TEXAS HOUSE OF REPRESENTATIVES

Committee on
Environmental Regulation
74th Texas Legislature

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March 27, 1996

U.S. Department of Energy
Office of Fissile Materials
P.O. Box 23786
Washington D.C. 20026

Re: Comment on Stockpile Stewardship and Management (SSM) and Storage and Disposition (S&D) of Weapons-Usable Fissile Materials Draft Programmatic Environmental Impact Statements (PEISs).

Thank you for the opportunity to comment on the U.S. Department of Energy's (DOE) Programmatic Environmental Impact Statements (PEISs) on Stockpile Stewardship and Management (SSM) and Storage Disposition (S&D) of Weapons-Usable Fissile Materials. Please also consider this my comment on the Pantex Site-Wide Draft Environmental Impact Statement, since most of the issues addressed in these documents are identical.

First and foremost, I am adamant that any current and future functions at Pantex will be conducted in a safe and environmentally sound manner. Our first priority is to ensure any expansion at Pantex be implemented in a way that does not impair the health or safety of area residents or have an adverse effect on the environment. These goals serve as a prerequisite to any current or future activities at Pantex, including expansion. 1/09.00.04

I. Generally: I am pleased that DOE selected Pantex as a preferred alternative for assembly/disassembly, thereby abandoning earlier plans to transfer those functions to the Nevada Test Site (NTS) which would have been cost prohibitive and never been adequate to meet future needs. However, by failing to recognize Pantex as the preferred candidate site for new and/or consolidated stockpile management facilities, the DOE overlooks the best site for maintaining the integrity of the U.S. nuclear stockpile and attaining maximum efficiencies and cost savings.

II. SSM PEIS:

1. Pantex is the best place to site new construction/stewardship activities. Pantex is perhaps the most cost-effective alternative for any new construction of SSM facilities. Labor costs, utility rates, water and land availability at Pantex, as well as public and political support, are more amenable than those at any other Complex site. It is appropriate to consider Pantex as an alternative site for all future defense-related facilities to complement activities at the national labs (such as planned Atlas Facility and plutonium pit fabrication site at Los Alamos National Laboratory [LANL]). DOE makes no mention of a strategic plutonium reserve that is necessary to meet future national
security needs, even though the PEIS mentions that strategic storage should be co-located with disassembly. Pantex should be the preferred site for such a mission in coordination with its management functions. The location of additional defense-related activities at Pantex would ensure that core technical capabilities are preserved at a location that can secure them at the most efficient cost to the American people. In its deliberations, *DOE should insist that budgetary comparisons between Pantex and other sites are accurate, and include capital, transportation, training, remediation, and other costs.*

2. Pantex is the best site to continue High Explosives fabrication. Consistent with the strengths identified above for increased stewardship and management duties, the high explosives (HE) functions should also remain at Pantex. Because the production assembly/disassembly functions remain at Pantex, the HE fabrications duties should be present at the corresponding site. After all, the SSM Draft admits that Pantex must retain HE capabilities to process the inventories already on site from dismantling. Therefore, the least expensive alternative is to maintain HE functions at Pantex. I adamantly disagree with

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Potential environmental consequences of each alternative at Pantex were analyzed in the PEIS. Results of these environmental analyses will be given full weight, along with other factors such as cost, technical risk, schedule, and national security requirements, in the process of selecting the storage and disposition strategy. Pantex will continue to operate in compliance with all Federal, State, and local regulations.

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the statement in the draft PEIS that there are no advantages to siting high explosives at Pantex as opposed to the national labs. The capital outlay alone necessary for transfer is cost prohibitive. In addition, should future need arise for new weapons production, it will be critical to have the HE facilities at the weapons production/assembly site.

III. Fissile Materials (Plutonium) Storage and Disposition PEIS: As the sole DOE-authorized facility for assembly and disassembly of nuclear weapons, Pantex has historically handled these functions in a safe and efficient manner for more than forty years. One of the challenges faced after dismantling a significant portion of the nuclear stockpile is processing or disposal with the materials that remain. The DOE is considering several options. Once again, acknowledging cost savings considerations, Pantex could continue to store plutonium which is already at the site and upgrade facilities for any and all storage options being considered by the DOE with minimal cost and difficulty. Pantex currently safehouses more than 8,000 surplus pits and plans are being made to ship additional pits from Rocky Flats to Pantex. It makes little sense to re-create storage facilities at another site and then unnecessarily transport large amounts of plutonium across the country from Pantex. The budgetary and political costs for such a decision would be enormous. Because of these costs, Pantex also should be designated the preferred site for any disposition options and related functions. It makes budgetary and policy sense to site disposition where storage already exists. Furthermore, it makes no sense from any perspective, budget or otherwise, to site strategic storage at one site and surplus at another. Pantex should be selected for both storage functions. Pantex has the necessary safety, security, and surveillance capabilities to accommodate an expanded role with minimal costs and it is the production site closest to Los Alamos, the planned pit fabrication site. 2/08.03.01

IV. Conclusion: Based upon these reasons, I respectfully urge DOE to designate Pantex as the preferred alternative site for all existing and new stockpile management and stewardship functions as well as consideration of all plutonium storage and disposition and any related functions. Again, thank you for the opportunity to comment on these documents.

Sincerely,

Warren Chiasson

Warren Chiasson

WC/sg

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The Department of Energy acknowledges the commentor's support of Pantex. Decisions related to future missions at Pantex will be based upon environmental analyses, technical and economic studies, national policy considerations, and public input.