

From: [Janet](#)
To: [Hearing](#)
Subject: [EXTERNAL] LANL comments
Date: Friday, January 20, 2023 6:16:17 PM

Joyce Connery,
Chair Defense Nuclear Facilities Safety Board
625 Indiana Ave NW Suite 700
Washington, DC 20004

Dear Chairwoman Connery,

The DOE has announced that the new site wide environmental impact statement for continuing operations at LANL will not include increased pit production. DOE contends that the 2008 EIS adequately covers the subject.

Citizens for Alternatives to Radioactive Dumping (CARD) disagrees with this contention on the basis of the inadequacy of the 2008's EIS coverage of environmental justice.

The 2008 EIS devoted one page to environmental justice. The conclusion is: NNSA looked at potential exposure through special pathways as part of the human health impacts analysis in the SWEIS. Even considering these special pathways, NNSA did not find disproportionately high and adverse health impacts to minority or low-income populations. Page 17

A number of downwind communities including this author's own, Dixon, New Mexico, have already been contaminated by Los Alamos during the 2000 Cerro Grande fire. In figure #1, attached, one can clearly see that the smoke from the fire went through the Dixon community. According to DOE/SEA-03, 7,650 acres of LANL property were burned during the fire. Though there is no inventory of exactly what burned during the fire, LANL's long term to present practice of leaving wastes outside with little or no protection, makes contamination of the smoke a close certainty.

Though LANL determined that there was no significant contamination from the fire, LANL's studies contained several flaws. LANL used 'upwind' communities for a control in the study of 'downwind' communities. Though it is true that Dixon, Embudo, Ojo Sarco etc. lie in the prevalent SW to NE wind pattern, during the CG fire, the wind blew in a south by southeast direction for at least one day, making Cochiti, one of the 'control' sites also a 'downwind' site.

Another flaw was the lack of independent lab work and analysis; another that individual radio nuclides which are admittedly associated with LANL such as Cesium 137 whose incidence did increase in some downwind communities after the fire is left unexplained.

Members of the Dixon and Ojo Sarco (a valley directly above Dixon) communities (including myself) attended a meeting with the New Mexico Environment Department in Ojo Sarco soon after the fire. These community members were told that there was Cobalt in their plums and Cesium in their broccoli but that the amount was below regulatory concern. Regulations are based on urban eating habits whereas in a rural setting families eat many plums when they become ripe, the same with broccoli.

There were other signs that we had been contaminated: Foals died after nursing (if young horses die after birth, they usually die before nursing.); goats the same; chickens stopped laying. As time went on, one of our neighbors who was a vegetarian and ate mostly out of her garden, died of cancer; in a small community above Ojo Sarco, at the exact elevation of the labs, cancer became rampant. I worked with former Rocky Flats workers a decade or so ago. They had as many nerve-related problems as they had cancers. A person close to me who was born and raised in Dixon now has nerve problems; his doctor has told him that he carries a Cesium body burden. My closest neighbor has advanced MS.

Is there a risk of an air release of contaminants due to accidents during the increased production of plutonium pits at Los Alamos? If we look at LANL's track record and the DNFSB presentation made recently in Santa Fe, New Mexico, it is impossible not to suspect a high risk. The DNFSB recommended that the High Active Confinement Ventilation System at Los Alamos labs be replaced but instead the labs will only replace some of the components, meaning that there are weak links in the system with no guarantee that these weak links will be taken care of before increased plutonium production begins. Contamination may not be confined to the labs but instead there is a risk that any release of contaminants will reach the outside air and eventually to the air we breathe. Also, the labs' safety system has been in place since 1978 and there has been no comprehensive reliable upgrade. So to conclude that there is no pathway for contaminants to reach us seems overly optimistic.

Pit production was halted a decade ago at LANL due to the inability of the labs to manufacture pits safely. Given this background, one would think that LANL would be taking to heart all recommendations of the Safety Board, but instead the usual pattern of meeting production deadlines, as the primary, immutable goal of the labs, prevails. Washington is not innocent when it comes to this deadly and dangerous practice. Fines for safety infractions remain low while

rewards for meeting production deadlines remain high.

Dixon is in Rio Arriba County. The demographics of Rio Arriba are that we are 71.3% Hispanic or Latino and that our average family median income is \$46,004 compared to the average US family median income of \$70,784. The first language of 58.3% of the population is other than English. So we are the low income and minority population that supposedly will have no 'adverse health impacts'

In addition to the unacknowledged risk of contamination that our EJ community is subject to due to increased plutonium pit production at Los Alamos, the NNSA has issued an EIS for shipping plutonium pits to Los Alamos from Pantex to be oxidized, transforming them into powder as part of its plan to ship surplus plutonium to WIPP. Oxidized pu is the form of pu that is most pyrophoric. In an article for the Bulletin of Atomic Scientists, Robert Alvarez calls Los Alamos 'a potential bottleneck'. Few of us in our community believe that these two delicate operations can be performed at Los Alamos simultaneously without an accident of some kind.

One of the reasons for our low opinion of Los Alamos ability to operate safely is that for a number of years, before the leader passed, there was a support group meeting for contaminated Los Alamos workers every Saturday morning at the Dixon library. Also, Los Alamos' shipment of unstable drums of waste to WIPP, one of which exploded, causing millions of dollars of damage, is well known.

An honest approach to a new EIS for continuing Los Alamos operations would include a health study of the already contaminated downwind communities and consideration of whether these EJ communities should be further put at risk by more dangerous projects at the labs. And, of course, an opportunity opened for all the communities surrounding the labs to comment on the risky operations to which they will soon be exposed. A number of corporations and federal agencies, including the DOE, are accustomed to treating the detrimental impacts of their dangerous projects on us and other communities in New Mexico as a necessary sacrifice or collateral damage. The new, more enlightened Biden administration policies concerning environmental justice have not touched us or our situation.

To add insult to injury the 2008 EIS was never translated into Spanish or any other language: so another environmental justice mandate is being ignored. How many of us know about the DOE's plans is debatable.

Thank you for your consideration.

Sincerely,

Janet Greenwald, Coordinator,
Citizens for Alternatives to Radioactive Dumping (CARD),

