

Gingerich, Wilma B.
Harrisonburg, VA
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Harrisonburg, VA 22802
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U.S. Dept. of Energy
Oak Ridge Operations Office
Attn: Gary Hartman
P.O. Box 2001
Oak Ridge, TN 37831

I wish to comment on the Environmental Impact Statement for the proposed Y-12 National Security Complex.

Since time has already overtaken the policy decisions on which these actions are based there is no "need" - politically, strategically, or militarily - for new bomb manufacturing operations. The Y-12 EIS is premised on obsolete program objectives.

Further, the Y-12 EIS violates U.S. nonproliferation goals.

The established baseline for assessing the environmental impacts of Y-12 is false. It must incorporate the historic contamination which makes Y-12 an EPA Superfund Site. In periods of heavy rainfall, mercury release from Y-12 exceed legal limits whether the plant is operating or not.

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 cannot be believed.

1/16

2/05

3/14

Comment No. 1

Issue Code: 16

Since the end of the Cold War, the United States has significantly reduced the size of its nuclear weapons stockpile, and DOE has dismantled more than 15,000 nuclear weapons. At the present time, the United States is further downsizing its deployed nuclear weapons stockpile consistent with the terms of START I and START II. Although Russia suspended its nuclear weapons dismantlement actions on January 20, 2001, DOE has continued its weapons dismantlement activities. While future arms control reductions may change requirements for maintaining the weapons stockpile, DOE is responsible for meeting the current requirements set forth by the President and Congress. 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 dismantlement. The need for nuclear weapons and alternative uses of the Nation's funds are beyond the scope of the Y-12 SWEIS.

Comment No. 2

Issue Code: 05

DOE believes that it has adequately addressed impacts to the environment that could result from implementing the proposed action and alternatives in the Y-12 SWEIS. 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

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The Y-12 EIS should address the larger economic questions surrounding the trade-off required for an investment of \$4 billion in a new bomb plant. President Eisenhower made the explicit connection between military spending and social needs. The hungry child and its homeless mother are the products of this short-sightedness. The surest way to overcome enemies is not to make bombs to keep them in fear but to make them into friends.

*Sincerely,
 Wilma B. Gingerich*

*cc: Senator John Warner
 U.S. Senate
 Wash. D.C. 20510
 - Senator George Allen
 U.S. Senate
 Wash. D.C. 20510
 - Representative Bob Goodlatte
 House of Representatives
 Wash. D.C. 20515*

Comment No. 2 (cont.)

Issue Code: 05

would not be inconsistent with nor impact these ongoing clean-up activities.

1/16
 (cont.)

The release of mercury from the Y-12 Site storm sewers has been a problem during heavy rainfall events. However, corrective actions, such as storm sewer cleaning and relining and mercury source removals, conducted since 1985 have greatly reduced releases of mercury from former mercury-use facilities. The Y-12 National Security Complex has an Integrated Mercury Strategy Program to achieve compliance with regulations and guidance addressing mercury contamination in EFPC. A description of mercury releases at Y-12 is provided in Appendix D, Section D.3.7.1. Effects of mercury in the environment at Y-12 are also described and reported in the ORR Annual Site Environmental Report. The discussion of mercury contamination in the environment at Y-12 is contained in Chapter 4, Section 4.5, Hydrology, and Section 4.7, Air Quality of the SWEIS.

Comment No. 3

Issue Code: 14

DOE believes that it has adequately addressed impacts to public health and safety that could result from implementing the proposed action and alternatives. Volume I, Chapter 5, Section 5.12 of the Y-12 SWEIS addresses impacts to public health and safety from the proposed action and alternatives; 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. Appendix A discusses the actions taken at specific facilities at Y-12 in response to fire and worker safety at Y-12. (Also see response to Comment No 26 on fire and safety issues on page 217).