

Sersch, Mike

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Hartman, Gary S

From: Michael Sersch [sersch1@hotmail.com]
Sent: Thursday, February 15, 2001 11:47 AM
To: Y12EIS
Subject: Y 12

Dear Mr. Gary Hartman,

I am writing to you to express my grave concern over the proposal for Y-12, especially regarding the environmental impact statement. Some things have been left out. The baseline for assessing the environmental impacts of Y-12 must incorporate the historic contamination which makes Y-12 an EPA Superfund Site. In periods of heavy rainfall, mercury releases from Y-12 exceed legal limits whether the plant is operating or not.

1/05

I am a worker, spending my time with homeless men. I feel strongly about worker issues, including worker safety. Y-12's current operations compromise worker health and safety in several important ways. 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 short comings, 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. The claims made in the Y-12 EIS about safety in the workplace fly in the face of historic and current management practice and are simply not credible. Risk scenarios based on safety claims can not be believed.

2/14

Environmental Impact Statements are required by law to address economic issues as well as ecological concerns. The Y-12 EIS takes a narrow and parochial view in its economic analysis, despite the fact that an investment of \$4 billion has a national economic impact. (It was President Eisenhower who made the explicit connection between military spending and social needs: he said every dollar spent on the military is "a theft of a slice of bread from a child who is hungry and is not fed.") The Y-12 EIS should address the larger economic questions which make clear the trade-offs required for an investment of \$4 billion in a new bomb plant. I think this money would be far better spent on the hungry and homeless, rather than on more weapons.

3/16

The law requires an EIS to give special consideration to issues of Environmental Justice: whether proposed actions would disproportionately harm communities of color or low income communities. The Y-12 EIS disingenuously claims there are no environmental justice concerns related to DOE's plans. The truth is that the predominantly African-American community of Scarboro, located less than 1 mile from the Y-12 Plant, will be the first and most heavily impacted by all contamination released from Y-12 operations. DOE's own studies have documented Highly Enriched Uranium and other contamination in the surface soils in Scarboro, and future activities will have similar impacts visited disproportionately on the black community.

4/13

Given all of this information, I am highly critical of this proposal. I strongly urge against it, as it is a hazardous facility that is wasteful of tax dollars. Our dollars.

5/16

Sincerely,

Mike Sersch

Comment No. 1

Issue Code: 05

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. 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. DOE believes that it has adequately analyzed environmental impacts that could result from implementing the proposed actions and alternatives. Volume I, Chapter 4 of the Y-12 SWEIS describes the affected environment for the proposed action and alternatives in the Y-12 SWEIS.

The EM Program staff at Y-12 is currently conducting the Reduction of Mercury in Plant Effluents Project at Y-12. Two specific actions, Mercury in Soils and Bank Stabilization are components of the project. Section 3.2.2.3 of the SWEIS identifies the ongoing EM restoration activities under No Action - Planning Basis Operations and the other alternatives. The Reduction in Mercury in Plant Effluents Project achieved a record low concentration in August 1999 for average mercury concentrations at Station 17.

Comment No. 2

Issue Code: 14

DOE is committed to worker safety. Y-12 operations are conducted in accordance with applicable health and safety practices. The existing Y-12 facilities are safe and comply with appropriate safety and environmental requirements. A description of the safety features of the proposed facilities can be found in Sections 3.2.3.2 and 3.2.4.2. One of the major design goals for the proposed facilities is to achieve a reduced risk to workers and the public relative to the existing storage and production facilities. The design of the proposed HEU Materials Facility and the Special Materials Complex would meet Y-12 Conduct of Operations and Integrated Safety Management requirements. The processing area within the HEU Materials Facility and all the production areas within the Special Materials Complex facilities would be equipped with gloveboxes, inert atmosphere, negative air pressure, and other engineered controls supported by administrative controls to protect workers from exposure to radiological and hazardous materials. As explained in Section 3.2.4.2, there are no radiological materials handled within the proposed Special Materials Complex facilities. Appendix A discusses actions taken at specific facilities at Y-12 in

**Comment No. 2 (cont.)****Issue Code: 14**

response to fire and worker safety issues. (See also response to Comment No. 26 on fire mitigation and worker safety on page 217.)

**Comment No. 3****Issue Code: 16**

The purpose of the NEPA process is to ensure that accurate environmental studies are performed; that they are done with public involvement, and that public officials make decisions based on the understanding of the environmental consequences. Macroeconomic analysis is outside the scope of NEPA analysis. NEPA requires an analysis of socioeconomic impacts which is included in the Y-12 SWEIS.

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. 4****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 CEQ's guidelines of 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. As discussed in Volume I, Chapter 5, Sections 5.12 and 5.13 of the Y-12 SWEIS, implementation of the alternatives for the continuation of 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 non-radiological 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 response to Comment No. 20 regarding the Scarboro Community on page 212.)

**Comment No. 5****Issue Code: 16**

Comment noted.