicated in the revised Section 1.6, SRS is preferred for the proposed facilities because the site has extensive experience with plutonium processing, and these facilities complement existing missions and take advantage of existing infrastructure. Decisions on the surplus plutonium disposition program at SRS will be based on environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input. DOE will announce its decisions regarding facility siting and approach to surplus plutonium disposition in the SPDEIS ROD.

(1)

THANK YOU MR. MODERATOR, DOE, ~~Elected~~ *Appointed officials*  
*well wishers*

LET ME FIRST THANK YOU FOR THE OPPORTUNITY TO SPEAK ON THIS  
ISSUE AND EXPRESS THE VIEWS OF THE BARNWELL COUNTY  
COUNCIL.

IT SEEMS WE COME TO THESE MEETINGS SEVERAL TIMES A YEAR TO  
ASK THE DEPARTMENT OF ENERGY TO DO SOMETHING, ~~AND HERE~~  
~~WE ARE AGAIN!!!~~

THIS TIME WE ARE TALKING ABOUT LOCATING ALL THE PLUTONIUM  
DISPOSITION MISSIONS WITHIN THE DOE COMPLEX.

THE DEPARTMENT HAS ALREADY DETERMINED THE SAVANNAH  
RIVER SITE WILL PERFORM THE VITRIFICATION COMPONENT. THE  
SECRETARY HAS ALREADY ANNOUNCED THAT IF A MOX FUEL  
FACILITY IS BUILT, IT WILL BE BUILT AT SAVANNAH RIVER.

THE ONLY QUESTION LEFT, IS WHERE WILL THE PIT DISASSEMBLY  
AND CONVERSION BE DONE?

THE LOCATION CHOICE IS BETWEEN TEXAS AND SOUTH CAROLINA.  
*IT APPEARS*  
AND NOW THE DECISION FOR THIS COMPONENT HAS BROKEN

1

SCD39

SCD39-1

Alternatives

DOE acknowledges the commentor's support for siting the proposed surplus plutonium disposition facilities at SRS. As indicated in the revised Section 1.6, SRS is preferred for the proposed facilities because the site has extensive experience with plutonium processing, and these facilities complement existing missions and take advantage of existing infrastructure. Decisions on the surplus plutonium disposition program at SRS will be based on environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input. DOE will announce its decisions regarding facility siting and approach to surplus plutonium disposition in the SPDEIS ROD.

(2)

DOWN TO A POLITICAL ONE.

WHO HAS THE MOST RESOURCES TO PERSUADE CONGRESS? WHO  
HAS THE MOST INFLUENCE WITH THE DEPARTMENT OF ENERGY?

~~FOR ONCE I WOULD LIKE TO SEE THE DEPARTMENT OF ENERGY~~  
*SO IF* MAKE A DECISION BASED ON TECHNICAL MERIT, AND IN THE

BEST INTEREST OF THE NATION AND ITS TAXPAYERS. *SRS*

AND IF THAT SHOULD HAPPEN, YOU KNOW THE SAVANNAH RIVER  
SITE IS THE ONLY CHOICE FOR ALL PLUTONIUM RELATED MISSIONS,  
AS WELL AS, MANY OTHERS.

THERE IS NO SAFER, MORE EFFICIENT, AND KNOWLEDABLE SITE IN  
THE NATION. *Other* THERE IS NO SITE THAT ENJOYS THE COMMUNITY  
SUPPORT THAT SRS HAS!

~~IF THIS DECISION WAS PURELY A LOGICAL DECISION, WE WOULDN'T  
HAVE HAD TO BE HERE TODAY.~~

~~ALTHOUGH, I ENJOY SEEING OUR GOOD FRIENDS FROM AIKEN AND  
AUGUSTA, I CERTAINLY COULD HAVE FOUND SOMETHING ELSE  
TO DO BESIDES RIDE 60 MILES TO BE HERE.~~

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SCD39

**BARNWELL COUNTY COUNCIL  
HONORABLE CLYDE T. REED  
PAGE 3 OF 3**

(3)

AFTER TODAY THE DECISION IS IN YOUR LAP.

YOU'VE HEARD FROM THE COMMUNITIES, YOU KNOW THE SITE'S  
CAPABILITIES.

LET'S HAVE AN ANNOUNCEMENT!

1

Again THANK YOU for this opportunity

NAME CLYDE T. REED (Barnwell County Council Chairman)  
ADDRESS P.O. BOX 1238  
BARNWELL, S.C. 29812  
PHONE 803-541-0023

SCD39

**BARNWELL SCHOOL DISTRICT 45**  
**JAMES E. BENSON ET AL.**  
**PAGE 1 OF 2**

BARNWELL SCHOOL DISTRICT 45  
James E. Benson  
Superintendent

2008 Hagood Avenue  
Barnwell, S.C. 29812  
(803) 541-1300 • FAX 541-1348  
E-Mail: Barnwell 45@barnwellsc.com

September 14, 1998

Ms. Laura Holgate  
Director, Office of Fissile Materials Disposition  
U. S. Department of Energy  
1000 Independence Avenue  
Washington, DC 20585

Dear Ms. Holgate:

The Barnwell School District 45 Board of Trustees unanimously adopted a Resolution on August 27, 1998, supporting the location of the pit assembly and conversion mission at Savannah River Site. We have sent you the Resolution.

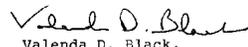
During the 1997-98 school year, approximately 20% of our students had a parent or guardian employed at Savannah River Site. These parents and guardians are active in numerous efforts which benefit our students. They are members of the Scarlet Knights Band Booster Club and the Barnwell Warhorse Club, organizations which raise thousands of dollars annually for the district's band and athletic programs. Many members of the Barnwell Elementary School PTO are employees at SRS.

In addition to being dedicated supporters of their local schools in Barnwell District 45, the SRS parents are hard working, loyal employees. Over the years, they have continuously met safety requirements and demands at the Savannah River facility. Today, they stand ready to meet any challenges which come with the selection of SRS as the location of any new missions, including the vital pit disassembly and conversion mission.

Finally, as stated in the enclosed Resolution, the Barnwell School District 45 Board of Trustees encourages the Department of Energy to select SRS as the facility for the new missions. Hundreds of Barnwell School District 45 graduates have been outstanding employees at SRS for more than four decades. Hopefully, the Department of Energy's decision will assure that students presently being educated in Barnwell School District 45 will be given an opportunity to be a part of the highly skilled work force needed for new missions at SRS. Barnwell School District 45 is working hard to help prepare the next generation of outstanding SRS employees.

Sincerely,

  
James E. Benson,  
Superintendent

  
Valenda D. Black,  
SRS Liaison

Encl.

FULLY ACCREDITED BY SOUTHERN ASSOCIATION OF COLLEGES AND SCHOOLS

MD287

**MD287-1**

**Alternatives**

DOE acknowledges the commentors' support for siting the pit conversion facility at SRS. As indicated in the revised Section 1.6, SRS is preferred for the pit conversion facility because the site has extensive experience with plutonium processing, and the pit conversion facility complements existing missions and takes advantage of existing infrastructure.

Although cost will be a factor in the decisionmaking process, this SPD EIS contains environmental impact data and does not address the costs associated with the various alternatives. A separate cost report, *Cost Analysis in Support of Site Selection for Surplus Weapons-Usable Plutonium Disposition* (DOE/MD-0009, July 1998), which analyzes the site-specific cost estimates for each alternative, was made available around the same time as the SPD Draft EIS. This report and the *Plutonium Disposition Life-Cycle Costs and Cost-Related Comment Resolution Document* (DOE/MD-0013, November 1999), which covers recent life-cycle cost analyses associated with the preferred alternative, are available on the MD Web site at <http://www.doe-md.com> and in the public reading rooms at the following locations: Hanford, INEEL, Pantex, SRS, and Washington, D.C. Decisions on the surplus plutonium disposition program at SRS will be based on environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input. DOE will announce its decisions regarding facility siting and approach to surplus plutonium disposition in the SPD EIS ROD.

**BARNWELL SCHOOL DISTRICT 45**  
**JAMES E. BENSON ET AL.**  
**PAGE 2 OF 2**

***RESOLUTION***  
***Board of Trustees***  
***Barnwell School District 45***  
***August 27, 1998***

WHEREAS, the Savannah River Site is being considered by the Department of Energy as the location for the vital pit disassembly and conversion mission, and

WHEREAS, the Department of Energy has previously expressed confidence in Savannah River Site by assigning the MOX and immobilization missions to the Site; and

WHEREAS, highly skilled work force and experienced employees are already in place at Savannah River Site and trained to perform duties and responsibilities necessary for the pit disassembly and conversion mission; and

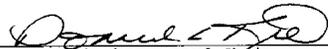
WHEREAS, selection of Savannah River Site for all parts of the plutonium disposition mission, including pit disassembly and conversion, can save taxpayers at least 1.6 billion dollars because structures and equipment required for the mission already exist at Savannah River Site; and

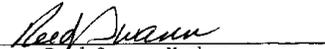
WHEREAS, Savannah River Site employees have consistently met strict safety requirements for over four decades, thus establishing a stellar record of safe operations at the Site, and

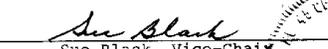
WHEREAS, location of the pit disassembly and conversion mission at Savannah River Site would create hundreds of employment opportunities for local citizens, including Barnwell High School graduates,

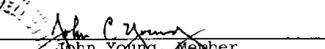
BE IT THEREFORE RESOLVED that we, the Trustees of Barnwell School District 45, do hereby totally and wholeheartedly support the location of the pit disassembly and conversion mission at Savannah River Site.

1

  
Donald Kitt, Board Chair

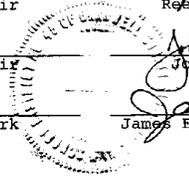
  
Reed Swann, Member

  
Sue Black, Vice-Chair

  
John Young, Member

  
James McCormack, Clerk

  
James E. Benson, Superintendent





United States  
Department  
of Energy

**Comment Form**

NAME: (Optional) CHARLES BURT  
ADDRESS: 3047 MAPLEWOOD DR N. AUGUSTA S.C 29841  
TELEPHONE: (803) 2791726  
E-MAIL: CHARLES.BURT@SRS.GOV

SRS HAS THE INFRASTRUCTURE COMMUNITY + LEGISLATIVE  
SUPPORT FOR THE ENTIRE PLUTONIUM STABILIZATION MISSION.  
SENDING ANY PIECE OF THIS WORK TO LANTEX OR ANY OTHER  
SITE IS A MISTAKE IN COST-EFFECTIVENESS AND EFFICIENCY OF  
OPERATIONS.

1

SCD26

**SCD26-1**

**Alternatives**

DOE acknowledges the commentor's support for siting the proposed surplus plutonium disposition facilities at SRS. As indicated in the revised Section 1.6, SRS is preferred for the proposed facilities because the site has extensive experience with plutonium processing, and these facilities complement existing missions and take advantage of existing infrastructure. Decisions on the surplus plutonium disposition program at SRS will be based on environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input. DOE will announce its decisions regarding facility siting and approach to surplus plutonium disposition in the SPDEIS ROD.

