



# Los Alamos Study Group

*Nuclear Disarmament • Environmental Protection • Social Justice • Economic Sustainability*

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Sent today by email to [NEPA-SRS@srs.gov](mailto:NEPA-SRS@srs.gov)

## **Addendum to comments on the Draft Supplement Analysis (DSA) of the Complex Transformation Supplement Programmatic Environmental Impact Statement (CTSPEIS)**

Although there is no requirement to do so, I was hoping for a formal acknowledgement of receipt of our subject August 12 [comments](#), as we had received after submitting our July 25, 2019 [comments on the scope of the Environmental Impact Statement \(EIS\) for plutonium pit production at the Savannah River Site \(SRS\)](#).

Could you please send such an acknowledgment?

I have to say, the abysmal quality of the National Nuclear Security Administration's (NNSA's) current National Environmental Policy Act (NEPA) compliance efforts with regard to pit production make it difficult to comment. We have no idea what the actual plan is. Neither, we believe, does NNSA. We believe that NNSA's secret planning processes for its major plutonium programs have an ad hoc quality. All this means NNSA is in total dereliction of its NEPA responsibilities.

There was therefore something of a necessary joke embedded in our August 12 comments, namely that NNSA's evolving but still secret pit production plans, supposedly "covered" by a 4-page list of obsolete NEPA documents, elicit from us a list of our own prior comments. In our case these stretch back only a little more than a year, as opposed to more than two decades of obsolete information offered by NNSA, now capped by the non-analysis in this DSA.

As we said in our [comments on the scope of the EIS for plutonium pit production at SRS](#), we believe the only logical and legal approach to NEPA compliance for NNSA's pit production program involves a fresh programmatic analysis of pit production nationally, followed by site-wide analyses at the two sites in question. The latter analyses could incorporate project-specific environmental analyses, to the extent the constituent projects are mature enough. If those plans are not mature, project-specific EISs could follow at a later date for the larger projects.

Best wishes, and thank you for your attention and consideration,

Greg Mello, Executive Director