



Nuclear Information and Resource Service Southeast Office

6930 Carroll Avenue Takoma Park, Maryland 20912
301-270-6477 www.nirs.org nirsnet@nirs.org

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Theodore A. Wyka, Bombplex 2030
SEIS Document Manager, Office of Transformation, US Department of Energy
NA 10-1
1000 Independence Avenue, Washington, DC 20585

Via email: complex2030@nnsa.doe.gov

Dear National Nuclear Security Administration:

On January 4, 2007, Henry Kissinger and three Cold War colleagues published a statement in the Wall Street Journal calling for worldwide nuclear disarmament, pointing out that the end of the Cold War ended any validity that the “deterrent strategy” had. These former “Cold Warriors” called on the United States to take concrete steps to lead the world towards elimination of all nuclear weapons. Unfortunately the Kissinger statement fell short - it did not point out that the US Department of Energy and the National Nuclear Security Administration’s action, in even *suggesting* a return to industrial production of nuclear weapons in the USA, is taking an action that is completely counterproductive to the goal of ridding the world of these WMDs - and makes a mockery of US attempts at “leadership” towards nuclear nonproliferation in the world.

On January 15, the Editors of the New York Times stated the obvious, referring to the “Reliable Replacement Warhead,” the editorial states: “ While the program has gotten very little attention here, it is a public-relations disaster in the making overseas. Suspicions that the United States is actually trying to build up its nuclear capabilities are undercutting Washington’s arguments for restraining the nuclear appetites of Iran and North Korea...America would be much safer if the president focused on reducing the number of old nuclear weapons still deployed by the United States and the other nuclear powers. The new Congress should stop this program before any more dollars are wasted, or more damage is done to America’s credibility.” We concur.

It is important to reflect that it is clear to all that nuclear weapons are WMDs when they are in the hands of those we do not trust, AND nuclear weapons are still WMDs in our hands. The World Court has delivered a judgment that because of the indiscriminant nature of the destruction caused by nuclear weapons, they violate the Geneva Code, and therefore international law. It is time that the United States affirm the Rule of Law by submitting to the judgment of the World Court and declaring nuclear weapons - all of them, everywhere - WMD and initiate a

program whereby this country, and all nations will come into compliance with the Code and the law. It is only then that the USA can effectively lead the world towards order, justice, freedom and peace.

Pursuant to the opportunity to comment on the Programmatic Environmental Impact Statement for Complex (Bombplex) 2030 scoping process we offer the following, in addition to registering our support for comments submitted by our individual members and allied organizations, specifically: John Clarke, Alliance for Nuclear Accountability, Natural Resources Defense Council, Los Alamos Study Group, Physicians for Social Responsibility.

As stated by our member, John Clarke, one is compelled to include in scope not only the impact of the production of new or replacement nuclear weapons (itself an important matter) - one must also look at the impact of the use of these weapons - particularly since the justification for this entire program is that the nuclear weapons we have today have some small probability of no longer being useable. Since use is the stated reason for the program, the impact of use must be included in the scope of the PEIS.

When use of the weapon is looked at, it must be considered in the context of today's world. It is also important that results of the use of the nuclear weapon not be truncated in time. Specifically - today there are thousands of nuclear weapons on what is called "hair-trigger alert" in more than one nation. If a single nuclear weapon were detonated, the scope of this inquiry must look at what such an event would do to the arsenals that must respond to "use it or loose it" scenarios in a matter of hours or minutes. How credible is it that a single nuclear weapon could be detonated without resulting in one or more additional nuclear detonations? This is absolutely vital in assessing the impact of "use" of these weapons. Further, in any environmental analysis, it is important to consider the "bounding" case. In the case of the use of nuclear weapons, this would be the "all out nuclear war" scenario. On what basis would NNSA / DOE exclude the "unthinkable" as it has been famously called from the scope of this study? Merely because the consequences ARE unthinkable - beyond our ability to truly comprehend? This is not the reason to exclude the matter from scope - this is the reason to either leave this matter completely, or take it upon oneself to convince ALL higher authorities that THEY must lead towards worldwide nuclear disarmament, and do so NOW, not in some future generation.