CITIZENS FOR NUCLEAR TECHNOLOGY AWARENESS  
MICHAEL BUTLER  
PAGE 1 OF 14



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**Executive Director**

Michael Butler  
2711 Middleburg Drive  
Suite 212  
Columbia, SC 29204  
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August 11, 1998

Ms. Laura Holgate  
Director, Office of Fissile Materials Disposition  
U.S. Department of Energy  
1000 Independence Ave  
Washington, DC 20585

Dear Ms. Holgate:

Citizens for Nuclear Technology Awareness (CNTA) is an organization dedicated to creating greater public awareness of nuclear technology issues and supporting the vital activities of the Savannah River Site (SRS). Our membership consists of current and former SRS employees as well as interested members of the community at large.

Attached to this letter are questions raised by our general membership about inadequacies of the Draft Surplus Plutonium Disposition EIS. While they deal with a wide range of issues, our primary concern lies with the consideration of locating a plutonium processing capability at Pantex where no such mission exists today.

Plutonium processing is a highly specialized technology with unique skill, safety, material accountability and waste management requirements—none of which are in place at Pantex. In addition, if located at Pantex, such processing places extensive clean-up, decontamination and decommissioning demands on a site where those expensive obligations don't currently exist. These issues are not adequately addressed in your current draft which appears to run counter to the conclusions reached in your similar 1996 EIS for Stockpile Stewardship & Management which states:

*"Plutonium would not be introduced into a site that does not currently have a plutonium infrastructure because of the high cost of new plutonium facilities and the complexity of introducing plutonium into sites without current plutonium capabilities."*

Unlike Pantex, SRS is a site with existing infrastructure and worker skill base to meet those obligations efficiently and effectively. The men and women of SRS have safely met the requirements of this complex processing arena for more than four decades.

1

2

**SCD24-1**

**Alternatives**

DOE acknowledges the commentor's opposition to siting the proposed surplus plutonium disposition facilities at Pantex. Decisions on the surplus plutonium disposition program will be based on environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input. DOE will announce its decisions regarding facility siting and approach to surplus plutonium disposition in the SPDEIS ROD.

**SCD24-2**

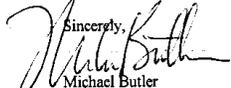
**Alternatives**

DOE acknowledges the commentor's support for siting the proposed surplus plutonium disposition facilities at SRS. As indicated in the revised Section 1.6, SRS is preferred for the proposed facilities because the site has extensive experience with plutonium processing, and these facilities complement existing missions and take advantage of existing infrastructure.

**CITIZENS FOR NUCLEAR TECHNOLOGY AWARENESS**  
**MICHAEL BUTLER**  
**PAGE 2 OF 14**

With its unrivaled history of safe operations, environmental stewardship, technological accomplishment and community support, SRS deserves your fair consideration of the issues and questions CNTA has submitted. If that is done, we are certain that SRS will be your site of choice for all three important missions analyzed in this EIS.

2

Sincerely,  
  
Michael Butler  
Executive Director

SCD24

Citizens for Nuclear Technology Awareness  
Additional Questions the Surplus Plutonium Disposition EIS

Plutonium Missions/Plutonium Sites/Plutonium Infrastructure

1. In 1996 DOE decided that Pantex was not suitable for a plutonium mission because "plutonium would not be introduced into a site that does not currently have a plutonium infrastructure because of the high cost of new plutonium facilities and the complexity of introducing plutonium operations into sites without current capabilities." (Stockpile Stewardship EIS). What has changed? Why is DOE considering abandoning this policy? 3

2. DOE explains that its preference for immobilization at SRS "complements existing missions and takes advantage of existing infrastructure and staff expertise." (Page S-9). In the June 23, 1998 MOX announcement, DOE said its preference for MOX at SRS was because this mission "complements existing missions and takes advantage of existing infrastructure and staff expertise," and that Pantex "does not offer a comparable infrastructure including waste management." What is different about the plutonium processing required for the pit disassembly and conversion mission that makes Pantex equally preferred? What existing missions at Pantex are complementary? What existing infrastructure and staff expertise can be applied to pit disassembly and conversion? The Cost Report identifies significant inadequacies in the Pantex infrastructure. 4

3. DOE is certainly very responsive to some of the public. "During the scoping process, the comment was made that Pantex should be considered for the pit conversion facility," and three options were added. The EIS claims such comments were screened against three criteria, one of which was infrastructure cost. Please explain how Pantex, with no plutonium infrastructure, could pass this screen. Please provide evidence of a "public" demand to make Pantex a new plutonium processing site. 5

Pit Storage, Transportation, and Safety

4. In the 1997 PEIS Record of Decision, DOE said that it would store surplus pits awaiting disposition in upgraded facilities at Zone 12 at Pantex by 2004. What is the status of that program? Will it be completed on schedule? Since all the surplus pits will have to be packaged and shipped from their current temporary storage in Zone 4 to these upgraded facilities in Zone 12, then moved back again to a pit disassembly facility located in Zone 4, wouldn't there be less cost and exposure to move them once directly to SRS? 6

SCD24

SCD24-3

DOE Policy

The *Final Programmatic Environmental Impact Statement for Stockpile Stewardship and Management (SSM PEIS)* (DOE/EIS-0236, September 1996) states that the pit fabrication mission would not be introduced into a site that does not have an existing plutonium infrastructure because of the high cost of new plutonium facilities and the complexity of introducing plutonium operations into sites without current plutonium capabilities. The SSM PEIS states further that an important element of the site selection strategy is to maximize the use of existing infrastructure and facilities as the nuclear weapons complex becomes smaller and more efficient in the 21st century; thus, no new facilities were to be built to accommodate stockpile management missions. Accordingly, DOE considered as reasonable only those sites with existing infrastructure capable of supporting a pit fabrication mission. Although Pantex has the infrastructure to carry out its current weapons assembly and disassembly mission and nonintrusive pit reuse program, it was not considered a viable alternative for the pit fabrication mission because it did not possess sufficient capability and infrastructure to meet the SSM PEIS siting assumption stated above. Among the operations that were considered in developing siting alternatives for pit fabrication in the SSM PEIS were plutonium foundry and mechanical processes, including casting, shaping, machining, and bonding; a plutonium-processing capability for extracting and purifying plutonium to a reusable form either from pits or residues; and assembly operations involving seal welding and postassembly processing.

When comparing the site selection strategy for pit disassembly and conversion with that used for the pit fabrication mission, the siting criteria in the SSM PEIS have little or no bearing on siting criteria used in this SPD EIS. Pit disassembly and conversion do not require the foundry and mechanical processes discussed in the SSM PEIS and can be accomplished in a stand-alone facility. Also, the SSM PEIS siting assumptions include a requirement to use existing facilities, whereas, the pit conversion facility would be a new structure no matter where it is located.

**SCD24-4**

**Alternatives**

The initial preference for Pantex and SRS as sites for the pit conversion facility was based on a determination by DOE that the differences in environmental impacts were modest, and thus did not warrant the preference of one site over the other. Existing infrastructure that supported placement of the pit conversion facility at Pantex included security, staff expertise, and the presence of the pits that need to be dismantled. Costs for all required infrastructure were estimated, and even with the additional waste management infrastructure support needed at Pantex, the cost differences were not considered significant.

As indicated in the revised Section 1.6, SRS is preferred for the pit conversion facility because the site has extensive experience with plutonium processing, and the pit conversion facility complements existing missions and takes advantage of existing infrastructure.

**SCD24-5**

**Alternatives**

Pantex was identified as a candidate site for both the pit conversion and MOX facilities in the NOI. The alternatives that were added after the scoping process to include Pantex as a candidate site for pit conversion were associated with the immobilization-only options; Pantex had already been identified as a candidate site for the pit conversion facility for a number of the hybrid alternatives. As discussed in Section 2.3.1, these options were added after DOE confirmed that they met all the screening criteria.

**SCD24-6**

**Storage and Disposition PEIS and ROD**

DOE acknowledges the commentor's concern regarding the storage of plutonium pits at Pantex. DOE is committed to the safe, secure storage of pits and is evaluating options for upgrades to Pantex Zone 4 facilities to address plutonium storage requirements. DOE has addressed some of the commentor's concerns in an environmental review concerning the repackaging of Pantex pits into a more robust container. This evaluation is documented in the *Supplement Analysis for: Final Environmental Impact Statement for the Continued Operation of the Pantex Plant and Associated Storage of Nuclear Weapon Components—AL-R8 Sealed Insert Container* (August 1998). This

document is on the MD Web site at <http://www.doe-md.com>. Based on this supplement analysis, the decision was made to repackage pits at Pantex into the AL-R8 sealed insert container and to discontinue plans to repackage pits into the AT-400A container.

Worker exposure estimates attributable to the decisions to repackage pits in AL-R8 sealed insert containers were incorporated in the revised Section 2.18 and Appendix L.5.1.

The issues raised in this comment relate to pit storage decisions made in the *Storage and Disposition PEIS* and the *Final Environmental Impact Statement for the Continued Operation of the Pantex Plant and Associated Storage of Nuclear Weapon Components* (DOE/EIS-0225, November 1996). DOE is considering leaving the repackaged surplus pits in Zone 4 at Pantex for long-term storage. An appropriate environmental review will be conducted when the specific proposal for this change has been determined; e.g., whether additional magazines need to be air-conditioned. The analysis in this SPD EIS assumes that the surplus pits are stored in Zone 12 in accordance with the ROD for the *Storage and Disposition PEIS*.

5. Locating pit disassembly and conversion at Pantex could be viewed from a safety perspective in the following way:
- DOE is proposing to convert sealed plutonium metallic components into a large quantity of dispersible plutonium oxide, then store it directly in the flight path of the Amarillo airport in a facility near bunkers of high explosives and nuclear warheads.
  - Then DOE must ship a dispersible form of plutonium in quantities far larger than has ever been shipped before.
- Please explain the logic of this proposal from a safety perspective.

7

6. The EIS transportation data show a significant transportation safety advantage and essentially no more total shipping by co-locating all three disposition programs at SRS. Since the only explanation given for adding Pantex to the program as a processing site was because the pits were there and that might mean a transportation advantage for this option, isn't there now reason to eliminate Pantex, especially since it has no history of plutonium work?

8

7. DOE's Environmental Management Division has stated that they expect to save over a billion dollars by accelerating shipment of non-pit plutonium from Hanford and Rocky Flats to SRS for disposition. If it is cost effective for EM to expedite the movement of that plutonium, then isn't it cost effective for DOE to accelerate the shipments of pits from Pantex? Particularly considering the major upgrades required at Pantex for safe storage if the pits are not promptly moved.

9

***EIS Inadequacies***

8. Appendix N. Plutonium Polishing, shows that an aqueous process can purify plutonium and produce plutonium oxide with very little waste. Since dissolving plutonium metal is easier than dissolving plutonium oxide, it stands to reason that direct dissolving of pits is a reasonable alternative. Where is the alternative of dissolving pits compared and assessed versus the proposed dry process of pit conversion?

