Siskind, Erica
Page 1 of 1

4/27/4

Dear DOE:

Here is my comment on the draft Site-Wide Environmental Impact Statement on Livermore Lab operations over the next ten years. The SWEIS calls for major increases in nuclear weapons design and manufacture. New plutonium activities include: raising the inventory from 1,540 pounds to 3,300 pounds; tripling the amount "at risk" at one time; creating prototype bomb cores for a new "Modern Pit Facility;" fissioning plutonium in the NIF mega-laser; and, vaporizing plutonium oxide on-site to separate isotopes. The SWEIS also reveals plans to increase the "at risk" limit for radioactive tritium 10-fold.

1/01.01 I oppose these actions in the SWEIS that will
2/04.01 increase nuclear proliferation and damage our
3/07.01 environment. I call on you to analyze conversion of the Lab to peaceful purposes as an alternative.

Signed: ERICA SISKIND

Address: 1427 PARKER ST. BERKELEY, CA 94702

NO EXPANSION OF NUCLEAR WEAPONS PROGRAMS. CONVERT TO PEACE!

GREETINGS FROM Far Far Away

To:

00422

RECEIVED MAY 03 2004

Mr. Tom Grim
DOE, NNSA, L-293
7000 East Avenue
Livermore, CA
94550

Siskind, Erica
Page 1 of 1

4/19/04

Dear Mr. Grim,

1/02.01 I do not want weapons of mass destruction to be developed and produced ANYWHERE - but certainly not in Livermore.

Plutonium should be banned as dangerous and unnecessary. The hazardous plans for "Plutonium Atomic Vapor Laser Isotope Separation" and the "Modern Pit Facility" and the "National Ignition Facility"

2/04.01 should be canceled. As should plans for any "Bio-Nuclear Research Facility at risk." Please do not put my

Sincerely, Erica Siskind
1427 Parker St
Berkeley CA 94702

MR. TOM GRIM
D.O.E. NNSA. L-293
7000 EAST AVE.
LIVERMORE, CA
94550

Snake River Alliance, Jeremy M. Maxand, Executive Director
Page 1 of 6

Mr.,

Please find attached our comments on the Lawrence Livermore National Laboratory Sitewide Environmental Impact Statement.

Jeremy M. Maxand
Executive Director
Snake River Alliance
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(208) 331-0885 fax
sra@snakeriveralliance.org
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"[Senator Graham's high-level waste] legislation would be a huge step backward, reinforcing public fears about our nation walking away from nuclear cleanup obligations." (Idaho Governor Dirk Kempthorne, May 13, 2004)

Snake River Alliance, Jeremy M. Maxand, Executive Director
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snake river alliance
IDAHO'S NUCLEAR WATCHDOG

May 20, 2004

Mr. Thomas Grim, L-293
U.S. Department of Energy,
National Nuclear Security Administration
Livermore Site Office, SWEIS Document Manager
7000 East Avenue
Livermore, CA 94550-9234
Fax: (925) 422-1776
Email: tom.grim@oak.doe.gov

RE: Comments on the Department of Energy's Site-Wide Environmental Impact Statement (SWEIS) for Continued Operations at Lawrence Livermore National Laboratory (LLNL).

Dear Mr. Grim:

The Snake River Alliance is an Idaho-based grassroots group working through research, education, and community advocacy for peace and justice, the end to nuclear weapons production activities, and responsible solutions to nuclear waste and contamination. I submit the following comments and questions on behalf of our dues-paying members.

1/31.04 Through this letter we are expressing our deep concern with the health and environmental risks posed by the expanded nuclear weapons mission for the Lawrence Livermore National Laboratory (LLNL) into the indefinite future. We appreciate your focused attention to this matter. Below, we have outlined a number of specific concerns that, taken cumulatively, lead us to the conclusion that the Site Wide Environmental Impact Statement (SWEIS) for the continuing operation of LLNL is so deficient in information and analysis that it must be fixed and re-circulated in draft form. This would allow the community, the regulators, and the legislators to have the opportunity to evaluate the new information that is requested in these comments. Our specific concerns are:

2/08.02 1. The same day of the public hearings for the SWEIS, April 27, 2004, the Congressional Subcommittee on National Security, Emerging Threats, and International Relations for the Committee on Government Reform held a hearing on the security of nuclear

