

**TEXAS RADIATION ADVISORY BOARD**  
**MICHAEL S. FORD**  
**PAGE 1 OF 3**

Statement to DOE on PD&C Mission at Pantex/ M. S. Ford  
Page 1 of 3  
11 August 1998

Good afternoon. My name is Michael Ford and I stand before<sup>you</sup> wearing two hats today. I making a living as a certified health physicist and radiological engineer at Pantex. However, my primary role here today is to represent the Texas Radiation Advisory Board (TRAB). We advise three agencies within the State of Texas on radiation safety matters: the Bureau of Radiation Control, the Texas Natural Resource Conservation Commission, and the Railroad Commission of Texas. While the TRAB has not taken specific action to endorse the Pit Disassembly and Conversion mission, the TRAB continues to take an interest in Pantex operations. It is anticipated that a vote for endorsement of the PD&C mission at Pantex will be held at the October 3rd, 1998 meeting. Based on my understanding of the position of several members of the Board, I feel that the TRAB would join Governor Bush in supporting the PD&C mission at Pantex.

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Certain troubling statements by two South Carolina politicians, however, require a clarification of any terms of the support for this facility. Representative Lindsey Graham (R-S. C.) has stated on August 3rd 1998 that "It would be foolhardy to introduce plutonium contamination to a site that isn't already contaminated." And on August 4th, Senator Strom Thurmond of South Carolina indicated that he was willing to use the existing separations canyons — 1950's and 60's technology — to perform the PD&CF mission as a cost savings.

The combined affect of these statements by these politicians indicate that South Carolina is less concerned about embracing the proposed technology — which would confine the plutonium to enclosed processes -- than they are about bringing the work to their state. Unfortunately, it appears that they are prepared to increase the plutonium contamination at Savannah River Site at the expense of the surrounding environmental in order to secure the facility. I firmly believe that I would speak for the Governor and all members of the TRAB when I say that a PD&CF that uses the inefficient and wasteful technologies of the 50's and 60's would be an unacceptable replacement for what is proposed in the SPD EIS. As a TRAB member and a U.S. taxpayer, I find South Carolina's position to be very troubling.

2

TXD45

**TXD45-1**

**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.

**TXD45-2**

**DOE Policy**

DOE acknowledges commentor's concern that the surplus plutonium disposition program be carried out in an environmentally safe and efficient manner. The proposed surplus plutonium disposition facilities would be designed, constructed, operated, and deactivated in accordance with applicable Federal, State, and local environmental, safety, and health requirements. Within these limits, DOE believes that the level of contamination should be kept as low as is reasonably achievable, so that the benefit of reducing the already low level of contamination would warrant the additional cost of that reduction. Further, D&D would be necessary wherever the proposed facilities were located. D&D is discussed in Section 4.31. DOE will evaluate options for D&D or reuse of the proposed facilities at the end of the surplus plutonium disposition program.. At that time, DOE will perform engineering evaluations, environmental studies, and further NEPA review to assess the consequences of different courses of action.

This SPD EIS does not consider the use of existing canyons for any pit disassembly and conversion activities. For example, the use of F-Canyon at SRS to convert plutonium for use in either the immobilization or MOX facility would require reconfiguring the canyon and keeping it in operation for another 10 years or more. DOE has already made a commitment to the public, the U.S. Congress, and DNFSB to shut the canyon down.

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**MICHAEL S. FORD**  
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In reviewing the Cost Analysis (in Support of Site Selection for Surplus Weapons-Usable Plutonium Disposition), I noted with interest where the document states in multiple locations that -- in both constant 1997 dollars and discounted costs -- overall, the costs for the alternatives are approximately the same. However, some clarification would be appreciated in the following areas:

1. It appears that some of the PD&CF needs for SRS are being rolled into the design changes for the APSF (page 3-3) and are not being reflected in the cost estimates.
2. The need for a Source Calibration Facility is not discussed in the SPD EIS and its function is not stated in the Cost Analysis. Instrument calibrations are currently handled by both Pantex personnel and offsite calibration services.
3. The initial D&D efforts needed to support construction in currently contaminated facilities is not addressed in any detail. (pg. 1-9).
4. The indirect cost factors were not explained in any detail. It was not clear whether these factors varied by location, and if so, what the basis for the variation was (pg. 1-10).
5. It is unclear as to what additional SNM-processing facilities are required beyond those that the PD&CF provides (pg. 2-3).
6. Zone 4 stores weapons and pits (§ 2.3.3, ¶2).

