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I am submitting these comments to NNSA's *Programmatic Environmental Impact Statement for Plutonium Pit Production* on behalf of Nuclear Watch South, a Georgia environmental organization with 1,000 members founded in 1977:

**NEPA requires NNSA to analyze all foreseeable impacts of producing plutonium pits.** Therefore, deployment of the atomic bombs which will utilize the plutonium pits must be analyzed in the PEIS. Since atomic weapons are the most destructive force created by mankind, annihilating living environments *by design*, they cannot possibly be permitted under NEPA.

There is plenty of hard evidence upon which to base the environmental impacts of plutonium. Examine Trinity downwinders with cancer in Tularosa, NM. Examine survivors in Nagasaki, Japan, who were ravaged by Fat Man. Sacred Western Shoshone tribal lands are scarred and contaminated from testing plutonium bombs. In our country's worst "broken arrow," a B52 bomber crashed losing four plutonium bombs in Palomares, Spain. Areas are still restricted since the 1966 catastrophe. U.S. soldiers dug up plutonium-contaminated soil filling 8,000 barrels which were transported to Savannah River Site in South Carolina for shallow burial.

Significant to this PEIS is the plutonium pit production experience at Rocky Flats in Colorado, which was raided by the FBI and shutdown in 1989 after a series of fires, explosions, and deliberate contamination. Following the FBI raid there were shocking revelations about the contamination and radioactive waste stored at Hanford and Savannah River Site where the plutonium used at Rocky Flats was created in nuclear reactors and separated for atom bombs. Since the FBI raid, DOE has attempted, first in 1991 with "Complex 21," then again in 2008 as "Complex Transformation," to site a plutonium pit production factory at SRS. The citizens who commented in these EIS processes resoundingly rejected plutonium pit production at SRS.

DOE/NNSA is back for its third attempt with the $1.5 trillion "Nuclear Modernization Program" and the proposal to build-out the unfinished MOX factory at SRS for plutonium pit production. The writers of the PEIS should be required to read **The Ambushed Grand Jury: How the Justice Department Covered Up Government Nuclear Crime: And How We Caught Them Red Handed** by Wes McKinley and Caron Balkany and **Full Body Burden: Growing Up in the Nuclear Shadow of Rocky Flats** by Kristen Iversen. I wish to incorporate both texts by reference into these comments.

It is unacceptable under NEPA to produce atomic bombs and plutonium triggers because of their inherent destructive natures and SRS is a particularly unsuitable place for the poisonous plutonium enterprise. SRS is situated on the banks of the Savannah River, a major river in the Atlantic Seaboard and the boundary between Georgia and South Carolina. The Savannah River empties into the Atlantic Ocean 200 miles downstream from SRS where a rich and fragile ecosystem supports millions of birds, alligators, sea turtles, oysters, shrimp, gopher tortoises, and so many creatures. The PEIS must account for them. The Georgia/South Carolina coast is where the critically endangered North Atlantic right whale migrates annually to give birth and nurture newborn calves. The Savannah River supports a diverse ecology while serving agriculture and industry and providing drinking water for 1,000,000 people downstream from SRS and is a major transportation route. The Savannah River is currently ranked as the nation's third most polluted waterway, and it should be protected under NEPA from further injury from plutonium pit manufacture.

**NEPA also requires analysis of alternatives to the proposed action.** Nuclear disarmament is the natural, logical alternative to building new nuclear weapons and is an urgent mission which will enhance national and global security. Nuclear disarmament poses a scientific challenge that will require breakthroughs in research and technology to manage the fissile materials, radioactive waste, contaminated buildings, and land which are the lethal legacy of the Atomic Age. Remediating the harm from decades of producing weapons of mass destruction will take a Manhattan Project-level commitment equal to the effort made to develop nuclear weapons 80 years ago.

The U.S. has 90 tons of weapons-grade plutonium of which 45 tons is already recognized as excess. The U.S. has 67,800 tons of uranium of which 600 tons is weapons-grade. These fissile radioactive elements have radioactive lifespans which defy human comprehension and must be appropriately managed and safeguarded if life is to continue on our home planet.

The U.S. has more than 5,000 nuclear weapons to dismantle. There are 35,000,000 gallons of high-level radioactive liquid waste in Cold War-era underground tanks at SRS. There are 56,000,000 gallons of tank waste currently stranded at Hanford. These wastes were generated to produce the U.S. inventory of plutonium and it is urgent that they be managed and contained. The one possible saving grace of the lack of progress in vitrifying these radioactive tank wastes into glass for deep geologic burial is the potential to immobilize plutonium in the waste vitrification process. The high radiation in the tank wastes will create a lethal barrier to plutonium being recovered and diverted to nuclear weapons again in the future. The concept of plutonium immobilization was considered in the MOX PEIS, and it should be reconsidered in the PEIS for Plutonium Pits.

The PEIS analysis of the vital nuclear disarmament mission will provide a blueprint to establish the amount of time, money and personnel that will be needed to close the circle on the splitting of the atom. The U.S. led the world into the Atomic Age, and it is a noble and just mission to lead the world to nuclear disarmament.

We have a good start towards nuclear disarmament as we have not produced nor tested nuclear weapons for more than 30 years. Global support for nuclear disarmament is expressed in the U.N. Treaty on the Prohibition of Nuclear Weapons which entered into force of law in 2021, signed by 122 nations and ratified by 73 state governments. Despite these achievements, the U.S. is still spending over $100,000 per minute on nuclear weapons, more than all other nuclear-armed nations combined. With that kind of money, we can surely accomplish the great work of dismantling nuclear weapons.

I am grateful to the National Environmental Policy Act and to NNSA for giving the public a voice on the life-and-death matter of nuclear weapons. I am grateful to the South Carolina Environmental Law Project which represented SRS Watch, Nuclear Watch New Mexico, Tri-Valley CAREs, and the Gullah/Geechee Sea Island Coalition to protect our right to be heard and to have our comments recorded for history.

Please include me on the PEIS distribution list.

Respectfully submitted,  
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