

## **Conversation Points for the *Draft Site-Wide Environmental Impact Statement for Los Alamos National Laboratory***

The Department of Energy (DOE) has issued a draft Site-Wide Environmental Impact Statement (SWEIS) for Los Alamos National Laboratory (LANL). In it they state the planned future activities for LANL and their assessment of the cumulative environmental, socioeconomic and public health impacts of these operations. This document is open for public comment, and by commenting on the issues and inadequacies within it, you will be able to influence the decisions made about LANL activities, such as expanded plutonium pit production.

DOE is proposing three Alternatives, but wants to implement its Expanded Operations Alternative. This Alternative will mean an increase in weapons activities, such as a quadrupling of plutonium pit production, along with an increase in air emissions, discharges to surface water and waste generation. It will result in increased needs for water, electricity and natural gas.

### General Recommendation

- Congress must change the mission of LANL to focus on research and development into renewable energy and creating sophisticated cleanup technologies that minimize impacts to the air, soil, water and public and environmental health.

### Seismic

- LANL lies on three major fault lines. Many of the buildings are not up to building codes.
- Many advances have been made in the geologic understanding of the seismic activity beneath LANL, including data which shows that the most recent seismic incident occurred 2,000 years ago rather than 45,000 years ago. DOE has seen indications that there is a pattern of seismic activity every 2,000 years, suggesting that one is due at any time. The draft SWEIS has not incorporated this data into their hazard analysis.

### Seismic Recommendations

- DOE is proposing to construct six new projects at LANL, including the Center for Weapons Physics Research Project and a Radiological Sciences Institute Project. Any further construction in this area must take this new seismic activity information into account.
- Existing operations must be reexamined and brought up to seismic standards.
- A 2006 seismic hazard study is due to be released this year. It was premature for DOE to issue the draft SWEIS without this information. In the alternative, the SWEIS should include a reanalysis based on the findings in the 2006 seismic hazard study.

## Water

- The proposed expanded activities will increase water usage by LANL and the County of Los Alamos above the amount allotted to it from the regional aquifer.
- Contaminants have been found in the regional aquifer, including fast-moving perchlorate, a chlorine-based chemical that interferes with thyroid function.
- Residents of Los Alamos County obtain 100% of their drinking water from the regional aquifer below LANL.
- LANL discharges approximately 163,000,000 gallons per year, or 500 acre-feet per year, of industrial and sanitary effluent into the canyon systems which flow to the Río Grande.
- DOE did not use the most current water quality standards when assessing impacts in this draft SWEIS.
- DOE did not use the most current data about the number of streams that are impaired on the Pajarito Plateau from LANL activities.
- DOE is not monitoring 1,405 sites that have the potential to release contaminants into surface water during storms and when the snow melts.

## Water Recommendation

- DOE must analyze LANL's impacts against the latest water quality standards and the current impaired stream information in the SWEIS.
- In order to ensure that water quality is protected now and in the future, DOE must adopt the Removal Option for all clean up activities.

## Air Emissions

- DOE recommends increasing activities at the Los Alamos Neutron Science Center (LANSCE), which has the highest amount of radionuclide air emissions and has a long history of technical problems resulting in increased emissions. LANSCE supports weapons development.
- Under the projected expansion of nuclear weapons operations, LANL will process 87,000 pounds of high explosives and up to 6,900 pounds of depleted uranium will be blown up in "dynamic experiments" annually.
- Facilities that began operations prior to December 31, 1988 have been granted "grandfather" status by New Mexico air regulations allowing them to emit these pollutants that newer facilities cannot. LANL has many of these grandfathered facilities.

## Air Emission Recommendations

- Due to the increased air emissions under the Expanded Operations Alternative, LANL must be required to reevaluate and broaden their air sampling programs.
- DOE should no longer hide under the grandfather clause for air emissions from its old facilities at LANL. DOE must institute a program to stop all toxic air pollutant emissions from LANL facilities.
- DOE must monitor and implement comprehensive sampling programs at all open burning and open detonation sites and for all activities using high explosives and depleted uranium.

