

### Complex Transformation

The “Complex Transformation” (formerly Complex 2030) plan ignores U.S. disarmament obligations under the nuclear Non-Proliferation Treaty (NPT) and threatens to derail diplomatic efforts to stem nuclear weapons development by other nations. It also would create serious environmental and health risks for communities downwind and downstream of the U.S. nuclear weapons complex.

Complex Transformation involves a massive overhaul of U.S. nuclear weapons facilities. The Department of Energy (DOE) National Nuclear Security Administration (NNSA) vision includes a continuous stream of new and modified nuclear weapons design and production, involving a host of “modernized” plants. Far from scaling back nuclear weapons activities, major new facilities are planned for uranium production (at Y-12 in Tennessee) and plutonium bomb cores (at Los Alamos Lab in New Mexico).

With both the public and national security experts calling for U.S. leadership toward a nuclear weapons free world, Complex Transformation is counterproductive. Additionally, the DOE is attempting to illegally build a new nuclear weapons plant in Kansas City, Missouri, on the basis of a flawed environmental assessment by using “creative financing” and private developers. Federal litigation to stop that scheme has been filed by public interest organizations.

### Public Opposition

Since it was first proposed, Complex Transformation has faced public opposition unprecedented in the history of the DOE. During legally required public comment periods in 2006 and 2008, DOE received more than 140,000 comments opposing Complex Transformation. By far, this is the largest number of responses opposing a program DOE has ever received. Despite this outcry, DOE ignored the public’s recommendations and has moved forward with the plan.

In December 2008, NNSA released two Records of Decision (RODs) with six major elements:

- Plutonium manufacturing and R&D will remain at the Los Alamos National Laboratory, where NNSA will construct and operate the Chemistry and Metallurgy Research Replacement–Nuclear Facility.
- Uranium manufacturing and R&D will remain at the Y–12 National Security Complex, where NNSA will construct and operate a Uranium Processing Facility.
- Assembly and disassembly of nuclear weapons and high explosives production and manufacturing will remain at the Pantex Plant.
- Tritium R&D will be consolidated at the Savannah River Site.
- Flight testing will be conducted at Tonopah Test Range under a reduced footprint permit.
- Major environmental test facilities will be consolidated at Sandia National Laboratories.

## Financial Costs

The estimated price tag for Complex Transformation starts at \$150 billion, according to the Government Accountability Office. Given DOE's history of cost overruns and the fact that current estimates do not include funds for eventual decommissioning and cleanup of the facilities to be constructed, the total cost may approach \$300 billion.

## Environmental and Health Risks

Complex Transformation threatens the air, land, water, and health of communities around DOE's nuclear weapons facilities. All current nuclear research and production sites are polluted. New accidents, spills and leaks are common. Workers at the Livermore and Los Alamos National Laboratories have suffered from plutonium exposure. Highly enriched uranium fires and leaks have plagued the Y-12 Complex in Oak Ridge.

## Nuclear Proliferation Impacts

Complex Transformation is designed to indefinitely enhance and preserve U.S. nuclear weapons. This is contrary to the Nuclear Nonproliferation Treaty (NPT), which requires signatories to negotiate in good faith the elimination of nuclear arsenals. The programs also undermine the vision of former Secretary of State Henry Kissinger, former Senator Sam Nunn, and others who have recently called for a world free of nuclear weapons under the framework of the NPT to increase national security.

Complex Transformation signals to the rest of the world that the United States is rebuilding its Cold War-era production capability. The U.S. cannot expect to convince nations such as North Korea and Iran to give up their nuclear programs while it plans for the production of a new generation of "modernized" nuclear bombs. This provocative policy will increase the global nuclear danger.

### RECOMMENDATIONS:

- Postpone all Complex Transformation decisions until a new Nuclear Posture Review is completed.
- Stop plans for a new Kansas City Plant to manufacture non-nuclear weapons components until the nation's nuclear policy and the future of its arsenal is clear.
- Investigate the financing scheme that would allow a private corporation to own a nuclear weapons manufacturing plant and lease it back to DOE.
- Instruct the DOE National Nuclear Security Administration not to issue any additional Records of Decision for Complex Transformation. Further, instruct the DOE not to implement either of the two Complex Transformation RODs published in the Federal Register on December 18, 2008.
- Take a fresh look at opportunities to downsize, not rebuild, the U.S. nuclear weapons complex in line with new initiatives for a smaller stockpile.

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