



IEER Comments on the Modern Pit Facility Notice of Intent

Comments of the Institute for Energy and Environmental Research on the Notice of Intent of the National Nuclear Security Administration to prepare a Supplemental PEIS on the Modern Pit Facility

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Mr. James Rose

Supplement to the Programmatic EIS on SSM for a Modern Pit Facility Document Manager

NA-53, Forrestal Building

US Department of Energy/NNSA

1000 Independence Ave., SW

Washington, DC 20585

fax 1-202-586-5324

James.Rose@nnsa.doe.gov

Dear Mr. Rose:

The following are IEER's comments on the NOI of the NNSA to prepare a Supplemental PEIS on the Modern Pit Facility.

1. Such a facility would primarily be for a vast expansion of the US capability to make nuclear weapons rather than for the maintenance of the arsenal slated to be active under the 2002 SORT treaty between the United States and Russia. The NNSA is already authorized to make up 80 pits per year. Past replacement experience due to defects has not been driven by nuclear-related aging defects in the primary. In fact, there has historically never been an aging-related safety defect in a primary throughout the history of the nuclear weapons program, as IEER showed in our 1996 study, Nuclear Safety Smokescreen.

At a replacement rate of 2 percent per year, the 80-pit current authorization would allow for the maintenance of an arsenal of 4000 warheads, about double the agreed active arsenal under the SORT treaty.

2. Aging does not appear to produce safety defects in the primary. It also does not appear to produce performance defects according to recent data discussed in the December 2000 issue of Physics Today. See the article by Raymond Jeanloz in that issue. It is essential that the NNSA justify the need in relation to the technical data discussed in that paper or justify why it is not appropriate to use it.

3. The construction of a large pit facility that could make up to 500 pits per year could maintain an arsenal as large as 25,000 warheads. This would be in gross violation of the US obligations under the nonproliferation Treaty and re-start a dangerous arms race that would damage health, the environment, US security, and global security.

4. The [NPT](#) is a security cornerstone of for the United States, its allies and the rest of the world and it is part of the law of the United States under Article VI of the constitution. Constructing a large MPF that includes provision for new weapons and new weapon types is contrary to promises made by the US to



other [NPT](#) parties.

5. The DOE repeatedly promised the people of the United States that it would not again put health and safety and environment in second place below weapons production. But the new push for weapons production is occurring simultaneously with an abandonment of DOE's commitments for clean up of its sites around the country. The proposals to leave large amounts of high-level waste in place on sites like Savannah River Site, Hanford, and INEEL are an alarming echo of the policies that created environmental and health problems on a large scale in the past.

6. The NNSA is therefore obliged to consider the no action alternative in the Supplemental PEIS.

7. IEER prepared a study on stockpile stewardship, including safety and reliability of nuclear weapons in 1996 based on official DOE data. The summary of that study is a part of these comments. It can be found on the web at: <http://ieer.org/resource/reports/the-nuclear-safety-smokescreen/>

Arjun Makhijani, Ph.D.

President, Institute for Energy and Environmental Research

Official documents:

[Notice of Intent to Prepare a Supplemental Programmatic Environmental Impact Statement on Stockpile Stewardship and Management for a Modern Pit Facility](#)

[National Nuclear Security Administration](#)