

Douglas M. Kelly, Hereford, Texas 79045. 704 11th Street.  
And I thought this was to make a comment on whether we  
needed that facility up there for the plutonium and my ideas  
was heck no due to the water. And the one mistake and it's  
gone. That was it. Good bye.

1

PD014

**PD014-1****Alternatives**

DOE acknowledges the commentor's opposition to siting the proposed surplus plutonium disposition facilities at Pantex. There would be no discernible contamination of aquatic biota (fish) or drinking water, either from the deposition of minute quantities of airborne contaminants into small water bodies or from potential wastewater releases. Therefore, it is estimated that no measurable component of the public dose would be attributable to liquid pathways. Decisions on the surplus plutonium disposition program at Pantex 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.

I am for the location of additional missions at the Pantex Plant in Amarillo. The Amarillo economy needs the additional jobs that offer good pay and good benefits. The Pantex Plant adds an enormous, and welcome, boost to the Amarillo economy.

1

WD021

**WD021-1**

**Alternatives**

DOE acknowledges the commentor's support for siting the proposed surplus plutonium disposition facilities at Pantex. Decisions on the surplus plutonium disposition program at Pantex 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.

**Question/ Information  
Request Card**



Name: MARK KOPKE

Address: 4116 SILVERINGTON  
AMARILLO TEXAS

Phone: 806 358-4063 Fax: \_\_\_\_\_

E-mail: \_\_\_\_\_

Question/ Request: YOU BOKE ARE AIR BASE AWAY  
SAVANNA HAS GOTTEN A MISSION, BE FAIR  
GIUE PANTEX A MISSION & WE HAVE EARNED  
IT. LOOK AT NEP RECORDS

For further information contact:  
U.S. Department of Energy, Office of Fissile Materials Disposition, MD-4  
Forrestal Building, 1000 Independence Ave., SW, Washington, D.C. 20585  
1-800-820-5156

1

TXD12

**TXD12-1**

**Alternatives**

DOE acknowledges the commentor's support for the surplus plutonium disposition program at Pantex. Decisions on the surplus plutonium disposition program at Pantex will be based on environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input.

LADD, KEENA  
PAGE 1 OF 1

August 11, 1998

Keena Ladd  
Rt 7 Box 680  
Amarillo, TX 79118

To whomever this may concern,

As a citizen of Amarillo, I would like to express my feelings upon the issue of the Pantex Plant. I have lived here for 23 yrs. and have yet to hear many critical points about this plant. As many people that it employees, that tells you right off that Mason & Hanger is a fantastic company to work for. Why don't people just go on about their business? How would they like it if someone tried to close their doors? The reason I am discouraged, my Dad is an Master Electrician at the plant. How is there going to be food on our table if he has no work? **Leave it alone** and help our Nation with **Drugs, Teen Pregnancy, Weapons**, things that are far more important. Please consider this my vote. Thank you!

1

**"I AM FOR PANTEX IN OUR COMMUNITY!!"**

Sincerely,



Keena Ladd  
Age 23  
Amarillo, TX

FD005

FD005-1

Alternatives

DOE acknowledges the commentor's support of Pantex. Decisions on the surplus plutonium disposition program at Pantex will be based on environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input.

United States  
Department  
Of Energy

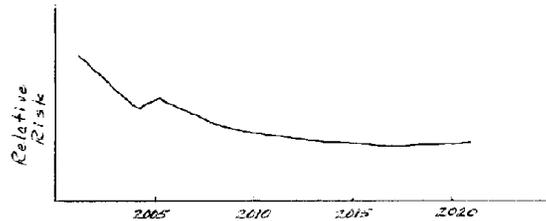
Comment Form

NAME: (Optional) Jerome B. Martin, CHP *J. Martin*  
ADDRESS: 5 Locke Place, Amarillo, TX 79124  
TELEPHONE: (806) 342-9985  
E-MAIL: jbmartin@am.net

The major risk to workers and the public from current operations at Pantex Plant is the accidental detonation of high explosives. Nuclear weapons contain two types of high explosives: sensitive and insensitive HE. As the nuclear stockpile is modernized and older weapons programs are disassembled, sensitive HE is gradually being eliminated from the stockpile. Thus, the relative risk of operations at Pantex is decreasing with time.

If the Plutonium Disassembly and Conversion Facility were built and operated at Pantex, there may be a small incremental risk added to the risk of current operations. However, further reductions in risk achieved by continued elimination of sensitive HE would soon counter the added increment from a new mission at Pantex. A sample plot of risk vs. time is shown below. If the relative risk can be quantified and illustrated as shown below, it would be helpful in explaining risk to the public and for demonstrating that the risk of the Plutonium Disassembly and Conversion Facility is small and manageable.

1



For further information contact:  
U.S. Department of Energy, Office of Fissile Materials Disposition, MD-4  
Forrestal Building, 1000 Independence Ave., SW, Washington, D.C. 20585  
1-800-820-5156

FD201

FD201-1

Human Health Risk

While the commentor's input is illustrative, the accident analysis performed in this SPD EIS is limited to characterizing risk of the alternatives at issue. The accident risks associated with constructing and operating the pit conversion facility at Pantex can be found in the Facility Accidents sections of Chapter 4 of Volume I and in Appendix K.4.



Maryknoll Education Center

The Maryknoll Society  
4301 Bryan Street # 202 Dallas, Texas 75204  
Area Code (214) 821-4501

August 17, 1998

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

Dear Department of Energy, Office of Fissile Materials Disposition:

I do not support plutonium processing at the Pantex Plant. In the *Surplus Plutonium Disposition Draft Environment Impact Statement*, the Department of Energy prudently decided against locating one plutonium processing facility at the Pantex Plant. For the following additional reasons, a Plutonium Pit Disassembly and Conversion facility also should not be located at Pantex:

1. Pantex should not become the next Rocky Flats. As Pantex has never processed plutonium, it has apparently escaped the type of contamination found at plutonium processing sites like Rocky Flats and Hanford. Let's keep it that way.
2. There is so much about the potential risks that is unknown: It is not the time to proceed. It is unacceptable to have plutonium operations above the Ogallala Aquifer, and only one mile from where people live and work in a vibrant agricultural producing area.
3. There is valid, strong criticism of safety in the current storage of Plutonium at Pantex. Promises to improve safety conditions at the site have not happened. The U.S. Government Accounting Office and the Defense Nuclear Facilities Safety Board have both issued reports critical of plutonium storage safety at Pantex. If the DOE cannot accomplish the job of safely storing Pantex plutonium in the most stable environment, there is no reason to accept its unsubstantiated assurances to safely process deadly plutonium powders at Pantex.

Thank you for this opportunity to comment.

Sincerely,

*Sr. Patricia Ridgley*  
Sr. Patricia Ridgley, SSMN

"We are called to be bridges between our own U.S. Church that sends us  
and the local churches where we serve." - Maryknoll Mission Vision

MD041

MD041-1

DOE Policy

DOE acknowledges the commentor's opposition to Pantex as a candidate site for surplus plutonium disposition activities. Analyses in Chapter 4 of Volume I indicate that impacts of operating these facilities on health, safety, and the environment at Pantex would likely be minor. To avoid contamination that has occurred in the past at some DOE sites, DOE would design, build, and operate the proposed facilities in compliance with today's strict environmental, safety, and health requirements. Decisions on the surplus plutonium disposition program at Pantex will be based upon environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input.

MD041-2

Water Resources

DOE acknowledges the commentor's opposition to siting the proposed surplus plutonium disposition facilities at Pantex. As discussed in Section 4.26.3.2.2, there would be no discernible impacts on water quality from normal operation of these facilities. Other sections show, moreover, that the normal operation of these facilities would likely have minor impacts on human health, agriculture, and livestock: Sections 4.17.1.4 and 4.17.2.4 address the potential radiological and hazardous chemical effects of the maximum-impact alternative on workers and the public at Pantex; Appendix J.3, the potential contamination of agricultural products and livestock, and consumption of these products by persons living within an 80-km (50-mi) radius of Pantex.

MD041-3

DOE Policy

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. In addition, 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.

Concerning the pit reprocessing (MOX conversion), I feel Pantex should be considered the #1 choice for the mission. I have worked at Pantex for 12 years and have been thoroughly impressed by the commitment of the employees and community in safety and environmental issues when performing a mission as well as performing the mission in a timely and efficient manner.

1

WD015

**WD015-1**

**Alternatives**

DOE acknowledges the commentor's support for siting the pit conversion facility at Pantex. However, to clarify, the pit conversion facility does not involve reprocessing plutonium. The facility would be used for disassembling pits and converting the recovered plutonium (as well as plutonium metal from other sources) into plutonium dioxide suitable for disposition. Similarly, 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). Decisions on the surplus plutonium disposition program at Pantex 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.

**Comment on the Location of the  
Pit Disassembly Operation**

I am a degreed Industrial Engineer with 26 years experience in the manufacture of the various types of products including:

- ◆ Small AC Motors
- ◆ Large Steam Turbines
- ◆ Aluminum Reduction, Coil, Sheet, and Plate
- ◆ Industrial Water Filtration Equipment
- ◆ Solid Fuel Motors for C4, D5, MX, P2 Missiles and Space Craft
- ◆ Air Force C17 Transport Aircraft

For the last 4-1/2 years I have been employed at PANTEX. Naturally, as an Industrial Engineer, I have mentally compared the characteristics of PANTEX versus other employers I have worked for. Based on my substantial manufacturing experience, I present the following reasons why PANTEX should undoubtedly be selected as the site for the Pit Disassembly operation :

**Quality of the workforce**

The Production Technicians and other "hands-on" operations personnel are far superior to their counterparts at other manufacturing locations I have observed. They are highly trained. New employees are carefully monitored after initial training, and systems and procedures are in place to assure that they do not work on various operations until they are fully capable. They have an extremely strong "esprit de corps" which translates to pride in workmanship, plant mission, and dedication to their country. I have never seen such a high level of positive workplace interpersonal relationships. The education level of the workforce varies, but includes personnel working on Engineering and other degrees and those who already have a Bachelors Degree in Engineering.

**Quality of work**

The type of work performed here is very technical and precise, and the product generated by PANTEX continuously meets the high quality

1

FD243

FD243-1

Alternatives

DOE acknowledges the commentor's support of Pantex and appreciates the enumeration of reasons for siting the pit conversion and MOX facilities at Pantex. Decisions on the surplus plutonium disposition program at Pantex 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.

parameters typically required for nuclear weapons. Quality is constantly emphasized and monitored and operations personnel stress it to each other. Management and other support functions have the same level of commitment and pride in high quality output.

#### **Security**

The superiority of the PANTEX security force is legend both within and outside the DOE complex. Due to their high emphasis on physical conditioning and continuous training and application of proven security principles, the members of this force are constantly alert and perform their duties in a highly professional and effective manner. Security is increasingly becoming more demanding in its requirements and the PANTEX Security force is the "best there is".

#### **Workforce Experience**

The PANTEX work force has decades of successful experience in nuclear weapons assembly and disassembly. This type of experience is rare and the numbers of personnel possessing it is limited. DOE should capitalize on this reserve of personnel with this rare type of qualification and utilize them and their skills in the Pit Disassembly operation which is closely related to work they are already performing. This factor cannot go unconsidered in the final selection process.

#### **Community Support**

For every public issue there are those who support it and those who oppose it along with others who either don't care or are not knowledgeable about the issue. The important factor is what portion of the public fall into each category. As a result of the Freedom of Speech, which all Americans possess, parties for and against an issue can proclaim their views in person, through displays, and through the news media. The news media generally present the views of each camp equally although one camp may be substantially smaller in number than the other. This can lead to misunderstanding by the public as to the amount of support that exists in the public domain for each side of the issue.

The fact of the matter regarding community support for the possible location of the Pit Disassembly operation at PANTEX is that support for locating it at PANTEX is overwhelmingly in favor of doing so. The

opposition is minute in comparison and, as it appears to me, is composed of some sincere local citizens along with a mixture of persons who are not from the Texas panhandle, possessing other "agendas" which might include trying to maintain an apparent need for them to remain in the area as an opposition force which also would assure them of a continued monthly pension from their parent organization.

