

## LANL Site-Wide Environmental Impact Statement (SWEIS): Talking points, key issues

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1. The fundamental policy issue in these hearings is whether or not individuals and organizations will oppose the creation and operation of a plutonium warhead core ("pit") factory at Los Alamos National Laboratory (LANL). Policy-wise, everything else is more-or-less a distraction. Pit production dwarfs all other considerations.

These hearings are about the future of LANL. This is the fundamental political divide at these hearings.

Many "anti-nuclear activists," arms control NGOs, and disarmament people <u>support</u> pit production at LANL, which means they support immediate pit production. LANL production *uniquely* enables manufacture of a new warhead type for a new, multiple-warhead-capable land-based intercontinental missile. Without LANL pit production, there will be no pit production at all for a decade. All the details in the draft SWEIS are side issues compared to this.

The LANL growth necessary to support pit production is the main source of increased environmental impact at LANL.

A misleading question is how "big" LANL pit production should be – i.e. whether it should be "expanded." *Expanded from what?* LANL has essentially zero pit production capacity right now. We don't want to stop "expanded" pit production; we want no pit production. LANL can be a training facility for pit production, yes. No more than that.

- We oppose all pit production at LANL. It is important to clearly state pit production is not welcome in our state.
- ▶ We want to halt all construction projects supporting pit production at LANL which are not strictly needed for the safety of non-pit operations. The "Los Alamos Plutonium Pit Production Project (LAP4)" is the central factory project.
- 2. The second fundamental policy issue in these hearings is whether LANL's nuclear weapons programs, and LANL itself, should expand, contract, or stay the same size. Questions of how to minimize LANL's environmental impact are secondary to how big LANL is overall. Most LANL environmental impacts are driven by scale.

All three SWEIS alternatives, including "No Action," involve massive growth and billions of dollars in new construction.

Pit production is LANL's largest growth engine, but it is not the only one. Nuclear weapons design and testing missions are also growing as the number of nuclear weapons under development grows. Other national security missions may also grow. Non-defense missions comprise a very small fraction of LANL activity. They will not grow significantly in any case. Environmental management might grow modestly, but it will not make much difference in LANL's overall scale.

Only reduced operations alternatives should be considered for LANL. LANL could shrink in a number of ways. These paths to downsizing LANL should be defined and explored in the SWEIS.

"Modernized" and "expanded" operations alternatives should be dropped, except for cleanup and safety.

► The "No Action" Alternative should really be NO ACTION – wind down LANL missions except for environmental cleanup and the dismantlement and disposal of facilities and waste. There are few valuable missions at LANL; all of them would be better done elsewhere. LANL provides no unique net value to the state, nation, or world.

3. Other talking points

▶ This SWEIS process is illegal. It is being staged to create a veneer of legitimacy for decisions taken in 2020. It is not legal, not honest or in good faith, and not democratic. Passively going along with the process means concurring in nuclear colonialism and community self-harm.

▶ Pit production is not a "done deal." All LANL projects, including pit production, are funded year by year after White House, DOE, NNSA, and congressional review. The decision to make pits is not final. Many NNSA projects die.

► Federal efforts to acquire pit production facilities at LANL have failed 4 times in the past, for good engineering and management reasons. The present effort is not supported by any NNSA comparative study. Known problems include:

- LANL's plutonium facility ("PF-4") is small, already 50 years old, built for R&D and not production, and has several existing plutonium missions which must continue. It is crowded.
- PF-4 does not yet and may never meet modern safety standards. Other necessary buildings are also old and unsafe. PF-4 is only about 3,000 ft from residences.
- NNSA and LANL are attempting to overcome LANL's lack of proper facilities by running multiple shifts in this old building and others, while building new support buildings and moving hundreds of staff off-site.
- LANL pit production is expected to be temporary at best. NNSA expects to move production to South Carolina.
- LANL is geographically isolated. Road access, housing, labor supply, and regional educational facilities are limited. There is essentially no supportive high-tech industry.
- LANL's topography is highly dissected. Effectively, LANL is a small site. Residences, highways, national monuments, tribal lands, are near nuclear facilities needed for pit production and waste staging.
- LANL has three active earthquake faults on-site, and is underlain at shallow depths by unconsolidated sediments. LANL's mesas are extensively fractured and seismically unstable.
- LANL is vulnerable to wildfire and extreme weather hazards.
- LANL is located on sacred Native American lands, with roughly 2,000 ruins and shrines on-site.

▶ No valid EIS process has been conducted supporting the choice to build pits at LANL. Studies done in 2008 assumed LANL would have a big new plutonium building. Citizens stopped that project. Those studies are invalid.

▶ NNSA is building a new pit factory in South Carolina which will be able to make all required pits starting in 2035 at higher safety standards, with few if any negative local community impacts. That facility is 10 times farther from the public than LANL's.

► The decision to temporarily use LANL for a pit factory was entirely political, done for the sake of pork barrel spending and to facilitate new warheads by being able to making pits sooner.

► The new warheads are "needed" only to provide ADDITIONAL, "BONUS" warheads for the much-delayed, grotesquely over-budget Sentinel intercontinental nuclear attack missile, now expected to cost >\$172 B. Sentinel should be canceled, along with its unnecessary new warhead and the unnecessary new pits LANL would make for it.

▶ In 1996, DOE estimated of the cost of building a 50 pit per year (ppy) factory at LANL at \$110 million (M) (\$622 M in 2024 dollars). Our current estimated total cost of a 30 ppy factory at LANL, through completion of construction in 2032, is \$22 billion (B), <u>35 times as much</u>. In 2017, NNSA estimated the cost of a 30 ppy factory at \$3 B, <u>7 times less</u> than today. By any measure, LANL pit production is grossly over budget – in the business world, a 5<sup>th</sup> failure.

▶ Depending on what is counted, each LANL pit is going to cost between \$68 and \$156 M, i.e. in the neighborhood of \$100 M. That is as much as a large new high school, or a year's pay for 2,000 teachers. Neither the United States nor New Mexico can afford such idiotic priorities. New Mexico: last in education, first in plutonium pits? Sickening.

► The excuse for LANL pit production is a reckless and dangerous nuclear arms race, which the U.S. must not enter and cannot "win." Unless stopped, that race will lead either to nuclear war or national bankruptcy. It is basically a run on the Treasury by the military-industrial complex. We cannot afford to continue being so stupid.

4. The other big (set of) issue(s) on the table has to do with <u>us</u> – with the nature and direction of our collective engagement, including our resistance to nuclear-military colonization, U.S. wars, and the nuclear arms race.

How can we discern, and disengage from, efforts to normalize a) pit production at LANL and b) our nuclear colonial status? How can we make resistance to nuclear weapons expansion in New Mexico effective? What shapes might it take? How can it be integrated into efforts to build a more humane, resilient society? How can it enhance our relationships, careers, and lives? How can we build community while successfully opposing nuclear weapons?