Snake River Alliance, Jeremy M. Maxand, Executive Director
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materials. The hearing highlighted potentially insurmountable problems with plutonium and highly enriched uranium at certain Department of Energy (DOE) sites, with a focus on the vulnerability of nuclear materials storage at LLNL. On May 7, 2004, Energy Secretary Spencer Abraham delivered a speech on the deficiencies in the security of nuclear materials at LLNL and other DOE sites. The Energy Secretary made a commitment to consider removing the special nuclear materials at LLNL by 2005. This recent acknowledgement by the DOE that security at LLNL is questionable makes it imperative that the SWEIS evaluate an alternative that would remove all special nuclear materials from LLNL. These acknowledgements make this not only a reasonable option, but one that should be evaluated because it is a foreseeable outcome within the next decade at LLNL.

2/08.02 cont.

2. Instead of reducing the amount of special nuclear materials on-site at LLNL, this plan proposes to more than double the limit for plutonium at Livermore Lab from 1,540 pounds to 3,300 pounds. Additionally, under the Proposed Action, the administrative limit for highly enriched uranium in Building 239 would increase from 55 pounds to 110 pounds. Seven million people live in surrounding areas, and residences are built right up to the fence. Plutonium is difficult to store safely because, in certain forms, it can spontaneously ignite and burn. Moreover, it poses a criticality risk when significant quantities are stored in close proximity. The amount of plutonium proposed for LLNL is sufficient to make more than 300 nuclear bombs. Because of the health risks, the proliferation dangers, storage hazards, and very serious security concerns, we believe it is irresponsible to store plutonium, highly enriched uranium and tritium at LLNL. We are calling upon the DOE to de-inventory the plutonium, highly enriched uranium and tritium stocks at LLNL rather than to increase them.

3/34.01
4/33.01, 25.01

3. The SWEIS proposes to increase the at-risk limits for tritium ten fold, from just over 3 grams to 30 grams. The SWEIS proposes to increase the at-risk limit for plutonium from 44 pounds to 132 pounds. We believe it is unsafe to increase the amount of tritium and plutonium that can be "in process" in one room at one time. LLNL has a history of criticality violations with plutonium and releases of both tritium and plutonium, making it evident that these amounts should be decreased, rather than increased.

5/27.01

4. This plan will revive a project that was canceled more than 10 years ago because it was dangerous and unnecessary. The project was called Plutonium - Atomic Vapor Laser Isotope Separation (AVLIS). Now it is called the "Integrated Technology Project"(ITP) and the "Advanced Materials Program"(AMP). This is a scheme to heat and vaporize plutonium and then shoot multiple laser beams through the vapor to separate out plutonium isotopes. The ITP / AMP is a health risk and a nuclear proliferation nightmare. We believe the ITP and AMP work should be cancelled as the Plutonium AVLIS was cancelled in 1990 - this time permanently.

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Snake River Alliance, Jeremy M. Maxand, Executive Director
Page 4 of 6

6/37.01

5. This plan makes Livermore Lab the place to test new manufacturing technologies for producing plutonium pits for nuclear weapons. A pit is the softball-sized piece of plutonium that sits inside a modern nuclear weapon and triggers its thermonuclear explosion. DOE says these new technologies will then be used in a new bomb factory, called the Modern Pit Facility (MPF). Public and Congressional opposition to the MPF has caused its delay this year. The Livermore Lab plutonium pit program goes full-speed ahead in the wrong direction. It will enable the MPF and production of 150 - 450 plutonium bomb cores annually, with the ability to run double shifts and produce 900 cores per year. This production capability would approximate the combined nuclear arsenals of France and China - each year. We call upon the DOE to halt all work on plutonium pit production technologies at Livermore Lab. We believe it is premature for the DOE to spend taxpayer dollars on this technology and the prudent and reasonable outcome is to delay or cancel this project.

7/26.01
8/26.03

6. This plan will add plutonium, highly-enriched uranium and large quantities of lithium hydride to experiments in the National Ignition Facility mega-laser when it is completed at Livermore Lab. Using these materials in the NIF will increase its usefulness for nuclear weapons development, including for the design of new types of nuclear weapons. It will also make the NIF more hazardous to workers and the environment. This is not only dangerous to people's health and safety, and a proliferation risk, but it is sure to result in an inordinate cost to the taxpayer. No cost estimate associated with this proposal has been released to date. We ask the DOE to cancel these dangerous, polluting, proliferation-provocative and unnecessary new experiments proposed for the NIF.

