

Theodore A. Wyka,  
Complex 2030 PEIS Document Manager,  
Office of Transformation,  
U.S. Department of Energy, NA-10.1,  
1000 Independence Avenue SW,  
Washington, D.C. 20585,

Dear Theodore A. Wyka,

Please enter these comments into the record for the Supplement to the Stockpile Stewardship and Management Programmatic Environmental Impact Statement, also known as the Complex 2030 PEIS, and answer the following concerns. These comments will also be sent to New Mexico legislators and press, as matters of such gravity are too important in a democracy to leave up to an agency of unelected officials.

As stated in NNSA mission, it is your mandate to respond to nuclear and radiological emergencies in the United States and abroad. If Complex 2030 proposal is allowed to go forward, it will continue to exacerbate an enormous preexisting nuclear and radiological emergency here in New Mexico and the rest of the world. The entire nuclear weapons program has been run irresponsibly, is an environmental disaster, and is, in itself, a nuclear and radiological emergency.

NNSA literature states that your mission is to enhance national security through the military application of nuclear science and to reduce global danger from weapons of mass destruction. Is this not what the Nuclear Non-Proliferation Treaty that the U.S. government entered into force in 1970 is designed to do? The treaty states an intent “to further the easing of international tension and the strengthening of trust between States in order to facilitate the cessation of the manufacture of nuclear weapons, the liquidation of all their existing stockpiles, and the elimination from national arsenals of nuclear weapons and the means of their delivery pursuant to a Treaty on general and complete disarmament under strict and effective international control.”

Please explain in your response in this draft Complex 2030 PEIS how NNSA is upholding the mission to reduce global danger of nuclear weapons by creating a new nuclear weapons production complex, thereby ignoring the intent of an international treaty ratified by the U.S. government to eliminate nuclear weapons.

Should the NNSA pursue the Complex 2030 initiative, NNSA would be in violation of Article VI of the U.S. Constitution that states, “all treaties made, or which shall be made, under the authority of the United States, shall be the supreme law of the land.” It is the responsibility of the federal government to comply by the constitution that was written to insure the preservation of our union.

Your literature also states that the mission of NNSA is to “provide safe and reliable nuclear weapons, and to accomplish this in a way that protects the environment and the health and safety of the public and the workers.” This statement is a classic oxymoron. The only safe nuclear weapon is one that has been dismantled and rendered completely useless. This dismantlement alternative is not presented as one of the alternatives listed. The dismantlement and safe consolidation of the extremely toxic nuclear materials is an extremely important national security concern. According to the Institute for Energy and Environmental Research, LANL has lost track of at least 300 kilograms of plutonium — enough to make 60 nuclear bombs. Securing the inventory is a very “reasonable alternative” to be addressed in draft Complex 2030 PEIS.

You state that NNSA’s mission is to protect the United States from the threat of an “adverse change in the global political climate.” Please take into consideration an adverse change in the American political climate as part of the global landscape. We currently have a president who has led us into an illegal and immoral war, and has done so in the face unprecedented opposition from U.S. citizens and the world. We witnessed his “shock and awe” display of military might over Baghdad — an act of state-sponsored terrorism against Iraqi noncombatant citizens with no means to defend themselves. In the hands of a president who might fraudulently find himself in office (which many believe has happened in this country), who erodes the checks and balances in the Constitution, (as has been the current American experience), there is a frightening potential that the largest nuclear arsenal under the command of such a president could destabilize and cause an “adverse change in the global political climate” — posing a clear threat to its citizens. Please address this distinct possibility, as well, in the draft Complex 2030 PEIS.

The idea of deterrent works both ways. The other countries of the world with resources that the United States wants to control, like oil, have good reason to fear the U.S. military strength and nuclear weapons capability. Fear is what motivates the need to create a deterrent. A stepping up of our capability to produce nuclear weapons engenders fear and restarts the global arms race, which is what we see happening in the world. Please respond to this cause-and-effect argument in the light of the proposal for draft Complex 2030 PEIS. The best deterrent for nuclear proliferation in the world is to present clear evidence that we are reducing the stockpile with the intention of eliminating it. By using our available resources for humanitarian aid across the world, the United States would transform fear and the motives behind terrorism into mutual respect. The prophecy that these weapons would be weapons to end all war would then be realized. We live in an evolving world.

The environmental impacts are painfully obvious to everyone suffering from the toxins in the environment from all facets of weapons production. The nuclear-production industry is dealing with the most toxic substances known to humankind. Los Alamos National Laboratory has dealt with our environment unbelievably irresponsibly. The radioactive contaminants are evident everywhere downwind and downstream from the lab. How is NNSA intending to deal with the 12,500 drums of nuclear waste at Area G buried before 1971 that are currently contaminating the aquifer? According to a study from LANL, contaminants have moved off-site and are contaminating the potable wells

for Los Alamos County and the Buckman Wellfield, which serves 40 percent of the Santa Fe population. Neptunium-237 is well above the EPA standards and strontium-90 is 13 times the EPA standards for potable water in Los Alamos County wells. How do you intend to remediate the aquifer?

And what about the tritium, plutonium and other radionuclides found in the canyons? On top of the Pajarito Plateau is the largest nuclear-waste dump in the world, with the waste in barrels stored in tents in a fire-prone zone. Is the plan to continue the storage of this waste in tents? What happens in the event of a fire or some major weather calamity? Plutonium doesn't burn, but when carried by the wind or transported through the watershed it can land on any farmer's land. One particle of plutonium if breathed or otherwise ingested can cause cancer.

Why would any rational agency want to put a nuclear weapons production facility on top of a windswept mountain, on an earthquake fault, in the middle of a wildfire zone, and at the source of a watershed that serves 10 million people? Please answer these questions in the Supplement to the Stockpile Stewardship and Management Programmatic Environmental Impact Statement, and state a clear intent as to how you are preparing to take care of these current environmental emergencies that are the legacy of environmental abuse by LANL and all other nuclear weapons facilities.

And finally, senior scientists concur that the existing nuclear stockpile is not degrading. The nuclear pits will be reliable for another 80 to 100 years or more. There is no need to re-build the stockpile by creating replacement warheads. The most appropriate stewardship activities according to your mission would be to steward the stockpile out of existence. Please address the following reasonable and necessary alternatives in the draft Complex 2030 PEIS: (1) insist upon the massive cleanup of the contaminated areas; (2) support research in the remediation of radioactive wastes; (3) find the means to make reparations to those communities whose soil, air and water have been contaminated; (4) dismantle the stockpile without replacing the warheads; and (5) present a clear plan for consolidating and maintaining the security of the extremely toxic and dangerous nuclear weapons materials in the inventory into perpetuity.

This is the most important work that can be stewarded by NNSA in our nuclear labs and for the generation who will be bearing children in the year 2030. Please understand that American citizens who are opposing your Complex 2030 alternatives are striving to create a sustainable, socially responsible and compassionate global society. Please join us and participate in this vision for the role of NNSA, and for the Department of Energy as a whole, for the year 2030.

Respectfully yours,