

Oak Ridge Environmental Peace Alliance

Oak Ridge, TN

Page 21 of 25

DOE recognizes this: in the Y-12 *Integrated Site Modernization, 21st Century* (Y-12/SEB-0124; Y/EN 5858) document, a color chart on page 2 lists "International Verification" as a key element in weapons retirement under Science-Based Stockpile Stewardship.

The Y-12 SW-EIS indicates that limited transparency is being designed into the HEU facility in the expectation of that day. It would seem wise from a policy standpoint and prudent from an economic standpoint to design and construct the new facility in a way that permits international inspection and verification at every station when that day comes.

The importance of US leadership in this arena can not be overstated. In the years to come, other nations will be drawn more and more to do as the US does, regardless of what we say, in the nuclear arena.

The Y-12 SW-EIS is also unclear when it describes the capacity of the proposed new facility (S-26), providing a statement of capacity but no information about the expected capacity need over time—is 14,000 cans and 18,000 drums all we ever will need to store?

29/16
(cont.)

GENERAL

While it is understood that federal agencies are generally granted wide latitude with respect to the adequacy of their EIS processes, it can not be the case that federal agencies may never be held accountable to the public or by the public for the accuracy, quality, or adequacy of an Environmental Impact Statement. The public which seeks to compel revision or rejection of an EIS should have to clear a high bar, but the bar can not be impossibly high. We believe these comments demonstrate the inadequacy of the EIS to an extent sufficient to clear this hurdle.

Comment No. 23 (cont.)

Issue Code: 12

In addition, D&D activities at Y-12 do not depend exclusively on the proposed action and alternatives in the Y-12 SWEIS and are already occurring or planned, as a result of site downsizing activities. Buildings that become surplus as a result of downsizing or modernization will go through the Y-12 Facility Transition Program, as outlined in A.1.2, prior to transfer to EM. Transfer to EM will be done as prescribed by DOE O 430.1A, *Life Cycle Asset Management*. A facility's budget for S&M is transferred to EM upon transition of the facility. At this time, surplus facilities have not been identified due to proposed modernization activities analyzed in the SWEIS.

Comment No. 24

Issue Code: 17

The employment numbers reported in the Executive Summary will be clarified. There are approximately 8,900 workers employed at Y-12 of which about 5,300 are BWXT-Y12 contractor employees and 3,600 are DOE employees. The socioeconomic impacts associated with the proposed action and alternatives are addressed in Section 5.3 of the SWEIS. Impacts on area employment would be short-term, lasting only the duration of the construction period. An estimated 1,130 jobs (540 direct and 590 indirect) could be created as a result of Alternative 4. The existing ROI labor force could likely fill all of the jobs created during the construction period. There would be no increases in Y-12 employment due to operation of the HEU Materials Facility and the Special Materials Complex because these facilities would be staffed by existing Y-12 employees associated with these operations in the existing facilities to be replaced.

Comment No. 25

Issue Code: 14

The Y-12 facilities discussed in Volume II, Section A.4, are currently operational or have been operational and their impacts are included under No Action - Status Quo Alternative. All of the facilities meet operational safety and health requirements as specified in applicable regulations and DOE Orders. These facilities cannot operate unless they are in compliance with safety and health regulations provided by DOE Orders and requirements. The information is provided in