9/26.04

7. The SWEIS reveals plans to manufacture tritium targets at LLNL. The tritium-filled targets are the radioactive fuel pellets that the NIF's 192 laser beams will "shoot" in an attempt to create a thermonuclear explosion. Producing the targets will increase the amount of tritium that is used in any one room at Livermore Lab from the current limit of just over 3 grams to 30 grams - nearly 10-fold more. In the mid-1990's, LLNL stated that target fabrication was to occur off-site because of LLNL's proximity to large populations.

Livermore Lab has a history of tritium accidents, spills and releases. The NIF will increase the amount of airborne radioactivity emanating from LLNL. We call on DOE to cancel plans to manufacture tritium targets for NIF at Livermore Lab. Further, we urge cancellation of the NIF megalaser. Cancellation of NIF is a reasonable alternative that should be fully analyzed in the SWEIS.

10/39.01

8. This plan also calls for Livermore Lab to develop diagnostics to "enhance" the nation's readiness to conduct full-scale underground nuclear tests. This is a dangerous step back to the days of unrestrained nuclear testing. All work at LLNL to reduce the time it takes to conduct a full-scale underground nuclear test should be terminated immediately.

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Snake River Alliance, Jeremy M. Maxand, Executive Director
Page 5 of 6

11/35.01 9. This plan mixes bugs and bombs at Livermore. It calls for collocating an advanced bio-warfare agent facility (BSL-3) with nuclear weapons activities in a classified area at Livermore Lab. The plan proposes genetic modification and aerosolization (spraying) with live anthrax, plague and other deadly pathogens. This could weaken the international biological weapons treaty -- and it poses a risk to workers, the public and the environment here in the Bay Area. The draft SWEIS does not adequately describe these programs, or the unique security, health and environmental hazards they present. Construction should be halted on the portable BSL-3 facility. All plans to conduct advanced bio-warfare agent (BSL-3) research on site at LLNL should be terminated.

12/14.01 10. There are 108 buildings identified at LLNL as having potential seismic deficiencies relative to current codes. The SWEIS should include a complete list of these buildings and an accounting of the ones that house or may house hazardous, radiological and biological research materials. LLNL is located within 1 kilometer of two significant earthquake faults, including the Las Positas Fault Zone less than 200 feet from the LLNL boundary. How can we mitigate harm done from an earthquake that damages these buildings before they are brought up to code? We urge the Livermore Lab to stop any work with hazardous, radioactive or biological substances that may be occurring in any building that does not comply with federal standards.

13/22.01 11. A contractor will be paid to package and ship more than 1,000 drums of transuranic and mixed transuranic waste to the WIPP dump in New Mexico, yet the SWEIS says this is exempt from environmental review. This work in its entirety must be included in the review.

14/20.05 12. The DOE does not acknowledge in the SWEIS that the double-walled shipping containers described in the document may be replaced by less health - protective single-lined containers. We believe that no waste should be shipped in single-walled containers and the SWEIS should provide a guarantee to that effect.

15/01.01 13. The Purpose and Need statement in the SWEIS relies heavily upon the US Nuclear Posture Review, which calls for an aggressive modernization and manufacturing base within the US nuclear weapons complex. This stands in stark contrast to the binding legal mandate to shift "from developing and producing new weapons designs to dismantling obsolete weapons and maintaining a smaller weapons arsenal". We believe a revised Purpose and Need statement should accurately reflect the Livermore Lab's legal responsibility with regard to US law, including US obligations under the nuclear Non-Proliferation Treaty (NPT).

16/07.01 Further, the Purpose and Need statement in the SWEIS almost completely omits LLNL's important role in civilian science research. This omission fatally flaws the alternatives analysis in the SWEIS by neglecting to consider the expanded role that civilian science programs at the LLNL could play in the next decade.

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Snake River Alliance, Jeremy M. Maxand, Executive Director
Page 6 of 6

The alternatives analysis should be revised to consider LLNL's role in light of the commitments in the NPT and the Livermore Lab's civilian science mission as well as the compelling case for removing special nuclear materials (i.e., plutonium and highly enriched uranium) from the LLNL site.

Sincerely,

Jeremy M. Maxand
Executive Director

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Soske, Julie
Page 1 of 2

Julie Soske
106 Shady Ln.
Ojai, Ca 93023

May 24, 2004

Mr. Tom Grim
DOE, NNSA L-293
7000 East Ave.
Livermore, CA 94550

Dear Mr. Grim:

1/04.01 I am writng you because I am very concerned about the new programs that are being considered for implementation at the Livermore Labs in Northern California. The following are some of my concerns:

Here are my comments on six dangerous new programs being proposed at Livermore Lab.

