

snake river alliance

IDAHO'S NUCLEAR WATCHDOG

January 31, 2005

Timothy A. Frazier, Document Manager
NE-50/Germantown Building
Office of Space and Defense Power Systems
Office of Nuclear Energy, Science and Technology
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-1290

RE: Scoping questions and comments on the draft Environmental Impact Statement for the proposed consolidation of nuclear activities related to production of radioisotope power systems

Dear Mr. Frazier:

The Snake River Alliance is an Idaho-based grassroots group working through research, education, and community advocacy for peace and justice, the end to nuclear weapons production activities, and responsible solutions to nuclear waste and contamination. I submit these comments on behalf of our dues-paying members.

1. The Department of Defense has outlined a number of future space-based projects that will most likely involve plutonium space batteries and nuclear reactors. Please describe how plutonium space battery production at INEEL will relate to future plutonium needs for these space-based military and surveillance missions.
2. Describe in detail all types and amounts of waste that will be generated in all aspects of the consolidation proposal on a yearly basis, including waste treatment options, interim storage, and final disposition of each waste type. Please compare in detail all projected waste streams to current waste acceptance criteria for any assumed disposal facility.
3. Describe in detail each step of plutonium production including transportation, target fabrication, irradiation, plutonium extraction, storage, and purification, and battery construction and storage. For each step, please note whether it will occur

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in an existing facility or require new construction. Please describe in detail the economic and waste management impacts of decontaminating and decommissioning each facility.

4. Plutonium activities have led to serious worker health and safety problems. Please describe those problems and how they will be avoided.
5. Please describe the NEPA coverage for the transfer of neptunium-237 to INEEL and for the construction and operation of the Space and Security Power Systems Facility at INEEL.
6. Describe in detail all transportation-related aspects of this proposal for both waste and nuclear material used in the plutonium production and space battery production processes.
7. Describe the amount of water required on a yearly basis to support plutonium consolidation at INEEL, including whether and how this water will be contaminated, treated, and finally disposed of.
8. Describe in detail the ventilation systems (including whether or not they are passive or active) that will be used to protect people and the environment from all plutonium isotopes.
9. Describe in detail all monitoring systems that will be used to ensure plutonium containment, including how the DOE has addressed recent issues raised regarding plutonium-238 and AIRNET monitoring at Los Alamos National Laboratory (attached).
10. Describe in detail the design features of the proposed consolidation facility intended to prevent and extinguish fires, including how these systems will operate successfully while not deteriorating or otherwise adversely affecting ventilation systems used to contain plutonium and other contaminants.
11. Describe how the DOE has resolved HEPA filter issues raised by the Defense Nuclear Facilities Safety Board regarding the issues raised in the "Lessons Learned" document (attached) and the recent notice of "downgrading" of ventilation safety systems by the DOE (attached).
12. Describe how this project relates to the larger programmatic vision for INEEL, including any future collaborative efforts between the DOE, NASA, and DOD at INEEL.

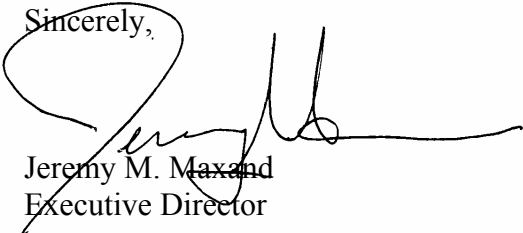
13. Describe in detail and map the areas that could be affected by a plutonium airborne release due to accident or terrorist attack.
14. Describe in detail how the DOE will prepare local and state emergency responders to handle any accident that results in an off-site release. The next numeral is in the wrong place.
15. Describe in detail how the DOE will train on-site emergency responders to handle fires inside the plutonium consolidation facility so that HEPA filter integrity is maintained.
16. How much will upgrading of existing facilities for plutonium consolidation at INEEL cost? Which facilities will need to be upgraded and how will they need to be upgraded? Preliminary estimates by DOE of the cost have been “minimal,” but an actual dollar figure is necessary.
17. When neptunium-237 is irradiated, plutonium isotopes, including Pu-237 and those with higher atomic numbers, are produced. The plutonium must then be extracted from the Np-237 targets. It is our understanding that the DOE will evaluate both pyroprocessing and an aqueous technique for extraction. These should be evaluated fully in the draft EIS. These processes also raise weapons material proliferation concerns. Those concerns should be addressed in detail in a non-proliferation assessment.
18. What is the total amount of Russian Pu-238 available for future use by the DOE?
19. What relationship will Lockheed Martin have with the consolidation project now and in the projected future?
20. What relationship to the INEEL plutonium consolidation project does the “Stirling” space battery have?
21. Will the consolidation facility proposed for INEEL be fully designed and reviewed prior to construction or will the DOE “design build” the facility, designing the facility as it is being built?
22. Describe in detail how this project will affect current deadlines for removal of waste from INEEL.
23. Describe how moving neptunium-237, which is a “special nuclear material,” to INEEL is consistent with the DOE’s recent efforts to move such material off INEEL to other, more secure sites.

