

Ewald, Linda
Knoxville, TN
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1-25-01

There are major problems with this Draft Y-12 Environmental Impact Statement. The Department of Energy is breaking its plan into pieces, which defies the law against segmenting a decision to minimize apparent impacts. This plan contains steps toward new nuclear weapons production facilities. Authorization of this EIS will put us on the track of increased bomb building. There is no political, strategic or military need for new bomb manufacturing operations. The premise is obsolete and the plan violates goals of nuclear weapons non-proliferation.

1/26

2/16

Concerning environmental impacts, this Y-12 EIS establishes a false baseline. Assessment must incorporate historic contamination which has made Y-12 an Environmental Protection Agency Superfund Site. Claims about workplace safety are also not believable. Y-12 worker health and safety are compromised by current operations and oversight agencies regularly criticize DOE for health and safety shortcomings that are not addressed. The EIS claims there are no environmental justice concerns related to DOE's plans. Actually, the mostly African-American community of Saraboro less than one mile from Y-12 was, is, and will be heavily impacted. DOE studies have documented highly enriched uranium and other contaminants in the surface soil of Saraboro. Finally the draft EIS does not adequately, and should, address the economic trade offs of investing \$ four billion dollars in a new nuclear weapons production facility when people are hungry and homeless. Children need education and the environment

3/12

4/14

5/13

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(cont.)

Comment No. 1

Issue Code: 26

Segmentation involves separately analyzing connected actions in order to reduce the significance of the environmental impacts of an action as a whole. CEQ's regulations are directed at avoiding improper segmentation, and the Y-12 SWEIS was prepared in accordance with CEQ regulations. The proposed action and alternatives in the Y-12 SWEIS are independent of other potential future modernization actions at Y-12. Any future proposals would be the subject of separate NEPA reviews if and when it is decided to move forward with specific actions.

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 phase 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 modernization 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

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 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.

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needs cleaning up. The Big Question is - When
 will we get over our National "IN security"
 Complex and work to Build Peace, not Bombs?
 Thank-you for your time and attention and
 the opportunity to comment.

Linda Ewald
 Linda Ewald
 949 Ponder Road
 Knoxville, TN 37943
 Oak Ridge Environmental
 Peace Alliance

2/16
 (Cont.)

Comment No. 2 (cont.)

Issue Code: 16

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.

Discussion of alternative uses of the Nation's funds is beyond the scope of the Y-12 SWEIS. 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 ongoing clean-up activities.

Comment No. 3

Issue Code: 12

Volume I, Chapter 4 of the Y-12 SWEIS describes the current affected environment which includes the effects of past operations and environmental contamination. The effects due to past releases are reflected in the No Action-Status Quo Alternative. Over the past several years DOE has had a very aggressive clean-up program and has worked with EPA, the states, stakeholders, and the general public to clean up the ORR 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 operations would not be inconsistent with nor impact these ongoing clean-up activities.

Comment No. 4

Issue Code: 14

DOE believes that it has adequately addressed impacts to health and safety that could result from implementing the various alternatives. Volume I, Chapter 5, Section 5.12 addresses occupational and public health and safety impacts, and Volume II, Appendices D and E provide further detailed analyses related to human health effects from normal operations/facility accidents and air quality, respectively.

Comment No. 5

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

Comment No. 5 (cont.)

Issue Code:13

analysis was prepared in compliance with the CEQ's guidelines of environmental justice under NEPA. The Y-12 SWEIS addresses the issue of whether implementation of the proposed action and 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 the CEQ's implementation recommendations (see 40 CFR Part 1508.27). As discussed in Volume II, Chapter 5 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 nonradiological 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 the response to OREPA Comment No. 20 regarding the Scarboro Community on page 212.)