



**INSTITUTE FOR ENERGY AND
ENVIRONMENTAL RESEARCH**

6935 Laurel Avenue, Suite 201
Takoma Park, MD 20912

Phone: (301) 270-5500
FAX: (301) 270-3029
e-mail: ieer@ieer.org
<http://www.ieer.org>

December 13, 2005

A.J. Eggenberger, Chairman
Defense Nuclear Facilities Safety Board
625 Indiana Ave. NW, Suite 700
Washington DC 20004

Dear Mr. Eggenberger,

Please find enclosed a report that Institute for Energy and Environmental Research issued recently entitled, "Weapons Plutonium in Los Alamos Soil and Waste: Environmental, Health, and Security Implications." I gave a copy of the report to Dr. Charles Keilers your representative at LANL, and he promised to call this report to your attention. He told me to write directly to you for any action on the report. I would like to call your attention particularly to Part II of the report which analyses weapons plutonium accounting discrepancies at LANL as they relate to the amounts released or discharged to wastestreams.

The report concludes that LANL has unaccounted for plutonium of at least 300 kilograms. I'm sure you will agree that this is a very serious discrepancy, especially since it is an estimate of overreporting of losses in the Nuclear Materials Management and Safeguards System (NMMSS). What happened to the plutonium and how the NMMSS account came to book as much as 610 kilograms of plutonium as "Normal Operating Losses" is a substantial mystery.

I am writing to request you to initiate an urgent and thorough investigation into Los Alamos weapons plutonium waste accounts, including the waste portion of the NMMSS account.

I have been trying to call attention to plutonium accounting problems for several years. This problem came to light in 1996 – please see Appendix A of the report where a DOE memorandum on the subject is reproduced. The DOE's promised "working group" either did no work or its work has not been published. As part of that effort I wrote a letter in August 2004 to Dr. G. Peter Nanos, then Director of LANL, to no effect. Finally, the DOE did make a promise to me on November 30, 2005, when I released the report at Los

Alamos. At that time, John Ordaz, Assistant Manager for Environmental Management for DOE at LANL, came to my press conference and stated:

I promise to have a preliminary response shortly, as indicated, and a more elaborate response later on. I don't know how long that will take. We need to talk to Los Alamos and obviously we need to resolve these discrepancies. We need to give you answers. Questions have to be answered.¹

While I believe DOE's decision to take this matter seriously is a positive turn, I believe that an investigation independent of DOE and contractor staff at Los Alamos is needed. That is the reason for my request to you.

I believe both from a scientific point of view and an environmental point of view, this matter requires the most urgent attention which I hope the DNFSB will give it.

Thanking you in anticipation.

Sincerely yours,

Arjun Makhijani, Ph.D.
President

cc: Samuel Bodman, Secretary of Energy
Dr. Charles H. Keilers, U.S. DOE-LAAO
Dr. Robert Kuckuck, Director of LANL
John Ordaz, U.S. DOE-LAAO

¹ This quote was taken from the videotape of the November 30 press conference.