10

9. The Nuclear Weapons and Material Monitor reported that there was an Appendix B which evaluated an aqueous alternative for pit conversion and concluded that it could be done faster and used proven technology. Where is this alternative in the draft?

11

10. Please provide supporting data for the claim that the proposed dry process for pit conversion produces fewer wastes. This is truly puzzling. There is no data in the EIS to support this claim.

12

11. A recent amendment to the MOX RFP says DOE will pay the delay cost associated with failure to deliver acceptable PuO<sub>2</sub> on schedule. Was this requested by the potential vendors because of DOE's plan to use ARIES - produced oxide, and their concern as to its acceptability?

13

SCD24

**SCD24-7**

**Human Health Risk**

DOE acknowledges the commentator's concern about the safety of locating and operating a pit conversion facility at Pantex.

In response to public concerns, a number of actions (see Appendix K.1.5.1) have been taken to reduce the risk of an aircraft crash at Pantex. The frequency of a crash into a pit conversion facility vault containing plutonium powder (plutonium dioxide) is less than 1 in 10 million per year. According to conservative calculations (see Table K-12), this "beyond-extremely-unlikely" accident (estimated frequency: lower than 1 in 1 million per year) would induce 4.5 LCFs in the population within 80 km (50 mi) of the site.

The impacts of explosives and the associated release of plutonium powder into the environment have also been evaluated (Appendix K.1.5.2.1). An explosion would be "unlikely" (estimated frequency: 1 in 10,000 to 1 in 100 per year). Conservative calculations (see Table K-12) indicate that this accident would induce only 0.00011 LCF in the population within 80 km (50 mi) of the site. The inadvertent detonation of a nuclear warhead is not considered credible.

Impacts associated with transporting plutonium dioxide from Pantex to offsite facilities are addressed in this SPD EIS; an estimate of the maximum potential impacts of such a shipment is included in Appendix L.6.3. According to conservative calculations, a transportation accident in an urban area would produce 27 LCFs within a radius of 80 km (50 mi) of the accident location. However, given the extremely low frequency of the accident (much lower than 1 in 10 million per year), the actual risk of a fatal cancer is extremely low. A transportation accident in a rural area, the scenario discussed in Section 4.6.2.6, has a frequency of 1 in 10 million per year and a predicted impact of less than 0.1 LCF. The net result is an extremely low risk of a fatal cancer among the population within 80 km (50 mi) of the accident.

In summary, conservative evaluations indicate no significant safety concerns to the public from locating the pit conversion facility at Pantex.

**SCD24-8****Transportation**

The selection of sites for potential surplus plutonium disposition facilities was based on a number of factors. The location of the surplus pits at Pantex was not the only reason for making it a reasonable alternative for siting the proposed surplus plutonium disposition facilities. As indicated in Section 2.18, no traffic fatalities from nonradiological accidents or LCFs from radiological exposures or vehicle emissions are expected. Table L-6 shows the transportation risks for all alternatives. Analyses of transportation risks are just one of the factors considered in the decisionmaking regarding facility siting.

**SCD24-9****Storage and Disposition PEIS and ROD**

The potential cost saving that could result from the early movement of nonpit surplus plutonium from RFETS and Hanford is based on the termination of storage operations and the required security at those sites. The same situation does not apply to Pantex, which will continue its storage mission and associated security. Further, major upgrades of storage facilities at Pantex are not required, but DOE is considering some upgrades (e.g., air conditioning, catwalks, standby power) to address plutonium storage requirements. Although SRS is preferred for the proposed surplus plutonium disposition facilities, a decision has not been made. DOE will announce its decisions regarding facility siting and approach to surplus plutonium disposition in the SPDEIS ROD.

**SCD24-10****Plutonium Polishing and Aqueous Processing**

DOE analyzed the full range of reasonable alternatives for the disassembly and conversion of the plutonium in pits into a form suitable for disposition using either immobilization or MOX fuel. There are two basic technologies available for the conversion of pit plutonium into plutonium dioxide: wet (aqueous) and dry processing. DOE determined that aqueous processing, a proven technology, was not a reasonable alternative for pit conversion because current aqueous processes using existing facilities would produce significant amounts of waste, and aqueous processing would complicate international safeguard regimes. Dry processing was analyzed in the *Storage and Disposition PEIS* and this SPD EIS. DOE is currently demonstrating the



12. If you used an aqueous process to make pure plutonium oxide, there would be a big savings in the cost and environmental impact of both the MOX and immobilization plants. The plants could be smaller, less automated, and much less R&D would be required. Did your decision to only consider a dry process consider the downstream impact of your conversion process decision? Please provide the details of your evaluation of the differences in the downstream facilities. 14

13. A pit disassembly and conversion plant at Pantex will have to high-fire the plutonium oxide to comply with DOE Standard 3013 for shipment and storage. Is the high-fired oxide usable for either MOX or immobilization without extensive pretreatment? If aqueous polishing is required, the Oak Ridge report says the feed cannot be high-fired. How will you polish plutonium oxide treated to the 3013 Standard? 15

14. There is no analysis of the savings possible by using existing facilities at SRS for converting plutonium to the oxide form for MOX or immobilization. Since the SRS facilities are already operating and have most of the capabilities needed for this activity, wouldn't there be a big savings of time, investment, and future cleanup? 16

Programmatic Questions and Issues

15. Appendix N, Plutonium Polishing, is presented as a "contingency." What is the legal status of a "contingency" or an Appendix? Generally a NEPA issue has to be presented as part of the proposed action, available for public review and comment, to be a legal basis for a decision. 17

16. The MOX Request for Proposal (RFP) has been revised four times since its original issue a little more than two months ago in May. MOX feed is now described as being produced by a "dry process" rather than the original hydride-dehydride process. What is the significance of this change? What process is described in the EIS? Will the EIS be revised to incorporate the evolving process proposed for MOX? 18

17. The ten year MOX disposition program is inconsistent with schedules, capacities and reactor cycles. The elapsed time is more likely the 20-25 years described by many. The EIS uses a ten year basis for estimating exposure. This represents a best—worst—boundary case. Do you plan to revise the EIS to reflect more realistic schedules? 19

Waste and Waste Management

18. How much waste would be produced by using the existing facilities at SRS to convert plutonium to plutonium oxide? Would this amount significantly impact the waste DOE already has to handle at SRS? If all of the 50 metric tons of surplus plutonium were aqueously processed at SRS, fewer than 20 additional glass logs would be produced by DWPF out of an approximate total of 5200 and would represent less than one month out of 25 years of operation of DWPF. 20

SCD24

**SCD24-14 Plutonium Polishing and Aqueous Processing**

Although cost will be a factor in the decisionmaking process, this SPD EIS contains environmental impact data and does not address the costs associated with the various alternatives. A separate cost report, *Cost Analysis in Support of Site Selection for Surplus Weapons-Usable Plutonium Disposition* (DOE/MD-0009, July 1998), which analyzes the site-specific cost estimates for each alternative, was made available around the same time as the SPD Draft EIS. This report and the *Plutonium Disposition Life-Cycle Costs and Cost-Related Comment Resolution Document* (DOE/MD-0013, November 1999), which covers recent life-cycle cost analyses associated with the preferred alternative, are available on the MD Web site at <http://www.doe-md.com> and in the public reading rooms at the following locations: Hanford, INEEL, Pantex, SRS, and Washington, D.C. This new report includes the cost associated with plutonium polishing in the estimates for the MOX facility.

The remainder of this comment is addressed in response SCD24-10.

**SCD24-15 Plutonium Polishing and Aqueous Processing**

It is not certain that plutonium dioxide would have to be high-temperature fired prior to shipment and storage to meet the DOE 3013 standard, *Criteria for Preparing and Packaging Plutonium Metals and Oxides for Long-Term Storage*. High-temperature-fired dioxide can be used for either the immobilization or MOX approach; it just does not dissolve as readily as material that has not been subjected to the higher temperatures. The report to which the commentor may be referring, *Final Data Report Response to the Draft Surplus Plutonium Disposition Environmental Impact Statement Data Call for Generic Site Add-On Facility for Plutonium Polishing* (ORNL/TM-13669, June 1998) indicates that it is better not to subject the plutonium dioxide to the higher-temperature processing, but does not indicate that plutonium dioxide processed at higher temperatures is unacceptable as feed for either immobilization or MOX fuel fabrication.

The remainder of this comment is addressed in response SCD24-10.

**SCD24-16****Cost**

Because cost issues are beyond the scope of this SPD EIS, this comment has been forwarded to the cost analysis team for consideration. The *Cost Analysis in Support of Site Selection for Surplus Weapons-Usable Plutonium Disposition* (DOE/MD-0009, July 1998) report and the *Plutonium Disposition Life-Cycle Costs and Cost-Related Comment Resolution Document* (DOE/MD-0013, November 1999), which covers recent life-cycle cost analyses associated with the preferred alternative, are available on the MD Web site at <http://www.doe-md.com> and in the public reading rooms at the following locations: Hanford, INEEL, Pantex, SRS, and Washington, D.C.

**SCD24-17****General SPD EIS and NEPA Process**

CEQ regulations for NEPA in 40 CFR 1502.18 state that an appendix shall: (a) consist of material prepared in connection with an EIS (as distinct from material which is not so prepared and which is incorporated by reference); (b) normally consist of material which substantiates any analysis fundamental to the EIS; (c) normally be analytic and relevant to the decision to be made; and (d) be circulated with the EIS or be readily available on request. In accordance with CEQ regulations, lengthy technical discussions of modeling methodology, baseline studies, or other work are best reserved for an appendix. In other words, if technically trained individuals are the only ones likely to understand a particular discussion, then that discussion should be included as an appendix, and a plain language summary of the analysis and conclusions of that technical discussion should be included in the text of the EIS.

The remainder of this comment is addressed in response SCD24-10.

**SCD24-18****Pit Disassembly and Conversion**

The HYDOX (dry) process described for the pit conversion facility in Section 2.4.1.2 is a process for converting plutonium metal with certain impurities to a plutonium dioxide with a minimum of impurities. In the HYDOX process, the pit hemishells (i.e., nonpit plutonium metal) would be placed into the HYDOX module, where the metal would be exposed to and react with hydrogen, then nitrogen, and finally oxygen at controlled temperatures and pressures to produce plutonium dioxide. This is one variation of the basic hydride-dehydride process; another would produce a metal rather than an

oxide. The process described in this SPD EIS is not only representative of the proposed process, but is bounding for potential impacts, including accidents. However, a pit disassembly and conversion demonstration aimed at optimizing process operations for the pit conversion facility is under way at LANL. Should evidence from that demonstration or other research invalidate the analyses reflected in this EIS, additional NEPA documentation would be prepared.

#### **SCD24–19**

#### **MOX Approach**

DOE's MOX RFP specified a timetable including first insertion of production, not test, fuel no later than the end of calendar year 2007, and a date of last insertion no later than 2019. This timetable was acceptable to DCS, the team that was selected for this effort.

