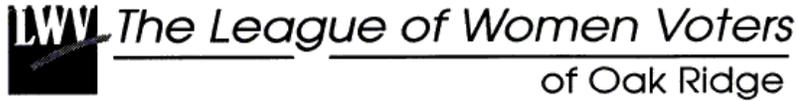


League of Women Voters of Oak Ridge  
 Oak Ridge, TN  
 Page 1 of 1



18 February 2001

Mr. Gary S. Hartman  
 U. S. Department of Energy  
 Oak Ridge Operations, EM-912  
 P. O. Box 2001  
 Oak Ridge, TN 37831

Reference: *Draft Site-Wide Environmental Impact Statement (SWEIS) for the Oak Ridge Y-12 Plant* (December 2000, DOE/EIS-0309)

Dear Mr. Hartman,

The League of Women Voters of Oak Ridge (LWVOR) is pleased to submit comments for the Draft SWEIS for the Oak Ridge Y-12 Plant.

The LWVOR endorses Alternative 4 in the draft EIS to include design, construction, and operation of a new Special Materials Complex and a new highly enriched uranium Materials Facility. These two new facilities are necessary for the continued mission of the Y-12 National Security Complex. We feel that this complex is a key facility in the National Nuclear Security Administration and an asset to the City of Oak Ridge.

The new facilities will add the element of modernization, which will ensure the continued safe operation of Y-12. All aspects of nuclear disarmament are enhanced by modernization, providing a route to economical operation, management, and efficiency.

LWVOR endorsed the End Use Working Group (EUWG) final report in 1998. We are concerned that Site 1 for the Special Materials Complex is a greenfield site and inconsistent with the EUWG final report. We suggest you follow the EUWG recommendations for Y-12 and the EUWG Community Guidelines, which specifically call for brownfield sites, not greenfield sites, to be used for new facilities sites.

We strongly encourage that the remaining proposed facilities in the integrated modernization of Y-12 follow these same EUWG recommendations and guidelines. Either further analysis of environmental impacts for the remaining proposed facilities should be included in the final SWEIS or a supplemental SWEIS should be issued providing environmental analysis for the remaining modernization.

Thank you for accepting our comments on this important SWEIS.

Sincerely,

Shirley P. Hendrix  
 President

c: Spencer Abraham, Secretary of Energy  
 Bill Brumley, Assistant Manager for Defense Programs, NNSA  
 State Representative Gene Caldwell  
 G. Leah Dever, Manager, US DOE Oak Ridge Operations  
 U.S. Senator William H. Frist  
 Mayor Jerry Kuhaida and Oak Ridge City Council  
 State Senator Randy McNally  
 U.S. Senator Fred Thompson  
 U.S. Representative Zach Wamp

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**Comment No. 1**

Comment noted.

**Issue Code: 22**

**Comment No. 2**

DOE recognizes that Site 1 for the proposed Special Materials Complex is just outside the proposed and recommended Western development areas indicated in the End Use Working Group (EUWG) Report. However, all of Site 1 is not a greenfield site as the commentor notes. A portion of the site (about 10 acres) has been used for a construction lay-down area in the past, and although legacy contamination from prior Y-12 operation support activities is not expected (See Section 3.2.4.2), it cannot be ruled out without further extensive site testing. The Record of Decision on the Y-12 SWEIS will identify DOE's decision and action on the Special Materials Complex and siting. DOE uses screening criteria and appropriate weighting factors developed specifically for each proposed project in identifying potential siting alternatives (See Section 3.3). Future modernization projects not included in the Y-12 SWEIS would be subjected to appropriate site screening and evaluation to determine reasonable alternative sites to be analyzed under separate NEPA review.

1/22

2/01

3/26

**Issue Code: 01**

**Comment No. 3**

While the proposed HEU Materials Facility and the Special Materials Complex have progressed to the conceptual design level, other facilities at Y-12 being considered for modernization are still in the very early planning phase at this time. Table 3.3-1 provides a summary of the potential new facilities. None of potential future modification projects are included in the No Action - Planning Basis Operations Alternative. Two modernization projects are included in the action alternatives for the Y-12 HEU Storage Mission and Special Materials Mission as discussed in Sections 3.2.3, 3.2.4, and 3.2.5. As new modernization projects are proposed for Y-12, separate NEPA analyses would be conducted.

**Issue Code: 26**