**Conclusion**

The above factors make it extremely clear that the Pit Disassembly operation should be located at PANTEX. As you review these factors it should also become clear that an apparent mistake has been made concerning the DOE decision naming SRS as the preferred sit for the MOX facility. Politics should not enter into decisions concerning issues as critical as the location of Pit Disassembly and MOX operations. By locating both the MOX facility and Pit Disassembly facility at PANTEX, unnecessary possible hazardous transportation problems would be alleviated and the operations would be performed by a work force highly superior to those at any other DOE site. Please emphasize at the highest levels within DOE and Congress that truth cannot successfully be denied and the truth is that **THE PIT DISASSEMBLY OPERATION AND THE MOX FACILITY SHOULD BE LOCATED AT PANTEX.** This would be in the best interest of the United States of America.

William R. Henry  
Sr. Project Engineer  
PANTEX

FD243

Move ANY or ALL operations to Pantex. Count me as FOR | 1  
Pantex Expansion. Thanks.

WD016

**WD016-1**

**Alternatives**

DOE acknowledges the commentor's support for the surplus plutonium disposition program at Pantex. Decisions on the surplus plutonium disposition program at Pantex 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.

I believe since Plutonium was first made in a nuclear reactor, it should like wise be expended in a nuclear reactor. I would like to see Plutonium be processed into mixed oxide fuel for use in a nuclear reactor to produce electricity. Futhermore DOE should sell this fuel to reactor sites in the U.S. to try to defray any cost it has accrued in producing the fuel rods. I think Pantex site in Amarillo, Texas can do this for DOE in a safe and efficient manner and at substancially less cost than other DOE facilities. Please consider Pantex as a site for the pit disassembly and conversion process. I am a Pantex employee of 23+ years, and I can attest of our safe work practices. Thank you!  
Leon E. Tomlinson

1

WD013

#### WD013-1

#### Alternatives

DOE acknowledges the commentor's support for siting the pit conversion and MOX facilities at Pantex. Use of MOX fuel in domestic, commercial reactors is not proposed in order to generate electricity. 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.

DOE has identified as its preferred alternative the hybrid approach to surplus plutonium disposition. Pursuing both immobilization and MOX fuel fabrication provides the United States important insurance against potential disadvantages of implementing either approach by itself. The hybrid approach also provides the best opportunity for U.S. leadership in working with Russia to implement similar options for reducing Russia's excess plutonium in parallel. Further, it sends the strongest possible signal to the world of U.S. determination to reduce stockpiles of surplus plutonium, as quickly as possible, in a manner that would make it technically difficult to use the plutonium in nuclear weapons again.

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 Pantex 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.



United States  
Department  
of Energy

Comment Form

NAME: (Optional) Donald Maxie

ADDRESS: 2108 S Hayden, Amarillo, Tex.

TELEPHONE: (806) 376-7413

E-MAIL: During the testimony from the public

We heard some about the effect on  
property values with no information on  
what effect if any it has had at the  
site referenced in the testimony. As  
an epidemiology employee with the state  
of Texas I heard many many people talk  
about a new or expanded facility would damage property  
property values. I never saw it happen.

1

We also heard from an organization called  
Senior Citizens Against Nuclear Dumping  
or STAND. This organization is not  
seriously against nuclear dumping. In  
the time I've been in Amarillo they have  
never been anything except against  
Pantex. If they were serious about  
nuclear dumping why haven't we  
heard anything from them about the largest  
stream of nuclear materials going into  
the local landfills - smoke detectors  
from households.

2

TXD20

TXD20-1

Socioeconomics

DOE acknowledges the commentor's observation concerning property values.

TXD20-2

Other

DOE acknowledges commentor's views. Decisions on the surplus plutonium disposition program at Pantex will be based on environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input.

McKEEN, SHERRY  
PAGE 1 OF 1

August 10, 1998

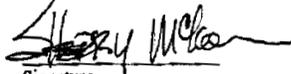
U.S. Department of Energy  
Office of Fissile Materials Disposition  
MD-4 Forrestal Building  
1000 Independence Avenue, SW  
Washington, D.C. 20585

As a citizen of Amarillo, I wish to express my feelings about the location of the disassembly and conversion of nuclear weapons plutonium components ("pits") at the Amarillo Pantex plant. I am totally in support of this function and hope you will consider the effort and the history of the Pantex plant in your decision making process for this site.

1

↓  
opposed!!!

Sincerely,



Signature

Amarillo TX 79101

Address

FD131-1

Alternatives

DOE acknowledges the commentor's opposition to siting the pit conversion facility at Pantex. Decisions on the surplus plutonium disposition program at Pantex 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.

FD131

3-857

Comment Documents—Texas

Dear Sirs

There are 2 main reasons the pit conversion project should be given to the Pantex Plant.

- \*1 The work force at Pantex is dedicated to doing the best job possible for DOE and all others concerned with this mission
- \*2 The pits are already stored here so why risk moving them to another site when Pantex can do the work here.

I have worked at Pantex 3 yrs and am truly convinced the mission would be a complete success if given to the people of the Panhandle area.

Thank you

If you have any questions for me please call

Leroy McMurry  
Box 1503  
Panhandle, Tx 79068  
806 537 5703

TXD14

#### TXD14-1

#### Alternatives

DOE acknowledges the commentor's support for siting the pit conversion facility at Pantex. Decisions on the surplus plutonium disposition program at Pantex will be based on environmental analyses (including analyses of transportation risks), technical and cost reports, national policy and nonproliferation considerations, and public input. DOE will announce its decisions on facility siting and approach to surplus plutonium disposition in the SPD EIS ROD.

I support Pantex and the ability for them to safely dismantle the plutonium pits. I am certain that the contractor will be responsible and accountable to the landowners and the citizens of the area.

1

WD011

**WD011-1**

**Alternatives**

DOE acknowledges the commentor's support for siting the pit conversion facility at Pantex. Decisions on the surplus plutonium disposition program at Pantex 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.

Subject: support for pit assembly

1

WD019

**WD019-1**

**Alternatives**

DOE acknowledges the commentor's support for siting the pit conversion facility at Pantex. Decisions on the surplus plutonium disposition program at Pantex 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.

 **Question/ Information Request Card**

Name: ROBIN MILLS

Address: HCR 01 BOX 245A  
PLAINVIEW TEXAS 79072

Phone: \_\_\_\_\_ Fax: \_\_\_\_\_

E-mail: \_\_\_\_\_

Question/ Request: WHAT IS THE RECORD OF SPILLS AND/OR CONTAMINATION AT OTHER SITES WORLDWIDE THAT HAVE PROCESSED PLUTONIUM.

For further information contact:  
U.S. Department of Energy, Office of Fissile Materials Disposition, MD-4  
Forrestal Building, 1000 Independence Ave., SW, Washington, D.C. 20585  
1-800-820-5156

1

TXD13

**TXD13-1**

**Other**

The scope of this SPD EIS is focused on analysis of alternatives on whether and how much U.S. surplus plutonium should be used as MOX fuel, which technology should be used for immobilization, where to construct the proposed surplus plutonium disposition facilities that are needed, and where to perform lead assembly fabrication and testing.

Although, DOE does not have specific data on spills or contamination from plutonium processing in other countries, DOE has visited some of these European plants and will use any pertinent experience in the development of its proposed facilities.

**MRD INVESTMENTS, L.L.C.**  
**D. EDWARD AND MELVA M. DAVIS**  
**PAGE 1 OF 1**

**MRD INVESTMENTS, L.L.C.**

**d/b/a MRD INVESTMENTS (In Missouri) MRDU INVESTMENTS, L.L.C. (In Texas)**  
**905 S. Fillmore Suite 105**  
**P.O. Box 2808**  
**Amarillo, Texas 79101**  
**Office (806) 376-9844 Fax (806) 376-8562**

August 11, 1998

U.S. Department of Energy  
Office of Fissile Materials Disposition  
MD-4 Forrestal Building  
1000 Independence Avenue, SW  
Washington, DC 20585

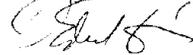
Ladies and Gentlemen:

We are small business owners here in Amarillo and own several commercial office buildings as well as our home. We appreciate having Pantex located here and want you to know that we sincerely hope that Amarillo is the location chosen for the plant to disassemble and convert nuclear weapons plutonium components.

1

We intend to live in Amarillo for the rest of our lives and look forward to having Pantex be a vital part of our community.

Sincerely,



D. Edward Davis



Melva M. Davis

TXD01

**TXD01-1**

**Alternatives**

DOE acknowledges the commentors' support for siting the pit conversion facility at Pantex. Decisions on the surplus plutonium disposition program at Pantex 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.

August 10, 1998

USDOE  
Office of Isotope Materials Disposition  
MD-4 Forrestal Building  
1000 Independence Avenue, SW  
Washington DC 20585

I live in Panhandle TX 10 east of Pantex Plant and work at the plant. I have been there since 1984 and hope to retire from Pantex.

I am totally in support of this function and hope you will consider the effort and the history of the Pantex Plant in your decision-making process for this site.

People of the Panhandle of Texas have an excellent track record. They are proud, dependable people on whom I'd be pleased to place the responsibility of this new effort. We would not let you down.

Sincerely,  
Darlene Muna  
Box 158  
Panhandle TX 79068

TXD15

TXD15-1

Alternatives

DOE acknowledges the commentor's support of the surplus plutonium disposition program at Pantex. Decisions on the surplus plutonium disposition program at Pantex will be based on environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input.

1

**NUNN ELECTRIC SUPPLY CORPORATION**  
**JOE D. BREWTON**  
**PAGE 1 OF 2**

TEXAS  
 Amarillo  
 Abilene  
 Austin  
 Lubbock  
 Odessa (Zimco)  
 Midland (Buildere' Choice)

**NUNN**  
**NUNN ELECTRIC SUPPLY CORPORATION**  
 WHOLESALE  DISTRIBUTORS

NEW MEXICO  
 Clovis  
 Hobbs  
 Roswell  
 Alamogordo

August 5, 1998

The Department of Energy  
 c/o Amarillo Chamber of Commerce  
 P.O. Box 9480  
 Amarillo, Texas 79105

Dear Sirs,

I am writing you this letter on behalf of the company I work for, Nunn Electric Supply Corporation. Nunn Electric has been a part of the Amarillo economy for more than 70 years and has been fortunate enough to do business with the Pantex facility for more than fifty of those. During that time, we have been directly involved with virtually every area of the Pantex plant and in most cases, three generations of workers. From our viewpoint, there is no industrial facility in this part of the country that has been as involved with the community and as concerned with safety as Pantex.

The plant has constantly concerned itself with liberal upgrades in all electrical areas of the plant. To that point, Pantex was the first DOE site to implement the use of "stand-by" HID lamps for security purposes, a procedure that is now commonplace throughout the nuclear complex as we understand it. They were also the first to use rechargeable alkaline batteries to reduce hazardous waste in that area. The same can be said for their use of low-mercury fluorescent and HID lamps, which again shows their commitment not only to a safe working environment, but the safety of the entire panhandle area as well.

These examples are but a few of the many electrical upgrades that Pantex has put into practice that we (as only one of hundreds of their vendors) know of. Pantex has an outstanding safety record with full-time union safety officers with whom these critical issues may be discussed and resolved. It is our understanding that the alternate site has nothing like this in place and no plans for it in the foreseeable future.

FD004

**FD004-1**

**Alternatives**

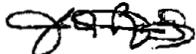
DOE acknowledges the commentator's support for siting the pit conversion facility at Pantex. Decisions on the surplus plutonium disposition program at Pantex will be based on environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input. DOE will announce its decisions regarding facility siting and approach to surplus plutonium disposition in the SPD EIS ROD.

**NUNN ELECTRIC SUPPLY CORPORATION**  
**JOE D. BREWTON**  
**PAGE 2 OF 2**

On July 1, 1998 Nunn Electric was awarded the first Vendor Managed Inventory contract in the history of the DOE nuclear complex. The estimated cost-savings for electrical supplies and their related expenses for the first year will be in excess of \$500,00.00. We can think of no better way to demonstrate this facility's commitment to cost-savings and streamlined efficient management. To our knowledge, there is no another plant in this part of the panhandle that has exhibited such forward thinking.

We know that the plant enjoys the support of some 80% of the surrounding community and it is said that Pantex is ultimately responsible for one out of every ten jobs in this area. The influx of 450 new jobs with the PDCF located here would be an invaluable shot in the arm to our local economy. We would hope that the DOE would look most favorably on the selection of Pantex for the critical PDCF and consider the overall impact that placing this facility here at Pantex - the best location in the nuclear complex.

Most Cordially Yours,



Joe D. Brewton  
Amarillo Division Manager

1

FD004

# Pantex doesn't deserve MOX

NORTH AUGUSTA, S.C. — I read your recent editorial regarding the public hearings for selecting the site for the Department of Energy's pit disassembly and conversion mission. These important hearings are being held at each of the potentially affected sites, but most significantly at Anapilto and in North Augusta, S.C.