1. Storage of More Nuclear Materials: The paln calls for more than doubling the waste alreadt stored.

2/27.01 2. Plutonium Atomic Vapor Laser Isotope Separation (AVLIS): There is a reason why a similar project was cancelled ten years ago. It is dangeous.

3/26.01 3. Dangerous New Experiments in the National Ignition Facility Mega-Laser:

4/37.01 4. New Technologies for Producing Plutonium Bomb Cores: This plan makes Livermore Lab the place to test new manufacturing technologies for producing plutonium pits for nuclear weapons. A pit is the softball-sized piece of plutonium that sits inside a modern nuclear weapon and triggers its thermonuclear explosion.. I join California Peace Action and the Livermore-based Tri-Valley CAREs in calling for termination of this technology development project.

5/39.01 5. Enhancing Readiness to Resume Full-Scale Nuclear Tests: This is not the direction we need to go.

6/35.01 6.: This plan mixes chemical warfare substances and bombs at Livermore Lab.

Soske, Julie
Page 2 of 2

I am concerned for the health and welfare for our planet.

7/07.01 Instead of proposing new weapons projects, DOE should enhance the peaceful, civilian scientific capabilities and mission at Livermore Lab by proposing new, unclassified programs in environmental cleanup, non-polluting and renewable energy, earth sciences, astrophysics, atmospheric physics and others. The alternative of a "green lab" in Livermore should be pursued instead of the dangerous nuclear weapons future proposed by the Site Wide Environmental Impact Statement.

Sincerely,

Julie Soske

Spann, Mark
Page 1 of 3

Mark Spann
4714 Ballard ave NW #320
Seattle, WA 98107

May 31, 2004

Mr. Tom Grim
DOE, NNSA L-293
7000 East Ave.
Livermore, CA 94550

Dear Mr. Grim:

Dear Mr. Grim

To you the future must look grim, so "why not just do whatever maximizes prophets' . Right? Well to a lot of people the future looks like a bridge, which spans the distance between all peoples needs. If we as individuals stand for what we know in our hearts to be right, we help build bridges which span the gaps between present conditions and people's needs . Please be a hero and do what you know in your heart to be right!

Please consider this letter with my comments on the environmental and proliferation risks from proposed nuclear weapons development and new plutonium and tritium programs at the U.S. Department of Energy's (DOE) Lawrence Livermore National Laboratory (LLNL).

1/02.01 I write to you because the DOE has prepared a draft Site Wide Environmental Impact Statement (SWEIS) that proposes to ramp up nuclear weapons activities at the Livermore Lab in Northern California. Livermore Lab is working on the design of a new, high-yield nuclear bunker-buster, called the "Robust Nuclear Earth Penetrator," and I oppose its development. Additionally, I oppose the development of so-called "mini-nukes" and other new nuclear weapons concepts being researched at Livermore Lab.

Here are my comments on six dangerous new programs being proposed at Livermore Lab.

2/08.02 1. Storage of More Nuclear Materials: This plan will more than double the storage limit for plutonium at Livermore Lab from 1,540 pounds to 3,300 pounds. It would increase the radioactive tritium storage limit from 30 grams to 35 grams. I join California Peace Action and the Livermore-based Tri-Valley CAREs group in calling on DOE to de-inventory the plutonium and tritium stocks at Livermore Lab, not increase them.

Spann, Mark
Page 2 of 3

3/27.01, 33.01 2. Plutonium Atomic Vapor Laser Isotope Separation (AVLIS): This plan will revive a project that was canceled more than 10 years ago because it was dangerous and unnecessary. The project is Plutonium AVLIS. This is a scheme to heat and vaporize plutonium and then shoot multiple laser beams through the hot vapor to separate out plutonium isotopes. To do this, Livermore Lab plans to increase the amount of plutonium that can be used at one time in any one room from 44 pounds to 132 pounds - a 3-fold increase. I join California Peace Action and the Livermore-based Tri-Valley CAREs in calling for cancellation of this project.

