



Union of Concerned Scientists

Citizens and Scientists for Environmental Solutions

November 21, 2008

Mr. Theodore A. Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation, NA-10.1
Department of Energy/NNSA
1000 Independence Avenue, SW
Washington, DC 20585

Dear Mr. Wyka,

We are writing to offer our comments on the National Nuclear Security Administration's (NNSA) final Complex Transformation Supplemental Programmatic Environmental Impact Statement (SPEIS) and to request the delay of any Record of Decision(s) (ROD) until President-elect Obama's administration conducts a Nuclear Posture Review (NPR). The United States needs a new nuclear policy—including a clearly articulated purpose and plan for the size and composition of its nuclear arsenal—before it makes major decisions on the future of the complex.

Our assessment of the Complex Transformation proposal finds that:

Construction of the Chemistry and Metallurgy Research Replacement Nuclear Facility (CMRR-NF) and the Uranium Processing Facility (UPF) would be premature given that the nation has not decided on the future size and characteristics of its nuclear arsenal.

While we strongly agree with the NNSA decision to eliminate plans for a 9,000-square foot extension to the proposed CMRR-NF, we maintain that any decision on building these facilities should await a comprehensive review of U.S. nuclear weapons policy, and a plan for the future arsenal.

Under its current policy, the United States does not need to produce new plutonium pits until at least 2015, and perhaps not until 2022. We applaud the NNSA decision to limit plutonium pit production to a maximum of 20 pits this year, postponing any action to allow Los Alamos National Labs to produce more until after the Nuclear Posture Review. Still, we stress that the only identified need for new pits today is to allow the nation to deploy its roughly 400 W88 warheads while maintaining enough of them in reserve to allow one to be destroyed each year in tests. By the end of 2008, the United States will have produced enough certified new W88 pits to allow 6 to 12 years of continued testing. Maintaining a warm production line, without producing any additional pits, is appropriate until after the completion of the NPR.

The United States should resize the nuclear weapons complex from the bottom up.

After the nation conducts the NPR and decides on a long-term nuclear weapons policy—and the stockpile it requires for implementation—the NNSA should perform a comprehensive, bottom-up review of the complex. NNSA should maintain only those programs and facilities deemed

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essential for the support of the future arsenal. The United States should then determine how best to use the freed-up resources within the complex for other important scientific missions.

Consolidating weapons-usable fissile material should be a higher priority for the NNSA.

The NNSA recognizes that consolidating such material reduces security costs, and the danger of theft, accident, and radiological exposure. However, while the agency's proposed plans are a step in the right direction, it should speed up those efforts and expand their scope.

The DOE should examine other alternatives for the future of the complex. In particular, the department should consider a future in which the United States spearheads a global effort to move toward the prohibition of nuclear weapons. NNSA should identify the new capabilities required for such an effort, including the verified dismantlement and storage of nuclear warheads, and the conversion of weapons-grade materials.

It would be inappropriate and premature for DOE to release an ROD prior to the 2009 NPR requiring construction of major new facilities or committing to the production of additional pits. Again, we ask that any ROD be delayed until the new administration has decided on and communicated its vision for the future of the U.S. nuclear weapons complex.

Sincerely,

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