I too encourage Panhandle residents to participate in this important decision. I also think it is important they not be blinded by the possibility of federal government dollars and jobs but really consider the facts and what is good for the country.

The disposition of surplus weapons-usable plutonium is an issue of international importance. We, in conjunction with the Russians, need to get on with this task in a safe and efficient manner.

I have worked in the plutonium processing area of the Savannah River Site for about 20 years. I am well aware of the technology, requirements and issues involved in plutonium disposition. Dismantling pits and converting the plutonium to an oxide is the necessary first step in the disposition process. Nothing else can happen until this occurs.

What is the best way to make this happen? Let's look at the facts.

Handling plutonium is a complicated task. The DOE sites which made and processed plutonium (Hanford, Rocky Flats and Savannah River) are all much larger and more complex operations than Pantex. Each of them has a legacy from the plutonium era which, in total, will cost all of us hundreds of billions of dollars to remediate and will take decades to complete.

Handling plutonium requires extensive support facilities, skills and oversight — generally called infrastructure. There are not "mod-

*Auth: Joe Bush, Keith & Hart*  
**Richard L. Geddes**

est differences" between the plutonium infrastructure of Pantex and SRS, as DOE recently said. SRS is a 300-square-mile complex of 14,000 employees engaged in major nuclear processing operations. It has a fully integrated, self contained nuclear waste management system capable of handling all forms of nuclear waste, operates the nation's only tritium purification and loading operation, and will be the site of the next generation of tritium production.

SRS produced nearly half of the plutonium which is no longer needed. In 1997, DOE called SRS "a plutonium competent site with the most modern, state-of-the-art storage and processing facilities" in the complex.

Pantex has no experience, capability or infrastructure with plutonium, only in handling and storage of sealed plutonium weapons components.

Handling plutonium creates a costly future legacy. DOE needs to explain why it is considering creating a new plutonium processing site. The determination that the Pantex site is "equally preferred" for the pit disassembly and conversion mission represents a dramatic repudiation of DOE policy.

In 1996, DOE announced 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 operation into sites without current capabilities." With DOE engaged in a multi-decade program to downsize, consolidate and remediate existing plutonium sites, the wisdom of continuing this policy is

Consolidation of the three major elements of the Plutonium Disposition program (pit disassembly, MOX and immobilization) is intuitively cost-effective. How much can be saved is a point of contention, but the fact that savings will accrue from co-locating all facilities is indisputable.

Storage of sealed weapons components containing plutonium metal is very different than processing, packaging and shipping dispersible plutonium oxide. DOE is proposing to invent a new process, build a new facility, create and operate a plutonium infrastructure, and eventually clean up and remove a plutonium processing operation so it can make a larger number of shipments of dispersible plutonium oxide to Savannah River for disposition. Alternatively, DOE could pack the pits and ship them — fewer shipments, more safety. SRS can make storage available, and the processing and disposition of these pits is just an extension of routine operations.

What is the logic of locating this mission at Pantex? Technically, financially, safety-wise and environmental protection-wise, there is none.

Jobs and federal dollars — that's the issue. But is plutonium, with its proliferation and safety issues, the right arena to be searching for federal pork? Our collective good sense should tell us no.

The Globe-News said that Pantex "deserves" this mission for being such a good neighbor over the years. I'm sure it has been.

I wish the plant and its employees well. But for plutonium processing, I don't think so.

Richard L. Geddes of North Augusta, S.C. works in plutonium processing at the Savannah River Site.

*Aug 16, 1998 Am. Gbl. News*

*Jeri R. Osborne  
CR 204 4-194 LTR*

*10/2/98*

1

FD144-1

Other

DOE acknowledges receipt of the commentor's article. DOE acknowledges the commentor's support for siting the plutonium disposition facilities at SRS. Decisions on the siting of surplus plutonium disposition facilities will be based on environmental analyses, as well as 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.



September 8, 1998

DOE Office of Fissile Material Disposition  
c/o SPD EIS  
U.S. Department of Energy  
P.O. Box 23786  
Washington, DC 20026-3786

**ATTENTION: Bert Stevenson, NEPA Compliance Officer**

Re: Comment on DOE's Draft Surplus Plutonium Disposition Environmental Impact Statement

Dear Mr. Stevenson:

We would like to take this opportunity to comment on DOE's *Draft Surplus Plutonium Disposition Environmental Impact Statement*. As co-chairs of Panhandle 2000, a group of Amarillo-area citizens interested in the environmentally sound retention and expansion of Pantex, we would like to express our support for siting the proposed new pit disassembly and conversion mission contemplated in this Draft PEIS at Pantex.

Throughout DOE's EIS process for pursuing plutonium storage and disposition options, the clearly identified goals have been to provide the highest level of security to minimize theft, diversion, or accidental exposure and to encourage Russia to reciprocate efforts to dispose of its plutonium in like manner. For these reasons, the preferred alternatives chosen in the *Record of Decision for the Storage and Disposition of Weapons-Usable Fissile Materials Environmental Impact Statement* chose a dual track approach of vitrification and MOX fuel fabrication. Viewing plutonium as an asset rather than waste provides the potential for taxpayers to recoup some economic benefit from their investment in the Cold War through use of MOX fuel in commercial reactors. Through this means, we are also encouraging Russia to dispose of their excess plutonium in a way that will provide them parallel economic nonproliferation benefits.

The Draft PEIS announced the Savannah River Site as the preferred location for the MOX fuel fabrication facility as well as the plutonium immobilization facility. Additionally, the Draft PEIS lists two alternatives for the siting pit disassembly and conversion. We would like to state for the record that we strongly support

MD168

### MD168-1

### Alternatives

DOE acknowledges the commentors' support for siting the pit conversion facility at Pantex. The goal of the surplus plutonium disposition program is to reduce the threat of nuclear weapons proliferation worldwide by conducting disposition of surplus plutonium in the United States in an environmentally safe and timely manner, not to derive economic benefit from the use of MOX fuel. By working in parallel with Russia to reduce stockpiles of excess plutonium, the United States can reduce the chance that weapons-usable nuclear material could fall into the hands of terrorists or rogue states and help ensure that nuclear arms reductions will never be reversed.

Decisions on the surplus plutonium disposition program at Pantex 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.

**PANHANDLE 2000****JEROME W. JOHNSON ET AL.****PAGE 2 OF 3**

the alternative which proposes siting the plutonium disassembly and conversion facility at Pantex. | 1

The stated objective of disposing of excess plutonium is to reduce threat of international proliferation, as reaffirmed in President Clinton's 1993 Nonproliferation and Export Control Policy, the 1994 National Academy of Sciences report on plutonium management and disposition, and the January 1997 DOE report on Nonproliferation and Arms Control Assessment. The PEIS has apparently lost sight of this objective. Exposing plutonium to unnecessary transportation and the accompanying risks is inconsistent with this objective, but that is precisely the course of action contemplated by DOE if it chooses to site pit conversion at a site other than Pantex.

The argument for this alternative is compelling: Pantex currently serves DOE and the nation as the primary site for nuclear weapons dismantlement and safekeeping of weapons-ready nuclear materials. For over 40 years, the Pantex Plant has been in the business of taking weapons apart and demilitarizing their components. This mission is a natural and common-sense extension of what is already done at Pantex. Because it has always done this type of work, Pantex has a safe and solid history of strict production operations management, developed through years of experience handling more pits, more often than any other site.

Siting the disassembly and conversion plutonium at Pantex will eliminate the need for unnecessary transportation which poses a legitimate national and international threat. Transportation of pits from Pantex in unconverted form exposes them to potential theft, risk of accident and exposure, and costs associated with additional security measures and packaging. The recent aggression against our embassies abroad only serves to emphasize that we cannot afford to lower our guard against such threats. Indeed, we must be vigilant and mindful of the tremendous potential for harm that would result if classified nuclear materials were to fall into the wrong hands. Pantex has the most modern safeguards and security system, and the nation's top rated guard force. The plant's emergency management system was recognized as the "Standard Setter" after joint assessment by Defense Programs and Nonproliferation and National Security. As a result, classified weapons components located at Pantex are more threat-resistant than anywhere else in the complex. By performing pit disassembly at Pantex and then shipping demilitarized and unclassified plutonium oxide, DOE can eliminate these unnecessary risks. To abandon the record at Pantex and contemplate transfer of the pits to a site and facilities not accustomed to this function would precipitate the needless costs and risks associated with the transport and duplication of workers and facilities. | 2

Additionally, DOE cost estimates show that if the choice is made ignore the risks and package pits to transport them across the country, the price tag of | 3

MD168

**MD168-2****Nonproliferation**

DOE acknowledges the commentors' support for Pantex and appreciates the input regarding the capabilities at the site. Minimizing transportation risk was one of the considerations in selecting both Pantex and SRS as the preferred sites for the pit conversion facility. Although siting the pit conversion facility at Pantex would reduce the transportation of pits in unconverted forms, the plutonium dioxide that is produced at the facility would still have to be transported to the immobilization and/or MOX facilities.

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.

**MD168-3****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.

disassembly and conversion would increase by \$70 to \$85 million. It is doubtful whether this figure incorporates the considerable training cost that will be incurred to recreate the pit packaging and unpacking expertise that exists today only at Pantex. Furthermore, we are aware of claims being made by proponents of the Savannah River Site that siting disassembly and conversion in South Carolina would result in savings of nearly \$1.6 billion. Such claims are unsubstantiated and preposterous considering the total estimated cost of the entire mission, wherever located, equals \$920-\$980 million. We raise these issues to point out that, while many claims (factual and otherwise) are being made regarding the merits of different sites, one truth about costs remains. Plutonium pits are located at Pantex and moving them anywhere else for a mission that can be performed here creates unnecessary expense in terms of both dollars and the inherent proliferation risk to Texas and our country.

3

We regret that DOE did not attach this same logic for the MOX production facility. If it had, the arguments are clear for co-locating the pit conversion and MOX fuel fabrication facility at the existing pit storage site, the Pantex plant.

4

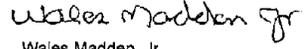
Finally, polls demonstrate the continued overwhelming support Pantex enjoys from local residents and state and federal elected officials. These surveys indicate that the plant enjoys support of more than 80% among the residents in the Amarillo area. Provided the new missions can be carried out safely and with minimal environmental impact, this support would reduce the potential for delay in proceeding with new disposition efforts. The plant also enjoys strong bipartisan support of the 32-member strong Texas Congressional Delegation. DOE must have broad-based political support for its plutonium disposition strategy to succeed. Placing pit disassembly at Pantex only strengthens that prospect.

1

For these reasons, Pantex clearly is the safest and best-suited alternative and we respectfully urge DOE to designate it as the preferred alternative site for the pit disassembly and conversion facility.

Yours truly,

  
Jerome W. Johnson  
Co-Chair, Panhandle 2000

  
Wales Madden, Jr.  
Co-Chair, Panhandle 2000

MD168

MD168-4

Alternatives

DOE acknowledges the commentors' support for collocating the pit conversion and MOX facilities at Pantex.

PANHANDLE AREA NEIGHBORS AND LANDOWNERS  
DORIS AND PHILLIP SMITH  
PAGE 1 OF 4

September 16, 1998

U. S. Department of Energy  
Office of Fissile Materials Disposition  
P.O. Box 23786  
Washington, DC 20026-3786

Dear Sirs:

As Co-Chairs of the Panhandle Area Neighbors and Landowners (PANAL) Organization, we are writing to voice our concern with the Plutonium Pit Disassembly and Conversion facility which the DOE is considering locating at Pantex. Our organization of agricultural producers, processors, neighbors and community business leaders does not support any type of plutonium processing in this agricultural producing area of Texas.

Our products are sent world wide to feed the hungry and to clothe the peoples of the world - why, under any circumstances, would the DOE even consider placing such a devastating process in the midst of food production? Why would DOE jeopardize the people, land, water, air and the products that have made and continue to be the support for the Texas Panhandle? Why does DOE continue to harrass this community with such horrendous missions for Pantex without even one thought as to the damage which could be reaked on the High Plains of Texas. Do you not understand that we have a strong healthy relationship with the land and we strive constantly to keep this land free of contamination and in a wholesome condition suitable for producing food?

