



Office of Peace, Justice & Creation Stewardship
Under the auspices of Catholic Charities of Gallup Diocese
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December 1, 2011

Mr. Tim Hall, Environmental Sci & Specialist
New Mexico Environment Department
Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505



Dear Mr. Hall,

This letter is written on behalf of people of faith in Gallup Diocese, including McKinley and Cibola Counties, who are deeply concerned over news that the Department of Energy (DOE) wants to bring more "hot" Remote-Handled (RH) transuranic (TRU plutonium-contaminated) waste to the Waste Isolation Pilot Plant (WIPP) in Carlsbad, NM.

Our concerns stem from the following serious issues:

- The amount of RH waste shipped to WIPP and disposed there would substantially increase. This would substantially increase risks of life-threatening radioactive exposure to populations from accidents on railways and public highways.
- Contrary to what DOE says, shielded containers cannot be handled in the same manner as Contact-handled (CH) TRU waste. Shielded containers that are damaged or leaking cannot be over-packed as CH waste has been. Moreover, the shielded containers request is not a proper class 2 permit modification.
- The amount of RH waste allowed in the Waste Handling Building would greatly increase. Because of DOE shipping and disposal practices over the past 12 years, the amount of underground space for RH waste at WIPP has been substantially reduced. DOE has not provided information about how much RH waste it has to bring to WIPP, when the waste would be ready to be shipped, whether more than the remaining capacity is needed, among other issues.
- DOE also plans to use shielded containers for hotter commercial waste, expanding WIPP beyond its legal limit of 175,564 cubic meters of TRU waste.

Given the dangers of RH waste, the need for much more information, and the complexity of the changes proposed, we request a public hearing on shielded containers, and that the containers be regarded as a class 3 modification. To safeguard human health and the environment, it is crucial that public hearings be held to insure more extensive public comment on these critical issues.

Thank you for your consideration of these serious issues impacting the future of all New Mexicans and beyond.

Sincerely,

Rose Marie Cecchini, MM

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Coordinator

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