PEIS Toolkit

Programmatic Environmental Impact Statement (PEIS) on Plutonium Pit Production

This toolkit is a short form of information available related to the draft Programmatic Environmental Impact Statement (PEIS) on Plutonium Pit Production. There is much to understand about this topic and the nuclear weapons complex in general; this is a shortened version to give you a general understanding of this issue.

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Summary

The federal government is producing **new** nuclear weapons in the United States. As a result, there will be an increase in all activities related to producing nuclear weapons and stockpile stewardship, including: uranium mining; materials transportation (to/from Los Alamos; to/from WIPP) (to/from various sites across the US); pit production at Los Alamos; and new transuranic and high-level waste generation.

National laboratories, like Los Alamos National Laboratory, and their respective federal agencies, are supposed to work to ensure the safety, security and reliability of nuclear weapons - **not to create new ones**. New plutonium pit production will cost U.S. taxpayers billions of dollars not only when producing the pits, but also when healthcare and other policies change. Plutonium pit production will also have significant impacts on water and the availability of that water for other uses (agriculture, ceremonial, recreation, etc.).

The amount of pit production proposed to happen puts the workforce and surrounding communities at extreme risk due to lack of oversight and inherent transparency issues of the nuclear weapons complex. New warheads for new bombs means more generations forced to endure the uncertainty of a world with nuclear weapons and the constant threat of nuclear war. **Funding for U.S. nuclear programs should be used for safe disarmament, and environmental clean up so workers, children, families, students, and elders can live long and healthy lives.**

We have an opportunity to use our collective voices to tell these agencies that **we do not want nuclear weapons made on our homelands**. Please consider sending in a written comment or make a plan to attend the in-person hearing.

Submit comments by midnight on July 16, 2026

Email: PITPEIS@NNSA.DOE.GOV

Mail: Pit Production PEIS Comments
Jade Fortiner
NNSA, Office of Pit Production Modernization
1000 Independence Avenue SW
Washington, DC 20585

Introduction

As an issue, plutonium pit production is very complex. Multiple agencies and federal facilities are involved - each with their own special role to play. This toolkit is written from the New Mexican perspective, from a place where the entire nuclear fuel chain exists within our state 'boundaries'. Above all else, the purpose of this document serves as an educational stepping stone to learn more about the nuclear weapons complex.

While this provides general context for the current draft Programmatic Environmental Impact Statement, please be advised that not every single aspect will be covered. This toolkit is designed to provide education for community members, nonprofit staff, Tribal leaders, and local officials on the issue and prepare for public comment.

National Environmental Policy Act (NEPA)

NEPA was enacted by Congress in 1969 to ensure that federal agencies consider the potential environmental impacts of proposed actions and alternatives **before** deciding on a course of action. NEPA establishes a national environmental policy and process for considering those environmental impacts.

The government defines environment as the following:

Natural or physical environment (air, water, geography, geology) as well as the relationship of people in that environment (health and safety, jobs, housing, schools, transportation, cultural resources, noise, aesthetics).

Pillars of NEPA

- **Transparency** – The government must disclose to the public, plans to build or fund certain projects
- **Informed Decision Making** – The government must conduct an evaluation of the project and relay the results to the public
- **Public Input** – Before it's started and throughout the project, the government must elicit and consider public input
- **Accountability** – NEPA helps the public utilize the courts to hold the government accountable
- Importantly, program-wide analyses must be done before a specific site-wide environmental impact statement (SWEIS) is prepared. In this case, the LANL site-wide document was done before the programmatic environmental impact statement was completed, despite NEPA being referred to as 'the people's law'.

