

Smith, Brad

Comer, GA

Page 1 of 2

DOE / Oak Ridge  
Attn: Gary Hartman  
Po 2001  
Oak Ridge, TN 37831

Box 68  
Comer, GA 30624

Dear Sirs:

I am writing in regards to the Environmental Impact Statement for the Y-12 proposed National Security Complex. Here are my comments:

I am deeply disturbed by the environmental degradation and damage that has occurred at various sites around the country connected with the production of nuclear weapons. The track record of the government in operating these facilities in a environmentally safe manner is miserable. I am opposed to any expansion of such facilities for this reason. Therefore I wish to go on record in opposition to the proposed National Security Complex.

A second area of concern is the safety of workers in the proposed complex. The information I have heard about the operation of Oak Ridge and inattention to safety violations leads me to question the work place conditions that would be present here. Again the track record here of the government is poor and so I conclude that it would be dangerous folly to build this new complex.

1/16

2/14

**Comment No. 1**

**Issue Code: 16**

Comment noted. In accordance with Section 91 of the *Atomic Energy Act*, DOE carries out its mission (i.e., atomic weapons activities) consistent with the consent of and direction from the President and Congress. This consent and direction are contained in the Nuclear Weapons Stockpile Memorandum, which is updated annually. The issue of whether DOE should produce nuclear weapons is beyond the scope of the Y-12 SWEIS.

DOE recognizes that it has facilities which require some level of environmental cleanup. Most of the facilities at Y-12 were designed and constructed in the 1940s and 1950s, prior to today's environmental requirements when the understanding of waste management principles was not what it is today. Over the past several years, DOE has had a very aggressive facility upgrade and clean-up program and has worked with EPA, the states, stakeholders, and the general public to clean up its facilities to acceptable levels. To date, DOE has completed numerous clean-up activities and is aggressively working toward the cleanup of its remaining environmental problems. Actions taken to continue Y-12 weapons support missions, and construction and operation of new facilities for the HEU Materials and Special Materials missions at Y-12 would not be inconsistent with nor impact these ongoing clean-up activities.

**Comment No. 2**

**Issue Code: 14**

DOE believes that it has adequately analyzed 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; and Volume II, Appendices D and E provide further detailed analysis related to human health effects from normal operations/facility accidents and air quality, respectively. Appendix A discusses the actions taken at specific facilities at Y-12 in response to fire and worker safety issues. Workers safety is always the first priority at Y-12. (See also response to Comment No. 26 regarding fire safety on page 217.)

Smith, Brad  
Comer, GA  
Page 2 of 2

A third concern I have is in the area of environmental justice- The presence of a predominantly African-American community within a mile of Y-12 is a major concern for me: What protections do these people, and any of the neighbors of Y-12, have from any possible accidents or contamination that might release radioactivity into the air, water, or earth? There is already surface soil contamination in this area (the Scarboro community) and I am seriously concerned about the disproportional impact these residents will bear of the future activities of this proposed complex.

Finally, I have to ask - does it make any sense at all to spend billions of dollars on a new bomb plant? In this post-Cold War era, I see absolutely no justification or rationale for this. It seems clear to me that the Y-12 EIS is premised on outmoded thinking and obsolete program objectives.

In conclusion, there is much that disturbs me about this proposed National Security Complex. I see many potential threats to environmental and worker safety, as well as a huge expenditure of tax payer's money, all for a goal that is no longer valid. I am opposed to any construction of the proposed National Security Complex.

Thank you for consideration of these comments.  
Brad Smith

3/13

1/16

(cont)

**Comment No. 3**

**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 the 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. CEQ's guidance 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 I, Chapter 5, Section 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 health risks to the public regardless of the racial, ethnic, and economic composition of potentially affected populations. (See also the response to Comment No. 20 regarding the Scarboro Community on page 212.)