



ENTERED

From: Scott Kovac
To: Kliphuis, Trais, NMENV
Cc: Jay Coghlan
Subject: Nuclear Watch New Mexico Comments on Shielded Containers PMR
Date: Monday, September 10, 2012 4:59:16 PM
Attachments: NWNM Shielded Containers Comments 9-10-12.pdf

Trais Kliphuis:

Nuclear Watch New Mexico respectfully submits these comments for the Permit Modification Request (PMR) for Addition of a Shielded Container at the Waste Isolation Pilot Plant (WIPP). The PMR is dated July 2012.

Thank you,
Scott

~~~~~  
Scott Kovac  
Operations and Research Director  
Nuclear Watch New Mexico  
1000 Cordova Place #808  
Santa Fe, NM, 87505  
505.989.7342 office & fax  
[www.nukewatch.org](http://www.nukewatch.org)





September 10, 2012

Trais Kliphuis  
New Mexico Environment Department  
2905 Rodeo Park Drive East, Building 1  
Santa Fe, NM 87505

Via e-mail: [trais.kliphuis@state.nm.us](mailto:trais.kliphuis@state.nm.us)

Dear Ms. Kliphuis:

**Nuclear Watch New Mexico** respectfully submits these comments for the Permit Modification Request (PMR) for Addition of a Shielded Container at the Waste Isolation Pilot Plant (WIPP). The PMR is dated July 2012. **We request a public hearing and that the shielded containers PMR be treated as a Class 3 modification.**

We are concerned that we have not been given the true reason for the Department of Energy's (DOE's) need for this PMR. It is stated that, "These changes do not reduce the ability of the Permittees to provide continued protection to human health and the environment." (Pg. 1) It is unclear if these changes will increase the ability of the Permittees to provide continued protection. Please request that the Permittees explain how the use of shielded containers will increase safety.

Page 9 states, "The Permittees believe the use of shielded containers will be beneficial because the shipment of RH TRU mixed waste in shielded containers in the HalfPACT may be more efficient than shipment in canisters using the RH 72-B Cask." Believe? May be? What, if any, are the exact benefits?

Page 9 states, "Shielded containers are expected to reduce the time and personnel necessary for the packaging of RH TRU mixed waste at generator sites and the management, storage, and disposal of that waste at the WIPP facility." Are expected? What are the exact management, storage, and disposal time and personnel reductions?

If this PMR is a money-saving measure, please have the Permittees state how much will be returned to the taxpayers annually with the use of shielded containers. We have all already spent much time and effort on this issue.

The September 2011 PMR stated, "*The use of the shielded containers will enable DOE to significantly increase the efficiency of transportation and disposal operations for RH TRU waste at the Waste Isolation Pilot Plant (WIPP).*" This statement is missing from the current July 2012 revision. Has it been decided that shielded containers will not increase the efficiency of operations?

In the September 2011 PMR, DOE claimed "negligible effect on long-term performance" of the shielded containers. This claim is no longer made. What are the effects of shielded containers on long-term performance?

No mention is given of any thermal effects of remote-handled waste stored in shielded containers. The thermal effects of remote-handled waste stored in shielded containers on the waste matrix at WIPP must be studied.

It seems that we have been getting less information on shielded containers, not more. What we do know is that much of the planned RH space in the walls of underground rooms is not available because DOE brought contact handled waste to WIPP while RH waste was prohibited. Available RH space for emplacement in some of the panels was lost. And, from the time RH waste was permitted, DOE still has not shipped RH waste at a rate sufficient to use the available capacity. Is this PMR an effort to catch up on lost opportunities to replace RH in WIPP? In this Permit Modification Request, ***DOE must state a valid reason to use shielded containers.***

This shielded containers request is NOT a proper Class 2 permit modification. ***We request a public hearing and that the proposal for shielded containers be treated as a Class 3 modification*** so that there would be the opportunity for more extensive public comment and a hearing.

Given the inherent increased dangers of RH waste, the need for much more information, the complexity of the changes proposed, and the public concern about RH waste, shielded containers require a Class 3 modification request. This proposal is of more than sufficient significance that NMED should now designate DOE's request as a Class 3 modification and treat it as such.

Contrary to what DOE says, shielded containers cannot be managed in a manner consistent with management of CH waste. This language must be changed in the PMR. There is the simple matter of the radically increased weight involved with shielded containers, which logically would call for using different handling procedures than CH wastes.

The amount of RH waste allowed in the Waste Handling Building would greatly increase. The modification request includes no limits on the number of RH shielded containers that could be in the CH Bay, in effect substantially increasing the amount of RH waste allowed. The exact limits must be stated in the PMR.

These comments respectfully submitted,

Jay Coghlan  
Scott Kovac  
Nuclear Watch New Mexico  
551 Cordova Road #808  
Santa Fe, NM, 87501  
505.989.7342 office & fax  
[www.nukewatch.org](http://www.nukewatch.org)