§1021.313 Public Review of Environmental Impact Statements

1. The public review and comment period on a DOE draft EIS shall be no less than 45 days (40 CFR 1506.10(c)). The public comment period begins when EPA publishes a Notice of the document in the Federal Register.
2. DOE shall hold at least one public hearing on DOE draft EISs. Such public hearing shall be announced at least 15 days in advance. The announcement shall identify the subject of the draft EIS and include the location, date, and time of the public hearings.
3. DOE shall prepare a final EIS following the public comment period and hearing on the draft EIS. The final EIS shall respond to oral and written comments received during public review of the draft EIS, as provided at 40 CFR 1503.4. In addition to the requirements at 40 CFR 1502.9(b), a DOE final EIS may include any Statement of Findings requires by 10 CFR part 1022, "Compliance with Floodplain and Wetland Environmental Review Requirements," or a Statement of Findings may be issued separately.
4. DOE shall use appropriate means to publicize the availability of draft and final EISs and the time and place for public hearings on a draft EIS. The methods chosen should focus on reaching persons who may be interested in or affected by the proposal and may include methods listed in 40 CFR 1506.6(b)(3).

NEPA Process

During the NEPA process, the public has a few opportunities to participate based on which stage, usually during a public comment period, on an Environmental Impact Statement (EIS).

An Environmental Impact Statement is a government document that should analyze the impact of a proposed federally funded project on the surrounding environment. An EIS describes the positive and negative environmental impacts of a proposed action, and usually includes one or more alternative actions that may be chosen. There are two kinds of EIS:

Site-Wide Environmental Impact Statement (SWEIS)

Used to assess cumulative impacts of all operations and projects within a specific, geographically defined location.

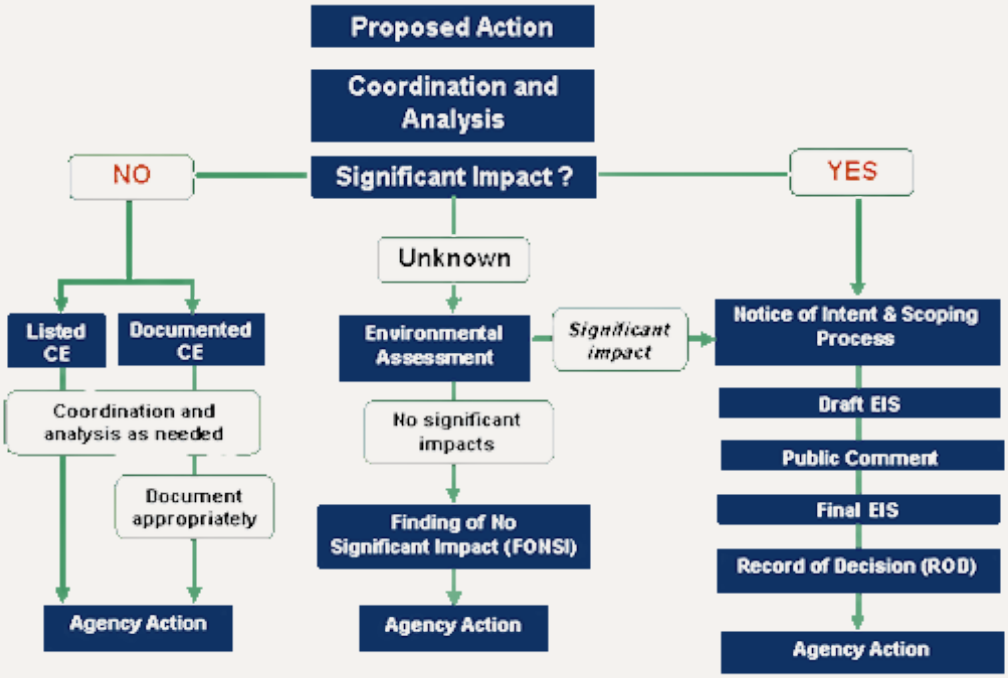
- Focuses on a single, defined geographic location
- Laboratories, Production Areas, Storage, Military Bases
- i.e. Operation Plans for LANL

Programmatic Environmental Impact Statement (PEIS)