In fact, credible analyses of the impact of full-scale nuclear war have been done - by physicians around the world; by climate scientists (due to the finding that multiple nuclear detonations will enshroud the planet and induce "nuclear winter"), and by some former military / Pentagon experts. We commend the NNSA to investigate the independent literature on the consequences of nuclear war, via such archives as are available from International Physicians for the Prevention of Nuclear War, Physicians for Social Responsibility, Natural Resources Defense Council, Nuclear Policy Research Institute, Center for Defense Information, Nuclear Age Peace Foundation and many others.

In addition to a realistic assessment on the scale of use, it is also important that the inquiry NOT truncate the duration of impact. In terms of geopolitical, cultural and biological impact, Hiroshima and Nagasaki are not over yet.

Since the results - the impacts - of use of nuclear weapons would result in irreversible consequences - with the potential to end life as we know it -- we further submit that the scope of this inquiry must look at dimensions of this world and society that could lead to / contribute to the use of such weapons.

The Pentagon has published a report asserting that Climate Change / Global Warming may lead to such stress on resources, society and civilization that nuclear war would become more likely. The scope of this PEIS should include the question - does the VERY PRODUCTION of new nuclear weapons in the United States increase, or decrease the likelihood of a nuclear war that might be triggered by pressures due to global climate shifts?

There have been studies on the psychological impact of nuclear weapons, the Cold War, and the arms race. It may be important to recognize that anyone who is part of the nuclear infrastructure—paid by the federal government to work on nuclear weapons production -- are not qualified - possibly incapable - of conducting an honest analysis of the factors we are presenting. It might be that NNSA and the DOE need to include other bodies in making this assessment. Since the consequences of the use of nuclear weapons are by definition global, and have disproportionate impact on children, it might make sense for this portion of the analysis to be conducted by an international body that serves children. Nuclear Information and Resource Service does not have the expertise to suggest what organization (or multiple bodies) that should be, but we would be glad to serve on an advisory panel that could arrive at such a recommendation.

A second area of deep concern for NIRS is the intersection of the PEIS on Bombplex 2030 and the PEIS on the Global Nuclear Energy Partnership (GNEP). The Department of Energy is not being transparent in assessing the intersection of these two major programs, particularly where both impact the same communities. The nature of impact, and the natural of Nature - in the sense of "environment" is such that it will be impossible to extricate impact from the Bombplex from concurrent potential impact from GNEP in those communities where it is possible that operations under both programs would be ongoing. Additive, cumulative and synergistic impacts of these two programs on one community and on our environment will be missed by separate NEPA processes. In fact, for purposes of engagement with the public under the National Environmental Policy Act, DOE and NNSA should be addressing why this is not ONE NEPA process - or alternately make it one process.

In addition to our environment, and our communities, another common thread between GNEP and Bombplex 2030 is plutonium. It is not at all clear how plutonium storage, handling, production, destruction or use is fungible (or not) in

these two programs. This must be made clear in order to assess the potential impact of either program on the communities and environment around Savannah River Site in particular, but any of the sites under consideration for new DOE / NNSA activity.

In addition, an analysis of plutonium in isolation also makes no sense. At no time has the federal government engaged with the fundamental issue of the Nuclear Age - source term (the inventory of all radioactive isotopes, and duration of activity). Both GNEP and Bomplex 2030 have enormous consequences that can only be assessed by an honest and comprehensive analysis of source term throughout all systems / operations and the potential radiological and biological consequences of its production, handling, storage, destruction, disposal, decay, release, uptake and cycling.

We commend the DOE and NNSA for engaging with the public on these vital matters. NIRS was pleased and proud to offer oral comments at two scoping meetings with our members and allies in Oak Ridge, TN and Washington, DC. We offer these additional written comments, and will continue to add to the record on this matter.

We would further like to commend the NNSA for having an Office of Transformation. We await the day - it could be today - when it officially becomes the mission of the Office of Transformation to lead the DOE, the US executive branch, and the world in the ONLY sane direction: complete nuclear disarmament.

Thank you for this opportunity to comment.

Mary Olson, Kevin Kamps
Nuclear Information and Resource Service