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September 3, 2012



Trais Kliphuis
New Mexico Environment Department
2905 Rodeo Park Dr. East, Bldg. 1
Santa Fe, New Mexico 87505

Dear Trais Kliphuis,

I am opposed to the Department of Energy bringing more "hot" Remote Handled transuranic waste to the Waste Isolation Pilot Plant. When WIPP opened in 1999, you no doubt are aware Remote Handled waste was not permitted. Since 2007 when Remote Handled Waste had begun to be shipped to WIPP, it was not done in a manner to leave enough room for further waste that is being proposed now.

The transfer of waste in shielded containers being proposed now has many problems. The containers would expand the space available at WIPP for Remote Handled waste that is dangerous to transport, store and dispose of. Contrary to what the Department of Energy says, shielded containers cannot be handled the same as contact-handled waste. Shielded containers that are damaged or leaking could be too radioactive to be placed in over-pack containers without exposing workers and the public. As DOE plans to use shielded containers for hotter commercial nuclear waste, this requires changing federal law to expand WIPP beyond its legal limit of 175,564 cubic meters of defense plutonium contaminated transuranic waste. Shielded containers have not been used before.

The Environment Department denied a similar request on January 31, 2012 and should deny it again. Minimally I request a public hearing and that shielded containers be a class 3 modification so that there would be more extensive public comment and an opportunity for a hearing. We do not need more hot wastes coming to WIPP.

Sincerely,

Joan Robins
Joan Robins

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