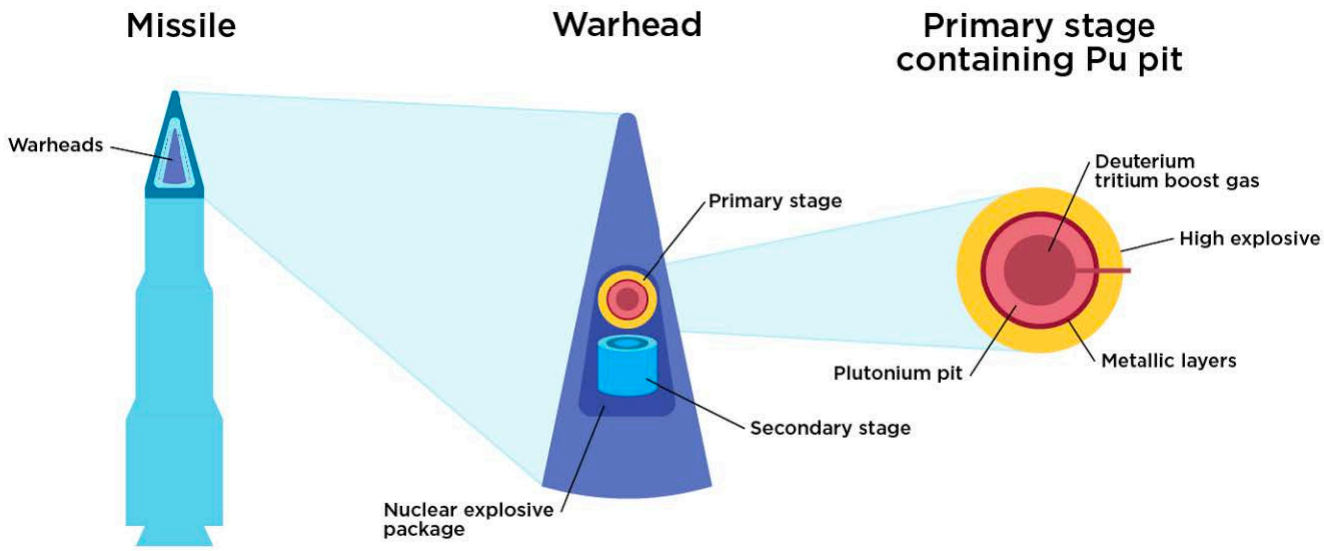
Used to evaluate the broad environmental impacts of large-scale, long-term policies or plans.

- Covers policies, plans, or programs over large areas or long timeframes
- i.e. Plutonium Pit Production

In either EIS, members of the public have an opportunity to be involved, during the beginning of the NEPA analysis (Scoping Process), and when a NEPA document is published for review (Draft EIS; Final EIS).



Draft Programmatic Environmental Impact Statement on Plutonium Pit Production



Left: Intercontinental and submarine-launched ballistic missiles, among other delivery vehicles, can deliver one or more nuclear warheads. Center: The warhead's nuclear explosive package contains materials that undergo nuclear fission and fusion, unleashing huge amounts of energy. Right: The plutonium pit is a hollow shell within the weapon's primary stage. When imploded by high explosives, it drives fission reactions that set off the weapon; the nuclear chain reaction is what renders such weapons so destructive.

Note: Diagram not drawn to scale. SOURCE: UCS.

Plutonium pits are the core of US thermonuclear weapons. These bomb cores begin the chain reaction that creates the explosion. Plutonium pits have not been manufactured on a large scale in the US since 1989, after the FBI raided the Rocky Flats Plant in Colorado for environmental crimes due to plutonium pit production.