4/26.01, 26.03 3. Dangerous New Experiments in the National Ignition Facility Mega-Laser: This plan will add plutonium, highly-enriched uranium and lithium hydride to experiments in the National Ignition Facility (NIF) mega-laser when it is completed at Livermore Lab. Using these materials in the NIF will increase its usefulness for nuclear weapons development. It will also make the NIF more hazardous to workers and the environment. I join California Peace Action and the Livermore-based Tri-Valley CAREs in calling for a close out of the NIF project and termination of plans to use plutonium and other new materials in it.

5/37.01 4. New Technologies for Producing Plutonium Bomb Cores: This plan makes Livermore Lab the place to test new manufacturing technologies for producing plutonium pits for nuclear weapons. A pit is the softball-sized piece of plutonium that sits inside a modern nuclear weapon and triggers its thermonuclear explosion. DOE says these new technologies will then be used in a new bomb core factory, called the Modern Pit Facility (MPF). The Livermore Lab plutonium pit program will enable the MPF and production of 150 - 450 plutonium bomb cores annually, with the ability to run double shifts and produce 900 per year. This production capability would approximate the combined nuclear arsenals of France and China - each year. I join California Peace Action and the Livermore-based Tri-Valley CAREs in calling for termination of this technology development project.

6/39.01 5. Enhancing Readiness to Resume Full-Scale Nuclear Tests: This plan calls for Livermore Lab to develop diagnostics to "enhance" the nation's readiness to conduct full-scale underground nuclear tests at the Nevada Test Site. This is a dangerous step back to the days of unrestrained nuclear testing and I join with California Peace Action and Tri-Valley CAREs to oppose any move to "enhance" U.S. readiness to conduct full-scale tests.

7/35.01 6. Mixing Bugs and Bombs: This plan mixes bugs and bombs at Livermore Lab. It calls for collocating an advanced bio-warfare agent research facility with nuclear weapons activities in a classified area at Livermore Lab. The DOE proposes genetic modification and aerosolization (spraying) with live anthrax, plague and other deadly pathogens on site at LLNL. This could weaken the international biological weapons treaty -- and it poses a risk to workers, the public and the environment here in the California. Interestingly, this program is listed as part of LLNL's "no action alternative" as though it were an existing program -- even though it is not yet constructed, Tri-Valley CAREs has brought litigation against it, and a federal Judge has issued a "stay" prohibiting the importation of dangerous pathogens into the facility while the lawsuit moves forward. I join Tri-Valley CAREs in opposing the operation of a bio-warfare agent facility at Livermore Lab.

Spann, Mark
Page 3 of 3

8/04.01 I believe the DOE plan to introduce new weapons programs into LLNL will promote a new arms race and escalate the nuclear danger. Further, the DOE proposal to double LLNL's plutonium storage limit to 3,300 pounds and triple the amount held "at risk" in any one room increases the environmental threat LLNL poses to the people of California. The SWEIS propels Livermore Lab in exactly the wrong direction.

9/07.01 Instead of proposing new weapons projects, DOE should enhance the peaceful, civilian scientific capabilities and mission at Livermore Lab by proposing new, unclassified programs in environmental cleanup, non-polluting and renewable energy, earth sciences, astrophysics, atmospheric physics and others. The alternative of a "green lab" in Livermore should be pursued instead of the dangerous nuclear weapons future proposed by the Site Wide Environmental Impact Statement.

Sincerely,

Mark Spann

Sroufer, Becky
Page 1 of 1

Dear DOE: MAR 17 04

Here is my comment on the draft Site-Wide Environmental Impact Statement on Livermore Lab operations over the next ten years. The SWEIS calls for major increases in nuclear weapons design and manufacture. New plutonium activities include: raising the inventory from 1,540 pounds to 3,300 pounds; tripling the amount "at risk" at one time; creating prototype bomb cores for a new "Modern Pit Facility;" fissioning plutonium in the NIF mega-laser; and, vaporizing plutonium oxide on-site to separate isotopes. The SWEIS also reveals plans to increase the "at risk" limit for radioactive tritium 10-fold.

1/01.01
2/04.01
3/07.01 I oppose these actions in the SWEIS that will increase nuclear proliferation and damage our environment. I call on you to analyze conversion of the Lab to peaceful purposes as an alternative.

Signed: BECKY SROUFER

Address: 2211 12TH ST
SACRAMENTO CA 95816

To:

Mr. Tom Grim
DOE, NNSA, L-293
7000 East Avenue
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NO MORE WEAPONS OF MASS DESTRUCTION!