The analyses in this SPD EIS reflect a 10-year schedule of operations for the proposed surplus plutonium disposition facilities. Section 4.30.2 includes a discussion of incremental impacts of variations in that schedule. As explained in that section, certain impacts (e.g., exposure) would occur only or primarily during processing, and the total impacts would not change even if the processing schedule were extended or shortened. For example, if the operating period of the MOX facility were extended by 1 year, the total dose and LCFs for the worker and the public would remain essentially unchanged, though the annual dose would be expected to decrease. If the facility were not operating, or operating at a lower throughput, the dose rate would be lower. Then the only contributors would be small amounts of internal equipment contamination and material in highly shielded storage, and presumably fewer workers would be at the facility. Total impacts from these internal sources, however, would depend on the period of operations; lengthening operations for 1 year would mean continued impacts at the levels described in Chapter 4 of Volume I for 1 year longer.

To support the MOX approach, the proposed reactors would use MOX fuel for up to 3 years after it is placed in the reactor core. Therefore, the reactors could operate with MOX fuel for 3 to 5 years after the MOX facility has ceased operating because that facility includes space for storage of up to 2 years' worth of fresh fuel assemblies.

**SCD24-20****Waste Management**

Use of F-Canyon at SRS to convert plutonium for use in either the immobilization or MOX facility would require reconfiguring the canyon and keeping it in operation for another 10 years or more. DOE has already made a commitment to the public, the U.S. Congress, and DNFSB to shut the canyon down. DOE presented the SRS Chemical Separation Facilities Multi-Year Plan to Congress in 1997. This plan provides the DOE strategy for the expeditious stabilization of SRS nuclear materials in accordance with DNFSB Recommendation 94-1, and provides for the early stabilization of certain limited quantities of plutonium materials from RFETS. Once this stabilization effort was complete, the canyon would be shut down and D&D activities would begin. In addition, this process would make the surplus material considerably more weapons-usable, and as such would not fulfill the purpose and need of the proposed action.

The remainder of this comment is addressed in response SCD24-12.

19. DOE plans to entomb six million cubic feet of TRU waste at WIPP. The pit disassembly and conversion facility will produce less than .1% of this quantity regardless of whether a dry or aqueous process is used. Therefore whether one pit conversion process produces slightly more or less TRU waste than another is irrelevant. The appropriate criteria are:

- Cost, schedule, technical confidence
- Impacts on downstream processing
- Potential for using existing facilities

Where is the comparison of the two process options against these criteria?

21

EIS Data Inconsistencies

20. Why is the radiation exposure to construction workers at Pantex reported as zero when section 3.4.4.1.2. reports that annual doses of 100 mrem above background are measured in zone 4, the site of the proposed facilities?

22

21. Why is the annual TRU waste volume for pit disassembly and conversion, a very large facility handling 33 metric tons of plutonium oxide, much less than the TRU waste from the much smaller MOX and immobilization facilities which handle equal or less plutonium?

23

SCD24

**SCD24-21**

**Waste Management**

An aqueous process for conversion of plutonium would need to be placed in a new facility. Existing canyon facilities are not configured for a plutonium disposition mission and are either shut down or planned for shutdown and D&D.

DOE is committed to waste minimization and pollution prevention throughout the complex.

The remainder of this comment is addressed in response SCD24-10.

**SCD24-22**

**Human Health Risk**

As stated in Section 3.4.4.1.2, the 100-mrem dose is the dose measured at an offsite control location. It is the dose strictly associated with the natural background levels of the area; no part of the dose is attributable to above-background sources. Therefore, there is no discrepancy in the assertion of a zero dose (i.e., the dose level above background) for Pantex construction workers. A statement was added to applicable Chapter 3 (Volume I) sections to further clarify this issue.

**SCD24-23**

**Waste Management**

The pit conversion facility would convert relatively clean plutonium metal pits to clean plutonium dioxide. In contrast, both the immobilization and MOX facilities mix the plutonium with other materials, increasing the material flow through the facility by a factor of 10 to 20. Additionally, the immobilization facility would handle plutonium in various forms, including fuel rods and plates, impure oxides, and impure metals and alloys. Each form of plutonium requires different processing techniques; some would require significantly more handling than pits require in the pit conversion facility and therefore would generate more TRU waste. Likewise, many steps are needed to fabricate the clean plutonium dioxide into fuel assemblies in the MOX facility. Because the immobilization and MOX approaches are more complicated and process a considerably larger total material throughput, it is estimated that more TRU waste would be produced by the immobilization and MOX facilities than the pit conversion facility.

**CITIZENS FOR NUCLEAR TECHNOLOGY AWARENESS**  
**MICHAEL BUTLER**  
**PAGE 1 OF 4**



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August 11, 1998

Ms. Laura Holgate  
Director, Office of Fissile Materials Disposition  
U.S. Department of Energy  
1000 Independence Ave  
Washington, DC 20585

Dear Ms. Holgate:

Citizens for Nuclear Technology Awareness (CNTA) is an organization dedicated to creating greater public awareness of nuclear technology issues and supporting the vital activities of the Savannah River Site.

Earlier this year a committee of our members with an extensive background in nuclear science, project management and plutonium processing conducted a general analysis of the life-cycle cost of locating all three Plutonium disposition facilities at the Savannah River Site (SRS). That analysis, using the best information available at the time, determined that as much as \$1.6 billion could be saved by co-locating all three facilities with other plutonium-related operations and infrastructure at SRS.

Our analysis was never intended to be precise. It was, however, intended to show the magnitude of the cost savings SRS offers. For that reason we were puzzled by the cost report accompanying the draft EIS for Surplus Plutonium Disposition. It lists the cost difference between locating the pit disassembly and conversion operations at Pantex vs SRS to be only about \$60 million (\$920 million at SRS vs \$980 million at Pantex). While your report acknowledges that those estimates could vary as much as 40 percent-- potentially making the SRS option \$715 million less expensive than doing it at Pantex --it also could be misconstrued to set the Pantex costs well below those at SRS, something we find incredible.

A detailed review of your report by our experts found that it ignored a number of significant project cost factors, including:

1

SCD01-1

Cost Report

Because this comment relates directly to the cost analysis report, it has been forwarded to the cost analysis team for consideration. The *Plutonium Disposition Life-Cycle Costs and Cost-Related Comment Resolution Document* (DOE/MD-0013, November 1999), which covers recent life-cycle cost analyses associated with the preferred alternative, is available on the MD Web site at <http://www.doe-md.com> and in the public reading rooms at the following locations: Hanford, INEEL, Pantex, SRS, and Washington, D.C.

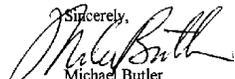
SCD01

\* the potential synergy and economies of scale gained by locating all three programs at SRS. Co-locating the plutonium disassembly plant with these facilities and other related operations would surely offer significant cost advantages by way of shared facilities and personnel.

\* the extremely high programmatic cost and schedule impact of creating, operating and eventually decommissioning a complete plutonium processing infrastructure at Pantex, where no such infrastructure exists today. Significant plutonium-related support capabilities (RadCon programs, waste management, analytical labs, experienced processing workers, nuclear material accountability programs, etc.) would have to be built from scratch at Pantex. That expensive basic infrastructure already exists at SRS.

Each of those important cost factors was included in our analysis. Attached to this letter are a number of specific related issues our experts identified. We believed that these inadequacies need to be addressed before a final decision is made that may not be in the best interest of the tax payers and our nation's nonproliferation efforts.

We look forward to your consideration of these concerns and anticipate that your decision on site preference for the vital pit disassembly and conversion mission reflects the obvious: SRS is the logical choice for this important program.

Sincerely,  
  
Michael Butler  
Executive Director

1

2

SCD01

SCD01-2

Alternatives

DOE acknowledges the commentor's support for siting the pit conversion facility at SRS. As indicated in the revised Section 1.6, SRS is preferred for the pit conversion facility because the site has extensive experience with plutonium processing, and has the pit conversion facility complements existing missions and takes advantage of existing infrastructure. Decisions on the surplus plutonium disposition program at SRS will be based on environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input. DOE will announce its decisions regarding facility siting and approach to surplus plutonium disposition in the SPD EIS ROD.

**CITIZENS FOR NUCLEAR TECHNOLOGY AWARENESS  
MICHAEL BUTLER  
PAGE 3 OF 4**

**Citizens for Nuclear Technology Awareness  
Questions Concerning Cost Report Inadequacies  
Associated with the Surplus Plutonium Disposition EIS**

1. The Cost Report (page 1-10) says DOE's estimate for the immobilization facility was determined on a square foot basis based on experience with similar projects. What were those similar projects? Most of the large comparable nuclear facilities built in this country in the last 15 years have been built at SRS (e.g., DWPF, NSR, HB-Line, RTF). All of them were significantly more per square foot than it appears you are using in the cost report (\$450M/108,000 sq. ft. = \$4200).
2. Both the MOX and Immobilization facilities are estimated at about \$4200/sq. ft. Why is the cost per square foot of the pit disassembly and conversion facility so much less, about \$2900 per sq. ft. of hardened space? (\$440M/~150,000 sq. ft. = \$2900).
3. In the Cost Report (Table ES-2) a number of infrastructure deficiencies at Pantex are identified. How much did you incorporate into the cost study for:
  - Creating strategic nuclear material processing capability at Pantex?
  - Creating radioactive waste management capability at Pantex?
  - Constructing a source calibration facility at Pantex? (The new source calibration facility at SRS cost \$35M)
  - Constructing a plutonium analytical lab at Pantex?

These infrastructure improvements would cost hundreds of millions of dollars to construct and operate. The report did not consider the substantial cost to clean up and remove them at the end of the mission. These costs must be considered for a valid cost analysis.
4. The construction of a MOX plant is reported at \$510M for both Pantex and SRS, yet the Pantex plant is bigger in the EIS. In addition, the Cost Report identifies the major deficiencies in the infrastructure at Pantex which would have to be added to support a MOX operation. How do you explain this?
5. The storage of pits at Pantex is inadequate. The GAO issued a report in April saying worker's health and safety have been placed at risk. The Defense Board says that DOE's efforts to improve storage "appear confused" and lack technical basis. Since the plutonium will have to come to SRS for MOX or immobilization anyway, doesn't it make sense to pack and ship as soon as possible and avoid a large cost to upgrade pit storage. Pit disassembly and Conversion at Pantex means surplus pits will remain in inadequate storage for nearly 20 more years. How much is in the Cost Report to improve pit storage at Pantex? SRS already has NEPA coverage to transport and store up to 20,000 pits in P-Reactor. (Pantex EIS)

3

SCD01

SCD01-3

This comment is addressed in response SCD01-1.

