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FROM: CAROL MOORE
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US Dept. of Energy
 Oak Ridge Operations Office
 Att: Gary Hartman
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RE: Y-12 BOMB PLANT
 EIS

I object to the proposed Y-12 Bomb Plant and support the no action alternative only.

The original need for the bombs are now absent. Russian President Putin, ^{and} our new President Bush, ~~and time~~ are willing to make deep cuts in the arsenals of our nations. The Y-12, and any other bomb facilities for nuclear weapons, undermines US nonproliferation policy.

The Y-12 EIS ignores historic contamination in determining adverse impacts. This blatant manipulation of the facts is incredible considering the potential devastation that can result from mercury and radioactive pollution.

The \$4 billion required to build Y-12 is a shocking waste. The EIS analysis does not, and must, consider where this money could have better benefited our society. Further, the community of Seabro is a predominantly black, low income area that would be the most severely impacted. This is environmental injustice! Carol Moore

1/16
 2/18
 1/16
 (cont.)
 3/12
 4/17
 5/13

Comment: 1 **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 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 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.

Comment: 2 **Issue Code: 18**
 Comment noted.

Comment: 3 **Issue Code: 12**
 The effects due to past releases are reflected in the No Action - Status Quo Alternative. Volume I, Chapter 4 of the Y-12 SWEIS describes the current affected environment (baseline) which includes the effects of past operations and environmental contamination. Over the past several years, DOE has had a very aggressive clean-up program and has worked with EPA, the states, stakeholders, and the general public to clean up ORR to acceptable levels. To date, DOE has completed numerous clean-up activities and is aggressively working towards the cleanup of its remaining environmental problems. Actions taken to continue Y-12 operations would not be inconsistent with nor impact these ongoing clean-up activities. DOE believes that it has adequately

Comment: 3 (cont.)

Issue Code: 12

addressed impacts to the environment that could result from implementing the various alternatives. Volume I, Chapter 5 of the Y-12 SWEIS addresses impacts from the proposed action and alternatives; and Volume II, Appendices D and E provide further detailed analyses on human health effects from normal operations/facility accidents and air quality, respectively.

Comment: 4

Issue Code: 17

DOE is responsible for meeting the current requirements set forth by the President and Congress. The need for nuclear weapons and alternative uses of the Nation's funds are beyond the scope of the Y-12 SWEIS.

Comment: 5

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 environmental justice analysis was prepared in accordance with the CEQ's guidelines on environmental justice under NEPA. The Y-12 SWEIS addresses the issue of whether implementation of the proposed action or alternatives would result in disproportionately high and adverse environmental effects on minority or low-income populations. CEQ's guidance further states that an environmental effect must be significant to qualify as disproportionately high and adverse, where significant is defined by CEQ's implementation recommendations (see 40 CFR Part 1508.27). As discussed in Volume I, Chapter 5, Section 5.12 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 the response to Comment No. 20 regarding the Scarboro Community on page 212.)