The costs for repackaging the pits was addressed in the Cost Analysis as \$69M for repackaging and \$10M to \$15M for transportation, but little attention was paid to what impact the repackaging effort might have on Pantex's weapons mission. Over the last five years, Pantex's total collective doses have ranged from 14.6 to 44.9 person-rem with an average of 31 person-rem. In the EIS addressing plutonium storage, it was estimated that approximately 30 person-rem per year would be incurred due to the repackaging of pits in DOT Type B containers. Such an activity would roughly double Pantex's average exposures, and it would triple 1997's collective doses. With the reduction in the dose limits, this could have a noticeable impact on Pantex's weapons mission.

TXD45

**TXD45-3**

**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.

**TXD45-4**

**Human Health Risk**

Appendix L.5.1 was revised to show that workers at Pantex would receive an additional dose of 10.4 person-rem/year. On the basis of a health risk estimator of 400 fatal cancers per 1 million person-rem (see Appendix F.10.2.1), a dose of 10.4 person-rem translates to an increase of 0.0042 LCF per year. Thus, for a 10-year operational period, the risk of a single additional fatal cancer among the workforce would be less than 1 in 20. While DOE continually evaluates dose limits, there are no current plans to change the existing limits.

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**MICHAEL S. FORD**  
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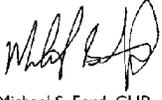
Statement to DOE on PD&C Mission at Pantex/ M. S. Ford  
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11 August 1998

Finally, Pantex personnel have been called "amateurs" with regard to the PD&C mission. Using the word "amateur" does not appear to be consistent with Pantex's role in assembling, disassembling and maintaining some of the most complex weapon systems in the world. While Pantex has not undertaken plutonium processing operations in the past, its record of safely handling both plutonium and high explosives more than demonstrates the competence and capabilities of Pantex personnel to successfully undertake the PD&C mission.

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Thank you for allowing me to speak on behalf of the TRAB.

Very Respectfully,



Michael S. Ford, CHP  
Member

Texas Radiation Advisory Board  
1100 West 49th Street  
Austin, Texas 78756

TXD45

**TXD45-5**

**Other**

DOE would not have considered Pantex for the surplus plutonium disposition program if it did not believe that Pantex employees were qualified to perform the work safely and effectively.



TOM HAYWOOD  
DISTRICT 30

The Senate of  
The State of Texas

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COMMITTEES:

ECONOMIC DEVELOPMENT  
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+ SUBCOMMITTEE ON HIGH CULTURE, CHAIRMAN  
NOMINATIONS

July 28, 1998

Bert Stevenson, NEPA Compliance Office  
DOE Office of Fissile Material Disposition  
c/ SPD EIS  
US Department of Energy  
PO Box 23786  
Washington, DC 20026-3786

Dear Mr. Stevenson,

Thank you for the opportunity comment on the Department of Energy's Draft Surplus Plutonium Disposition Environmental Impact Statement (SPD EIS).

Please know that I am adamant that any current and future functions at Pantex be conducted in a safe and environmentally sound manner. My first priority is to ensure that expansion there 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, which is located within my Texas Senate District.

I am 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. I am extremely disappointed in DOE's decision to site the MOX facility at SRS, since Pantex remains the best and cheapest site for that mission.

However, of the proposed plutonium disposition actions and alternatives discussed by the department in the SPEIS, I wish to focus my comments on the selection of Pantex as the preferred site for locating the plutonium pit disassembly and conversion facility. I am 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.

Pantex is already uniquely suited to assume this new function. Pantex currently storehouses more than 8,000 surplus pits, with a long history of handling pits and the related infrastructure and

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843/777-3075

2091 Ickovick Plaza, Suite 235  
Sherman, Texas 75090  
936/665-2347

1025 East 10th, Tenth Street  
Arling, Texas 75001  
972/72-2439



MD006

**MD006-1**

**DOE Policy**

DOE has and will continue to make health, safety, and environmental issues a matter of utmost importance in the planning and conduct of all nuclear operations, including the disposition of surplus plutonium. This SPD EIS shows that the impact of properly implementing the proposed action at Pantex would have no major effect on the health, safety, and environment in the Amarillo area.

**MD006-2**

**Alternatives**

DOE acknowledges the Senator's support for siting the MOX facility at Pantex. 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.

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.