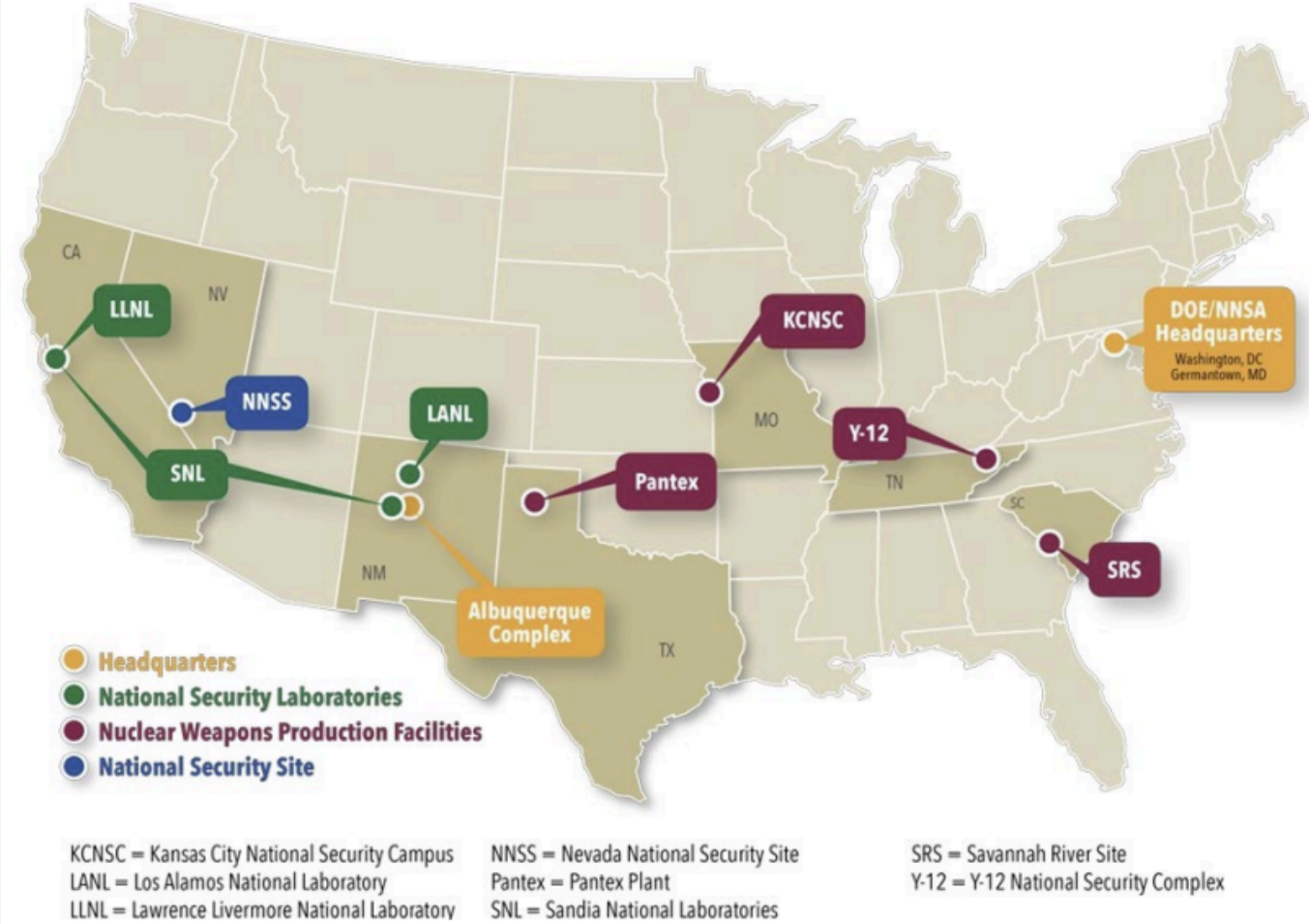


Figure 1.4-1 NNSA's Nuclear Security Enterprise

Shipment Type	Origin ⇒ Destination
Existing pits	Pantex, NNSS ⇒ Pit production site(s)
Plutonium	LANL, SRS, NNSS, Pantex ⇒ Pit production site(s)
HEU	Y-12 ⇒ Pit production site(s) Pit production site (s) ⇒ Y-12
Beryllium	LANL or commercial manufacturer ⇒ Pit production site(s)
Nonnuclear parts	KCNSC or commercial vendors ⇒ pit production site(s) Pit production site(s) ⇒ KCNSC
New or recertified pits	Pit production site(s) ⇒ Pantex
TRU waste	Pit production site(s) ⇒ WIPP
LLW	Onsite disposal at SRS Pit production site(s) ⇒ NNSS (classified LLW) or commercial facility
MLLW	Pit production site(s) ⇒ NNSS (classified MLLW) or commercial facility
Hazardous and nonhazardous wastes	Pit production site(s) ⇒ commercial waste disposal facilities

