LANGER, SIDNEY, SAN DIEGO, CA
PAGE 1 OF 2

[redacted]

May 05, 1996

Department of Energy
Office of Fissile Materials Disposition
P.O. Box 23786
Washington, DC 20026-3786

Dear Sirs:

I believe there is a serious omission in the Draft Programmatic Environmental Impact Statement on the Storage and Disposition of Weapons-Usable Fissile Materials (Storage and Disposition PEIS). I have reviewed the three volumes and Summary documents of the PEIS and find no discussion of an important consideration in evaluating the various options: 1/01.03.00

The plans of other nuclear power nations for disposition of their civil and weapons-grade plutonium.

It makes no sense for the United States to adopt a preferred option in isolation from the world community. While such a selection may well be the safest, most environmentally benign, and most cost-effective method for the United States to dispose of its own excess weapons plutonium, the potential adverse global impacts of plutonium availability may be enhanced by the U.S. selection of an option which differs from the selections of most other nations.

As an example of how U.S. policy can adversely impact global issues, consider the question of nuclear fuel reprocessing. It could easily be argued that world-wide availability of civil (and perhaps all) plutonium would be under far better international controls than it is today if the U.S. had joined with other nations twenty years ago in developing mechanisms for controlling and using plutonium for beneficial purposes. Instead we developed our policy in myopic isolation with high moral purpose, convinced that if we led the way others would follow. Now we turn around to discover that we are alone! Other nations that reprocess low-enriched uranium fuels are beginning to utilize the bred plutonium and are solving, in-part, the waste disposal problem. We have done neither! We are neither a leader nor a follower; we are just in the way!

The PEIS should discuss how the U.S., in conjunction with other nuclear nations, can develop and implement a universal policy for utilization and control of all plutonium, both military and civil. This discussion should be an 1/01.03.00 cont.

F-013

01 03 00 Comment Number 1

The PEIS analyzes the environmental impacts for storage of weapons-usable Pu and HEU from the U.S. weapons stockpile, disposition of Pu declared surplus to national defense needs. U.S. civilian materials and the materials of other nations, whether civilian or military, are not within the scope of the PEIS. The PEIS is not a U.S. or international policy-making document. However, by completing environmental analyses and related cost, schedule, technical, and nonproliferation analyses that will be used to reach a ROD, the United States will be in a position to implement Pu disposition efforts multilaterally or bilaterally through negotiations, or unilaterally as an example to Russia and other nations.

integral part of the discussions in Chapter I. An adverse impact that needs to be considered is whether a U.S. policy, developed again in isolation, would increase the future global availability of plutonium for nefarious purposes. It appears to me that such a primary decision is a prerequisite to consideration of the technical proposals for disposition. 1/01.03.00 cont.

Thank you for the opportunity to comment on the Draft PEIS,

Sincerely yours,

Sidney Langer

F-013