

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

Jan 29, 2001

Dear Mr. Hartman,

As a concerned citizen of the United States, I write to comment on the Environmental Impact Statement for the proposed Y-12 National Security Complex.

My understanding is that Russia has ratified the START 2 Treaty, and that the Russian president has called for even deeper cuts in the arsenal than the negotiated START 3 target level. President elect Bush in fact has already indicated his willingness to make deep cuts in the US arsenal. It seems to me that there is no "need" politically, strategically or militarily for new bomb manufacturing operations. The Y-12 EIS is premised on obsolete program objectives.

The Y-12 EIS also violates US nonproliferation goals.

The claims made in the Y-12 EIS about

Comment No. 1

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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 weapons 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 the HEU Materials Facility and Special Materials Complex by the United States does not conflict with such an agreement. The proposed action, which includes continuing weapons dismantlement 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 START I and the recently ratified START II.

DOE is committed to worker safety. 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

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safety in the workplace are not legitimate when Y-12's current operations compromise worker safety + health. Oversight agencies have regularly criticized DOE for significant health + safety shortcomings which have not been addressed.

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Thank you for your attentions to the concerns of the American people.

Sincerely,

Josie Winterfeld

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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 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. 2

Issue Code: 14

DOE believes that it has adequately addressed health and safety impacts that could result from implementing the various alternatives. 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, 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 discusses actions taken at specific facilities at Y-12 in response to fire and worker safety issues. (See also response to Comment No. 26 on fire mitigation and worker safety on page 217.)