PANAL considers the Plutonium Pit Disassembly and Conversion Facility (PDCF) to be the most outrageous mission /facility to be forced on this community. Pantex has never processed plutonium and does not have the massive contamination problems as those sites which have handled this material processing. In the words of Ann Loadholt (Chair of the SRS CAB) "*Concerning pit disassembly...should Pantex be chosen...this decision would create a new plutonium processing site within a system endeavoring to consolidate operations for cost effectiveness, but most importantly, would increase the amount of cleanup that ultimately will be required.*" When people from other areas even see the hypocrisy of the siting of these missions at Pantex, why does DOE not see this? Are you just not looking at all the issues or are you blinded by your own stupidity?

Pantex is a fraction of the size of other plutonium sites, new environmental risks associated with the processing of plutonium oxide powder, as well as health risks would be incurred by this community due to the close proximity of the people to the site. The unreported air contaminants of radioactive tritium and highly toxic beryllium would be pumped from a smokestack and fall on our Panhandle lands contaminating our products and livestock, thus making them unmarketable. Do you want another Russia on your hands? Their products are so contaminated by the nuclear weapons productions that the people cannot eat them and economic devastation is the result. Is that what DOE is trying to achieve here? Such negative consequences to people and the farmland are much more likely to occur on a small, open, windy site such as Pantex, than at a larger, more secluded site - a site large enough so that the smokestack will belch forth its bile on the site itself and not on the surrounding stakeholders and property.

Why do you think that plutonium processing can be done safely at Pantex when it has never been done safely or without contaminating the environment at any other DOE site? The technologies just are not there - the DOE has gone to great lengths to deceive the public with half truths and lies about new advancements in technologies, the result is increased distrust of DOE by our community of stakeholders. We have witnessed your actions over the past eight years, when we first became involved in this issue. DOE has assured the public of their openness and theory of public involvement, however DOE has failed miserably on both accounts. There is no openness and no effort to engage the public in "meaningful public participation".

MD284

MD284-1

Human Health Risk

DOE acknowledges the commentors' opposition to siting the pit conversion facility at Pantex. Although Pantex is smaller in overall size in comparison with the other candidate sites, analyses in Chapter 4 of Volume I indicate that impacts of operating the pit conversion facility on health, safety, and the environment at Pantex would likely be minor. Section 4.26.3.2 analyzes impacts to the environment (including contamination to the Ogallala aquifer) due to construction and normal operation of a pit conversion facility at Pantex. There would be no discernible contamination of aquatic biota (fish) or drinking water, either from the deposition of minute quantities of airborne contaminants into small water bodies or from potential wastewater releases. Therefore, it is estimated that no measurable component of the public dose would be attributable to liquid pathways. Appendix J.3 includes an analysis of potential contamination of agricultural products and livestock and consumption of these products by persons living within an 80-km (50-mi) radius of Pantex. If the proposed surplus plutonium disposition facilities were located at Pantex, a very small incremental annual dose to the surrounding public from normal operations would result via radiological emission deposition on agricultural products (i.e., food ingestion pathway). This dose (about 0.56 person-rem/yr) would be 0.0006 percent of the dose that would be incurred annually from natural background radiation.

Ingestion doses at Pantex were assessed for eight different food categories: leafy vegetables, root vegetables, fruits, grains, milk, meat, poultry, and eggs. Public doses incurred from the uptake of these foodstuffs were determined to be well below Federal, State, and local regulatory limits; therefore, potential radiological impacts to local prime farmlands would be essentially nonexistent.

While it is true that the pit conversion facility is the first consolidated facility for accomplishing this mission on a large scale, the processes that would be used in this facility are not entirely new. Many of these processes are in use at LANL and LLNL. In addition, DOE has recently started a pit disassembly and conversion demonstration project at LANL, where processes will be further developed and tested.



**PANHANDLE AREA NEIGHBORS AND LANDOWNERS  
DORIS AND PHILLIP SMITH  
PAGE 3 OF 4**

The siting of the PDCF over the Ogallala Aquifer, our source of water, is repugnant with DOE assertions of protecting the environment. Placing plutonium processing over the water supply of the Texas Panhandle and eleven other cities and towns further south is unacceptable. Pantex has already been the source of heavy contamination to the water source both beneath the site and offsite to the east on adjacent private property. To cleanup the aquifer is impossible, adding plutonium processing and associated wastes to the problem will only compound the contamination issue. What do you propose to prevent this further contamination to the Ogallala Aquifer from happening? What proven and demonstrated technologies do you claim will keep the Ogallala Aquifer from being contaminated?

3

Our community has been saddled with storage of plutonium pits in old, World War II bunkers which are not suitable for the storage of the most deadly material in the world. There are innumerable problems associated with the storage which have not been corrected - since the DOE has not accomplished this mission of safely storing the plutonium pits, then how in the world do you think you can safely process this material? We are tired of your claims, assertions and promises, just leave the Texas Panhandle alone, take care of the problems you now have at Pantex and do not dump anymore missions on this small site.

4

As the agricultural community which surrounds the Pantex site - we beg you to please use common sense in your decision of siting these new missions. We are laboring to produce food to feed and sustain the world, while you are producing weapons of mass destruction to kill and mame the world, this dichotomy has to end.

With the Cold War over, DOE is facing the time when this madness could all be stopped - do you have the courage and the integrity to be truthful to the American taxpayers and say ..this is the end, we will not waste more of your tax dollars - there will be no more weapons , no more processing - we are stopping...?

Thank you for the opportunity to comment.

Sincerely,



Doris and Phillip Smith, Co-Chairs  
Panhandle Area Neighbors and Landowners

MD284

**MD284-3****Water Resources**

DOE acknowledges the commentors' concerns regarding potential contamination of the Ogallala aquifer. As described in Section 4.17.2.2, wastes would be managed in accordance with current site practices. No radioactive or hazardous wastes would be disposed of at Pantex. Wastes would be treated and stored in accordance with all applicable regulations and permits. In addition, plutonium moves extremely slowly through soils and groundwater. In the unlikely event of an accident, plutonium would be contained in surface soils and remediated before it could travel into the Ogallala aquifer.

The remainder of this comment is addressed in response MD284-1.

**MD284-4****DOE Policy**

To avoid contamination that has occurred in the past at some DOE sites, DOE would design, build, and operate the proposed surplus plutonium disposition facilities in compliance with today's strict environmental, safety, and health requirements.

DOE acknowledges the commentors' 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 decision 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 developed; addressing, for example, 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*.

The goal of the surplus plutonium disposition program is to reduce the threat of nuclear weapons proliferation worldwide by conducting disposition of surplus plutonium in the United States in an environmentally safe and timely manner.

I am a worker at Pantex and have been there for 17 years now and I wanted to say that I very much support the Surplus Plutonium Disposition Draft Environmental Impact Statement or commonly know as the Pit Disassembly at Pantex. Thank you. Tim Flowers

1

WD018

**WD018-1**

**Alternatives**

DOE acknowledges the commentor's support for siting the pit conversion facility at Pantex. Decisions on the surplus plutonium disposition program at Pantex 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.

I feel that Pantex is the best location for the pit disassembly and conversion facility. We are centrally located in the U.S. and we are the final disassembly point for the weapons; so the pits are already here. I have been with this company for seventeen years and it is very safety oriented. Also the citizens of Amarillo trust Pantex because of their long standing safety record. Thank you for considering our Pantex plant for this important job. Sincerely, Jim Harbin

1

WD001

**WD001-1**

**Alternatives**

DOE acknowledges the commentor's support for siting the pit conversion facility at Pantex. Decisions on the surplus plutonium disposition program at Pantex 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.

Yes, my name is Hal Pedigrew. I live at 5501 Ranchview Drive in Amarillo. The area code is 79124 and I would like to get a copy of that documentation. I'd also like to voice my opinion that I would like to have that facility put anywhere else in the United States but here. Thank you.

1

PD016

**PD016-1**

**Alternatives**

DOE acknowledges the commentor's opposition to siting the pit conversion facility at Pantex. Decisions on the surplus plutonium disposition program at Pantex 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.

U.S. Department of Energy  
Office of Fissile Materials Disposition  
P.O. Box 23786  
Washington, DC, 20026-3786

Dear Department of Energy, Office of Fissile Materials Disposition:

I do not support plutonium processing at the Pantex Plant. In the *Surplus Plutonium Disposition Draft Environmental Impact Statement*, the Department of Energy prudently decided against locating one plutonium processing facility (MOX fuel fabrication) at the Pantex Plant. For the following additional reasons, a Plutonium Pit Disassembly and Conversion facility also should not be located at Pantex:

**Pantex Should Not Become the Next Rocky Flats**

Pantex has never processed plutonium. The Pantex Superfund site has so far apparently escaped the type of radioactive contamination found at plutonium processing sites like Rocky Flats in Colorado and Hanford in Washington.

**Risks That Are Unknown Are Too High**

The Pantex Plant occupies an area that is a fraction of the size of other plutonium sites.

SIZE MATTERS: A Comparison of the Area of the Four Candidate Sites (Square Miles)			
Pantex	Savannah River Site	Idaho National Engineering Lab.	Hanford
23	309	890	560

The technologies proposed in the Plutonium Pit Disassembly and Conversion Facility are undemonstrated and unproven. It is unacceptable to have plutonium operations above the Ogallala Aquifer and only one mile from where people live and work in a vibrant agricultural producing area. The Pantex legacy already includes heavy contamination in a perched layer of groundwater less than one hundred feet above the Ogallala Aquifer. This pollution extends from under the Pantex Plant to adjacent private property and the real impacts remain unknown. The risk of any additional groundwater pollution is unacceptable in an agricultural region.

Common sense dictates that negative consequences to people and farmland from nuclear accidents are far more likely in a small, open, windy location like Pantex. The Department of Energy has acknowledged that the most visually unappealing feature of the plutonium facilities will be their smokestacks. Visual blight will be a minor inconvenience compared to the air pollutants--many of them radioactive--expected to escape into the atmosphere daily through smokestack filters. Routine air emissions of tritium, plutonium, americium, and beryllium constitute unacceptable new hazards to the Texas Panhandle.

MD114

**MD114-1**

**Alternatives**

DOE acknowledges the commentors' opposition to siting the proposed surplus plutonium disposition facilities at Pantex. Analyses in Chapter 4 of Volume I indicate that impacts of operating the proposed facilities on health, safety, and the environment at Pantex would likely be minor. To avoid contamination that has occurred in the past at some DOE sites, DOE would design, build, and operate the proposed facilities in compliance with today's strict environmental, safety, and health requirements. Decisions on the surplus plutonium disposition program at Pantex 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.

**MD114-2**

**Human Health Risk**

Although Pantex is smaller in overall size in comparison with the other candidate sites, analyses in Chapter 4 of Volume I indicate that impacts of operating the pit conversion facility on health, safety, and the environment at Pantex would likely be minor (e.g., see Section 4.6).

While it is true that the pit conversion facility is the first consolidated facility for accomplishing this mission on a large scale, the processes that would be used in this facility are not entirely new. Many of these processes are in use at LANL and LLNL. In addition, DOE has recently started a pit disassembly and conversion demonstration project at LANL, where processes will be further developed and tested.

Section 4.26.3.2 analyzes impacts to the environment (including contamination to the Ogallala aquifer) due to construction and normal operation of a pit conversion facility at Pantex. There would be no discernible contamination of aquatic biota (fish) or drinking water, either from the deposition of minute quantities of airborne contaminants into small water bodies or from potential wastewater releases. Therefore, it is estimated that no measurable component of the public dose would be attributable to liquid pathways. Appendix J.3 includes an analysis of potential contamination of agricultural products and

livestock and consumption of these products by persons living within an 80-km (50-mi) radius of Pantex. If the proposed surplus plutonium disposition facilities were located at Pantex, a very small incremental annual dose to the surrounding public from normal operations would result via radiological emission deposition on agricultural products (i.e., food ingestion pathway). This dose (about 0.56 person-rem/yr) would be 0.0006 percent of the dose that would be incurred annually from natural background radiation. This analysis indicates that impacts of operating the pit conversion facility on agricultural products, livestock, and human health at Pantex would likely be minor.