Cost Report

**CITIZENS FOR NUCLEAR TECHNOLOGY AWARENESS**  
**MICHAEL BUTLER**  
**PAGE 4 OF 4**

6. Why does a MOX plant (120,000 sq. ft.) require about 50% more construction manpower than the pit disassembly and conversion facility (~150,000 sq. ft.)?
7. The Cost Report says it “does not incorporate possible synergies between co-locating disposition facilities at one site” (page 3.3). What would be the savings if all three missions are located at SRS?
8. Safeguards and Material Control & Accountability requirements are significantly different and more complex for handling plutonium in bulk forms rather than the piece counts employed at Pantex. Where have you evaluated the cost and schedule impacts of major safeguards and MC&A upgrades at Pantex?
9. Where is the cost of facilities required for on-site TRU management and storage for MOX and PDCF facilities at Pantex? Did the assumptions include anything more complex than “pass-through” to WIPP? Have you included the cost of reworking the WIPP EIS to allow shipments from Pantex? Pantex currently cannot ship TRU waste to WIPP, and the EIS says that shipments to WIPP cannot begin until 2016.
10. You have penalized sites other than Pantex with an \$80 million dollar charge for packaging and shipping pits to a pit disassembly facility elsewhere (page 3-4). How much did you penalize a facility at Pantex for the higher cost of shipping plutonium oxide to SRS? Plutonium oxide requires more shipments, requires more extensive packaging and uses higher cost shipping and storage containers than shipping pits.

3

SCD01

CITIZENS FOR NUCLEAR TECHNOLOGY AWARENESS  
FRED C. DAVISON  
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April 24, 1998

Honorable Federico Pena  
Secretary Of Energy  
U.S. Department of Energy  
1000 Independence Avenue  
Washington, D.C. 20585

We understand, Secretary Pena

... that within the next month or so the Department of Energy plans to announce its selection of the preferred sites for the three components of the Plutonium Disposition Program (Pit Disassembly and Conversion, MOX and Immobilization). We also understand that the Department is leaning toward selecting the Pantex Plant and ~~as the preferred location for the Pit Disassembly and Conversion facility with the Savannah River Site selected for the immobilization plant and possibly the MOX plant.~~

Our organization, Citizens for Nuclear Technology Awareness (CNTA), is deeply concerned about the possibility of not co-locating all three new facilities at Savannah River. Such a decision would ignore significant financial and institutional considerations. As a pro-nuclear educational organization with more than 1000 members, we would hope our views would be considered in your decision.

It should be obvious that co-locating all three new facilities at Savannah River will significantly reduce the up-front capital investment in new facilities and we estimate the cost of the overall program could be reduced by in excess of \$1 Billion compared to the course that we believe the Department intends to take. Further, for the department to consider creating another plutonium site at Pantex at the same time it is requesting billions to clean up the ones it already has should be a matter of grave concern to all taxpayers in this country. ~~Pantex is not now a plutonium site. They have never processed plutonium and have only handled sealed weapons components containing plutonium and, as a result, there is no plutonium handling infrastructure and competency at Pantex.~~ The Department is proceeding on a path which will require that it duplicate at Pantex the unique plutonium structure now operating at SRS - environmental and personnel

1

SCD78

SCD78-1

Alternatives

DOE acknowledges the commentor's support for siting the proposed surplus plutonium disposition facilities at SRS. As indicated in the revised Section 1.6, SRS is preferred for all three proposed facilities because the site has extensive experience with plutonium processing, and these facilities complement existing missions and take advantage of existing infrastructure.

The *Final Programmatic Environmental Impact Statement for Stockpile Stewardship and Management (SSM PEIS)* (DOE/EIS-0236, September 1996) states that the pit fabrication mission would not be introduced into a site that does not have an existing plutonium infrastructure because of the high cost of new plutonium facilities and the complexity of introducing plutonium operations into sites without current plutonium capabilities. The SSM PEIS states further that an important element of the site selection strategy is to maximize the use of existing infrastructure and facilities as the nuclear weapons complex becomes smaller and more efficient in the 21st century; thus, no new facilities were to be built to accommodate stockpile management missions. Accordingly, DOE considered as reasonable only those sites with existing infrastructure capable of supporting a pit fabrication mission. Although Pantex has the infrastructure to carry out its current weapons assembly and disassembly mission and nonintrusive pit reuse program, it was not considered a viable alternative for the pit fabrication mission because it did not possess sufficient capability and infrastructure to meet the SSM PEIS siting assumption stated above. Among the operations that were considered in developing siting alternatives for pit fabrication in the SSM PEIS were plutonium foundry and mechanical processes, including casting, shaping, machining, and bonding; a plutonium-processing capability for extracting and purifying plutonium to a reusable form either from pits or residues; and assembly operations involving seal welding and postassembly processing.

When comparing the site selection strategy for pit disassembly and conversion with that used for the pit fabrication mission, the siting criteria in the SSM PEIS has little or no bearing on siting criteria used in this SPD EIS. Pit disassembly and conversion do not require the foundry and mechanical processes discussed in the SSM PEIS and can be accomplished in a stand-alone facility. Also, the SSM PEIS siting assumptions include a requirement to use existing

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FRED C. DAVISON  
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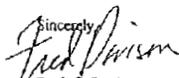
protection and monitoring systems, plutonium capable laboratories, new waste management systems, but most importantly, the entire intellectual infrastructure, competency and experience base. In fact, in 1996 the Department said, in its "Final Programmatic Environmental Impact Statement for Stockpile Stewardship and Management", in regard to taking Pantex out of consideration for Pit Manufacturing:

"Plutonium would not be introduced into a site that does not currently have a plutonium infrastructure because of the high cost of new plutonium facilities and the complexity of introducing plutonium operations into sites without current plutonium capabilities"

Considering all of the implications of the decisions involved, we believe it would be appropriate that a completely independent assessment of the total costs of locating these facilities separately at Pantex and SRS compared to co-locating all three facilities at SRS be conducted prior to any decisions by the Department as to the preferred sites.

Savannah River has an unequalled history of safe and reliable production, processing, and storage of plutonium. The disposition mission is overwhelmingly supported by the citizenry and officials of the two-state region. SRS is clearly the logical choice for consolidating all three functions.

The CNTA membership includes many experts in large scale plutonium processing. We are prepared to assist the Department in ensuring the success of the Plutonium Disposition Program and we are looking forward to hearing from you in the near future regarding our concerns.

Sincerely,  
  
Fred C. Davison  
Chairman

cc: Sen. Strom Thurmond  
Sen. Fritz Hollings  
Sen. Pete Domenici  
Congressman Lindsey Graham  
Elizabeth A. Moler

SCD78

facilities, whereas, the pit conversion facility would be a new structure no matter where it is located.

As discussed in Section 1.6, factors used in site selection for the preferred alternative included site infrastructure, mission, and staff expertise. Although Pantex may not currently have the extensive plutonium processing infrastructure already present at SRS, analyses in Chapter 4 of Volume I indicate that impacts of construction and normal operation of the proposed surplus plutonium disposition facilities on infrastructure, health, safety, and the environment at Pantex would likely be minor (e.g., see Sections 4.6 and 4.26.3).

Although cost will be a factor in the decisionmaking process, this SPD EIS contains environmental impact data and does not address the costs associated with the various alternatives. A separate cost report, *Cost Analysis in Support of Site Selection for Surplus Weapons-Usable Plutonium Disposition* (DOE/MD-0009, July 1998), which analyzes the site-specific cost estimates for each alternative, was made available around the same time as the SPD Draft EIS. This report and the *Plutonium Disposition Life-Cycle Costs and Cost-Related Comment Resolution Document* (DOE/MD-0013, November 1999), which covers recent life-cycle cost analyses associated with the preferred alternative, are available on the MD Web site at <http://www.doe-md.com> and in the public reading rooms at the following locations: Hanford, INEEL, Pantex, SRS, and Washington, D.C. Decisions on the surplus plutonium disposition program at SRS will be based on environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input. DOE will announce its decisions regarding facility siting and approach to surplus plutonium disposition in the SPD EIS ROD.

**CITIZENS FOR NUCLEAR TECHNOLOGY AWARENESS**  
**WILLIAM C. REINIG**  
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September 3, 1998

Ms. Laura Holgate  
Office of Fissile Materials Disposition  
U. S. Department of Energy  
1000 Independence Avenue  
Washington, D.C. 20585

Dear Ms. Holgate:

We are unable to understand DOE's recent decision that the Savannah River Site and the Pantex site are "equally preferred" for siting the pit disassembly and conversion mission.

In 1996 the Department of Energy announced, in the Stockpile Stewardship and Management EIS, that "plutonium would not be introduced into a site that does not currently have a plutonium infrastructure because of the high cost and complexity of introducing plutonium operations into sites without current capabilities."

The 1996 position was established during consideration of Pantex (and other sites) as potential locations for a pit manufacturing mission. Pantex was disqualified from consideration on the basis of this 1996 position. We have been told that pit manufacturing and pit disassembly and conversion have similarities; both processes are "dry" and involve handling of the plutonium and associated pit parts. Compared to pit manufacturing, the Disposition Program function of pit disassembly and conversion involves a much larger quantity of plutonium and produces plutonium oxide rather than the much easier to manage metallic form. If it is too expensive and complex to introduce pit manufacturing into Pantex, then surely it must follow that it is considerably less desirable to introduce pit disassembly and conversion.

At the public meeting in North Augusta on August 13, your staff was unable to explain why DOE is now considering Pantex. We would very much like to know the following:

1

**MD245-1**

**Alternatives**

DOE believes that the siting alternatives and analyses included in this SPD EIS are not inconsistent with the *Final Programmatic Environmental Impact Statement for Stockpile Stewardship and Management* (SSM PEIS) (DOE/EIS-0236, September 1996). The SSM PEIS states that the pit fabrication mission would not be introduced into a site that does not have an existing plutonium infrastructure because of the high cost of new plutonium facilities and the complexity of introducing plutonium operations into sites without current plutonium capabilities. The SSM PEIS states further that an important element of the site selection strategy is to maximize the use of existing infrastructure and facilities as the nuclear weapons complex becomes smaller and more efficient in the 21st century; thus, no new facilities were to be built to accommodate stockpile management missions. Accordingly, DOE considered as reasonable only those sites with existing infrastructure capable of supporting a pit fabrication mission. Although Pantex has the infrastructure to carry out its current weapons assembly and disassembly mission and a nonintrusive pit reuse program, it was not considered a viable alternative for the pit fabrication mission because it did not possess sufficient capability and infrastructure to meet the SSM PEIS siting assumption stated above. Among the operations that were considered in developing siting alternatives for pit fabrication in the SSM PEIS were plutonium foundry and mechanical processes, including casting, shaping, machining, and bonding; a plutonium-processing capability for extracting and purifying plutonium to a reusable form either from pits or residues; and assembly operations involving seal welding and postassembly processing.

When comparing the site selection strategy for pit disassembly and conversion with that used for the pit fabrication mission, the siting criteria in the SSM PEIS have little or no bearing on siting criteria use in this SPD EIS. Pit disassembly and conversion do not require the foundry and mechanical processes discussed in the SSM PEIS and can be accomplished in a stand-alone facility. Also, the SSM PEIS siting assumptions include a requirement to use existing facilities, whereas, the pit conversion facility would be a new structure no matter where it is located. This SPD EIS analyzes the environmental impacts

MD245

- Why was this position changed?
- Who in DOE approved this change?
- What new information exists to warrant this change?
- If aqueous processing is required, would Pantex be dropped from consideration?

