

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

**Submitted by**

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United Church of Christ  
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Women's Action for New Directions (WAND)

and

52 State and Regional Religious Organizations

**Submitted to**

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## Summary

As religious leaders in the United States, we firmly oppose the administration's multi-billion dollar plan to rebuild the nation's nuclear weapons capabilities through the Department of Energy's Complex Transformation proposal.

The administration's plans to rebuild the U.S. nuclear weapons production capacity is dangerous and expensive, and could reignite an arms race, encourage proliferation, and reduce national security. We believe that to restart U.S. nuclear warhead production and possibly build new weapons as called for by the Energy Department's preferred plan, will risk the lives of the entire human family.

We urge our political leaders to follow instead the course outlined by statesmen George Shultz, William Perry, Henry Kissinger, and Sam Nunn by taking immediate and deliberate steps toward multilateral nuclear disarmament. Many of these steps would directly involve the Energy Department and the future of the weapons complex including: increasing nonproliferation efforts, accelerating weapon dismantlement, and extending key arms control treaties.<sup>1</sup> To this list, we would add pursuing alternative missions for the national nuclear laboratories. This path, away from nuclear weapons, will make us safer and is consistent with our moral values.

Along with these steps, we call on our political leaders to show the moral and political courage necessary to bring about a shift in our nation's nuclear weapons posture. Today we have a historic opportunity to begin the journey out from under the shadow of nuclear weapons. We hope and pray that all Americans will take advantage of this moment and join us as we work toward the total elimination of these weapons of mass destruction.

In line with these beliefs, we propose a No Production Alternative to Complex Transformation. This would include the following steps:

- Place a moratorium on new warhead designs.
- Do not expand plutonium pit production capacity.
- Consolidate and downsize the Nuclear Weapons Complex.
- Continue the nuclear testing moratorium.

Our joint public comments on the Energy Department's Complex Transformation proposal are divided into two main sections. In the first section, we address the Energy Department's preferred alternative for Complex Transformation. In the second, we set forth our proposed No Production Alternative for Complex Transformation.

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<sup>1</sup> Henry Kissinger, et al., "Toward a Nuclear-Free World," *Wall Street Journal*, January 15, 2008, p. A13, [http://online.wsj.com/public/article\\_print/SB120036422673589947.html](http://online.wsj.com/public/article_print/SB120036422673589947.html)

## Energy Department's Preferred Alternative

The Department of Energy's (DOE) stated goal is "to make the Nuclear Weapons Complex smaller, and more responsive, efficient, and secure."<sup>2</sup> We endorse all of these stated priorities, except for a more "responsive" Complex, which we firmly reject.

"Responsiveness is the ability to quickly react to new developments and threats and successfully execute SSP [Stockpile Stewardship Program] requirements...Lack of responsiveness is evidenced by...the lack of a sufficient pit production capability."<sup>3</sup> Or in plain terms, a responsive Complex means having the ability to quickly produce new warheads and warhead components.

The United States has no need for new nuclear weapons production now or in the foreseeable future, either to replace existing warhead types or to build warheads designed for new missions. New infrastructure to support the production up to 80 warheads per year, as proposed by the Energy Department is wasteful, unneeded, and dangerous.

U.S. nuclear arsenal is "safe and reliable," and has been certified by the President as such since 1996. In the annual stockpile assessment, submitted by the President and by the Secretaries of Defense and Energy to Congress, the U.S. stockpile has been certified as safe and reliable every year for over a decade. This process was initiated by the Clinton administration in 1995-1996 and was codified in Sec. 3141 of the defense authorization bill for fiscal year 2003.

The stockpile's warheads are "reliable," based on pit lifetimes, well into the foreseeable future. The DOE's pre-2007 argument that warheads would soon be unreliable due to the aging of their plutonium pits has turned out to be inaccurate. The November 2006 JASON study determined that "most plutonium pit types have credible lifetimes of at least 100 years. Other pit types have mitigation strategies either proposed or being implemented."<sup>4</sup>

The administration has argued that new warheads with new missions may be required to address what they have termed "emerging threats." In the Energy Department's words, "[e]merging threats could call for new or modified warhead development or for providing additional warheads for force augmentation."<sup>5</sup>

New nuclear weapons for "emerging threats" and new missions are unnecessary and costly, and would undermine international nonproliferation efforts. As long-time U.S government science advisor Dr. Sidney Drell and Ambassador James Goodby conclude, "We find no need for designing new nuclear weapons against potential new threats."<sup>6</sup>

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<sup>2</sup> U.S. Department of Energy, *Draft Complex Transformation SPEIS - Summary*, December 2007, [http://www.fcnl.org/pdfs/nuclear/SPEIS\\_Summary.pdf](http://www.fcnl.org/pdfs/nuclear/SPEIS_Summary.pdf), section S.1

<sup>3</sup> *Ibid.*, section S.2.1

<sup>4</sup> U.S. Department of Energy, *Letter to Sen. John Warner*, November 28, 2006, [http://www.fcnl.org/pdfs/nuclear/JASON\\_ReportPuAging.pdf](http://www.fcnl.org/pdfs/nuclear/JASON_ReportPuAging.pdf)

<sup>5</sup> National Nuclear Security Administration, *Responsive Infrastructure*, November 2006, [http://www.fcnl.org/pdfs/nuclear/Responsive\\_Infrastructure.pdf](http://www.fcnl.org/pdfs/nuclear/Responsive_Infrastructure.pdf)

<sup>6</sup> Sidney D. Drell and James E. Goodby, *What Are Nuclear Weapons For?* (Washington, DC: Arms Control Association, 2007), p. V [http://www.armscontrol.org/pdf/USNW\\_2005\\_Drell-Goodby.pdf](http://www.armscontrol.org/pdf/USNW_2005_Drell-Goodby.pdf)

## No Production Alternative

We believe the Nuclear Weapons Complex should be aligned with the global security realities of the 21st century and U.S. treaty obligations. To achieve these goals, we propose a No Production Alternative to Complex Transformation, consisting of four components:

- Place a moratorium on new warhead designs.
- Do not expand plutonium pit production capacity.
- Consolidate and downsize the Nuclear Weapons Complex.
- Continue the nuclear testing moratorium.

**Place a moratorium on new warhead designs.** No new warhead designs are needed now or in the foreseeable future. New nuclear weapons for new missions are unneeded and costly, and undermine international nonproliferation efforts.

**Do not expand plutonium pit production capacity.** As noted above, there is no need to expand the plutonium pit production capacity of the Complex. The DOE preferred alternative of increasing capacity to up to 80 pits per year at Los Alamos National Laboratory should not be approved. DOE should limit its pit production capacity to its current facilities, which are sufficient to replace the pits destroyed by the Life Extension Program's destructive surveillance activities.

**Consolidate and downsize the Nuclear Weapons Complex.** We agree with DOE on the need to consolidate and downsize the Complex. Nuclear material scattered across the Complex should be consolidated to mitigate the risks associated with these materials and to reduce the Complex footprint. In addition, unneeded facilities should be closed and cleaned up.

**Continue the nuclear testing moratorium.** In the interest of national security and nonproliferation, the Energy Department should continue the nuclear testing moratorium.

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*\* These signatories have signed in a personal capacity and are not representing their organization in supporting this statement.*

This statement was submitted to the Energy Department on March 25, 2008. It is being submitted again on April 30, 2008 with additional signatures.