#### MD114-3

#### Human Health Risk

It is DOE policy to operate in compliance with all applicable air quality requirements and to protect human health and the environment. DOE takes into consideration pollution reduction techniques to minimize air releases when designing, constructing, and operating its facilities. It also considers aesthetic and scenic resources in the design, location, construction, and operation of facilities. Potential concentrations of air pollutants at Pantex for the various alternatives have been estimated, considering appropriate local meteorology and other data associated with the area. Because the releases from the pit conversion and MOX facilities would be very small (see Appendix J.3.1.4), estimates of resultant radiological health risks are small. As indicated in Section 4.17.2.4, the maximum possible dose delivered to a member of the public during normal operations of the MOX and pit conversion facilities at Pantex would be 0.068 mrem/yr, 0.02 percent of the dose that individual would receive annually from natural background radiation. The estimated dose to the public from radiological emissions (e.g., americium, tritium, and plutonium) would be 0.077 person-rem/yr which would result in an increase of  $2.9 \times 10^{-3}$  LCFs over the 10-year operating life of the pit conversion facility. Any new facilities that might be built would be within existing site boundaries, and would be matched aesthetically with the current plant to limit potential visual impacts.

**There is Valid, Strong Criticism of Safety  
in the Storage of Plutonium at Pantex**

Since Pantex became the nation's long-term storage location for up to 20,000 plutonium pits, promises to improve safety conditions have not happened. The U.S. Government Accounting Office and the Defense Nuclear Facilities Safety Board have issued reports critical of plutonium storage safety at Pantex. Fifty million taxpayer dollars were spent on a failed plutonium pit container program (the AT-400A) and the plan to move over 10,000 pits into a safer remodeled building (Building 12-66) has also failed.

When it comes to plutonium pit storage problems, Panhandle residents are back to square one. The plutonium remains in old, unsuitable, corroding storage containers and in 35-55 year old "bunkers" that the Department of Energy promised were for "temporary" use. Plutonium that is supposed to be stored in a stable environment now sits in the bunkers--all but three without air conditioning--even as the Texas Panhandle experiences a spell of more than 40 consecutive days of 90+ degree temperatures, and more than 20 days this summer with thermometers registering 100+ degrees. If the Department of Energy cannot accomplish the job of safely storing Pantex plutonium in the most stable environment, there is no reason to accept its unsubstantiated assurances to safely process deadly plutonium powders at Pantex.

Thank you for this opportunity to comment.

Sincerely:

Please do not process plutonium at Pantex! Our water from the Ogallala Aquifer is the life blood of our nation's bread basket! 35% of the U.S. supply of beef is produced in the Texas Panhandle. Our crops, our livestock, and we depend on that water! No to Plutonium Processing!

4

5

MD114

**MD114-4**

**DOE Policy**

DOE acknowledges the commentors' 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 decision 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 developed; addressing, for example, 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*.

**MD114-5**

**Human Health Risk**

This comment is addressed in responses MD114-1 and MD114-2.



August 25, 1998

DOE Office of Fissile Material Disposition  
 c/o SPD EIS  
 U.S. Department of Energy  
 P. O. Box 23786  
 Washington, DC 20026-3786  
 ATTENTION: Mr. Bert Stevenson, NEPA Compliance Officer

Re: DOE's Draft Surplus Plutonium Disposition Environment Impact Statement

Dear Mr. Stevenson:

First and foremost, we are adamant that any current and future functions at Pantex be conducted in a safe and environmentally sound manner. Our first priority is to ensure that expansion at Pantex does not impair the health or safety of area residents or have an adverse effect on the environment. These goals serve as a prerequisite to any current or future activities at Pantex.

1

We are aware that DOE has selected the Savannah River Site (SRS) as the preferred alternative for the MOX fuel fabrication facility and is considering SRS, along with Pantex, as the location for the disassembly/conversion mission.

We wish to focus my comments on the selection of Pantex as the preferred site for locating the plutonium pit disassembly and conversion facility. We are concerned that locating the conversion mission at a site other than Pantex would not only increase the hazards of dealing with plutonium but would also ignore the facts that make Pantex the site most capable of ensuring that disposition goals are met with the utmost attention to economic and safety considerations.

2

MD122

**MD122-1**

**Alternatives**

According to the analyses reflected in Sections 4.6 through 4.8, environmental impacts of the proposed action on Pantex under any alternative would likely be minor. DOE is committed to ensuring that public health and safety are protected wherever the proposed surplus plutonium disposition facilities are located.

**MD122-2**

**Alternatives**

DOE acknowledges the commentors' support for siting the pit conversion facility at Pantex. 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 Pantex 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.

When considering the proliferation risks involved in unnecessarily transporting a large number of classified plutonium pits across the country from Pantex, it makes budgetary and policy sense to site disposition functions where storage already exists. First, due to its cheaper labor costs and utility rates, and water and land availability, Pantex clearly is the most cost-effective site over the life of the program than any other site under consideration. Second, transportation of plutonium in non-classified form (after disassembly and conversion at Pantex) to the SRS is far preferable to the perils that would be incurred by shipping plutonium in a weapons-ready form. Pantex has the necessary safety, security, and surveillance capabilities to accommodate an expanded role. Third, it is in the best interests of the United States to engage Russia in bilateral demilitarization and inspections independent of the politically contentious MOX fuel fabrication process. It will also be much easier to track converted plutonium pits for IAEA and international inspections if these activities are undertaken at the site of original pit storage.

The Pantex plant enjoys tremendous public and bipartisan political support for new missions and could provide them at the lowest additional costs to the taxpayers. To accomplish its disposition goals, DOE must have strong, broad-based political support. Bringing in the support of Texas Senators and Congressmen will help ensure that DOE disposition initiatives succeed.

Bases upon these reasons, we respectfully urge DOE to designate Pantex as the site for the pit assembly and conversion facility.

2

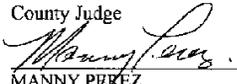
Sincerely,



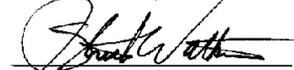
Arthur Ware  
County Judge



JOHN STRADLEY,  
COMMISSIONER, PRECINCT 1



MANNY PEREZ,  
COMMISSIONER, PRECINCT 2



STRICK WATKINS,  
COMMISSIONER PRECINCT 3

MD122

I am very much in favor of having the pit disassembly and conversion at Pantex where it will be done right the first time.

1

WD009

**WD009-1**

**Alternatives**

DOE acknowledges the commentor's support for siting the pit conversion facility at Pantex. Decisions on the surplus plutonium disposition program at Pantex 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.

August 10, 1998

U. S. Department of Energy  
Office of Fissile Materials Disposition c/o SPDEIS  
Box 23786  
Washington, DC 20026-3786

REF: Location of Pit Disassembly and Conversion Facility

As an employee at the Pantex Plant in Amarillo, Texas, and a long term resident of the Amarillo, Texas, I want to see the pit conversion work done at Pantex.

This is not just a personal issue. The real consideration should be safety, and of the two possible sites, Pantex is the safer facility. This can easily be confirmed by reviewing existing records for both facilities. At times it has almost seemed like Pantex was overlooked for additional weapons-related work because we are such a clean site.

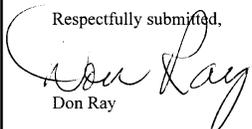
The safety record is directly attributable to the efforts of plant employees, who have worked very hard through the years to meet or exceed requirements. Even in the years before the creation of the various oversight agencies such as OSHA, the plant functioned safely. The technical skills of the employees who do hands on weapon work is another reason for the excellent record.

The fact that Texas is not as strong politically -- we don't have aggressive PACs or Strom Thurmond fighting for us -- should not be the major deciding point. As a matter of fact, maybe politics should be left out of it altogether.

The Pantex Plant has provided jobs for my family since 1980, and I hope that it will continue to provide employment for me and many others in the future. The Pantex Plant now has thousands of pits stored. Why risk shipping these items to another location? Why increase the cost to do the job?

I sincerely hope that the DOE will look at all issues with an open mind with the major consideration being safety. The second and third considerations should be the technical skill of the employees, and the last consideration should be cost. If these things are considered without PAC or other political influence, the only logical choice is for the pit conversion to be done at the Pantex Plant.

Respectfully submitted,

  
Don Ray

MD024

## MD024-1

## Alternatives

DOE acknowledges the commentor's support for siting the pit conversion facility at Pantex. DOE believes that all the candidate sites are suitable from an operational, community support, and safety standpoint.

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 Pantex will be based on environmental analyses (including analyses of transportation risks), 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.

1901 PHILADELPHIA ST.  
AMARILLO, TEXAS 79103  
AUGUST 10, 1998

U.S. DEPARTMENT OF ENERGY  
OFFICE OF FISSIONABLE MATERIALS DISPOSITION  
MD-4 FORRESTAL BUILDING  
1000 INDEPENDENCE AVE., SW  
WASHINGTON, D.C. 20585

DEAR SIR:

AS A CITIZEN OF AMARILLO, WE URGE YOU TO LOCATE THE PIT DISASSEMBLY AND  
CONVERSION FACILITY AT THE PANTEX PLANT FOR ECONOMICAL AND SAFETY REASONS.

PANTEX ALREADY HAS ADEQUATE STORAGE SPACE FOR THE CONVERTED PLUTONIUM THAT  
WOULD BE VERY EXPENSIVE TO CONSTRUCT ELSE WHERE AND WILL NOT ENTAIL TRANS-  
PORTING THE 'PITS' ACROSS THE COUNTRY, WHICH IS COSTLY AND SUSCEPTABLE TO  
TRANSPORTATION ACCIDENTS.

PANTEX PLANT EMPLOYEES HAVE MORE EXPERIENCE HANDLING PLUTONIUM PITS THAN  
ANY OTHER D.O.E. SITE AND HAS AN OUTSTANDING SAFETY RECORD. ALSO PANTEX  
ALREADY HAS TRAINED TECHNICAL PERSONNEL THAT ARE CERTIFIED TO PERFORM THE  
'GLOVEBOX' WORK REQUIRED FOR THIS TYPE WORK.

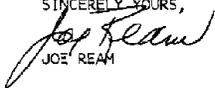
1

SECURITY AT THE PANTEX PLANT IS SECOND TO NONE COMPARED TO ALL THE OTHER  
DEPARTMENT OF ENERGY FACILITIES.

THE PANTEX PLANT ALSO HAS THE SUPPORT OF THE RESIDENTS OF THE COMMUNITY  
AND THE LOCAL AND STATE ELECTED OFFICIALS ALONG WITH THE TEXAS CONGRESSIONAL  
DELEGATION.

AGAIN, WE SINCERELY URGE YOU TO LOCATE THE PIT DISASSEMBLY AND CONVERSION  
FACILITY AT THE PANTEX PLANT.

SINCERELY YOURS,

  
JOE REAM

JR/L

FD150

**FD150-1**

**Alternatives**

DOE acknowledges the commentor's support for siting the pit conversion facility at Pantex. Decisions on the surplus plutonium disposition program at Pantex 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.

REAM, OLETA  
PAGE 1 OF 1

AUGUST 11, 1998

U.S. DEPARTMENT OF ENERGY  
OFFICE OF FISSILE MATERIALS DISPOSITION  
MD-4 FORRESTAL BUILDING  
1000 INDEPENDENCE AVE., SW  
WASHINGTON, DC 20585

DEAR SIR:

I AM A LONG TIME RESIDENT OF AMARILLO AND FULLY SUPPORT  
YOUR LOCATING THE PIT DISASSEMBLY AND CONVERSION FACILITY  
AT THE PANTEX PLANT LOCATED NEAR AMARILLO, TEXAS. | 1

SINCERELY,

*Olta Ream*

OLETA REAM  
1901 PHILADELPHIA  
AMARILLO, TEXAS 79103

FD232

FD232-1

Alternatives

DOE acknowledges the commentor's support for siting the pit conversion facility at Pantex. Decisions on the surplus plutonium disposition program at Pantex 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.

U.S. Department of Energy  
Office of Fissile Materials Disposition  
P.O. Box 23786  
Washington, DC, 20026-3786

Dear Department of Energy, Office of Fissile Materials Disposition:

I do not support plutonium processing at the Pantex Plant. In the *Surplus Plutonium Disposition Draft Environmental Impact Statement*, the Department of Energy prudently decided against locating one plutonium processing facility (MOX fuel fabrication) at the Pantex Plant. For the following additional reasons, a Plutonium Pit Disassembly and Conversion facility also should not be located at Pantex:

**Pantex Should Not Become the Next Rocky Flats**

Pantex has never processed plutonium. The Pantex Superfund site has so far apparently escaped the type of radioactive contamination found at plutonium processing sites like Rocky Flats in Colorado and Hanford in Washington.

**Risks That Are Unknown Are Too High**

The Pantex Plant occupies an area that is a fraction of the size of other plutonium sites.

