

Buller, Robert R.
Comer, GA
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1/29/01
P.O. Box 68
Comer, GA 30629

US Dept. of Energy
Oak Ridge Operations Office
P.O. Box 2001
Oak Ridge, TN 37831

Gary Hartman:

I wish to comment on the Environmental Impact statement for the proposed Y-12 National Security Complex.

The Y-12 EIS violates current U.S. nonproliferation policy in that facilities are included which will design and build new kinds of nuclear weapons. This will simply compel other countries to design and build more sophisticated nuclear weapons of their own.

The Y-12 EIS is based on obsolete program objectives. Russia has called for deep cuts in the nuclear arsenal by ratifying START 2, and has negotiated for even deeper cuts in START 3. There is no need for new bomb manufacturing operations.

Y-12's current operations compromise worker & health concerns. Oversight agencies have regularly criticized the DOE for violations of basic safety concerns. Worker safety is clearly not a priority commitment.

Comment No. 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 weapons dismantling 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 the 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.

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Comment No. 2

Issue Code: 14

Existing Y-12 facilities are safe and comply with appropriate safety and environmental requirements. The new facilities would provide more protection from natural phenomena events and accidental releases that could affect the public. (Also see response to Comment No. 26 concerning safety and fire issues on page 217.)

DOE believes that it has adequately addressed impacts to the environment that could result from implementing the proposed action and alternatives in the Y-12 SWEIS. Volume I, Chapter 5, Section 5.12 of the Y-12 SWEIS addresses occupational and public health and safety impacts of the proposed action and alternatives, and Volume II, Appendices D and E provide further detailed analysis related to human health effects from normal operations/facility accidents, and air

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Thank you for considering these concerns.

*Sincerely,
Robert R. Buller*

Comment No. 2 (cont.)

Issue Code: 14

quality, respectively. Appendix A discusses the actions taken at specific facilities at Y-12 in response to fire and worker safety issues. Worker safety is always the first priority at Y-12. (See also response to Comment No. 26 regarding fire mitigation and worker safety on page 217).