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Ann Arbor, MI  
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February 15, 2001

United States Department of Energy  
Oak Ridge Operations Office  
Attn: Gary Hartman  
P.O. Box 2001  
Oak Ridge, TN 37831

Dear Mr. Hartman,

I am writing to voice my opposition to the Department of Energy's plans for a new "National Security Complex" in Oak Ridge, Tennessee. I have a number of concerns over the recently released environmental impact statement (EIS) about the planned 4 billion dollar facility.

There is no need for more nuclear weapons. Russia is moving toward ever deeper cuts in its nuclear arsenal, and President Bush has already indicated his willingness to make deep cuts in the US arsenal. There is no "need"--politically, strategically, or militarily--for new bomb manufacturing operations. The Y-12 EIS is premised on obsolete program objectives and violates US nonproliferation goals.

The Y-12 EIS does not honestly address environmental impacts. Historic contamination is ignored. Mercury releases from the site are dangerous during heavy rainfall. The responsible action would be to address current contamination, before any discussion of expansion. Likewise, Y-12's record on worker health and safety are poor, and would argue against any plans for a new plant. Despite the fact that oversight agencies (the Defense Nuclear Facilities Safety Board and DOE's Inspector General) have regularly criticized DOE for significant health and safety shortcomings, Y-12 refuses to address many critical issues. Fire alarm and suppression systems do not work, important maintenance has been deferred for years, and worker safety is not a priority commitment. This history of environmental contamination and compromised worker health and safety damages the credibility of the EIS.

The Y-12 EIS should address the larger economic questions of the trade-offs required for an investment of \$4 billion in a new bomb plant. This is an enormous amount of taxpayer money. I, and the majority of Americans have very different priorities for our tax money. It is unconscionable to spend this way on weapons when people are struggling and in need.

My final concern is for the predominantly African-American community of Scarboro, located less than one mile from the Y-12 Plant, which will be the first and most heavily impacted by all contamination released from Y-12 operations. The DOE's own studies have documented contamination in the surface soils in Scarboro, and future activities will have similar impacts visited disproportionately on the black community. Historically, minority communities have borne the brunt of all sorts of environmental contamination. Surely, this is unjust, and must stop.

Sincerely,  
  
Kyla Boyse

**Comment No. 1**

**Issue Code: 16**

While future arms control reductions may change requirements for maintaining the weapons stockpile, DOE is responsible for meeting the current requirements set forth by the President and Congress. The need for nuclear weapons and the issue of how many nuclear weapons the United States maintains as a nuclear deterrent are beyond the scope of the Y-12 SWEIS.

**Comment No. 2**

**Issue Code: 05**

The Y-12 SWEIS has been prepared in accordance with Council on Environmental Quality regulations (40 CFR Parts 1500-1508) and DOE's NEPA regulations (10 CFR Part 1021) and procedures. The historic contamination at Y-12 is discussed in Sections 4.5.1, 4.5.2 and 4.5.3, which detail the surface and groundwater impacts. The release of mercury from Y-12 storm sewers has been a problem during heavy rainfall events. However, corrective actions such as storm sewer cleaning and relining and mercury source removals conducted since 1985 have greatly reduced releases of mercury from former mercury-use facilities. Mercury is known to be a contaminant of potential concern for fish consumption patterns in the Clinch River. The state of Tennessee has issued an advisory to the public concerning mercury and fish consumption. The effects due to past releases including mercury are reflected in the No Action - Status Quo Alternative and are also detailed in the ORR Annual Site Environmental Report. There is no proposal for expansion of Y-12 in the SWEIS. DOE believes that it has adequately 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 related to human health effects from normal operations/facility accidents, and air quality, respectively.

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**Comment No. 3****Issue Code: 14**

DOE believes that it has adequately addressed impacts to public health and safety that could result from implementing the proposed action and alternatives in the Y-12 SWEIS. Volume I, Chapter 5, Sections 5.12 and 5.14 of the Y-12 SWEIS address impacts to health and safety from the proposed action and alternatives, and Volume II, Appendices D and E provide further detailed analyses related to human health effects from normal operations/facility accidents, and air quality, respectively. Appendix A details the corrective actions taken at Y-12 concerning issues related to fire and worker safety. The missions at Y-12 would pose no significant radiological or nonradiological health risks to the public. The conservatively estimated dose the MEI for Alternative 4 would be approximately 4.5 mrem/year, which is below the radionuclide NESHAP standard of 10 mrem/year. (See also the response to Comment No. 26 regarding safety and fire issues on page 217).

**Comment No. 4****Issue Code: 16**

There is no plan or proposal in the Y-12 SWEIS to build a new bomb plant or manufacture new nuclear weapons. DOE is responsible for meeting the current requirements set forth by the President and Congress in the Nuclear Weapon Stockpile Memorandum, which is updated annually. The need for nuclear weapons and the discussion of alternative uses of the Nation's funds are beyond the scope of the Y-12 SWEIS.

**Comment No. 5****Issue Code: 13**

DOE is committed to compliance with provisions of Executive Order 12898, *Federal Action 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

**Comment No. 5 (cont.)**

**Issue Code: 13**

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 1, 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 radionuclide 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 response to Comment No. 20 regarding the Scarboro Community on page 212).