

Congress of the United States
Washington, DC 20510

December 18, 2017

The Honorable Rick Perry
Secretary
U.S. Department of Energy
1000 Independence Ave SW
Washington, DC 20585-1000

Dear Mr. Secretary:

We write to express very serious concern with the Analysis of Alternatives (AoA) for production of plutonium pits and its focus on a facility construction idea that was rejected years ago, rather than the latest modular building and refurbishment strategy at Los Alamos National Laboratory (LANL) that has been endorsed by the Nuclear Weapons Council (NWC) and the U.S. House and Senate Armed Services Committees.

The evaluation process undertaken by the National Nuclear Security Administration (NNSA) that led to this report was deeply flawed from the start and the results fail to support any reasonable alternative. These concerns were recently confirmed by your own Department's independent Cost Estimating and Program Evaluation (CEPE) office, which thoroughly refuted both the process and findings of the AoA.

In 2014, the NWC determined that a modular building strategy at LANL would fully meet the nation's requirements to maintain the nuclear weapons stockpile over a 30-year period. In addition, the modular approach would provide LANL a safer, more modern facility sooner than the two alternatives the AoA selected. Yet, despite having been endorsed by the NWC and Congress the modular building strategy was conspicuously absent in the AoA. A fundamental component of any AoA is presenting a benchmark by which alternatives can be compared. Shockingly, not only did the AoA fail to analyze the endorsed modular approach which has been in place for years, CEPE's own review shows that the AOA failed to even take into consideration the costs of repurposing other NNSA facilities. In other words, the AoA compared a long-ago abandoned facility plan at LANL and compared it to other NNSA locations as if they were prepared to produce pits today at no additional cost, and then presented its findings to the public as a comparison of current options. Making matters worse, such a disruptive relocation of the plutonium mission is likely to introduce new, unpredictable risks to the safety of workers and communities into an already challenging enterprise.

In addition, the AoA explored a significant increase in nuclear pit production and square footage beyond the Department of Defense's requirements and omitted any consideration of operating costs. The evaluated alternatives assumed the production of a total of 110 pits per year, which is a significant increase beyond the Department's stated requirements. Furthermore, the AoA

strangely pursued a massive increase in square footage beyond what experts and engineers believe is needed for the project. Finally, the AoA process was inherently flawed and inconsistent with NNSA's procedures and GAO's best practices for conducting an AoA, as verified by your Department's own independent review.

Perhaps most concerning is the fact that the failed AoA effectively wasted several years of time and money that could otherwise been dedicated to improving the reliability of the nation's nuclear stockpile and the safety of facilities and operations. The 3-year delay in completing the AoA, compounded by the serious flaws in the approach that led to a recommendation of two non-viable alternatives, could limit the nation's long-term capabilities to assure the safety, security and reliability of the nuclear weapons stockpile.

The NNSA's engineering analysis to evaluate alternatives and support a conceptual design is planned to be completed in February. We expect the engineering analysis will fully address your own Department's shortcomings identified in the AoA, including full consideration of the NWC's approved modular approach and take into consideration the availability and costs of completing this mission elsewhere, and that the final selection of an alternative will meet the requirements of the NWC from a cost, schedule, and capability perspective.

We ask for your immediate attention and personal assurance that the serious shortcomings of the AoA will be fully addressed in the comprehensive engineering analysis before making a final selection.

Sincerely,



TOM UDALL
United States Senator



MARTIN HEINRICH
United States Senator



BEN RAY LUJAN
Member of Congress