### Expanded Plutonium Pit Production

- DOE recommends expanding LANL's plutonium pit production capability from 20 to 80 pits per year. Plutonium pits are the "triggers" for nuclear weapons.
- Increased plutonium pit production would nearly double the waste produced. It would generate an additional 1,800 or more 55-gallon barrels of transuranic wastes each year for disposal at the Waste Isolation Pilot Plant, located in southeastern New Mexico. LANL currently has approximately 40,000 drums sitting above-ground in fabric tents awaiting shipment to WIPP.
- When DOE analyzed the cumulative impacts, it included the potential construction and operation of a Modern Pit Facility that would be capable of producing 450 plutonium pits per year at LANL.
- All activities at the plutonium facility alone, without the Modern Pit Facility, would generate 690 cubic yards of transuranic waste per year.
- LANL is not in compliance with DOE and Defense Nuclear Facilities Safety Board safety regulations and recommendations. Some LANL facilities are up to six years behind on preparing and submitting their safety documentation to DOE. Such lack of compliance poses an unacceptable risk to workers, the public and the environment.

### Expanded Plutonium Pit Production Recommendations

- LANL is not the place for pit production because of on going seismic concerns.
- LANL needs to be up-to-date and in full compliance with all Department of Energy and Defense Nuclear Facilities Safety Board safety regulations and recommendations.
- No new bomb factory. No where, no way! The people of New Mexico stood up against that Facility at a hearing in Pojoaque in the summer of 2004.

### Cleanup

- Increased cleanup was only included as part of the Expanded Operations Alternative. This makes it optional and ties it to expanded plutonium pit production and other activities which greatly increase LANL's waste production and contamination of the environment which threatens public health.
- One of the proposed cleanup plans consists of simply covering contaminated sites in such a way that it would be within health standards for people to work 40 hours a week in an industrial job on the site. This level of cleanup is not adequate for on site day care, let alone a change in land use.
- DOE does not plan to package the low-level radioactive waste removed from sites during clean up and only plans to package some of the waste from the demolition and decommissioning of buildings. Approximately 38,000 cubic yards of low-level radioactive waste will be dumped directly into the unlined pits, trenches and shafts of Area G.

### Cleanup Recommendations

- Compliance with the New Mexico Environment Department (NMED)/LANL Consent Order for cleanup at LANL by 2015 should not be made optional nor be tied to increased weapons activities and waste generation.

- The Pajarito Plateau was pristine prior to LANL setting up operations in 1943. DOE must be required to return the Plateau to that condition.
- The sites which are currently waiting for cleanup should be addressed first before any further waste is generated.
- All cleanup activities should be included in all three alternatives, not just in the Expanded Operations Alternative.
- All proposed cleanups must allow a future pregnant subsistence farmer to live on the land, grow her own food and drink surface water and groundwater for her entire lifetime as well as that of her offspring while living on the Pajarito Plateau. The Removal Option for the major material disposal areas (dumps), canyon cleanups and other NMED/LANL Consent Order actions will ensure that, in the long-term, water quality is protected.

### Waste

- If DOE were to implement the full cleanup of the major waste sites at LANL, the Expanded Operations Alternative and operate a Modern Pit Facility, they would generate 1.5 million cubic yards of low-level radioactive waste and 48,000 cubic yards of transuranic waste. There would not be enough space both onsite and at WIPP for the disposal of this waste.
- The preferred Expanded Operations Alternative would generate per year a total of 860 cubic yards of transuranic waste, 12,000 cubic yards of low-level radioactive waste and 2,750,000 pounds of chemical waste.

### Waste Recommendations

- DOE must explain in the SWEIS how they plan to address where the excess transuranic waste will be disposed if the Modern Pit Facility is constructed and operated at LANL.
- DOE should make permanent disposal of existing waste a priority, rather than continue to generate more.
- We compliment DOE for including an analysis of the cleanup impacts from implementing the NMED/LANL Consent Order in the draft SWEIS.

### Public Comment

**Give Comment in Person:** Hearings will be held between 6:30 and 9:30 pm.

**Los Alamos:** Tuesday, **August 8**, at Fuller Lodge, 2132 Central Avenue;

**Espanola:** Wednesday, **August 9**, at Northern New Mexico Community College, 921 Paseo de Oñate;

**Santa Fe:** Thursday, **August 10**, at Santa Fe Community College, 6401 Richards Avenue.

**Written comments** can be e-mailed to: [LANL\\_SWEIS@doeal.gov](mailto:LANL_SWEIS@doeal.gov), or mailed to: U.S. Department of Energy, National Nuclear Security Administration, Los Alamos Site Office, Attn: Ms. Elizabeth Withers, Office of Environmental Stewardship, 528 35th Street, Los Alamos, New Mexico, 87544. The Public Comment period ends on September 5<sup>th</sup>.