HEU = highly enriched uranium; KCNSC = Kansas City National Security Campus; LANL = Los Alamos National Laboratory; LLW = low-level radioactive waste; MLLW = mixed LLW; NNSS = Nevada National Security Sites; SRS = Savannah River Site; TRU = transuranic; WIPP = Waste Isolation Pilot Plant; Y-12 = Y-12 National Security Complex

Plutonium Pit Production

Plutonium pits are the core of US thermonuclear weapons. These bomb cores begin the chain reaction that creates the explosion. Plutonium pits have not been manufactured on a large scale in the US since 1989, after the FBI raided the Rocky Flats Plant in Colorado for environmental crimes from plutonium pit production.

The draft Programmatic Environmental Impact Statement (PEIS) was made available on April 10, 2026. This document should evaluate the programmatic environmental impacts of producing pits at the 'Congressionally mandated rate' (30 pits per year at LANL) using various single-site and multi-site alternatives; associated activities at other NNSA sites; and associated waste management and transportation activities.

While the PEIS provides some analysis on the impacted environment - including water resources, cultural and paleontological resources, human health and safety, and others - not everything is accounted for, especially from the perspective of land-based peoples.

For example, plutonium is a man-made element derived from uranium by being irradiated in a nuclear power plant. The plutonium is extracted and formed into pits. Although uranium mining projects were not directly mentioned in the PEIS, uranium will have to be mined and made available for the production of new plutonium pits. At this moment, it is unclear where exactly the uranium will be transported from, or if this project is tied to the new permit applications for uranium mining in the Grants Mining District in Western NM.

Additionally, there seems to be no clear disposal plan for the transuranic plutonium-contaminated nuclear waste that will be generated from the manufacturing of pits. The clean up, repackaging, and shipment of legacy plutonium-contaminated waste should continue to be the priority of LANL. The Waste Isolation Pilot Plant (WIPP) near Carlsbad, NM is over-prescribed with the amount of waste already there and the waste scheduled to come. Also, WIPP is the only transuranic waste disposal location in the US. There is no need for new waste generation, especially when there is no plan to handle, store, and dispose of it.

These are just two examples of the analyses that are missing from the draft PEIS. Other topics of concern include: artificial intelligence; data centers; small modular reactors (SMR); increased health impacts to women and infants; missing and murdered Indigenous relatives; man camps; forest fire risk; seismic activity; worker safety, and cleanup. Fortunately, there is an opportunity to ask these questions either at the in-person hearing or by submitting written comments.

Public Participation

Written Comments

NNSA invites other federal agencies, Tribal governments, State and local governments, industry, organizations, and members of the public to review and submit comments on the draft PEIS document, **from now until July 16, 2026.**
Email: PITPEIS@NNSA.DOE.GOV

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Jade Fortiner
NNSA, Office of Pit Production Modernization
1000 Independence Avenue SW
Washington, DC 20585

In-Person Hearing

In addition to written comments, NNSA committed to five (5) in-person hearings across the country in May 2026.

Tuesday, May 5, 2026 - North Augusta, South Carolina
5:00pm-8:00pm at North Augusta Community Center
(495 Brookside Dr. North Augusta, SC 29841)

Thursday, May 7, 2026 - Kansas City, Missouri
5:00pm -8:00pm at Hillcrest Community Center
(10401 Hillcrest Rd. Kansas City, MO 64134)

Tuesday, May 12, 2026 - Livermore, California
5:00pm-8:00pm at Garre Vineyard & Winery
(7986 Tesla Rd. Livermore, CA 94550)

Thursday, May 14, 2026 - Santa Fe, New Mexico
5:00pm-8:00pm at Santa Fe Farmers Market Institute
(1607 Paseo de Peralta Santa Fe, NM 87501)

Wednesday, May 20, 2026 - Washington DC
2:00pm-5:00pm at Southwest Library
(900 Wesley Pl, SW Washington, DC 20024)

July 16

July 16, 1945 was the day of the Trinity Test in the Jornada del Muerto in Southern NM. The Trinity Test marked the start of the 'atomic age', as the first ever detonation of a nuclear weapon. This test affected many people (civilians) in the Tularosa Basin - many, if not all, of whom had no prior warning or knowledge of nuclear fallout.