**MD006-3**

**Alternatives**

DOE acknowledges the Senator'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.

operations protocol that is the mainstay of an excellent safety culture. Furthermore, given the current weapons disassembly and storage functions at Pantex, disassembly and conversion of the pits already located there is consistent with the historic mission of the plan. Opponents of siting disposition functions at Pantex (SRS in particular) argue that DOE should not introduce plutonium missions at a site where the work could be considered "new" at the location. This argument is false and disingenuous. With the new MOX facility, SRS will undertake an NRC licensed function which is completely new to it -- current and future personnel will be required to receive training in an entirely new function. Pantex, on the other hand, has a production culture with a well trained, unionized workforce -- hardly a group of "amateurs" as they have been described by members of the South Carolina delegation.

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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 far easier to track converted plutonium pits for IAEA and international inspections if these activities are undertaken at the site of original pit storage.

4

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

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While I do not profess to be a rocket scientist, my doctorate in physics and my 1996 tour of the Pantex facility do provide greater insight.

Based upon these reasons, I respectfully urge DOE to designate Pantex as the site for the pit disassembly and conversion facility.

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Sincerely,



TOM HAYWOOD  
Texas State Senator

#### MD006-4

#### Transportation

DOE has considered the inherent risks, including proliferation concerns, associated with transporting pits versus plutonium dioxide. While DOE prefers to minimize the transportation of plutonium that is still desirable for weapons use, plutonium is routinely and safely transported in the United States. As described in Appendix L.3.3, transportation of nuclear materials would be performed in accordance with all applicable DOT and NRC transportation requirements. Interstate highways would be used, and population centers avoided, to the extent possible.

All shipments of surplus plutonium that have not been converted to a proliferation-resistant form would be made by DOE's SST/SGT system, as described in Appendix L.3.2. During the first week of September 1998, Presidents Clinton and Yeltsin held a Moscow summit and signed a statement of principles with the intention of removing approximately 50 t (55 tons) of plutonium from each country's stockpile. 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.

MD006



**John Hirschi**  
State Representative  
District 69

August 17, 1998

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 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.

1

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

. 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.

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Thank you for this opportunity to comment.

Sincerely,

John Hirschi  
State Representative

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MD058

**MD058-1**

**Alternatives**

DOE acknowledges the Senator's opposition to siting any plutonium processing facilities at Pantex. 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, 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.

**MD058-2**

**Alternatives**

Pit disassembly and conversion technologies are currently being demonstrated at LANL. This activity is 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>.

The analyses presented in Section 4.26.3.2.2 indicate that there would be no discernible impacts on water quality from normal operation of the pit conversion and MOX facilities at Pantex. Other sections show, moreover, that the normal operation of these facilities would likely have minor impacts on human health, agriculture, and livestock: Section 4.17.1.4 and 4.17.2.4 addresses the potential radiological and hazardous chemical effects of the maximum-impact alternative on workers and the public; Appendix J.3, the potential contamination of agricultural products and livestock, and the consumption of these products by persons living within an 80-km (50-mi) radius of Pantex.

1998  
Texas State Republican Party  
Platform  
(page 23-24)

The Party recognizes the value of alternative energy sources and supports continued private research and development of such sources; but **we oppose** the federal government using hazardous waste as an alternative energy source,

**such as the processing or reprocessing of plutonium and uranium for making mixed oxide fuels in agricultural areas and above major water sources.**

by: *Richard L. Geddes*  
8/13/98

SCD19

SCD19-1

Alternatives

DOE acknowledges the commentor's support for private research and development of alternative energy sources. The MOX approach does not involve the use of hazardous waste as an alternative energy source. Further, the use of U.S. surplus plutonium 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 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.

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 at any of those sites, including 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 the candidate sites should not impact the soil used for agriculture and farming in any of the regions adjacent to these sites.

**TEXAS STATE REPUBLICAN PARTY PLATFORM**  
**RICHARD L. GEDDES**  
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furthermore, public money or public powers should not be used to fund or implement any private projects such as high-speed rail or sports stadiums.

**Balanced Budget** - The Party supports full disclosure of all "on" and "off" budget spending. We demand that our federal legislators vote only for balanced budgets. Social Security should be taken off budget. In case of a budget surplus it should never be used to increase spending.