CNTA is a non-profit, grassroots organization that includes many of this country's experts in large scale plutonium processing. We are prepared to assist the Department in ensuring the success of the fissile material disposition program. But with DOE engaged in a multi-decade program to downsize, consolidate, and remediate existing plutonium sites, we are unable to understand why DOE would propose creating a new plutonium site. The wisdom of establishing the DOE position in 1996 was obvious to us then, and remains today.

1

Sincerely,



William C. Reinig  
Vice Chairman

cc: Sen. Strom Thurmond  
Sen. Fritz Hollings  
Congressman Lindsey Graham  
Honorable Bill Richardson  
Greg Rudy  
David Nulton

MD245

of construction and operation of these facilities at the four candidate sites, including the impact on infrastructure.

Appendix N of the SPD Draft EIS analyzed the plutonium-polishing process (by which impurities could be removed from the plutonium feed for MOX fuel fabrication) as part of either the pit conversion or MOX facility. However, on the basis of public comments received on the SPD Draft EIS, and the analysis performed as part of the MOX procurement, DOE has included plutonium polishing as a component of the MOX facility. Therefore, the polishing process is not a consideration in siting the pit conversion facility. The alternatives that include siting the MOX facility with plutonium polishing at Pantex are reasonable and are therefore included in the SPD Final EIS. Appendix N was deleted from the SPD Final EIS, and the impacts discussed therein were added to the impacts sections presented for the MOX facility in Chapter 4 of Volume I. Section 2.18.3 was also revised to include the impacts associated with plutonium polishing.

As indicated in the revised Section 1.6, SRS is preferred for the pit conversion facility because the site has extensive experience with plutonium processing, and the pit conversion facility complements existing missions and takes advantage of existing infrastructure. Decisions on the surplus plutonium disposition program will be based on environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input. DOE will announce its decisions regarding facility siting and approach to surplus plutonium disposition in the SPD EIS ROD.

Author: HOWARD CARTER at md-01  
Date: 9/16/1998 7:52 AM  
Priority: Normal  
TO: DAVID NULTON, BERT STEVENSON  
Subject: Savannah River site

I am writing to express my extreme displeasure with the quality of the hearings held in N. Augusta a few weeks ago. Those were not public hearings, they were cheerleading exercises for the SRS employees and local officials elected by those employees. The people of N. Augusta and Aiken do not speak for the whole state of SC. Of course the people who were there were in favor doing "plutonium disposition" in SC. Their employer (SRS) gave them the day off and told them to come down to the hearings in a show of support. Who is going to come and argue against his neighbor in N. Augusta? This was not a fair hearing, and did not represent the opinions of the majority of S. Carolinians. I demand that DOE hold other hearings around the state, at least in Columbia, Charleston, and Savannah. British Nuclear Fuels, who will be running SRS, does not have a great environmental record in Europe. The people of this state deserve to hear the WHOLE STORY about plutonium reprocessing and all of its effects on health and the environment. If the citizens of S.C. are going to be asked to assume the risks inherent in taking all of the weapons grade plutonium, we deserve to have some input into the decision making process. And, we are unequivocally opposed to MOX fuel, and there will be a fight about this, I guarantee it. Plutonium should not be used as an energy source. It should be collected, immobilized, and safely stored away, never to re-enter the environment again. I don't know who came up with this MOX idea, but it is a bad one, and I don't care what the Russians are doing, we need to take the environmental high road and tell them MOX is a bad idea, and we can't support it. Vitrification is the preferred method of disposition, but SHOW US THE PERMANENT SITE, PLEASE, otherwise, we don't want it coming here, because we don't trust you to ever take it away. We believe it will stay here forever, and SC is not a good site for permanent disposal. I am sure you will hear more from me, I am angry that this plutonium reprocessing monster has reared its ugly head again. It was a bad idea when Carter mixed it, and it's still a bad idea.

Thank you for your time, please consider holding more hearin

gs,  
especially in Columbia,

Susan Corbett  
2701 Heyward St.  
Columbia, S.C. 29205

FD333

FD333-1

General SPD EIS and NEPA Process

DOE acknowledges the commentor's concerns regarding the public hearing. DOE employees and contractors at SRS were neither granted leave nor ordered to present their views at the North Augusta hearing; they attended in an official capacity or took personal leave to attend. DOE believes that the hearing was objective and open; all attendees were given an opportunity to provide comments orally or in writing. It was simply not feasible to hold public hearings in every location, including the locations suggested by the commentor.

To provide for public comment on the SPD Draft EIS, DOE conducted public hearings near the potentially affected DOE sites, and thus, with the most directly affected populations. This decision did not preclude relevant comment by State and local government, tribes, individuals, and organizations. Approximately 1,700 copies of the SPD Draft EIS were mailed, and an NOA letter was mailed to an additional 5,500 members of the public. Several means were available for providing comments: public hearings, mail, a toll-free telephone and fax line, and the MD Web site. Equal consideration was given to all comments, regardless of how they were submitted.

FD333-2

Alternatives

DOE acknowledges the commentor's opposition to the MOX approach. As indicated in Section 1.6, SRS is preferred for the MOX facility because this activity complements existing missions and takes advantage of existing infrastructure and staff expertise. Pursuing both immobilization and MOX fuel fabrication provides the United States important insurance against potential disadvantages of implementing either approach by itself.

DOE is not considering reprocessing any of the surplus plutonium that is the subject of this SPD EIS. U.S. policy dating back to the Ford Administration has prohibited the commercial, chemical reprocessing and separation of plutonium from spent nuclear fuel. The use of U.S. surplus plutonium in existing domestic, commercial reactors does not involve reprocessing (reprocessing is a chemical separation of uranium, transuranic elements [including plutonium], and fission products from spent reactor fuel and the reuse of the plutonium and uranium to produce new fresh fuel). The proposed

use of MOX fuel is consistent with the U.S. nonproliferation policy and would ensure that plutonium which was produced for nuclear weapons and subsequently declared excess to national security needs is never again used for nuclear weapons.

DOE is not considering disposal of surplus plutonium in South Carolina. The proposed facilities would process the surplus plutonium so that it can be permanently disposed of in a potential geologic repository. Only the immobilized plutonium, in canisters of vitrified waste from DWPF, would be stored at SRS for any length of time, pending availability of the potential geologic repository. DOE is presently considering a replacement process for the in-tank precipitation (ITP) process at SRS. The ITP process was intended to separate soluble high-activity radionuclides (i.e., cesium, strontium, uranium, and plutonium) from liquid HLW before vitrifying the high-activity fraction of the waste in DWPF. The ITP process as presently configured cannot achieve production goals and safety requirements for processing HLW. Three alternative processes are being evaluated by DOE: ion exchange, small tank precipitation, and direct grout. DOE's preferred immobilization technology (can-in-canister) and immobilization site (SRS) are dependent upon DWPF providing vitrified HLW with sufficient radioactivity. DOE is confident that the technical solution will be available at SRS by using radioactive cesium from the ion exchange or small tank precipitation process. A supplemental EIS (DOE/EIS-0082-S2) on the operation of DWPF and associated ITP alternatives is being prepared.

This SPD EIS, for the purposes of analysis, assumes that Yucca Mountain, Nevada, would be the final disposal site for all immobilized plutonium and MOX spent fuel. As directed by the U.S. Congress through the NWPA, as amended, Yucca Mountain is the only candidate site currently being characterized as a potential geologic repository for HLW and spent fuel. DOE has prepared a separate EIS, *Draft Environmental Impact Statement for a Geologic Repository for the Disposal of Spent Nuclear Fuel and High-Level Radioactive Waste at Yucca Mountain, Nye County, Nevada* (DOE/EIS-0250D, July 1999), which analyzes the environmental impacts from construction, operation and monitoring, related transportation, and eventual closure of a potential geologic repository.

DOE also appreciates the commentator's concern that surplus plutonium disposition activities not contaminate the environment. This EIS analyzes the potential environmental impacts associated with implementing the proposed activities at the candidate sites. The results of these analyses, presented in Chapter 4 of Volume I and summarized in Section 2.18, demonstrate that the activities would not have major impacts at any of the candidate sites. Decisions on the surplus plutonium disposition program will be based on environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input.

My name is Susan Corbett and I'm calling to make some comments about the DOE hearings in North Augusta regarding the plutonium disposition plans for Savannah River Site. I live in Columbia and I drove down to the hearings hoping to hear some open discussion and debate of the issues. I was very disappointed and very angry at what I saw. It was a completely one sided conversation. It, this is, this is not a public meeting. Basically what I, what I could see, what I could hear was that the SRS had given their employees a day off so that they could come down and have a show of support for, you know, basically lining their own pockets by creating more jobs and, you know, having more money for their own personal little infrastructure there in North Augusta and Aiken and I put forth the idea that North August and Aiken does not speak for the whole State of South Carolina. And we are being asked to assume a number of risks by allowing this plutonium to be brought here. And I believe that there should be other hearings around the State and around Georgia, around that area too, Savannah probably, definitely Columbia, possibly Charleston, other places that stand to be affected by this process, and places where it's a true public cross section of the public. Nobody in North Augusta is going to come and argue against their neighbors employer. It just wouldn't be the right thing to do and so it is not a level playing field. It is not an objective group of people. This is their livelihood. Of

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PD059

**PD059-1**

**General SPD EIS and NEPA Process**

DOE acknowledges the commentor's concerns regarding the public hearing. DOE employees and contractors at SRS were neither granted leave nor ordered to present their views at the North Augusta hearing; they attended in an official capacity or took personal leave to attend. DOE believes that the hearing was objective and open; all attendees were given an opportunity to provide comments orally or in writing. It was simply not feasible to hold public hearings in every location, including the locations suggested by the commentor.

To provide for public comment on the SPD Draft EIS, DOE conducted public hearings near the potentially affected DOE sites, and thus with the most directly affected populations. This decision did not preclude relevant comment by State and local government, tribes, individuals, and organizations. Approximately 1,700 copies of the SPD Draft EIS were mailed, and an NOA letter was mailed to an additional 5,500 members of the public. Several means were available for providing comments: public hearings, mail, a toll-free telephone and fax line, and the MD Web site. Equal consideration was given to all comments, regardless of how they were submitted.

course they want more jobs there. Personally the State of South Carolina is not hurting for jobs so much that we need to bring in jobs and industries that create more pollution. This is already a very contaminated State and Savannah River is already a very contaminated river and I am basically opposed to bringing any more industries that can pollute and contaminate our State. I understand something has to be done with the plutonium and the warheads. At this point I would say that vitrification is definitely the preferred method.

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I am not in favor of MOX. I am absolutely opposed to MOX. I think that there are a lot of people that are going to be opposed to MOX. We do not want to see plutonium used as an energy source and set the very bad precedent to start doing that. And I, I heard some comment about well once they got all this weapons stuff burnt up in the MOX fuel they wouldn't make any more. I don't believe that for a second. I believe that once that facility is built and the capability is set up, that there will be an ongoing push to continue to use plutonium as an energy source. Now that's going to be a fight there I can guarantee it. There are a lot of people who are opposed to that. That's why the breeder reactor program never got off to the start. That's why Carter and his administration nixed it. It was a bad idea then, it's a bad idea now.