July 16, 1979 was the day of the largest radioactive spill in US history at the United Nuclear Corporation's uranium mill in Church Rock, NM. 94 million gallons of liquid radioactive waste spilled into the Rio Puerco, traveling at least 80 miles downstream. There was no federal disaster declaration, meaning no immediate clean up and radioactive soils and waters that remain to this day in the watershed.

July 16 continues to be a reminder of the environmental degradation brought on by the extractive nuclear industry. The deadline to submit comments by July 16 is no coincidence.

Talking Points

The beauty of community is the diversity of people that make up the community. Drafting a written comment or preparing to speak at a hearing can become overwhelming quickly. Here are some examples of talking points to help your thought process:

Youth Talking Points

- As a young person, I have the most to lose if my environment is harmed. Living in uncertainty and fear because of a dangerous environment does not give me an opportunity to live a healthy life.
- State and federal funding for nuclear weapons projects deprive youth of adequately funded school systems and social supports like SNAP and WIC.

Farmer/Gardener/Grower Talking Points

- Water gives life to our fields and is an exceptionally scarce resource in New Mexico. Plutonium pit production poses a direct threat to the water we need to grow food for the community.
- Accidents in the transportation of hazardous, radiological materials across the United States could directly impact many small, local farming families.

Reproductive Justice Talking Points

- Reproductive harms associated with environmental contamination include miscarriage, birth defects, infertility, and hormone disruption. Studies of nuclear-exposed populations demonstrate that exposure to radiation can have persistent effects on fertility, fetal development, and epigenetic expression.

Tribal Organization Talking Points

- Our relation with the land is rooted in reciprocal care, traditional knowledge, and responsibility. When the federal government treats these lands as sites for nuclear weapons development, waste disposal or militarized infrastructure, it disregards the deep interconnection between land, body, and spirit that defines our lifeways.
- DOE and NNSA must uphold their federal trust responsibility in conducting meaningful tribal consultation on the draft PEIS. Consultation should never put the burdens of travel, education, and technical support onto tribal communities.

Gendered Impacts Talking Points

- Women and gender-expansive people often serve as the primary caregivers in land-based communities. When exposure to radiological contamination results in cancers, respiratory illness or reproductive health issues, it is often women who carry the responsibility of navigating care, mourning losses, and holding families together.

Worker Safety Talking Points

- Increased plutonium pit production will generate more low-level, mixed low-level, hazardous, and transuranic waste that new waste facilities will be constructed. How much more radiation will I be exposed to if I am assigned to this new waste facility?
- The draft PEIS does not analyze an increased need for comprehensive health care plans for pit production workers.

Sample Comments & Resources

For more information about plutonium pit production, the entire Programmatic Environmental Impact Statement, and sample comments from various community organizations, scan this QR code to access a Google Drive folder with written material.

bit.ly/42wPoyo

To stay up-to-date about plutonium pit production and other issues related to nuclear colonialism in New Mexico, follow the work of these organizations:

Communities for Clean Water - ccwnewmexico.org

Concerned Citizens for Nuclear Safety - nuclearactive.org

Honor Our Pueblo Existance (H.O.P.E.) - shuffle.do/projects/honor-our-pueblo-existance-h-o-p-e

