

**Public Comments to the Energy Department on the
Supplement to the Stockpile Stewardship and Management
Programmatic Environmental Impact Statement
Complex 2030**

Submitted by

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American Friends Service Committee
Church of the Brethren Witness/Washington Office
Churches' Center for Theology and Public Policy
Conference of Major Superiors of Men
Disciples Justice Action Network (Disciples of Christ)
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United Church of Christ Justice and Witness Ministries
United Methodist Church, General Board of Church and Society

and

18 State and Regional Religious Organizations

and

33 Congregations of Women Religious

Submitted to
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The above 74 religious organizations submit the following comments on the intent of the Energy Department's National Nuclear Security Administration (NNSA) to prepare a Programmatic Environmental Impact Statement (PEIS) for "Complex 2030."

Religious communities in America have long advocated for a world free of nuclear weapons. The teachings of the Bible, the Qur'an and other sacred texts are clear that as people of faith, we must be committed to the task of peacemaking. Jesus told his followers, "Blessed are the peacemakers for they shall be called children of God" (Matthew 5:9). Psalm 34 calls us to "seek peace and pursue it." The Qur'an equates killing a single person unjustly with killing all humanity and saving a single life with saving the life of all humanity (5:32). Guided by texts such as these, we cannot envision a situation in which we could support the indiscriminate destruction of human life from the use of a nuclear weapon.

While we come from separate religious traditions, we speak with one voice to say that we oppose the construction of a new nuclear weapons complex. The production of nuclear weapons brings with it a legacy of health problems and environmental degradation, borne in large part by the poorest of the poor. The renewal of the nuclear weapons complex as described in the Complex 2030 plan would add to the devastation that these communities are already experiencing.

The impact of the Complex 2030 plan would also be felt internationally. The underlying premise of international efforts to stop the spread of weapons of mass destruction is that the U.S. and other nuclear weapons states will also work to reduce their own stockpiles. The U.S. cannot call on other nations to stop the production of new nuclear weapons while American scientists are spending billions to develop a new generation of deadly nuclear bombs. Given that the U.S. arsenal of nuclear weapons has the destructive power to unleash an estimated 50,000 times the devastation of Hiroshima and Nagasaki combined,¹ the U.S. should be working to reduce its stockpile of nuclear bombs, not devising new ways to spend billions of taxpayer dollars to build new weapons.

We believe that there is little justification for Complex 2030. In particular, we believe the proposal for the construction of a new pit production facility, referred to as the Consolidated Plutonium Center (CPC), is unjustified. Our comments focus on the CPC and NNSA's main

¹ Hans M. Kristensen, Federation of American Scientists, Washington, D.C., personal communication, December 7, 2006.

arguments for its construction. Additionally, we address the international treaty obligations of the United States.

Assessing the Need for a New Pit Facility

We do not agree that there are sufficient reasons to justify the creation of a new nuclear weapons complex, the proposed Complex 2030. The idea that the United States lacks a credible long-term deterrent or that U.S. nuclear warheads are unreliable is a fallacy.

According to NNSA, the CPC “addresses a critical gap in the credibility of the long-term nuclear deterrent of the United States, namely the lack of capability and associated capacity to manufacture plutonium pits to support the stockpile.”² Additionally, NNSA states that the CPC is intended to “have the flexibility to manufacture various pit types.”³ These two main issues of *capacity* and *flexibility* are addressed below:

Capacity

NNSA argues that it lacks the capacity to meet projected stockpile requirements. First, unless the United States is planning to abandon its international disarmament obligations to reduce its nuclear arsenal and plans to expand the nation’s stockpile, this is not true. Second, the assertion that the U.S. needs to replace pits because of plutonium aging issues has been proven inaccurate. Third, over 4,000 reserve warheads and a large surplus of more than 12,000 pits from dismantled warheads already exist.⁴

International Obligations and Stockpile Requirements. The United States currently has an estimated 5,000 deployed strategic nuclear warheads.⁵ In 2002, the U.S. government signed the Strategic Offensive Reductions Treaty (SORT) with Russia, which requires the United States to reduce its strategic nuclear arsenal to between 1,700 and 2,200 operationally deployed warheads by 2012. If the U.S. government does not intend to increase its nuclear weapons stockpile beyond SORT levels, there is no need for new pits for additional warheads.