SIZE MATTERS: A Comparison of the Area of the Four Candidate Sites (Square Miles)			
Pantex	Savannah River Site	Idaho National Engineering Lab.	Hanford
23	309	890	560

The technologies proposed in the Plutonium Pit Disassembly and Conversion Facility are undemonstrated and unproven. It is unacceptable to have plutonium operations above the Ogallala Aquifer and only one mile from where people live and work in a vibrant agricultural producing area. The Pantex legacy already includes heavy contamination in a perched layer of groundwater less than one hundred feet above the Ogallala Aquifer. This pollution extends from under the Pantex Plant to adjacent private property and the real impacts remain unknown. The risk of any additional groundwater pollution is unacceptable in an agricultural region.

Common sense dictates that negative consequences to people and farmland from nuclear accidents are far more likely in a small, open, windy location like Pantex. The Department of Energy has acknowledged that the most visually unappealing feature of the plutonium facilities will be their smokestacks. Visual blight will be a minor inconvenience compared to the air pollutants--many of them radioactive--expected to escape into the atmosphere daily through smokestack filters. Routine air emissions of tritium, plutonium, americium, and beryllium constitute unacceptable new hazards to the Texas Panhandle.

MD063

**MD063-1**

**Alternatives**

DOE acknowledges the commentor's opposition to siting the proposed surplus plutonium disposition facilities at Pantex. As described in Chapter 4 of Volume I and summarized in Section 2.18, potential impacts of any of the proposed activities during routine operations at any of the candidate sites would likely be minor. To avoid contamination that has occurred in the past at some DOE sites, DOE would design, build, and operate the proposed surplus plutonium disposition facilities in compliance with today's strict environmental, safety, and health requirements. Decisions on the surplus plutonium disposition program at Pantex will be based upon 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.

**MD063-2**

**Human Health Risk**

Although Pantex is smaller in overall size in comparison with the other candidate sites, analyses in Chapter 4 of Volume I indicate that impacts of operating the pit conversion facility on health, safety, and the environment at Pantex would likely be minor (e.g., see Section 4.6).

While it is true that the pit conversion facility is the first consolidated facility for accomplishing this mission on a large scale, the processes that would be used in this facility are not entirely new. Many of these processes are in use at LANL and LLNL. In addition, DOE has recently started a pit disassembly and conversion demonstration project at LANL, where processes will be further developed and tested.

Section 4.26.3.2 analyzes impacts to the environment (including contamination to the Ogallala aquifer) due to construction and normal operation of a pit conversion facility at Pantex. There would be no discernible contamination of aquatic biota (fish) or drinking water, either from the deposition of minute quantities of airborne contaminants into small water bodies or from potential wastewater releases. Therefore, it is estimated that no measurable component of the public dose would be attributable to liquid pathways. Appendix J.3

includes an analysis of potential contamination of agricultural products and livestock and consumption of these products by persons living within an 80-km (50-mi) radius of Pantex. If the proposed surplus plutonium disposition facilities were located at Pantex, a very small incremental annual dose to the surrounding public from normal operations would result via radiological emission deposition on agricultural products (i.e., food ingestion pathway). This dose (about 0.56 person-rem/yr) would be 0.0006 percent of the dose that would be incurred annually from natural background radiation. This analysis indicates that impacts of operating the pit conversion facility on agricultural products, livestock, and human health at Pantex would likely be minor.

**MD063-3**

**Human Health Risk**

It is DOE policy to operate in compliance with all applicable air quality requirements and to protect human health and the environment. DOE takes into consideration pollution reduction techniques to minimize air releases when designing, constructing, and operating its facilities. It also considers aesthetic and scenic resources in the design, location, construction, and operation of facilities. Potential concentrations of air pollutants at Pantex for the various alternatives have been estimated, considering appropriate local meteorology and other data associated with the area. Because the releases from the pit conversion and MOX facilities would be very small (see Appendix J.3.1.4), estimates of resultant radiological health risks are small. As indicated in Section 4.17.2.4, the maximum possible dose delivered to a member of the public during normal operations of the MOX and pit conversion facilities at Pantex would be 0.077 mrem/yr, 0.02 percent of the dose that individual would receive annually from natural background radiation. The estimated dose to the public from radiological emissions (e.g., americium, tritium, and plutonium) would be 0.58 person-rem/yr which would result in an increase of  $2.9 \times 10^{-3}$  LCFs over the 10-year operating life of the pit conversion facility. Any new facilities that might be built would be within existing site boundaries, and would be matched aesthetically with the current plant to limit potential visual impacts.

**There is Valid, Strong Criticism of Safety  
in the Storage of Plutonium at Pantex**

Since Pantex became the nation's long-term storage location for up to 20,000 plutonium pits, promises to improve safety conditions have not happened. The U.S. Government Accounting Office and the Defense Nuclear Facilities Safety Board have issued reports critical of plutonium storage safety at Pantex. Fifty million taxpayer dollars were spent on a failed plutonium pit container program (the AT-400A) and the plan to move over 10,000 pits into a safer remodeled building (Building 12-66) has also failed.

When it comes to plutonium pit storage problems, Panhandle residents are back to square one. The plutonium remains in old, unsuitable, corroding storage containers and in 35-55 year old "bunkers" that the Department of Energy promised were for "temporary" use. Plutonium that is supposed to be stored in a stable environment now sits in the bunkers--all but three without air conditioning--even as the Texas Panhandle experiences a spell of more than 40 consecutive days of 90+ degree temperatures, and more than 20 days this summer with thermometers registering 100+ degrees. If the Department of Energy cannot accomplish the job of safely storing Pantex plutonium in the most stable environment, there is no reason to accept its unsubstantiated assurances to safely process deadly plutonium powders at Pantex.

Thank you for this opportunity to comment.

Sincerely:



Don't risk The Ogallala for your  
Short-sighted money-making schemes!  
Your greed + disregard for human  
life and The health of The  
environment SICKENS me.



MD063

4

5

**MD063-4**

**DOE Policy**

DOE acknowledges the commentor's concern regarding 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 decision 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 developed; addressing, for example, 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*.

**MD063-5**

**DOE Policy**

DOE is committed to public and worker safety during the construction, operation, and deactivation of the proposed surplus plutonium disposition facilities, and would implement appropriate controls and procedures to ensure compliance with all applicable Federal, State, and local laws, rules, regulations, and requirements.

The remainder of this comment is addressed in response MD063-2.

U.S. Department of Energy  
Office of Fissile Materials Disposition  
P. O. Box 23786  
Washington, DC, 20026-3786

Dear Department of Energy, Office of Fissile Materials Disposition:

In the *Surplus Plutonium Disposition Draft Environmental Impact Statement*, the Department of Energy proposes to build new plutonium processing facilities and dispose of 55 tons of "surplus" plutonium. I ask that the following comments reflecting my concerns and reservations regarding these proposals be incorporated into the decisions made for the plutonium disposition program.

#### Immobilize

The objective of plutonium disposition is to make weapons-usable plutonium as inaccessible for reuse in nuclear weapons as the plutonium in irradiated nuclear fuel, and to do so in a timely and safe manner. For the following reasons the Department of Energy should choose to immobilize all surplus plutonium and consider the possibility of doing this at more than one location:

- Immobilizing all plutonium is a safer option because it involves less handling, processing, and transporting of plutonium and other radioactive materials, and is less expensive because it involves fewer new facilities and avoids the costs of subsidizing the nuclear industry. These same factors would allow disposition to occur in a much more timely manner;
- According to the Department of Energy's own studies, the "ceramification can-in-canister" approach to immobilization results in a waste product that is more resistant to theft, diversion, and reuse than irradiated mixed oxide (MOX) fuel;
- The immobilization approach does not involve increasing the risk to persons living near nuclear reactors because it avoids burning—for the first time ever—large amounts of weapons-grade plutonium.

If delays arise in the immobilization program, the Department of Energy should insure that:

- Tons of presently unstable plutonium oxide scheduled for immobilization are put in a safer, more stable form suitable for storage, inventory, and international inspection;
- The objective of interim demilitarization of currently stable forms of plutonium, such as plutonium in pits, must be the minimal alteration of its current form necessary for safe storage, inventory, and international inspection.

#### No To MOX

The ill-conceived mixed oxide (MOX) fuel option should be rejected because there is no rational justification to convert stable plutonium to less stable, more dangerous plutonium oxide powder for use in MOX fuel, and then subsidize the nuclear industry to irradiate the fuel in aging nuclear reactors. Now that it appears obvious that producing plutonium oxide powder suitable for use in MOX fuel will require liquid acid plutonium processing, the MOX option is a proven threat to human health and the environment.

The United States' rationale that it must choose the MOX option to appease Russia is unsubstantiated and flawed in several respects:

- There is little support for a plutonium fuel economy in Russia, where people voting in public referendums have overwhelmingly rejected new nuclear developments;

MD064

#### MD064-1

#### Immobilization

DOE acknowledges the commentor's support for the immobilization approach to surplus plutonium disposition. However, DOE has identified as its preferred alternative the hybrid approach. Pursuing both immobilization and MOX fuel fabrication provides the United States important insurance against potential disadvantages of implementing either approach by itself. The hybrid approach also provides the best opportunity for U.S. leadership in working with Russia to implement similar options for reducing Russia's excess plutonium in parallel. Further, it sends the strongest possible signal to the world of U.S. determination to reduce stockpiles of surplus plutonium as quickly as possible and in a manner that would make it technically difficult to use the plutonium in nuclear weapons again.

Multiple immobilization facilities would be very costly and time-consuming to implement, and therefore were not considered as an option in the SPD EIS. With only 50 t (55 tons) of surplus plutonium to disposition, it would not be practical to construct and operate more than one immobilization facility, even if the decision were made to immobilize all the surplus plutonium.

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. NAS identified that the Spent Fuel Standard could be met through disposition by either the immobilization or MOX approach. 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 operational life is expected to last beyond the life of the surplus plutonium disposition program.

NAS is currently conducting studies to confirm the ability of the ceramic can-in-canister immobilization approach to meet the Spent Fuel Standard.

This SPD EIS analyzes the potential environmental impacts associated with implementing the proposed surplus plutonium disposition 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 likely have minor impacts on the health, safety and environment at any of the candidate sites, including transportation impacts. Section 4.28 was revised to provide reactor-specific analyses and discuss the potential environmental impacts of using a partial MOX core during routine operations and reactor accidents.

#### **MD064-2**

#### **DOE Policy**

Surplus plutonium dioxide would be stabilized in conformance with DNFSB Recommendation 94-1 prior to being immobilized under the surplus plutonium disposition program. As discussed in Section 2.4, secure storage and monitoring provisions, including international inspection, and other safeguards will be integral components of the proposed facilities.

DOE is committed to the safe, secure storage of these pits and is evaluating options for upgrades to Pantex Zone 4 facilities to address plutonium storage requirements. Evaluation of repackaging Pantex pits into a more robust container 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.

#### **MD064-3**

#### **MOX Approach**

DOE acknowledges the commentor's opposition to the MOX approach. The *Joint Statement of Principles* signed by Presidents Clinton and Yeltsin in September 1998 provide general guidance for achieving the objectives of a future bilateral agreement to disposition surplus plutonium in the

United States and Russia. Sensitive negotiations between the two countries have indicated that the Russian government accepts the technology of immobilization for low-concentration, plutonium-bearing materials, but that the MOX approach would be considered for higher-purity feed materials.

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.

The addition of the plutonium-polishing process was analyzed and a description of the potential environmental impacts was added to the impact sections presented for the MOX facility in Chapter 4 of Volume I. As indicated by the analyses, the addition of this process is not expected to materially affect human health of the population living within 80 km (50 mi) of the candidate sites. For example, the annual dose associated with operating the MOX facility is expected to increase by between 0.017 and 0.18 person-rem/yr for the population living within 80 km (50 mi) of the candidate sites.

The remainder of this comment is addressed in response MD064-1.

- The argument that the Russian government opposes immobilization because the plutonium is more easily retrieved is undermined by the fact that irradiated MOX fuel is easier to re-use in nuclear weapons than the ceramification can-in-canister disposition approach;
- The United States should not be encouraging Russia to develop MOX capability due to the uncertainties produced by the U.S. underwriting costs of a Russian infrastructure to reprocess plutonium;
- Russia's choice of technology should not determine the U.S. choice. The governments themselves have recognized this, as in the United States-Russian Joint Plutonium Disposition study in 1996, which found that, *"The United States and Russia need not use the same plutonium disposition technology. Indeed, given the very different economic circumstances, nuclear infrastructures, and fuel cycle policies in the two countries, it is likely that the best approaches will be different in the two countries."*

3

Already, politically powerful voices are suggesting that United States policy regarding plutonium be re-examined. By establishing a new level of plutonium processing infrastructure which encourages plutonium commerce, U.S. non-proliferation policy is clearly undermined.