Nuclear Watch New Mexico - nukewatch.org

Southwest Organizing Project - swop.net

Tewa Women United - tewawomenunited.org

Union of Concerned Scientists - ucs.org

pitpeis.com

Relevant Departments, Agencies, and Facilities

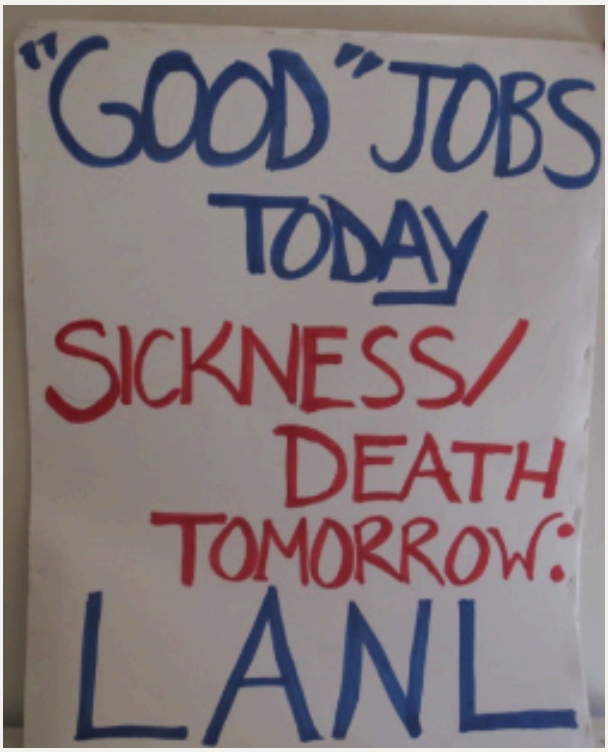
***Department of Energy (DOE)*:** agency of US government overseeing energy policy and energy production, research and development of nuclear power, military nuclear weapons program. DOE is the agency responsible for operating Los Alamos National Laboratory (LANL) and the Waste Isolation Pilot Plant (WIPP), both in New Mexico, and controls nuclear weapons and nuclear energy projects. DOE also identifies, packages, and stores legacy waste on-site at LANL for disposal at WIPP.

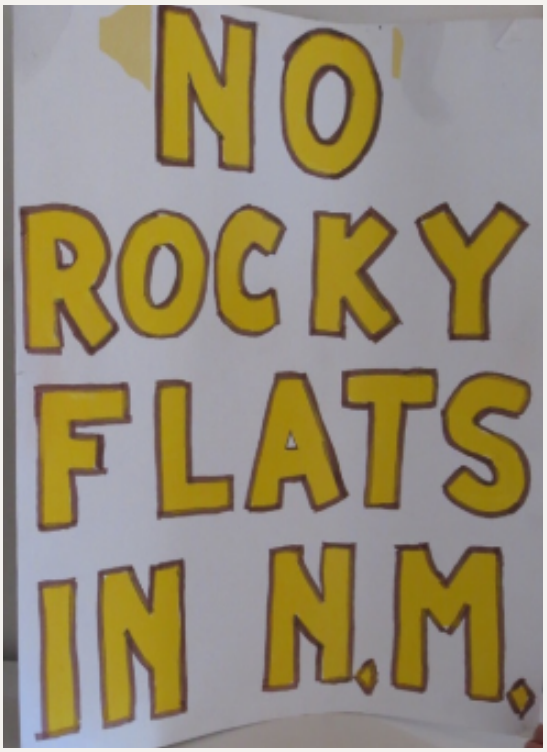
National Nuclear Security Administration (NNSA) is a DOE subagency responsible for military application of nuclear science through maintaining the current nuclear weapons stockpile and enforcing the Treaty on the Non-Proliferation of Nuclear Weapons (NPT). NNSA is in charge of the plutonium pit production at LANL.

Los Alamos National Laboratory (LANL) is a physical federal research, development, and manufacturing laboratory in Los Alamos, NM established in 1943 to develop atomic bombs. under the secret Manhattan Project called Project Y. LANL researched, developed and tested plutonium bombs, including the Trinity Test and the Fat Man bomb that was dropped on August 9, 1945 on Nagasaki, Japan. LANL is one of the DOE/NNSA sites responsible for producing plutonium pits (the cores of nuclear weapons).