Plutonium and Aging. The need to replace warhead pits in the near future because of aging effects of plutonium has also been used by the NNSA as an important reason for construction of a new pit plant. In testimony before Congress, Thomas D’Agostino, an administrator for NNSA, gave pit aging as the first reason for need of the new CPC. Mr. D’Agostino submitted that “our best estimate of minimum pit lifetime is 45-60 years.”⁶

² National Nuclear Security Administration, “Consolidated Plutonium Center,” fact sheet, November 2006. Available at <http://www.complex2030peis.com/Consolidated%20Plutonium%20Center.pdf>.

³ Ibid.

⁴ Robert S. Norris and Hans M. Kristensen, “Dismantling U.S. nuclear warheads,” *Bulletin of the Atomic Scientists*, January/February 2004, pp. 72-74. Available at http://www.thebulletin.org/article_nn.php?art_ofn=jf04norris.

⁵ Kristensen, personal communication, December 7, 2006.

⁶ Thomas P. D’Agostino, Deputy Administrator for Defense Programs, National Nuclear Security Administration, testimony before the House Armed Services Subcommittee on Strategic Forces, April 5, 2006, p. 10. Available at <http://www.house.gov/hasc/4-5-06DagostinoTestimony.pdf>.

However, a recent official study says otherwise. A congressionally mandated assessment of plutonium aging on pit lifetimes was conducted by scientists at the Los Alamos National Laboratory and Lawrence Livermore National Laboratory, independently reviewed, and released in November 2006. The study found that the plutonium in most nuclear weapons will remain “reliable” for a minimum of 100 years,⁷ approximately double the previous NNSA estimate of 45 to 60 years. These findings obviate the need to produce new pits based on the argument of pit unreliability due to plutonium aging.

Surplus of Pits and Reserve Warheads. NNSA already has over 12,000 surplus plutonium pits available at its Pantex Plant near Amarillo, Texas.⁸ The number of pits in storage is increasing each year due to warhead dismantlement and will continue to increase as the United States implements the SORT treaty. SORT requires additional reductions from the current deployed strategic nuclear arsenal of some 5,000 warheads to 2,200 warheads or less by 2012.⁹

In addition to deployed weapons, the U.S. government has over 4,000 warheads in its reserve stockpile.¹⁰ In view of the large number of surplus pits and reserve warheads in existence, there is no necessity to produce additional pits.

Flexibility

The Los Alamos National Laboratory currently has the ability to produce plutonium pits and has requested additional capacity.¹¹ According to NNSA, the Los Alamos National Laboratory lacks the agility to change quickly from one pit type to another, or to produce more than one type of pit at a time.

We believe the administration’s proposed new pit production facility and the stated need for flexibility is driven by its planning for the development of a new generation of nuclear weapons. We oppose the development of new nuclear weapons.

Treaty Obligations

The draft PEIS should address how the construction of the CPC complies with U.S. treaty obligations and advances nonproliferation efforts. Under Article VI of the U.S. Constitution, treaties are part of the “supreme Law of the Land.”

Nuclear Testing. A new nuclear weapon design with a redesigned pit may require nuclear testing. If the U.S. were to resume testing, other nuclear powers would follow suit, and the

⁷ National Nuclear Security Administration, “Studies Show Plutonium Degradation in U.S. Nuclear Weapons Will Not Affect Reliability Soon,” news release, November 29, 2006. Available at http://www.nnsa.doe.gov/docs/newsreleases/2006/PR_2006-11-29_NA-06-46.pdf.