**Inform People of the Real Hazards, Risks, and Uncertainties**

The Department of Energy has not fulfilled its legal obligation to fully inform people of the real risks, hazards, uncertainties and long-term implications of processing tons of plutonium powder that is hazardous to human health at the scale of micrograms. This latest voluminous, and largely unreadable, environmental document does not even contain the most basic information about hazards, such as the expected quantities of radioactive air pollutants. Instead, the public is forced to follow a paper maze if the information is available at all.

4

The Department of Energy must admit that the real hazards and risks are largely unknown, and that uncertainty is the only constant at this time. There is only one mixed oxide (MOX) fuel plant currently operating at the capacity proposed by this document—100 tons of MOX fuel fabricated per year—and that facility uses reactor-grade plutonium. No MOX fuel from weapons-grade plutonium has ever been fabricated or used on an industrial scale, and no weapons-grade plutonium has ever been immobilized on an industrial scale. The plutonium pit disassembly and conversion plant would be a first-of-its-kind facility utilizing unproven technologies that are controversial even within the nuclear establishment.

5

6

To compound the uncertainties, the Department of Energy plutonium disposition plan is not a model for success. Under the existing proposals, the Department of Energy would design facilities requiring unproven technologies while the technology demonstration and testing is ongoing, and begin facility construction before finishing their design. The Department of Energy has followed this model of development before and the result has always been cost overruns, delays, unexpected negative impacts on human health and the environment, and massive waste of taxpayer dollars.

7

Thank you for this opportunity to comment.

Sincerely:

*We don't need more radioactive waste! We do not need more nuclear power. There is nowhere to put the waste we have. NO to MOX- No to further subsidization of the nuclear power industry! This is crazy.*

8

MD064

**MD064-4**

**General SPD EIS and NEPA Process**

DOE has prepared this SPD EIS in accordance with the provisions of NEPA (42 U.S.C. 4321 et seq.) and the related CEQ and DOE implementation regulations (40 CFR 1500 through 1508 and 10 CFR 1021, respectively). It is intended as a source of environmental information for the DOE decisionmakers and the public. The primary objective of the EIS is a comprehensive description of proposed surplus plutonium disposition actions and alternatives and their potential environmental impacts. As with any EIS, technical information is included to the extent that it is required to understand those actions and impacts. Other data were added in the course of the EIS development—for example, expected radiological release quantities, including airborne releases, in Appendix J. Additional technical information concerning the proposed facilities is given in various data reports reflected in the list of references for Chapter 2 of Volume I. These referenced materials are available in DOE reading rooms.

**MD064-5**

**MOX Approach**

The commentor is correct that MOX fuel is not widely produced; however, the process is similar to production of LEU fuel. In fact, after the uranium and plutonium oxide powders are blended, the MOX fuel fabrication process is essentially identical to LEU fuel fabrication. While weapons-grade plutonium is currently used in MOX fuel, its behavior in fuel is essentially the same as that of non-weapons origin plutonium, and so does not present a situation different from MOX fuel experience to date. In addition, a limited number of MOX fuel assemblies would be irradiated and tested in accordance with NRC requirements to verify acceptability prior to fabricating the fuel on a larger scale for insertion into the reactors. NRC will also license the MOX facility under 10 CFR 70, and be responsible for issuing operating license amendments under 10 CFR 50 for the domestic, commercial reactors that have been selected to irradiate the MOX fuel. There are always uncertainties involved with construction projects and startup of new facilities and processes. However, DOE has considered the uncertainties in its evaluations and determined that MOX fuel fabrication for use in commercial reactors is a viable option to surplus plutonium disposition.

**MD064-6**

**Pit Disassembly and Conversion**

While it is true that the pit conversion facility is the first consolidated facility for accomplishing this mission on a large scale, the processes that would be used in this facility are not entirely new. Many of these processes are in use at LANL and LLNL. However, to ensure successful transition to full-scale operation, DOE is testing these components as an integrated system at LANL. This pit disassembly and conversion demonstration is focusing on equipment design and process development and will provide information for fine-tuning the process and operational parameters prior to pit conversion facility operation. While this demonstration could continue for up to 4 years, the information from the demonstration would be generated, gathered, and be available on a continuous basis throughout the facility design phase. This demonstration project and other R&D projects are described in the *Pit Disassembly and Conversion Demonstration EA* (DOE/EA-1207, August 1998), which is available on the MD Web site at <http://www.doe-md.com>.

**MD064-7**

**Alternatives**

DOE acknowledges the commentor's concern over potential shortcomings of the surplus plutonium disposition program. While it is true that the disposition of large quantities of plutonium is unprecedented, the various disposition alternatives are not. Several countries, including Russia and the United States, have experience with immobilizing high-level wastes and in use of the can-in-canister approach to that end. Using a ceramic rather than a glass matrix has been found to offer distinct advantages in the areas of proliferation resistance, repository durability, worker radiation exposure during processing, and cost-effectiveness.

Commercial reactors in the United States are capable of safely using MOX fuel. The MOX technology is used in Europe, and therefore does not require extensive research and development for implementation in the United States. The R&D effort would be concentrated on fabricating samples of MOX fuel and conducting limited experiments and tests on those samples to assess fuel performance. The main objectives of this effort by DOE are to ensure that the plutonium and uranium feed materials will produce acceptable MOX

fuel and to examine key issues relative to the performance of MOX fuel in commercial reactors.

**MD064-8****Waste Management**

As described in Sections 2.18.3 and 4.28.2.8, additional spent fuel would be produced by using MOX fuel instead of LEU fuel in domestic, commercial reactors. Spent fuel management at the proposed reactor sites is not expected to change dramatically due to the substitution of MOX assemblies for some of the LEU assemblies. Likewise, the additional spent fuel would be a very small fraction of the total that would be managed at the potential geologic repository.

The remainder of this comment is addressed in response MD064-1.

I am concerned about the environment especially the water of the panhandle, since a lot of people drink it.

1

Pantex seems to have a good record for safe handling of dangerous materials. The economy of the panhandle is important also, therefore I am in favor of the expansion of Pantex to recycle Pu.

2

WD012

**WD012-1**

**Water Resources**

DOE acknowledges the commentor's environmental concerns. Section 4.26.3.2 describes the potential effects of the maximum impact alternative on water resources at Pantex. These analyses indicate that the impacts of construction and normal operation of the pit conversion and MOX facilities on the Ogallala aquifer at Pantex would likely be minor.

**WD012-2**

**DOE Policy**

DOE acknowledges the commentor's support of future missions at Pantex. However, none of the missions contemplated involved the recycling or reprocessing of plutonium. 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. Decisions on the surplus plutonium disposition program at Pantex 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.

I strongly recommend that the Pantex Site is selected as the best site for the for the Pit Disassembly/Disposition process, for these reasons:

1. The site has exclusive and considerable experience in weapons disassembly. This experience translates into an improved safety envelope.
2. This site has no known radiological contamination of facilities.
3. This site already has a secure area with well trained security force.
4. The required infrastructure only lacks procedural refinements to accomodate the new mission.
5. This site enjoys a very supportive climate with its major stakeholders, including the local population, local and state lawmakers and regional environmental regulators.

Thank you. Ray Sadesky

WD002

#### WD002-1

#### Alternatives

DOE acknowledges the commentor's support for siting the pit conversion facility at Pantex. Decisions on the surplus plutonium disposition program at Pantex 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.

511 Avenue K  
Hereford, TX 79045

August 14, 1998

ATTENTION: DRAFT SPD-EIS  
U. S. Department of Energy  
Office of Fissile Materials Disposition  
P. O. Box 23786  
WASHINGTON DC 20026-3786

Gentlemen;

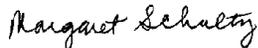
We Texans want to protect our water, air, and soil from radioactive pollutants. | 1

We do not want plutonium processing in the Texas Panhandle. |

And we do not want military plutonium turned into MOX fuel. | 2

I would appreciate your considering these matters.

Sincerely yours,



Margaret Schultz

MD057

**MD057-1**

**Alternatives**

DOE acknowledges the commentor's opposition to plutonium processing in the Texas Panhandle. This SPD 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 likely have minor impacts on any of those sites, including Pantex. Decisions on the surplus plutonium disposition program at Pantex 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.

**MD057-2**

**MOX Approach**

DOE acknowledges the commentor's opposition to the MOX approach. Pursuing both the immobilization and MOX approaches provides important insurance against potential disadvantages of implementing either approach by itself. The hybrid approach also provides the best opportunity for U.S. leadership in working with Russia to implement similar options for reducing Russia's excess plutonium in parallel. Further, it sends the strongest possible signal to the world of U.S. determination to reduce stockpiles of surplus plutonium as quickly as possible and in a manner that would make it technically difficult to use the plutonium in nuclear weapons again. 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.

*William Hughes Seewald*

14 September 1998

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

Subject: Surplus Plutonium Disposition Draft Environmental Impact Statement

Dear Madams and Sirs:

I enclose two letters herein that lay out some principles and objections to which I subscribe relative to the above referenced NEPA document.

I would also like to add two points that I wish to be considered in addition:

1. Pantex, as a site that has never processed plutonium before, should not be considered for the new plutonium processing missions if the Department is to honor a previous commitment not to introduce such risks to sites not already radiologically contaminated due to previous processing missions. The Department of Energy owes the people of the Texas Panhandle the respect of honoring that sensible commitment, notwithstanding efforts on the part of some local interests to confuse issues of economic development and good public policy.
2. It strains credibility that the scoping and analysis for the siting of these new processing facilities do not include as central criteria a site's previous experience in handling and processing plutonium as well as weighing the significance of any existing infrastructure that would not have to be replicated elsewhere. It seems absolutely self evident that to fail to do so leaves a NEPA document so flawed as to require significant overhaul.

1

2

Thank you for the opportunity to comment on these proposals.

Sincerely,

William H. Seewald

enc.

806-353-8486 Phone 353-9109 Fax \*\*\* P.O. Box 10090 - Amarillo, Texas 79116

MD198

**MD198-1**

**Alternatives**

DOE acknowledges the commentator's concern that contamination may be introduced at sites that do not currently have plutonium-processing missions. This SPD EIS analyzes impacts of the environment from construction and normal operation of the pit conversion facility. This facility would be located in a new building at either Pantex or SRS and, regardless of the site location, would generate the same level of contamination and require the same amount of D&D. Decisions on the surplus plutonium disposition program at Pantex 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.

**MD198-2**

**General SPD EIS and NEPA Process**

As discussed in Sections 1.6 factors used in site selection for the preferred alternative included site infrastructure, mission, and staff expertise. Pantex was selected as a candidate site for the pit conversion facility in part from comments received during the scoping period for the SPD Draft EIS. DOE has prepared this SPD EIS in accordance with the provisions of NEPA (42 U.S.C. 4321 et seq.) and the related CEQ and DOE implementation regulations (40 CFR 1500 through 1508 and 10 CFR 1021, respectively).

Hello, my name is Mary Shennum. I'm from Amarillo, Texas and I have requested materials in the past. I just wish to comment that I would like to say that I would be against any processing of plutonium here in the Panhandle. This is an agricultural region and our agriculture, our agriculture success is based upon our reputation here, as well as the reality of the difficulty of handling plutonium. I lived in Denver when plutonium was being processed at Rocky Flats and the citizenry grew to understand that it was just so difficult to handle and store there. And I'm just against any processing here. I think it's too dangerous. I think, I'd wish that there could be a place where there were operations already in place to work on these things. It's just a dangerous substance and amount of substances and we would rather not have it here in Amarillo. Thank you so much for your consideration of these comments. Thank you.

1

PD060

**PD060-1**

**Alternatives**

DOE acknowledges the commentor's opposition to siting the pit conversion and MOX facilities at Pantex. Incident-free (normal) releases of radioactivity from the proposed surplus plutonium disposition facilities to the food production chain are explained for each site in Appendix J. Current and future operations at any of the candidate sites should not impact the soil used for agriculture and farming in any of the regions adjacent to these sites. Decisions on the surplus plutonium disposition program at Pantex 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.