24. Describe in detail what “orphan” waste will be produced by plutonium production at INEEL?
25. Describe in detail the type and amount of wastes that will stay in Idaho permanently as a result of the plutonium consolidation project.
26. Describe in detail the possible security threats to the proposed plutonium facility and what measures will be taken to deter such attacks.
27. Describe in detail all known future space missions that will require plutonium-238 be produced at the proposed plutonium facility at INEEL, including the amounts of plutonium and an integrated timeline for production and use. It has come to our attention that some NASA missions are more suppositional than others, sort of the “if wishes were horses, beggars would ride” scenario. We would therefore also appreciate a discussion of past and current missions that include(d) plutonium.
28. Describe in detail all known past, current, and future “national security” missions that will require plutonium-238 be produced at the proposed plutonium facility at INEEL, including the amounts of plutonium and an integrated timeline for production and use.
29. Describe in detail the risks posed by an accident from a seismic event at or near INEEL.
30. Describe in detail the types and amounts of hazardous wastes that will be used or produced in plutonium production, including how these waste streams will be treated, stored, and eventually disposed of.
31. Describe in detail the projected cost to handle, treat, store, and dispose of all types of wastes produced by plutonium production at INEEL.
32. Describe how the recent “Waste Incidental to Reprocessing” amendment to the Nuclear Waste Policy Act could affect the disposition of nuclear waste generated by plutonium production.
33. Describe how the veil of “national security” secrecy will affect the State of Idaho and citizens of Idaho from monitoring activities related to the plutonium consolidation project at INEEL.
34. Describe in detail the evaluation of alternatives to plutonium use in space missions and “national security” missions, such as those being developed by the European Space Agency for the Rosetta mission, launched in March 2004.

35. The Snake River Alliance notes the need for a programmatic assessment of the entire nuclear energy research and development program, particularly since the current proposal quite clearly includes the use of infrastructure that will also be used in future NE missions.
36. Describe in detail any programmatic connections between the proposed plutonium consolidation project and the previously proposed “Space Port” for Idaho.
37. Describe in detail any existing or projected programmatic connection between the proposed plutonium consolidation project at INEEL and “Project Prometheus,” involving an ion propulsion system for space travel.
38. What relationship will the plutonium consolidation proposal have on air emission permits for the Site? How will compliance with the Clean Air Act be enforced?
39. Of the waste produced, what and how much, if any, will be disposed of at the Idaho CERCLA Disposal Facility (ICDF)?
40. Fully half the plutonium produced and processed in Idaho would be used by classified entities for classified purposes that may or may not be economically, environmentally, or ethically “worth it.” The DOE contends that only the end user(s) and use(s) will be secret and that everything else about the Idaho project will be public. But that runs counter to virtually universal experience across the decades and across the continent. Secrecy spreads. There is every reason to expect that worker and public health dangers will be shrouded and environmental harm hidden. That same scenario has already increased—immeasurably—the damage done by the DOE’s activities. Idahoans are being asked to bear a risk without ever being able to weigh any benefit. That raises grave questions in a democratic country rooted in the ideal of an accountable government. At the same time, the “statement of need” is one of the most important portions of an EIS and one most obviously shortchanged by federal agencies. We look forward to a fully developed statement of need, including the “national security” need.

Thank you for your attention and consideration. If you have questions, please contact me in our Boise office.

Sincerely,



Jeremy M. Maxand
Executive Director