

Greenwood, Carolyn
Knoxville, TN
Page 1 of 3

Hartman, Gary S

From: CDGreenwood@cs.com
Sent: Monday, February 05, 2001 1:07 AM
To: Y12EIS
Subject: Comments on EIS (Attn: Gary Hartman)

Dear Mr. Hartman:

Thank you for the opportunity to comment on the Environmental Impact Statement for the new National Security Complex in Oak Ridge. There has not been enough time to adequately review the EIS, so I am hereby requesting a delay in the deadline for acceptance of comments. I request that the comment period be extended by at least 60 days. In particular, I have concerns about the adequacy of evacuation plans and other details that I have not had a chance to review sufficiently.

1/25

In the event that this request for an extension of time is not honored, here are my comments thus far.

This EIS is unacceptable in several respects. First, it is flawed from an economic analysis standpoint. It is premised, at least in part, on a supposed need that no longer exists but that will cost a tremendous amount. In particular, based on statements of the Russians as well as of our own President Bush, the U.S. does not need to make new nuclear weapons at this point in history. We need to reduce our arsenals and we should comply with our nonproliferation policy. If we are really concerned about national security and economic impact, there are a lot better ways to spend \$4 billion.

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Second, the EIS does not adequately address issues of environmental justice. The impact on a predominantly black community about a mile from the proposed site has not been adequately addressed.

3/13

Third, the EIS does not accurately assess the likely environmental consequences or the health and safety impact on workers. Accidental or other releases to air, water, and/or soil need to be addressed, since history shows that, despite the best intentions of some, accidents do happen. This cost needs to be factored into the cost of the new facility.

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5/15

6/16

Thank you.

Sincerely,

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Comment No. 1

Issue Code: 25

The Draft Y-12 SWEIS was distributed to the public on December 13, 2000. The Notice of Availability was published in the Federal Register on December 22, 2000. Comments were accepted on the Draft SWEIS through February 23, 2001. The CEQ's minimum comment period requirement on draft EISs is 45 days (40 CFR Part 1506.10[c]). The original public comment period of 45 days for the Draft Y-12 SWEIS was extended by 15 days for a total of 60 days, which was considered appropriate for review and comment on the document. An email was sent to the commentor on February 5, 2001 notifying her of the extended comment period. The extension was noted in newspaper ads for the January 25, 2001 Public Hearings on the Draft SWEIS.

A new section on the Emergency Preparedness Program has been included in Volume II, Section D.8. This section discusses emergency plans (including evacuations) and procedures in place for ORR.

Comment No. 2

Issue Code: 16

Parties to the Nuclear Nonproliferation Treaty agree not to directly or indirectly transfer nuclear weapons or other nuclear explosive devices or control over them to any recipient; and not to in any way assist, encourage, or induce nonnuclear weapon states to manufacture or alter use, or acquire nuclear weapons, or alter nuclear explosive devices or control over them. Continuation of the Y-12 mission, and construction and operation of a HEU Materials Facility or Special Materials Complex by the United States does not conflict with such an agreement. The proposed action, which includes continuing weapons dismantlement activities at Y-12, fully supports the goals of Article VI of the Nuclear Nonproliferation Treaty, in which signatory nations agree to work toward total disarmament.

Since the end of the Cold War, the United States has significantly reduced the size of the nuclear weapons stockpile, and DOE has dismantled more than 15,000 nuclear weapons. At the present time, the United States is further downsizing the nuclear weapons stockpile

Comment No. 2 (cont.)

Issue Code: 16

consistent with the terms of START I and the recently ratified START II. Although Russia suspended its nuclear weapons dismantlement activities on January 20, 2001, DOE has continued its weapons dismantlement activities. The need for nuclear weapons and alternative uses of the Nation's funds are beyond the scope of the Y-12 SWEIS.

Comment No. 3

Issue Code: 13

DOE is committed to compliance with provisions of Executive Order 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*. The Y-12 SWEIS addresses the issue of whether implementation of the proposed action and alternatives would result in disproportionately high and adverse environmental effects on minority or low-income populations. As discussed in Volume I, Chapter 5 of the Y-12 SWEIS, implementation of the alternatives for the continuation of the Y-12's weapons support mission, and the construction and operation of new facilities for the HEU Storage and Special Materials missions at Y-12 would pose no significant radiological or nonradiological health risks to the public. The conservatively estimated dose to the MEI for Alternative 4 would be approximately 4.5 mrem/year, which is below the NESHAP standard of 10 mrem/year. The risks would not be significant regardless of the racial, ethnic, and economic composition of potentially affected populations. (See also response to Comment No. 20 regarding the Scarboro Community on page 212.)

Comment No. 4

Issue Code: 14

DOE believes that it has adequately addressed impacts to public health and safety and the environment that could result from implementing the proposed action and alternatives. Volume I, Chapter 5 of the Y-12 SWEIS addresses impacts to the environment and to public health and safety from the proposed action and alternatives. The existing Y-12 facilities are safe and comply with appropriate safety and

Comment No. 4 (cont.)

Issue Code: 14

environmental requirements. A description of the safety features of the proposed new facilities can be found in Sections 3.2.3.2 and 3.2.4.2.

Comment No. 5

Issue Code: 15

Volume I, Chapter 5 of the Y-12 SWEIS addresses impacts to the environment from the proposed alternatives. Volume II, Appendices D and E provide further detailed analyses related to human health effects from normal operations/facility accidents and air quality, respectively. The risks of accidents would be very small for the proposed action and alternatives in the Y-12 SWEIS; and would actually be improved by increasing the safety in handling and storage of radioactive and toxic materials.

Comment No. 6

Issue Code: 16

Issues regarding the specific macro-economics of the project are beyond the scope of the Y-12 SWEIS.