⁸ Norris and Kristensen, “Dismantling U.S. nuclear warheads,” pp. 72-74.

⁹ Kristensen, personal communication, December 7, 2006.

¹⁰ Robert S. Norris and Hans M. Kristensen, “U.S. nuclear forces, 2006,” *Bulletin of the Atomic Scientists*, January/February 2006, p. 70. Available at http://www.thebulletin.org/article_nn.php?art_ofn=jf06norris.

¹¹ National Nuclear Security Administration, “Notice of Intent To Prepare a Supplement to the Stockpile Stewardship and Management Programmatic Environmental Impact Statement—Complex 2030,” *Federal Register*, October 19, 2006, p. 61733. Available at <http://www.complex2030peis.com/NOI%20Oct%2019%2006.pdf>.

Comprehensive Test Ban Treaty would dissolve. The world would, once again, find itself in a nuclear arms race.

Nuclear Disarmament. The nuclear Non-Proliferation Treaty (NPT) has been the backbone of the nuclear nonproliferation regime since its inception in 1970. Article VI of the NPT requires countries “to pursue negotiations in good faith on effective measures relating to cessation of the nuclear arms race at an early date and to nuclear disarmament...”

Yet, NNSA has stated the agency would like to restore the U.S. ability to produce nuclear weapons to Cold War levels. Mr. D’Agostino testified that Complex 2030 “would restore us to a level of capability comparable to what we had during the Cold War.”¹²

We believe the planned construction of the CPC and production of plutonium pits undermines the NPT and the nonproliferation regime. As Kofi Annan, United Nations Secretary-General recently said, “All of the NPT nuclear-weapon States are modernizing their nuclear arsenals or their delivery systems. They should not imagine that this will be accepted as compatible with the NPT. Everyone will see it for what it is: a euphemism for nuclear rearmament.”¹³

Nuclear Nonproliferation. In the world today, we have a nation that has recently acquired nuclear weapons capability, North Korea, and another that has been in violation of International Atomic Energy Agency agreements with uncertain intent, Iran. The U.S. is calling for restraint of these and other nations’ military nuclear programs. In contrast, the U.S. government is proposing the expansion of its own nuclear weapons complex. If the U.S. government moves ahead with the CPC, this country will be joining North Korea and Iran in operating outside the nuclear nonproliferation framework, which Washington helped construct. This contradictory policy undermines the ability of the United States to call for restraint from North Korea and Iran and weakens the nonproliferation regime.

Why would an administration that is obligated to pursue nuclear disarmament seek the construction of a plant to produce additional nuclear weapons? We believe that the construction of the CPC would tell the world that the United States does not intend to keep its pledge of nuclear disarmament. Rather than reducing U.S. reliance on nuclear weapons, the construction of the CPC would reaffirm a central role for nuclear weapons in U.S. security policy. We believe NNSA should take seriously the commitments of the United States under the Non-Proliferation Treaty and reflect them in the draft PEIS for Complex 2030.

No Action Alternative

We ask for an *amended* “no action” alternative for Complex 2030 with the goal of not expanding the nuclear pit fabrication capacity of the United States. Spending billions of dollars to build a

¹² D’Agostino, testimony, April 5, 2006, p.4.

¹³ Kofi Annan, address at Princeton University, Princeton, N.J., November 28, 2006. Available at http://www.un.org/News/ossg/sg/stories/statments_full.asp?statID=6.

new pit facility as part of an over \$150 billion new nuclear weapons complex¹⁴ is unjustified and wasteful. NNSA should eliminate the proposed CPC from Complex 2030. It should focus on more urgent concerns such as meeting NPT commitments, a more vigorous nonproliferation program, and cleanup of the nuclear weapons complex.

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¹⁴ Government Accounting Office, *Suggested Areas for Oversight for the 110th Congress*, GAO-07-235R, November 17, 2006, p. 15. Available at <http://www.gao.gov/new.items/d07235r.pdf>.

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