



Physicians for Social Responsibility

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April 4, 2006

U.S. Department of Energy
Superfund Comment, Pit 7 Complex Proposed Plan
Livermore Site Office, Lawrence Livermore National Laboratory
P.O. Box 808
Livermore, CA 94551

Re: U.S. Department of Energy proposed plan for addressing radioactive and toxic soil and groundwater at Lawrence Livermore National Laboratory Site 300.

The San Francisco Bay Area Physicians for Social Responsibility (SFPSR) is a non-profit community based organization of over 2,800 Bay Area physicians and other health care professionals. We promote policies that protect public health from threats of nuclear war and the human and ecological effects of nuclear weapons research, development, testing, and production. PSR is the U.S. affiliate of the International Physicians for the Prevention of Nuclear War, which in 1985 was awarded the Nobel Prize for Peace for our efforts to protect the public health from the consequences of nuclear weapons.

As medical and public health professionals we offer the following comments on the U.S. Department of Energy's (DOE) proposed plan for addressing radioactive and toxic soil and groundwater at the Lawrence Livermore National Laboratory Site 300 Pit 7 Complex.

WHAT IS THE PROBLEM?

For many years, Livermore Lab dumped radioactive and other toxic debris generated by high explosive testing at Site 300 into huge, unlined trenches, so-called "pits." As a result of the Lab's work practices, the more than 3,200 acres that comprise the Pit 7 Complex are contaminated with radioactive and other hazardous substances. The Pit 7 Complex has released large amounts of tritium and uranium to the groundwater aquifer, and the plume of highly contaminated water is moving towards the fence line. Livermore Lab plans an escalation of nuclear weapons work, including the proposed use of tritium in open-air bomb testing at Site 300, where the Lab is also contemplating bio-weapons research activities.

WHAT SHOULD BE DONE?

- 1. SFPSR recommends that DOE should strengthen its plans to hydraulically control the spread of the tritium plume by including additional control measures downstream of the plume.**

We understand that the DOE proposes to keep water from further saturating the unlined pits by installing a series of surface water diversions upstream of the pits to reduce the rate of groundwater movement and allow more time for tritium to decay. We understand that Tri-Valley CARES has consistently advocated that the DOE should, in addition to these upstream control measures, also implement control measures downstream of the plume. Downstream measures are needed to ensure that the contaminated tritium does not continue to migrate and pollute presently uncontaminated water. We are concerned that controlling the outer edges of the contaminant plume is not currently part of the DOE's plans for Site 300, and want to support Tri-Valley CARES in their consistent advocacy for such measures.

- 2. SFPSR recommends that DOE's environmental remediation plan for Site 300 take into account the public health impacts of current and future planned operations at the facility.**

The current self-described main mission of Livermore Lab including Site 300 is to oversee the U.S. nuclear arsenal. The U.S. nuclear arsenal is maintained in support of our nation's current nuclear policy, recently characterized by former U.S. Secretary of Defense Robert McNamara as "immoral, illegal, militarily unnecessary, and dreadfully dangerous."¹ Former President Carter said last week, "A global [nuclear weapons related] holocaust is just as possible now, through mistakes or misjudgments, as it was during the depths of the Cold War."²

That the pursuit of nuclear weapons has also led to global environmental degradation is a well-established fact. For example, the National Academy of Sciences has stated that at many DOE nuclear weapons sites,

... "radiological and non- radiological hazardous wastes will remain, posing risks to humans and the environment for tens or even hundreds of thousands of years. Complete elimination of unacceptable risks to humans and the environment will not be achieved, now or in the foreseeable future."³

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It is in this context that Livermore Lab plans an escalation of nuclear weapons work. In the immediate future, Site 300 will be used for bomb testing, including the proposed use of tritium in open-air bomb tests. The bomb-testing proposal specifically allows radioactive tritium to be used on an outdoor, uncontained firing table. We are also gravely concerned that other contemplated activities at Site 300 include bio-weapons research.⁴

Historically, DOE assurances regarding risks to public health related to nuclear weapons activities have often been found to have nothing in common with the facts that emerge over time. As one of the more blatant illustrations of DOE's practice, it said for decades that no toxic waste from the leaking tanks at its nuclear weapons facility in Hanford, Washington would reach the groundwater for at least 10,000 years --- but it is already there, 10,000 years ahead of DOE's schedule.⁵ A Livermore Lab spokesperson recently assured the community that "The lab has a long history of handling nuclear material safely and soundly"⁶ while the same spokesperson admitted that the Livermore Lab does not "... feel confident that we have enough data to properly characterize the contamination there [at Site 300's Pit 7 Complex]" adding that documentation from the 1960s and '70s is incomplete, so the lab doesn't have a complete picture of what's in the pits.⁷ The fact that Livermore Lab's main site and Site 300 are both listed on the National Priorities list of the most contaminated sites in the nation also does not appear to support Livermore Lab's claim of a "long history" as environmental stewards.

SF PSR recommends that the DOE's plans ensure transparent, timely, and sufficient precautions to protect the public health from current and future weapons activities at Site 300. The local population directly in the path of the toxic and radioactive substances that are being generated by Site 300's nuclear weapons activities continues to grow. The population of Tracy has more than doubled since the 1990s, from about 35,000 residents to a 2004 population estimated at 76,900. DOE's plan needs to address the public health impacts of its practices to the growing local population and for all the planet's inhabitants. DOE should provide a full and detailed accounting of how expanding weapons work at Site 300 will impact the public and environmental health in its broadest dimensions, including, but not limited to: worker health and safety; radioactive and toxic emissions to the local ground water, air, and soil; the volume of toxic and radioactive waste that will be generated; and, plans for addressing waste generation and disposal.

Thank you. Please feel free to contact me at 510-845-8395 with any questions about our comments.

Sincerely,



Robert M. Gould, M.D.
President
San Francisco Bay Area Physicians for Social Responsibility

¹ McNamara RS. Apocalypse Soon. *Foreign Policy*. May/June 2005. See http://www.foreignpolicy.com/story/cms.php?story_id=2829&print=1 Accessed April 1, 2006.

² Carter J. A dangerous deal with India. *Washington Post*. March 29, 2006.

³ Matthew Wald. Nuclear sites may be toxic in perpetuity, report finds. *New York Times*. August 8, 2000.

⁴ Bob Brownne. Area test site may see bio-weapons and crop sustaining methods added. *San Joaquin News Service*. March 31, 2006.

⁵ Matthew Wald. Admitting error at nuclear weapons plant. *New York Times*. March 23, 1998.

⁶ Bob Brownne. Lab stocks up on plutonium. *Tracy Press*. December 2, 2005.

⁷ Bob Brownne. Lab considers cleanup options. *Tracy Press*. March 25, 2006.