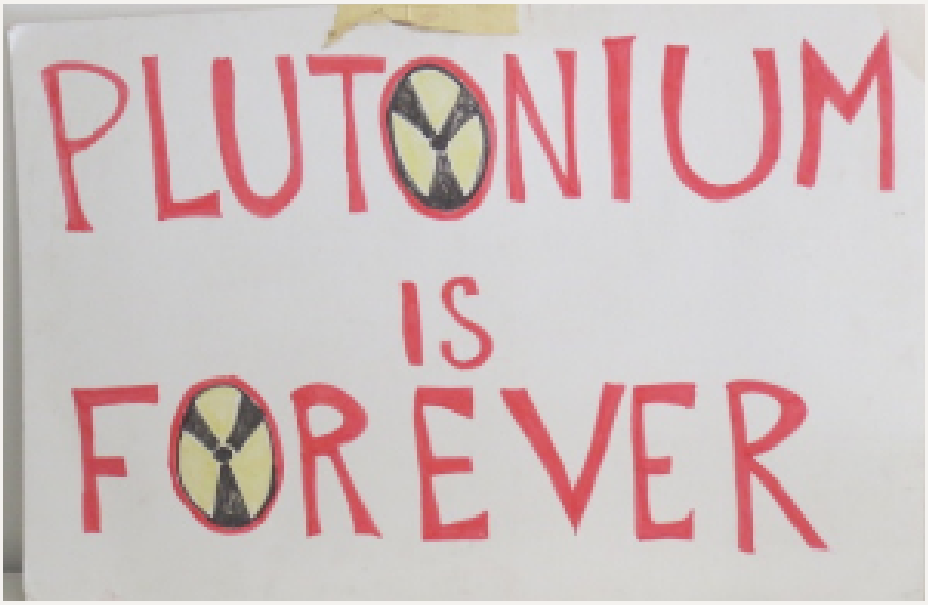
Waste Isolation Pilot Plant (WIPP) is the nation's only nuclear waste repository located near Carlsbad, NM. Plutonium-contaminated Transuranic, or TRU, waste from sites nationwide, including LANL, are shipped to WIPP regularly. The original operational limit for WIPP should have expired in 2024.

Nuclear Regulatory Commission (NRC) is a federal agency responsible for protecting public health and safety related to nuclear energy. This independent commission does not report to any other agency, and oversees matters of nuclear energy, medicine, safety, security, and civilian use of radioactive materials.





Relevant Departments, Agencies, and Facilities (*Continued*)



Sandia National Laboratories (SNL) is a physical federal research and development laboratory at Kirtland Air Force Base (KAFB) in Albuquerque, NM, established in 1949. SNL works in nuclear deterrence, arms control, nonproliferation, hazardous waste disposal, and climate change. SNL originally started as Z Division of the Manhattan Project in 1945.

Defense Nuclear Facility Safety Board (DNFSB) is an independent agency in the federal government who oversees the nuclear weapons complex administered by DOE/NNSA and provides recommendations to the Secretary of Energy. The DNFSB is made up of five members who are respected experts in the field of nuclear safety that have been appointed by the President.

Categorical Exclusion (CE) is a category of actions in the NEPS process that typically do not individually or cumulatively have a significant effect on the human environment. This means an agency can skip preparing an Environmental Impact Statement or an Environmental Assessment.

National Environmental Policy Act (NEPA) was signed into law on January 1, 1970. This law requires federal agencies to assess the environmental impacts of their proposed actions **prior** to making decisions. Using the NEPA process, agencies evaluate environmental, social, and economic effects and provide opportunities for members of the public to comment and participate in public hearings about the proposed actions.

Record of Decision (ROD) is the final, public document issued by a federal agency concluding the Environmental Impact Statement (EIS) process. It is published in the Federal Register.

Federal Register is the official journal of the federal government that contains agency rules, proposed rules, and public notices, such as Environmental Impact Statements (EIS).

Finding of No Significant Impact (FONSI) is a NEPA document concluding that a proposed action will not have significant environmental impacts and an Environmental Impact Statement is not required.