



Senator Lamar Alexander  
455 Dirksen Senate Office Building  
Washington, DC 20510

1 April 2014

Dear Senator Alexander:

On March 10, 2014, the National Nuclear Security Administration's "Red Team" began its review of the Uranium Processing Facility project in Oak Ridge, TN. Three weeks later, press reports indicate the Red Team has drawn its conclusions and will make a recommendation. We are writing to express concerns about this secret NNSA decision-making process. Almost all of what the Red Team is doing is secret—the names of the Team members have not been revealed. Only a very few things are known, and we know them because Red Team Director Thom Mason granted interviews before the Red Team began.

One of the most startling is the Red Team seems to believe their mission is to hit a \$6.5 billion cost estimate target for the UPF. This turns a normal budgeting procedure on its head—instead of justifying costs with a blueprint and the consequent calculation for materials and labor, the number \$6.5 billion has been pulled out of thin air and presented as a target as though doing so makes it suddenly and magically reasonable.

Early comments by Dr. Mason, suggest that the Red Team will not, unfortunately, consider true alternatives, but will attempt to repackaging the UPF to make it more palatable, pricewise. Mason hinted, referring to glovebox technology, that cost savings might be found by cutting back on safety features. This would be unacceptable.

Two fundamental questions should be answered about the UPF before any more money is spent on the current design, a Bomb Plant to Nowhere.

1. Is the work projected for the UPF necessary? At this point, it is impossible to project the need for major Life Extension Programs in 2025; the only thing we know with reasonable certainty about the stockpile is it is diminishing and that trajectory is unlikely to change in the future. We do not know what LEPs are necessary to preserve the safety and surety of the stockpile and which are optional "wants" by the weapons labs; we do know that some proposed modifications are significant and involve more than maintenance and that some experts question the advisability of untested modifications. We also know that none of our weapons systems are currently compromised by aging factors, so there is no immediate urgency to conduct LEPs. And we know the currently proposed LEPs carry cost-prohibitive pricetags. We may know more when a secondary lifetimes study is prepared, but until then prudence would suggest doing less and saving more is the fiscally responsible path.

2. Is it necessary for the work to be done in Oak Ridge? Several knowledgeable sources have suggested the most crucial life extension work, replacement of limited-lifetime components, can

be done at Pantex. If this is true, it would not only save money, it would eliminate the significant risks associated with transporting secondaries from Amarillo to Oak Ridge and back; it is no exaggeration to say that transportation route represents the US nuclear stockpile's greatest vulnerability.

At an interview following his presentation at the Howard Baker Center last month, UPF project manager John Eschenberg indicated the \$300 million budgeted this year for the UPF would be wisely spent by the design team on elements of the design that will apply regardless of the final decision on the UPF. This defies credulity. A billion dollars into the design, the team must surely be dealing with specific areas of the project, and there is no way to predict whether or not the work will be useful to the final project. It is obviously more sensible and fiscally responsible to halt design work until the shape of the project becomes clear and the "new" plan for the UPF is finalized.

The secrecy surrounding the current "revisioning" of the UPF is contrary to the requirements laid out in the National Environmental Policy Act and the CEQ Regulations implementing NEPA that the public must be consulted in a meaningful way in planning for significant government actions. While we might expect the NNSA to claim the existing Y12 Site-Wide EIS is sufficient to cover a new approach, the current Record of Decision will no longer be valid if the "new" UPF does not conform to the decision recorded by NNSA. In an interview published today on Frank Munger's Atomic City Underground blog, Red Team leader Mason is quoted saying, "By definition, when we're talking about an alternative, it's something other than the plan of record." In the standard EIS process the public is consulted at least twice—in scoping out the project at the outset, and in reviewing the draft EIS prior to its finalization. The rationale for this requirement is two-fold and simple: history shows including the public leads to better decisions as well as to increased public acceptance of decisions. It's not just that the public is more willing to buy-in if it feels included—it is that the decisions finally made are better decisions.

A case in point: In the original EIS process, the public raised concerns about the possible presence of contaminated materials in the soils that would be moved during the construction of the UPF. The public's concern was noted, and the NNSA said it would conduct a review of historic data and take other modest actions to address the issue. OREPA continued to question whether this action would be sufficient to identify wastes; we knew from more than twenty years of experience that records alone would not provide a complete or reliable picture of historic activities. NNSA forged ahead. Then, last month, crews were preparing transportation corridors in anticipation of UPF construction when they got a surprise—they uncovered a debris field with multiple pieces of radioactive trash, apparently an undocumented waste dump of some sort.

The extent and nature of that contamination has not been made public. But its very existence validates the public's initial concern and demonstrates the inadequacies of the NNSA/contractor approach. At this point, we have no way of knowing what risks the contamination uncovered posed to workers, and we have no way of knowing if the disturbance led to releases into the environment. We do know, however, that the Y12 Site-Wide EIS neither adequately contemplated nor analyzed this eventuality. Future events—and it is important to realize they are more likely than not—pose similar threats. What we have learned since the completion of the Y2 Site-Wide EIS three years ago—the discovery of an unanticipated debris field is a prime example—makes it clear that its analysis is no longer sufficient.

When the secret Red Team completes its review, the results of that review must be made public.

In light of NNSA's refusal to be forthcoming about the contamination discovery incident, OREPA has filed a Freedom of Information Act request to learn about the nature and extent of the incident. We expect the information we receive to further validate our concerns and to support our call for public involvement as the UPF is re-imagined and redesigned. NNSA will have to revisit its Record of Decision; we believe it is also required to re-open the EIS, or at the very least to prepare a Supplemental EIS.

Over the past twenty-five years, OREPA has been involved in many decision-making processes in Oak Ridge—some are formal, legal proceedings, others are less formal consultations, still others may be

as simple as a conversation. One thing is true about all of them. Early involvement of the public is better. It is less expensive, reduces project risk, avoids schedule delays, and ultimately leads to better decisions.

This will be true of the UPF project as it tries to move forward. As the NNSA, Red Team and Congressional leadership attempt to develop a "new" UPF, failure to involve the public will compromise political support for the project and, eventually, lead to project delays and rising costs. This is an outcome that benefits no one; it can be avoided by transparency and accountability sooner rather than later.

Thank you for your attention to our concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Ralph Hutchison", with a stylized flourish at the end.

Ralph Hutchison, coordinator  
Oak Ridge Environmental Peace Alliance