

ACT NOW TO STOP THE NEW BOMB PLANT!

The National Nuclear Security Administration was told by a federal judge to prepare a new analysis of the risks of an earthquake at the Y-12 site in Oak Ridge, Tennessee, where nuclear weapons parts are made. **Instead, NNSA prepared a very narrow analysis of the effects of an earthquake on three buildings at Y-12.** They published this Supplement Analysis in April and invited public comment.

How you can comment — and what you can say...

In addition to the usual reasons for commenting on NNSA's nuclear weapons plans—our responsibility to stand opposed to existential threats on behalf of ourselves, future generations, and the rest of creation—there is another important reason to comment on this Supplement Analysis: to demonstrate that the public does not consider NNSA's analysis or its process adequate.

If you want to read the Supplement Analysis, you can find it on OREPA's website: www.orepa.org.

On the right hand column, just under the UPF lawsuit heading.

Your comments should be sent by **May 26** to:

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or by email to: NEPA.Comments@npo.doe.gov

You are not limited to our suggestions; you can and should put any and all of your concerns on the record. See our main concerns at right:

1. The SA documents significant changes from the 2011 Site-Wide Environmental Impact Statement. In light of the higher probability of a catastrophic event and the higher consequences of such an event, NNSA must prepare a new Site-Wide EIS for all of Y-12.

2. Any environmental analysis of impacts must consider the whole environment, not just humans.

3. NNSA has no right to accept risk on behalf of the public without a public hearing. The SA indicates a risk ten times higher than the 2011 UPF plan—NNSA must talk with the public about that.

Additional talking points

- The SA doesn't analyze the site-wide consequences of an earthquake at the Y-12 Nuclear Weapons Complex as the court ordered. It only looks at the Uranium Processing Facility bomb plant and the two facilities in the Extended Life Program, the 9215 complex and the 9204-2E facilities.
- The SA must analyze the cumulative consequences of a major earthquake event at Y-12 across the entire site, including constraints on response personnel, the failure of fire suppression operations, the disruption of emergency response practices, the risk of a criticality event, and the release of all toxic and hazardous materials in the event of a series of fires.
- Continuing to use old, out-of-compliance facilities for 20-30 more years increases the probability of a devastating accident *five-fold* over the plan presented in 2011. The SA also finds the consequences to the public are *ten times greater* than the plan adopted in the 2011 Record of Decision. These findings alone are enough to require a new Environmental Impact Statement.
- The SA says no communities of color or low-income communities would be disproportionately impacted by an accident at Y-12. The Scarboro and Woodlawn communities, both located within a mile of Y-12, represent a concentration of people of color and low-income residents.
- The current COVID-19 pandemic crisis requires a reconsideration of spending priorities. We must prioritize funding that actually makes us safer—investments in medical research, infrastructure, technology, materials and equipment, and direct care services, not investments in weapons of mass destruction to threaten others.
- The COVID-19 pandemic reveals the danger of dismissing high-consequence/low-probability events—to those who face the danger when it happens, the low probability is of no consolation and provides no relief or protection. If the ELP facilities are unsafe, they must be retired immediately; all workers should be provided safe working conditions.
- The SA must consider impacts on the whole environment, not just humans.
- The public has a right to be consulted about the risks NNSA is exposing it to. NNSA should hold a public hearing to explain this and get feedback—the kind of hearing that is required by an Environmental Impact Statement.
- NNSA says it will not have updated evaluations of how the old buildings at Y-12 will perform in an earthquake until the end of 2021. How can they estimate the consequences of a catastrophic earthquake when they don't know what will happen should such an earthquake occur?
- NNSA should prepare a new Environmental Impact Statement and consider a Maximum Risk Reduction Alternative that would prioritize safety over producing more nuclear bombs.
- In 2011, NNSA said it could fulfill its mission—maintaining the nuclear stockpile—with a throughput capacity of less than 10 secondaries and cases per year. Why, then, is NNSA spending billions and billions of dollars on a plan to produce 80 secondaries and cases per year?

