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Brunswick, GA
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Hartman, Gary S

From: ROBERT G. RANDALL II [rrandall@compuserve.com]
Sent: Friday, February 02, 2001 11:19 AM
To: Y12EIS
Subject: comments on draft EIS for Y-12

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Mr. Hartman:

Thank you for sending me the 2-volume Draft Site-Wide EIS for the Oak Ridge Y-12 Plant. It has been laborious and scary reading, but attached are my comments.

1- Of major concern is the limited scope of this EIS. It is incomplete in that it addresses only a couple parts of a much larger movement toward new and ongoing nuclear weapons production. In other words, the impacts of the alternatives are diminished in this study because they do not consider the impacts of the further actions which are anticipated once a certain path is taken. No informed decision can be made because all the facts are simply not on the table.

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2- Besides ignoring the long-range impacts of the inevitable implications of starting down path A or path B, the SWEIS also ignores some of the short term impacts. There is, for example, no effort to address the moral environment. While I realize that certain immoral decisions which have been made are outside the purview of the SWEIS (i.e., the decision to continue to rely on mass annihilation as an instrument of foreign policy), the impacts of those decisions are precisely what an EIS is supposed to address. The moral environment is extremely important: almost every major religion and most minor ones draw connections between morality and the health of both individuals and nature. Might there be a difference in the ill effects of the minor choices which the SWEIS ends up analyzing? Probably not, but we cannot know because this all-important aspect was not even addressed. (Were it ever seriously studied, might there be a difference in the extent of choices allowed? Would we get an EIS with real alternatives rather than foregone conclusions?)

2/16

3- My first impression from reading through analysis after analysis in this document is that the whole EIS is just one large apologia for choices already made. For example, health effects are pooch-pooched (not a scientific word but you know what it means!) and then buried behind disputable assumptions and esoteric formulas and calculations. Analysis concentrates on fatalities rather than illness, and the actual cost of the health effects monetarily, to say nothing of psychologically and socially, are not even considered, much less estimated or calculated.

3/14

4- There is no analysis whatsoever of the cost trade-offs of spending so much money on new construction vs spending it on meeting human needs. What is the environmental impact of such a transference of funds. The EIS could start minimally by just addressing the trade-off between new construction vs clean-up, since this is an obvious one. The total budget for Oak Ridge has a cap, though we cannot know now how much it will be, and the more money which is committed to new production, the less there will be for clean-up and environmental restoration. This is clearly a site-wide concern; why is it not addressed in the SWEIS?

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More broadly, though, the full social and economic impacts of the choices should be addressed. Just as there is a cap on the Oak Ridge

Comment No. 1

Issue Code: 26

The Y-12 SWEIS was prepared in accordance with CEQ's regulations (40 CFR Parts 1500-1508) and DOE's NEPA regulations (10 CFR Part 1021) and procedures. While the proposed HEU Materials Facility and the Special Materials Complex have progressed to the conceptual design level, other facilities at Y-12 considered for modernization are still in the very early planning phases and are not ripe for decision 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 will be conducted. Sections 1.1.3 and 3.3 discuss the Y-12 Modernization Program.

Comment No. 2

Issue Code: 16

The Y-12 SWEIS assesses the potential environmental impacts associated with the continued operation of the Y-12 National Security Complex and the proposed construction and operation of new facilities for the HEU Storage Mission and Special Materials Mission at Y-12. DOE believes that the moral and ethical issues raised are outside the scope of the Y-12 SWEIS.

Comment No. 3

Issue Code: 14

Potential public health and safety impacts were analyzed for the alternatives included in the Y-12 SWEIS. DOE believes that the Y-12 SWEIS has adequately analyzed the impacts to public health and safety that could result from implementing the various alternatives. Volume I, Chapter 5, Section 5.12 of the Y-12 SWEIS addresses impacts to public health and safety from the proposed alternatives. 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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budget, there are constraints on the full federal budget. How does the choice to blow billions on new nuclear weapons facilities impact housing, education, health care, social security, and a host of other items which mean real security for our people? Whatever cost differences might exist in the very limited choices which this SWEIS finally allowed, the impact of these differences should have been fully explored rather than ignored.

4/16
cont.

5- Mathematically-based risk assessments falsely ameliorate the consequences of accidents by averaging two distinct realities into an unreal continuum. What I mean by this is simply that an accident either happens or does not happen. There is no such thing as .1 fatality; there is either a fatality or not. The real issue is whether a worst-case scenario is an acceptable consequence of doing an alternative action. The SWEIS does not address that question. If it did, could DOE opt for any of the choices offered in this EIS?

5/14

Finally, I must reiterate that, even within the extremely narrow scope of options allowed by this document, the full range of environmental impacts are not addressed and those which are addressed are done in a manner designed to shed the most favorable possible light on a decision which I believe you have already made. You will proceed to waste our money, resources, and intellectual and moral capital on creating unforgivable weapons for the destruction of God's creation. The management and workers of Y-12 and Oak Ridge, the surrounding citizens and natural environment, our entire nation, and ultimately the world itself, will continue, as we all have been and as karma dictates we must, to reap what you are sowing. That is an immutable environmental impact which no SWEIS can wipe away.

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May God have mercy on us all, for nothing else can save us from our own evil.

Sincerely,
Robert Randall

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Comment No. 4

Issue Code: 16

Comment noted. DOE is responsible for meeting the current requirements set forth by the President and Congress in the Nuclear Weapons Stockpile Memorandum, which is updated annually. The need for nuclear weapons and alternative uses of the Nation's funds are beyond the scope of the Y-12 SWEIS.

Comment No. 5

Issue Code: 14

Volume II, Appendices D and E provide detailed analysis related to human health effects from normal operations/facility accidents and air quality, respectively. The accident analyses in the Y-12 SWEIS use standard, accepted methods of taking into account the probability of accidents in deriving estimates of impact. The commentor's suggestion that DOE should assume all accidents will happen is not a reasonable basis for impact analysis, or technical/NEPA decisionmaking.

Comment No. 6

Issue Code: 16

Comment noted.