**Waste and Fraud in Government Contracts** - The Party is opposed to waste and fraud in government contracts and recommends that the Attorney General of the United States investigate fraud and misuse of government funds in government contracts prosecuting those found to be responsible. The Party also believes that all government contracts should be awarded only on the merits of the bidders' ability to produce the quality of the product or service performed at a reasonable cost. We also support the repeal of the Davis Bacon Act. We encourage the government to follow fair business practices.

**Business Subsidies** - The Party urges the cessation of subsidies. We support movement toward a free market economy both domestically and internationally.

**Downsizing the Federal Government** - We support the downsizing of the federal government in order to reestablish states' rights guaranteed by the Tenth Amendment of the United States Constitution. We further support the abolition of federal agencies involved in activities not delegated to the federal government under the original intent of the Constitution including, but not limited to, the Environmental Protection Agency, the Department of Energy, the Department of Housing and Urban Development, the Department of Health and Human Services, the Bureau of Alcohol, Tobacco and Firearms, the Department of Education, and the position of Surgeon General. These authorities should be eliminated or, where needed, transferred to the state or local governments. We also call for the defunding and abolition of the National Endowment for the Arts.

**Sunset Laws** - The Party supports a mandatory Sunset Law for the state of Texas which would automatically terminate all agencies or programs if they are not reenacted by the legislature every twelve years.

**Unfunded Mandates** - The Party favors limited government and no new taxes. The effect of mandating services without funding is a tax increase for local government. We oppose all unfunded mandates by the federal and state governments.

#### **Domestic Energy Industry**

**Support of the Domestic Energy Industry** - The foundation of our National Energy Strategy must be a competitive domestic oil and gas industry. Federal tax and regulatory policies are destroying the independent sector of this industry. Regulation and rule making must be done on a cooperative, rather than an adversarial basis, preserving jobs and the economy while promoting environmental preservation. The Party encourages the U.S. Congress to (1) aggressively support a greatly expanded use of domestic natural gas as a method to reduce U.S. dependence on foreign crude oil; (2) repeal all provisions of the alternative minimum tax that treat intangible drilling costs as tax preference items; and (3) stop the promulgation of unnecessary environmental legislation or regulation that causes domestic production to be economically not feasible.

**Alternative Energy Sources** - The Party recognizes the value of alternative energy sources and supports continued private research and development of such sources; but we oppose the federal

government using hazardous waste as an alternative energy source, such as the processing and or reprocessing of plutonium and uranium for making mixed oxide fuels in agricultural areas and above major water sources.

Restructuring Electrical Utilities - The electric services industry in Texas should be restructured. The Party believes the state of Texas instead of the federal government should restructure the electric service industry in Texas. We support deregulation with real competition.

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### **Restoring American Sovereignty and Leadership**

Immigration - The Party acknowledges that America is a beacon of hope and a place of new beginnings and we continue to welcome legal immigrants. Because we believe that one responsibility of government is to secure our nation's borders, we support: 1) returning immigration quotas to traditional levels in practice prior to 1965 of 300,000 per year or less, 2) expeditious hearing on deporting non-violent illegal aliens held in prisons or jails, 3) reclaiming control of international borders, 4) screening immigrants for communicable diseases, including HIV, 5) the amendment of the Immigration and Naturalization Act of 1952 to grant birthright citizenship only to the newborn of citizens of the United States of America or permanent legal residents, and 6) Congressional oversight of federal agencies to follow-up over-stayed visas.

The Party opposes: 1) automatic citizenship by birth to children born to illegal aliens, 2) federally-imposed requirements on the state regarding the care of illegal aliens including the extension to illegal aliens the benefits of public education, non-emergency medical care, and welfare including Social Security and SSI payments, 3) a national tracking system for control of immigration (or any other purpose), and 4) participation in any election by illegal aliens.

International Communism - The Party supports the worldwide movement away from Communism and toward representative government based on the premise that men's and women's rights come from God and governments are established to protect these rights.

MIA's and POW's - The Party urges the President and Congress to continue all measures necessary to seek and act upon all information concerning our Missing in Action and Prisoners of War. We oppose the extension of MFN status or normalizing relations with any nation before they support a full and complete accounting for all missing American service personnel.