Hello, my name is Mary Shennum. I'm in Amarillo Texas and I have another comment here on the processing of plutonium here in the Panhandle. We have a small area compared to some of the other areas that are being considered for storage of plutonium and we really don't want this processing here. It's a sensitive region. The non-success of agriculture in this area would affect the whole country. And we feel that's important. Also, as far as the producing of the MOX fuel, I think some people have said, and I would tend to agree with it, that the process itself is not quite well researched. It's, we don't really know all the implications of what might happen in processing this fuel. Handling the plutonium powder here is not something we wish to do and we think it should be looked at more closely. There are hazards that have not been recognized. Immobilizing the material seems to be a better option. It would be less dangerous and have some pluses because it would also decrease the risk of having, ever having this substance being used for weapons by someone that we didn't want to use them. Thanks for the opportunity to comment. Thank you very much.

1

PD066

**PD066-1****MOX Approach**

DOE acknowledges the commentor's opposition to the MOX approach to surplus plutonium disposition at Pantex. MOX fuel fabrication is not a new technology; it has been used in Europe for many years. DOE has visited some of these European plants and will use any pertinent experience in the development of its own plant, if MOX is chosen as an option. Both the immobilization and MOX fuel approach meet 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. Decisions on the surplus plutonium disposition program at Pantex 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.

Hello, this is Carol Smith and I think it would be a good thing for Pantex to have the plutonium disposition. And so that's my comment. Thank you.

1

PD023

**PD023-1**

**Alternatives**

DOE acknowledges the commentor's support for the surplus plutonium disposition program at Pantex. Decisions on the surplus plutonium disposition program at Pantex 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.

My name is Chuck Smith. This concerns the additional work at the Pantex Plant in Amarillo, Texas. I'm for that work. I think Pantex can do that work well. Thank you very much. Bye.

1

PD021

**PD021-1**

**Alternatives**

DOE acknowledges the commentor's support for the surplus plutonium disposition program at Pantex. Decisions on the surplus plutonium disposition program at Pantex 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.

U.S. Department of Energy  
Office of Fissile Materials Disposition  
P.O. Box 23786  
Washington, DC, 20026-3786

Dear Department of Energy, Office of Fissile Materials Disposition:

I do not support plutonium processing at the Pantex Plant. In the *Surplus Plutonium Disposition Draft Environmental Impact Statement*, the Department of Energy prudently decided against locating one plutonium processing facility (MOX fuel fabrication) at the Pantex Plant. For the following additional reasons, a Plutonium Pit Disassembly and Conversion facility also should not be located at Pantex:

**Pantex Should Not Become the Next Rocky Flats**

Pantex has never processed plutonium. The Pantex Superfund site has so far apparently escaped the type of radioactive contamination found at plutonium processing sites like Rocky Flats in Colorado and Hanford in Washington.

**Risks That Are Unknown Are Too High**

The Pantex Plant occupies an area that is a fraction of the size of other plutonium sites.

SIZE MATTERS: A Comparison of the Area of the Four Candidate Sites (Square Miles)			
Pantex	Savannah River Site	Idaho National Engineering Lab.	Hanford
23	309	890	560

The technologies proposed in the Plutonium Pit Disassembly and Conversion Facility are undemonstrated and unproven. It is unacceptable to have plutonium operations above the Ogallala Aquifer and only one mile from where people live and work in a vibrant agricultural producing area. The Pantex legacy already includes heavy contamination in a perched layer of groundwater less than one hundred feet above the Ogallala Aquifer. This pollution extends from under the Pantex Plant to adjacent private property and the real impacts remain unknown. The risk of any additional groundwater pollution is unacceptable in an agricultural region.

Common sense dictates that negative consequences to people and farmland from nuclear accidents are far more likely in a small, open, windy location like Pantex. The Department of Energy has acknowledged that the most visually unappealing feature of the plutonium facilities will be their smokestacks. Visual blight will be a minor inconvenience compared to the air pollutants--many of them radioactive--expected to escape into the atmosphere daily through smokestack filters. Routine air emissions of tritium, plutonium, americium, and beryllium constitute unacceptable new hazards to the Texas Panhandle.

MD102

**MD102-1**

**Alternatives**

DOE acknowledges the commentor's opposition to siting the proposed surplus plutonium disposition facilities at Pantex. As described in Chapter 4 of Volume I and summarized in Section 2.18, potential impacts of any of the proposed activities during routine operations at any of the candidate sites would likely be minor. To avoid contamination that has occurred in the past at some DOE sites, DOE would design, build, and operate the proposed surplus plutonium disposition facilities in compliance with today's strict environmental, safety, and health requirements. Decisions on the surplus plutonium disposition program at Pantex will be based upon 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.

**MD102-2**

**Human Health Risk**

Although Pantex is smaller in overall size in comparison with the other candidate sites, analyses in Chapter 4 of Volume I indicate that impacts of operating the pit conversion facility on health, safety, and the environment at Pantex would likely be minor (e.g., see Section 4.6).

While it is true that the pit conversion facility is the first consolidated facility for accomplishing this mission on a large scale, the processes that would be used in this facility are not entirely new. Many of these processes are in use at LANL and LLNL. In addition, DOE has recently started a pit disassembly and conversion demonstration project at LANL, where processes will be further developed and tested.

Section 4.26.3.2 analyzes impacts to the environment (including contamination to the Ogallala aquifer) due to construction and normal operation of a pit conversion facility at Pantex. There would be no discernible contamination of aquatic biota (fish) or drinking water, either from the deposition of minute quantities of airborne contaminants into small water bodies or from potential wastewater releases. Therefore, it is estimated that no measurable component of the public dose would be attributable to liquid pathways. Appendix J.3 includes an analysis of potential contamination of agricultural products and

livestock and consumption of these products by persons living within an 80-km (50-mi) radius of Pantex. If the proposed surplus plutonium disposition facilities were located at Pantex, a very small incremental annual dose to the surrounding public from normal operations would result via radiological emission deposition on agricultural products (i.e., food ingestion pathway). This dose (about 0.56 person-rem/yr) would be 0.0006 percent of the dose that would be incurred annually from natural background radiation. This analysis indicates that impacts of operating the pit conversion facility on agricultural products, livestock, and human health at Pantex would likely be minor.

#### MD102-3

#### Human Health Risk

It is DOE policy to operate in compliance with all applicable air quality requirements and to protect human health and the environment. DOE takes into consideration pollution reduction techniques to minimize air releases when designing, constructing, and operating its facilities. It also considers aesthetic and scenic resources in the design, location, construction, and operation of facilities. Potential concentrations of air pollutants at Pantex for the various alternatives have been estimated, considering appropriate local meteorology and other data associated with the area. Because the releases from the pit conversion and MOX facilities would be very small (see Appendix J.3.1.4), estimates of resultant radiological health risks are small. As indicated in Section 4.17.2.4, the maximum possible dose delivered to a member of the public during normal operations of the MOX and pit conversion facilities at Pantex would be 0.077 mrem/yr, 0.02 percent of the dose that individual would receive annually from natural background radiation. The estimated dose to the public from radiological emissions (e.g., americium, tritium, and plutonium) would be 0.58 person-rem/yr which would result in an increase of  $2.9 \times 10^{-3}$  LCFs over the 10-year operating life of the pit conversion facility. Any new facilities that might be built would be within existing site boundaries, and would be matched aesthetically with the current plant to limit potential visual impacts.

**There is Valid, Strong Criticism of Safety  
in the Storage of Plutonium at Pantex**

Since Pantex became the nation's long-term storage location for up to 20,000 plutonium pits, promises to improve safety conditions have not happened. The U.S. Government Accounting Office and the Defense Nuclear Facilities Safety Board have issued reports critical of plutonium storage safety at Pantex. Fifty million taxpayer dollars were spent on a failed plutonium pit container program (the AT-400A) and the plan to move over 10,000 pits into a safer remodeled building (Building 12-66) has also failed.

When it comes to plutonium pit storage problems, Panhandle residents are back to square one. The plutonium remains in old, unsuitable, corroding storage containers and in 35-55 year old "bunkers" that the Department of Energy promised were for "temporary" use. Plutonium that is supposed to be stored in a stable environment now sits in the bunkers—all but three without air conditioning—even as the Texas Panhandle experiences a spell of more than 40 consecutive days of 90+ degree temperatures, and more than 20 days this summer with thermometers registering 100+ degrees. If the Department of Energy cannot accomplish the job of safely storing Pantex plutonium in the most stable environment, there is no reason to accept its unsubstantiated assurances to safely process deadly plutonium powders at Pantex.

Thank you for this opportunity to comment.

Sincerely:

*Please don't contaminate our Ogallala  
Aquifer. Please don't contaminate our  
air.*

*Let Savannah have the MOX.  
They are prepared and they want it.*

*Thank You*

*Ernestine Smith, M.D.,  
1216 S. Austin St.*

*Amaillio 74 79102-1403*

4

5

MD102

**MD102-4**

**DOE Policy**

DOE acknowledges the commentor's concern regarding 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 Containers* (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 decision 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 Component* (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 developed; addressing, for example, 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*.

**MD102-5**

**DOE Policy**

DOE acknowledges the commentor's support for siting the MOX facility at SRS. 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.

The remainder of this comment is addressed in responses MD102-1 and MD102-2.

Yes, my name is Jim D. Smith. I live in the Texas Panhandle. Been here all my life, 68 years. I would like to voice opposition to the Pantex operations at Amarillo, Texas. You want public input, so here is some input. I know the Chamber of Commerce in Amarillo and the AEDC and all these people are gung-ho for this plant, but I'm going to tell you, most of the people that live out in the areas, rural areas of the Panhandle are not for this plant, the continuation of this plant, and certainly not for an increase operations out there such as this pit disassembly or whatever you call it. We live in the, a area where there is 3 million head of cattle and the feed lots, this Pantex Plant is located at the end of the runway of the Amarillo International Airport. All the storage is above ground. This is, this is an accident just waiting to happen. I really feel that that plant should be closed and the mess should be cleaned up and the operation should be sent elsewhere. My address is Box, excuse me, my address is HC2, Box 250, Kress, Texas. Zip is 79052. My phone number is (806) 684-2631. Thank you for letting me express my opinion.

1

PD022

**PD022-1****Facility Accidents**

DOE acknowledges the commentor's opposition to siting the pit conversion facility at Pantex. Accident risk is an important consideration in the decision of whether, and if so, how and where, to conduct the surplus plutonium disposition program. There is accident risk associated with pit conversion operations at Pantex, just as there is accident risk associated with any operations at any site. The analysis in this SPD EIS endeavored to clarify those risks on both an absolute and relative basis so that the wisest course of action can be identified and taken. Chapter 4 of Volume I summarizes the impacts of accidents due to aircraft crashes at Pantex (e.g., see Table 4-60). The frequency of such an accident is judged to be beyond extremely unlikely meaning there is less than 1 chance in 1 million per year that the accident would occur. Detailed presentation of the analysis is provided in Appendix K.1.5.1. Decisions on the surplus plutonium disposition program at Pantex 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.



United States  
Department  
of Energy

*Comment Form*

NAME: (Optional) Sam J. Sottile  
ADDRESS: P. O. Box 276, Bushland, TX 79012-0276  
TELEPHONE: ( 806 ) 356-6269  
E-MAIL: sjsottile@tuno.com

I wanted to convey the support of my family and myself for DOE's selection of PANTEX to receive the Pit Disassembly and Conversion Facility (PD&CF) mission.  
My family attended one of the public meetings here in Amarillo, Texas. We can not tell you how much we appreciated the opportunity to learn more about the overall concepts that are being perused by the DOE.

I personally have been working in the nuclear weapons field for nearly thirty years.  
Twenty two and a half years in the United States Navy as a Weapons Technician and five years at PANTEX.

Enjoying what I do for a living is a very important part of my own personal mission statement. I really do enjoy disassembling, modifying, and assembling this vital portion of our nation's defense. I preform these tasks safely, and with the utmost attention to detail. Our nation, DOE, the American taxpayers, the people of the state of Texas, my fellow workers, and my own family are my customers. My customers deserve that I put 110% effort into my job. I have all the confidence in the world that the highly trained and experienced workforce of the Mason and Hanger Corp. can preform the PD&CF mission safely and with the utmost respect for our environment..... that's right, we live here in the community also!

I knew the positive reputation and acceptance of the PANTEX plant from the business, community, and our elected officials was great, but I was very gratified to hear speaker after speaker laud the "Good Neighbors" they have in the people of the PANTEX plant.

My hope and prayers are that DOE will select the PANTEX plant for the Pit Disassembly and Conversion Facility mission!

Thank you for this opportunity to make these comments.

1

FD200

FD200-1

Alternatives

DOE acknowledges the commentor's support for siting the pit conversion facility at Pantex. Decisions on the surplus plutonium disposition program at Pantex 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.