



Savannah River Site Citizens Advisory Board

Recommendation 171

NEPA Implementation

Background

The National Environmental Policy Act of 1969 (NEPA) establishes a national policy to ensure that consideration is given to environmental values and factors in Federal planning and decision making. The Department of Energy's policy is to comply fully with the letter and spirit of NEPA. To ensure that environmental factors are considered in the decision-making process and to promote environmentally responsible decisions, DOE incorporates NEPA requirements early in the planning process for proposed actions.

An environmental impact statement (EIS) is a detailed, written statement required by Section 102(2)(C) of NEPA. The statement must be prepared when the proposed action may significantly affect the quality of the human environment. The EIS must include explicit discussion of alternatives to the proposed action. A programmatic environmental impact statement (PEIS) is a broad scope EIS that identifies and assesses the reasonably foreseeable impact of a proposed agency program.

Comments

Such a PEIS (Storage and Disposition of Weapons Usable Fissile Material EIS, DOE/EIS-0229) was referenced as the NEPA analysis for the consolidation of DOE-EM owned plutonium at one site (Ref. 1). This assumption appears to be in conflict with the stated need in the SRS Program Performance Management Plan for a supplemental EIS to select the preferred approach for plutonium without a clear disposition path (Ref. 2).

On May 20, 2002, the Council on Environmental Quality (CEQ), an advisory group within the Executive Office of the President, established a NEPA Task Force to review the current NEPA implementing practices and procedures. By Federal Register notices the public was invited to comment on the proposed nature and scope of the NEPA Task Force activities in the following areas: technology and information management; interagency and intergovernmental collaboration including joint-lead processes; programmatic analyses and subsequent tiered documents; and adaptive management. This comment period ended September 23, 2002 (Ref. 3).

The comments made by responders covered many topics and varied greatly. One comment specific to programmatic analysis, which directly relates to the plutonium consolidation, was the suggestion that "programmatic EISs do not result in approval of on-the-ground actions without a second environmental analysis".

Recommendation

The SRS CAB recommends that DOE:

1. Prepare a supplemental EIS on the consolidation of EM owned plutonium at SRS.
2. Prepare a supplemental EIS to select the preferred approach for plutonium without a clear disposition path, such as non-MOXable plutonium.

References

1. Storage and Disposition of EM Owned Plutonium at SRS, presentation to the NM Committee by Kevin Hall, August 18, 2003.
2. Environmental Management Program Performance Management Plan, WSRC-RP-2002-00245, Revision 6.

3. NEPA Task Force website, <http://ceq.eh.doe.gov/ntf/>.

Agency Responses

[Department of Energy-SR](#) (PDF)