Middle East - The Party believes that the U.S. and Israel share a special long-standing relationship based on shared values, a mutual commitment to our republican form of government, and a strategic alliance that benefits both nations. Our foreign policy in the Middle East should reflect the special nature of this relationship through continued military and economic assistance to Israel and recognition that Jerusalem is the capital of Israel and should remain an undivided city accessible to people of all faiths. We commend the Republican Congress' resolution to move the U.S. embassy from Tel Aviv to Israel's capital, Jerusalem. We commend Israel's privatization of state-owned companies and budget cuts in order to achieve its goal of economic independence. We encourage the Republican Congress' continuing support for Prime Minister Netanyahu's government in the peace talks between Israel and the Palestinians. We oppose pressuring Israel to make concessions it believes would jeopardize its security. We support continued sanctions against Iran in response to its celebration of "Death to America Day."

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.

MD107

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**MD107-1**

**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 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 SPD EIS ROD.

**MD107-2**

**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.

#### **MD107-3**

#### **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:

*August 14/1998*

*To Whom it may concern!*

*Advances in technology versus regression of Wisdom provides the signal to emphasize Wisdom hold fast on what we have of technology.*

*When balanced restart technology*

*Sincerely,  
Tadeo Spike Zywiski  
213 Avant Ave  
San Antonio TX 78210*

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**MD107-4**

**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. 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*.

**MD107-5**

**Other**

DOE acknowledges the commentor's concern that technology advances must be met with caution.

**THE METAL TRADES COUNCIL OF AMARILLO, TEXAS AND VICINITY**  
**RONALD W. ZERM**  
**PAGE 1 OF 3**



**THE METAL TRADES COUNCIL**  
of  
**Amarillo, Texas and Vicinity**  
A.F. of L. - C.I.O.  
AMARILLO, TEXAS

DOE Office of Fissile Materials Disposition  
c/o SPD EIS  
P.O. Box 23786  
Washington, D.C. 20026-3786

**SUBJECT: SURPLUS PLUTONIUM DISPOSITON DRAFT**  
EIS

MD186

THE METAL TRADES COUNCIL OF AMARILLO, TEXAS AND VICINITY  
 RONALD W. ZERM  
 PAGE 2 OF 3

As a Metal Trades Union Safety Officer, I would like to comment on this proposed EIS. Having both mechanical and safety backgrounds, I feel I can comment both on the proposed processes and the safety envelope within which these processes are to function.

In commenting on the processes, I would first comment on the Mixed Oxide Fuel Facility. The MOX process is, primarily, a mechanical process accomplished in glove boxes. Pantex already possesses parallel processes which are similarly found in a MOX plant. We blend materials, press these materials into pellets, weigh them, perform non-destructive inspection on them, heat (or scinter) them, and assemble the final product. We have been performing these processes for over 45 years. And we are actively performing these same processes today. Having had the opportunity to visit actual MOX plants in England and France, I can state with confidence that Pantex can perform this part of the EIS mission in an unparalleled manner.

In addressing the Pit Disassembly and Conversion Facility, it is important to keep in mind that the Aries System is a mechanical disassembly system. I have toured the Aries

system at Los Alamos and have seen no potential problems with its being sited here at Pantex. Pantex has, as I have already stated above, safely handled the items, slated for disassembly and conversion, for over 45 years and we currently store over 10,000 of them.

A major factor in siting these missions at Pantex is a well-trained and qualified Union Workforce, which is second to none in the country. This workforce actively participates in such endeavors as Voluntary Protection Program, Integrated Safety Management, Seamless Safety - 21 Program, and Enhanced Workplanning. All pro-active programs and all needed if the DOE intends to follow Former Secretary of Energy Pena's memo on Environment, Safety and Health of April 14, 1998. In addition, the one program which Pantex has which sets it apart from all other plants is the Metal Trades Union Safety Officer Program, which is staffed by three full-time Union Safety Officers. No other plant in the nation has anything comparable to this program and it provides the crucial and necessary check and balance needed by the DOE to maintain and further ES&H credibility with the nation.

Siting these two missions at Pantex is the most logical choice. Pantex is an "active" site, observing strict operational protocols. The safety infrastructure at Pantex has not been compromised "as at other sites" due to their "primary" mission being environmental remediation/restoration. It is of extreme importance to place these activities at a site where an **established** and **successful** Conduct of Operations / Formality of Operations philosophy is already in existence and utilized day to day.

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Alternatives

DOE acknowledges the commentor's support 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.

**THE METAL TRADES COUNCIL OF AMARILLO, TEXAS AND VICINITY**  
**RONALD W. ZERM**  
**PAGE 3 OF 3**

The DOE Pantex Plant should be the choice for these future PU EIS missions.

Sincerely,  
Ronald W. Zerm  
Metal Trades Union Safety Officer

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