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PD059

**PD059-2**

**Immobilization**

DOE acknowledges the commentor's support for the immobilization approach to surplus plutonium disposition. DOE is presently considering a replacement process for the in-tank precipitation (ITP) process at SRS. The ITP process was intended to separate soluble high-activity radionuclides (i.e., cesium, strontium, uranium, and plutonium) from liquid HLW before vitrifying the high-activity fraction of the waste in DWPF. The ITP process as presently configured cannot achieve production goals and safety requirements for processing HLW. Three alternative processes are being evaluated by DOE: ion exchange, small tank precipitation, and direct grout. DOE's preferred immobilization technology (can-in-canister) and immobilization site (SRS) are dependent upon DWPF providing vitrified HLW with sufficient radioactivity. DOE is confident that the technical solution will be available at SRS by using radioactive cesium from the ion exchange or small tank precipitation process. A supplemental EIS (DOE/EIS-0082-S2) on the operation of DWPF and associated ITP alternatives is being prepared. Decisions on the surplus plutonium disposition program will be based on environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input.

**PD059-3**

**MOX Approach**

DOE acknowledges the commentor's opposition to the MOX approach. Use of MOX fuel in domestic, commercial reactors is not proposed in order to subsidize the commercial nuclear power industry. Rather, the purpose of this proposed action is to safely and securely disposition surplus plutonium by meeting the Spent Fuel Standard. The Spent Fuel Standard, as identified by NAS and modified by DOE, is to make the surplus weapons-usable plutonium as inaccessible and unattractive for weapons use as the much larger and growing quantity of plutonium that exists in spent nuclear fuel from commercial power reactors. The MOX facility would produce nuclear fuel that would displace LEU fuel that utilities would have otherwise purchased. If the effective value of the MOX fuel exceeds the cost of the LEU fuel that it displaced, then the contract provides that money would be paid back to the U.S. Government by DCS based on a formula included in the DCS contract. The commercial reactors selected for the MOX approach include only those reactors whose

Vitrification is the preferred method for dealing with this plutonium. I don't want to comment at this point about exactly where or when. I, I think that we need to move a little more slowly in this and look at it carefully and make sure we're doing the right thing. I understand that there are vitrification problems at Savannah River right now with the existing high level waste that they have down there. And I think the DOE is rushing forward with this a little too cavalierly and I would like to see the process slowed down for more public education, more public input, more discussion around this area and definitely no MOX fuel. That is just not going to fly here.

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And I was very, like I said, very disturbed by those hearings. I don't think I've ever been to a public hearing where there was a more one-sided discussion. It was just, didn't even have the slightest hint of being an objective, diverse discussion. It was obviously so one-sided. And I think we need to here opposing voices and other points of view. But people are not going to come out in their own neighborhood, against their own neighbors. It just isn't fair to ask people to do that. So I know there are people in North August that have concerns but it would be difficult for them to speak out. And basically, as a person who went down to just listen and be objective, it would have been difficult for me to get up and ask questions because the environment was basically pretty hostile against anybody who wanted to question or, you know, look twice critically at this whole issue. And that, that is not the right way to conduct public hearings. We need to move around the state so we can hear other voices on the whole issue. That's all I have to say and I hope that you will consider these comments seriously. Thank you for listening. Bye-bye.

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PD059

operational life is expected to last beyond the life of the surplus plutonium disposition program. Should additional plutonium be declared surplus in the future, it is likely that MOX fuel fabrication would be a proposed disposition method if it proves successful, and the additional plutonium were amenable to MOX fabrication. However, additional NEPA would be required at that time to evaluate the potential impacts and inform the public.

The remainder of this comment is addressed in response PD059-1.

CORBETT, SUSAN  
PAGE 1 OF 1

Author: Martha Crosland at EM-06  
Date: 8/26/1998 7:00 PM  
Priority: Normal  
TO: David Nulton at MD-01, Bert Stevenson at MD-01  
CC: Bruce Bornfleth at ES  
Subject: Savannah River site

Dave and Bert:

The following stakeholder concern would seem to relate to the public hearings on the MD PEIS. I would assume that your office is the appropriate one to respond and if so please confirm with Bruce Bornfleth.

Thanks,

Martha

Forward Header

Subject: Savannah River site  
Author: Bruce Bornfleth at GSE  
Date: 8/26/98 2:53 PM

Martha,

Skila Harris asked that I forward this message to you. She suggested you would know the appropriate person to respond to this stakeholder.

Thank you,

Bruce Bornfleth, 586-4040

Forward Header

Subject: Savannah River site  
Author: jcorbett@gateway.net at INTERNET at X400PO  
Date: 8/26/98 12:08 PM

Hi, I am a concerned citizen of South Carolina, who has just recently found out about the plans DOE has for the Savannah River site. I went to N. Augusta to the hearings and was completely outraged. That was not an objective, fair public hearing. SRS gave their workers the day off to turn out in a show of force. There was no constructive or objective discussion or dialogue. As a citizen of this state, I resent the fact that a few members of a small, self-interested community dare to speak on behalf of the whole state regarding such a high risk venture as pit disassembly, MOX fabrication and Pu vitirification. I demand that DOE hold hearings in a more neutral venue, to allow for real discussion and the opposing views to be heard by the public. The hearings in N. Augusta were a sham and a white washing. Hearings should be held in Columbia, Savannah, and Charleston, at the very least. Sincerely, Susan Corbett

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FD172

FD172-1

General SPD EIS and NEPA Process

DOE acknowledges the commentor's concerns regarding the public hearing. DOE employees and contractors at SRS were neither granted leave nor ordered to present their views at the North Augusta hearing; they attended in an official capacity or took personal leave to attend. DOE believes that the hearing was objective and open; all attendees were given an opportunity to provide comments orally or in writing. It was simply not feasible to hold public hearings in every location, including the locations suggested by the commentor.

To provide for public comment on the SPD Draft EIS, DOE conducted public hearings near the potentially affected DOE sites, and thus with the most directly affected populations. This decision did not preclude relevant comment by State and local government, tribes, individuals, and organizations. Approximately 1,700 copies of the SPD Draft EIS were mailed, and an NOA letter was mailed to an additional 5,500 members of the public. Several means were available for providing comments: public hearings, mail, a toll-free telephone and fax line, and the MD Web site. Equal consideration was given to all comments, regardless of how they were submitted.



Fred E. Humes  
Director

September 15, 1998

Ms. Laura S. H. Holgate, Director  
Office of Fissile Materials Disposition  
U.S. Department of Energy  
P. O. Box 23786  
Washington, D.C. 20026-3786

Dear Ms. Holgate:

At your August 13, 1998 public meeting on the Surplus Plutonium Disposition (SPD) Draft Environmental Impact Statement (DEIS) I spoke in favor of siting all three portions of the SPD program at the Savannah River Site. A copy of my comments are attached. At this time I want to highlight my two comments regarding what I consider to be deficiencies in the DEIS, and recommend that the EIS be revised before issuance in final.

1. The Environmental Consequences analyses for the Pantex alternative does not reflect the increased probability and severity of environmental releases and worker safety risk resulting from (1) a lesser level of site plutonium infrastructure and (2) inexperienced workers handling and processing plutonium in metal and oxide forms. If pit disassembly and conversion is assigned to Pantex, there will be a "learning curve" as Pantex workers become familiar with handling a new material in new facilities and that the learning process will result in an increased incidence of operator errors and equipment failures. Such errors and failures will result in increased environmental impacts at Pantex when compared to the experienced personnel and extensive infrastructure which exist at Savannah River. The Draft EIS assumes that the probability and consequence of off-normal conditions are equal for Pantex and Savannah River - and that is not realistic. I suggest that you solicit the input of the Defense Nuclear Facilities Safety Board in quantifying the increased risks and impacts associated with startup of plutonium processing at Pantex. Without this analysis, the SPD-DEIS does not adequately address all environmental impacts.
2. The SPD-DEIS states that cost differences between Pantex and Savannah River are "within the uncertainty of cost estimates." That conclusion is not supported by the facts contained in the DEIS. The Draft describes the many facilities and operating capabilities which currently exist at Savannah River and which must be constructed or established at Pantex. In addition, the Draft identifies the many instances of program synergy that would exist at Savannah River and which

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### FD313-1

### Human Health Risk

DOE acknowledges the commentor's concerns regarding potential facility accidents and human health risks. Training would be conducted on mock, nonradiological material before facility processes became operational, so the "learning curve" would be largely completed before operation with radiological material. The probabilities of operational error cannot be meaningfully estimated, particularly for processes and procedures that are not yet fully developed, and for bounding accidents whose frequencies are low to begin with. In any case, the estimates of accident frequency presented in this SPD EIS are sufficiently conservative to bound any hypothetical increase in the probability of environmental releases.

### FD313-2

### Cost Report

Because this comment relates directly to the cost analysis report, it has been forwarded to the cost analysis team for consideration. The *Plutonium Disposition Life-Cycle Costs and Cost-Related Comment Resolution Document* (DOE/MD-0013, November 1999), which covers recent life-cycle cost analyses associated with the preferred alternative, is available on the MD Web site at <http://www.doe-md.com> and in the public reading rooms at the following locations: Hanford, INEEL, Pantex, SRS, and Washington, D.C. The cost report was independently reviewed by an outside architect-engineering firm before being released to the public. Any future updates to this report will also be independently reviewed.

**ECONOMIC DEVELOPMENT PARTNERSHIP**  
**FRED E. HUMES**  
**PAGE 2 OF 5**

cannot exist at Pantex. Either your conclusion must be changed or it must be supported by analysis. If DOE continues to believe that the comparative costs are "within the uncertainty of cost estimates" then DOE must prove that assertion. Review of the comparative estimates by a authoritative independent third party, such as the General Accounting Office, is one means of addressing this deficiency.

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Both of these deficiencies are more acute if a plutonium finishing module is included in the pit disassembly or MOX fabrication process.

We fully support the national program to dispose of United States and Former Soviet Union weapons-capable nuclear materials, and look forward to final approval and authorization of the Surplus Plutonium Disposition program.

Thank you for the opportunity to provide comments on this very important national program.

Sincerely,



Fred E. Humes  
Director



Fred E. Humes  
Director

**Statement for the Record  
Surplus Plutonium Disposition Draft  
Environmental Impact Statement  
August 13, 1998**

Good Afternoon, my name is Fred Humes and I am Director of the Economic Development Partnership, a non-profit organization with responsibility for economic development in both Aiken and Edgefield Counties. The Savannah River Site is an important and treasured part of our manufacturing community because its long history as a safe and environmentally responsible neighbor. We are proud of our role in helping to win the cold war, and we are equally proud of our future role in helping to reduce the nuclear danger by the disposition of excess plutonium from the weapons program. We are pleased and appreciative the Department has recognized the Site's capabilities for the Mixed Oxide Fuel fabrication and Immobilization portions of the disposition mission. We believe the identification of SRS for these two missions will provide the country the greatest assurance that plutonium will be prepared for fabrication and disposition in the safest, most efficient and most reliable manner.

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However, we are perplexed and concerned that DOE has not made the same determination regarding site selection for the Pit Disassembly and Conversion Facility. The draft EIS is replete with data which outlines the currently operational plutonium processing and radioactive waste management capabilities existing at SRS, and the document is equally clear that those same capabilities do not exist at the Pantex site. Therefore, in my opinion it is incredulous that the EIS concludes there are only "modest differences" between SRS and Pantex.

The data demonstrates there are significant differences between SRS and Pantex when evaluating the location for the Pit Disassembly and Conversion Facility:

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First and foremost, Savannah River has a forty-year history in all aspects of the safe handling and storage of plutonium. Savannah River's unparalleled safety record is the result of possessing a complete complement of specialized facilities and personnel with many years of "hands on" plutonium experience. Neither facilities nor the expertise exist at Pantex. Several hundreds of millions of dollars will be wasted just to build and operate new types of facilities needed for safe operations at Pantex: ranging from waste management to environmental monitoring to laboratory support facilities. But even if you wasted the dollars, you can never make up for the lack of plutonium experience in the Pantex workforce. Operating proficiency at Pantex could only be gained after many years of trial and error - years with inevitable low productivity, operating error... safety incidents and environmental releases. It is irresponsible for DOE to

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**FD313-3**

**Alternatives**

DOE acknowledges the commentor's support for siting the immobilization and MOX facilities at SRS. As indicated in Section 1.6, the preferred can-in-canister approach at SRS complements existing missions, takes advantage of existing infrastructure and staff expertise, and enables DOE to use an existing facility (DWPF). DOE is presently considering a replacement process for the in-tank precipitation (ITP) process at SRS. The ITP process was intended to separate soluble high-activity radionuclides (i.e., cesium, strontium, uranium, and plutonium) from liquid HLW before vitrifying the high-activity fraction of the waste in DWPF. The ITP process as presently configured cannot achieve production goals and safety requirements for processing HLW. Three alternative processes are being evaluated by DOE: ion exchange, small tank precipitation, and direct grout. DOE's preferred immobilization technology (can-in-canister) and immobilization site (SRS) are dependent upon DWPF providing vitrified HLW with sufficient radioactivity. DOE is confident that the technical solution will be available at SRS by using radioactive cesium from the ion exchange or small tank precipitation process. A supplemental EIS (DOE/EIS-0082-S2) on the operation of DWPF and associated ITP alternatives is being prepared.

SRS is also preferred for the MOX facility because this activity complements existing missions and takes advantage of existing infrastructure and staff expertise. Decisions on the surplus plutonium disposition program at SRS will be based on environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input. DOE will announce its decisions regarding facility siting and approach to surplus plutonium disposition in the SPD EIS ROD.

**FD313-4**

**Alternatives**

DOE acknowledges the commentor's support for siting the pit conversion facility at SRS. As indicated in the revised Section 1.6, SRS is preferred for the pit conversion facility because the site has extensive experience with plutonium processing, and the pit conversion facility complements existing missions and takes advantage of existing infrastructure.

**ECONOMIC DEVELOPMENT PARTNERSHIP**  
**FRED E. HUMES**  
**PAGE 4 OF 5**

impose on an inexperienced Pantex workforce these operational, safety and environmental problems, let alone on the citizens of the Texas panhandle.

The second compelling difference between Savannah River and Pantex is economics. The draft EIS describes the many facilities and operating capabilities that currently exist at Savannah River that will have to be duplicated at Pantex. Additionally, the document identifies the many instances of synergy that exist only at Savannah River as the PD&CF shares capabilities with current missions and the Immobilization mission. These differences exist today and cannot be dismissed as "within the uncertainty of cost estimates." Our region is competitive with all areas of the country in regards to construction and operations wage rates. In the private sector, we compete daily on an international basis for industries to locate in our area - and we are very successful. In the last two years, over two billion dollars in new private sector investment were announced in the Aiken-Augusta area - business decisions that were made because of our skilled labor force, competitive wage structure, and favorable business climate. Therefore, I do not agree with your conclusion that Pantex operating costs are less than Savannah River, or that total costs could be within seven percent.

The third significant difference between Savannah River and Pantex is the broad base of community support for SRS activities. This support includes two states, two Congressional Delegations, urban and rural constituents, site workers and people with no connection with SRS. That support is grounded in the knowledge that SRS has a paramount concern for safety, and that the site has a positive impact on the economic, social, cultural and educational base in our area. This relationship is priceless in today's environment, and provides DOE with confidence that programs assigned to the SRS will be carried out as planned.

A fourth consideration is the potential need to incorporate a Plutonium Polishing module in the pit conversion facility. Processing facilities, personnel expertise, and infrastructure to meet this need are currently operational at the Savannah River Site; the same capability does not exist at Pantex. Savannah River facilities are sufficiently flexible to accommodate all foreseen polishing requirements, guaranteeing a reliable supply MOX-grade plutonium oxide to the fuel fabrication vendor. Once again, the assignment of the Pit Disassembly and Conversion Facility to Savannah River will assure the safe performance of this critical step, save the taxpayer tens of millions of dollars and provide the highest confidence that the Plutonium Disposition mission is conducted in the most expeditious manner.

Specific comments on the draft EIS are as follows:

1. Revise the Environmental Consequences analyses for the Pantex alternatives to appropriately reflect the increased probability of environmental releases and safety concerns resulting from operational errors as Pantex employees go through the learning curve associated with handling and processing plutonium. Input from

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FD313

**FD313-5****Other**

All candidate sites have strong community and elected official support. In addition, the candidate sites are equally suitable from a safety and conduct of operations standpoint and all sites must comply with DOE environmental, safety, and health requirements.

Based on public comments received on the SPD Draft EIS, and the analysis performed as part of the MOX procurement, DOE decided to propose plutonium polishing as a component of the MOX facility to ensure adequate impurity removal from the plutonium dioxide.

The remainder of this comment is addressed in response FD313-2.

**FD313-6****Facility Accidents**

This comment is addressed in response FD313-1.

the Defense Nuclear Facilities Safety Board could assist in this evaluation. | 6

2. Submit your comparative cost estimates to an outside third-party review to assure that the operational and estimating basis for construction and operating costs, and required infrastructure are on a totally comparable basis. The General Accounting Office is one possible source for this review. | 7

My final comment is that we not lose sight of the important objective that you are implementing - that being to safely dispose of the excess supply of weapons capable plutonium. This is extremely important - both today and for future generations. Because of that importance and urgency, it must be entrusted to those who have demonstrated the capability to safely perform the mission. Now is not the time to train rookies. Now is the time for the first team to be in the game. The clear choice for the Pit Disassembly and Conversion Facility is the Savannah River Site! | 8

Thank you for the opportunity to present these comments.

FD313

**FD313-7**

**Cost Report**

Although cost will be a factor in the decisionmaking process, this SPD EIS contains environmental impact data and does not address the costs associated with the various alternatives. A separate cost report, *Cost Analysis in Support of Site Selection for Surplus Weapons-Usable Plutonium Disposition* (DOE/MD-0009, July 1998), which analyzes the site-specific cost estimates for each alternative, was made available around the same time as the SPD Draft EIS. This report and the *Plutonium Disposition Life-Cycle Costs and Cost-Related Comment Resolution Document* (DOE/MD-0013, November 1999), which covers recent life-cycle cost analyses associated with the preferred alternative, are available on the MD Web site at <http://www.doe-md.com> and in the public reading rooms at the following locations: Hanford, INEEL, Pantex, SRS, and Washington, D.C. The cost report was independently reviewed by an outside architect-engineering firm before being released to the public. Any future updates to this report will also be independently reviewed.

**FD313-8**

**Alternatives**

This comment is addressed in response FD313-4.



United States  
Department  
of Energy

Comment Form

NAME: (Optional) W. Glenn Fidds  
ADDRESS: 841 Hickory Ridge Rd Aiken SC 29003  
TELEPHONE: (803) 648-6696  
E-MAIL:

I was born and raised in Augusta, Ga. and have lived here (area)  
for all but 3 years of my life:  
As a young boy of 12 to 27 years old and since, I have been  
exposed to the professionalism and safety attitudes of SRP/SRS  
employees. I have worked at several distant industrial sites in  
the CSRA before going to work at SRP in 1984. The positive  
influence that I had experienced from people who work at SRS, both  
before and since my employment, convinces me that SRS would  
be the safest place to locate all Pu missions.  
I personally know & experience the dedication to safety and  
professionalism of SRS employees every day. I am confident  
that the best place for Pu missions, from all aspects of consideration,  
is SRS.

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SCD62

SCD62-1

Alternatives

DOE acknowledges the commentor's support for siting the proposed surplus plutonium disposition facilities at SRS. As indicated in the revised Section 1.6, SRS is preferred for the proposed facilities because the site has extensive experience with plutonium processing, and these facilities complement existing missions and take advantage of existing infrastructure. Decisions on the surplus plutonium disposition program at SRS will be based on environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input. DOE will announce its decisions regarding facility siting and approach to surplus plutonium disposition in the SPDEIS ROD.

FIRST BAPTIST CHURCH OF AIKEN  
FRED W. ANDREA, III  
PAGE 1 OF 1



August 13, 1998

Gentlemen and Ladies:

Good afternoon. I am Fred Andrea, Senior Pastor of First Baptist Church in Aiken, South Carolina. I am here to express my support for SRS and its employees. Many of the employees are members of my church family.

SRS and its employees are special to this community. Their contributions to our nation's security are many and significant. Over the last five years, SRS has lost over 10,000 jobs, yet the employees and this community have never lost their faith in the future or their commitment to continue the long history of safe and effective operations at SRS.

We know that the capabilities that exist at SRS are not found at the other DOE sites. We know that the Plutonium Disposition Missions which are so important to our national and international security require these capabilities. The decision should be easy but, for some reason, may become far more complicated than necessary. Of course, there being absolutely no politics in the local church, you would understand that I know nothing whatsoever about such matters. I trust and pray that this decision will not be determined by political considerations.

In fact, I am here today to let you know that, as a minister, I will be going to a higher authority than elected officials to encourage the Department of Energy to make the right decision for this nation and its taxpayers!

Seriously, Savannah River Site is the right choice for this mission. Impeccable safety and environmental protection records, cost effective operations, existing operating infrastructure, plutonium experience and expertise, and a second-to-none community support level undergird the soundness of this choice.

Thank you for this opportunity to express my wholehearted support for Savannah River Site. I do pledge my earnest prayers for wisdom and courage as this significant decision is made.

Yours sincerely,

Fred W. Andrea III

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Alternatives

DOE acknowledges the commentor's support for siting the proposed surplus plutonium disposition facilities at SRS. As indicated in the revised Section 1.6, SRS is preferred for the proposed facilities because the site has extensive experience with plutonium processing, and these facilities complement existing missions and take advantage of existing infrastructure. Decisions on the surplus plutonium disposition program at SRS will be based on environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input. DOE will announce its decisions regarding facility siting and approach to surplus plutonium disposition in the SPDEIS ROD.