

FW: Heaton Op Ed
Kliphuis, Trais, NMENV
Sent: Tuesday, February 12, 2013 7:22 AM
To: Allen, Pam, NMENV
Attachments: wippclass2oped-final.docx (17 KB)



For the record but not a public comment

From: Kyle Marksteiner [mailto:kmarksteiner@yahoo.com]
Sent: Monday, February 11, 2013 11:56 AM
To: Martin, David, NMENV
Cc: Kliphuis, Trais, NMENV
Subject: Heaton Op Ed

Here is the op ed on the Class 2 permit mod John Heaton submitted to the paper last week, sent to you at his request. The content is mostly the same as the letter submitted to the NMED.

Kyle Marksteiner

130213



Mayor's Task Force Endorses Permit Modification Request

Editor:

The Department of Energy's Carlsbad Field Office recently submitted a permit modification request to the New Mexico Environment Department, one of the Waste Isolation Pilot Plant's regulators. A permit modification request is basically a formal process of asking the state for permission to make changes to the permit allowing disposal of hazardous materials at WIPP (these are in containers with the radioactive waste when they are generated). This particular permit modification would eliminate the need for chemical sampling (through headspace testing and core sampling) before making the determination that a given waste stream of transuranic (TRU) mixed waste can be sent to WIPP.

In order to feel confident that this permit modification would not create a safety risk for either WIPP's workers or members of the community, I and several other members of Mayor Dale Janway's nuclear task force reviewed this request. We met with DOE employees and WIPP contractors on several occasions to ask questions, and we appreciate their diligence in providing us with the answers. Our goal was to understand this request and make sure, from our point of view, that this is a safe change.

After this extensive review, we have come to the conclusion that this permit modification does not reduce the safety of WIPP workers because they are protected by sampling the workplace environment directly, and not through sampling that is conducted thousands of miles away. We encourage the State of New Mexico to approve this proposed modification.

Our concern related to this issue is the men and women who work at WIPP and making sure this change in no way increases the risk of exposure to harmful chemicals. We believe that monitoring in the WIPP underground is clearly the best preventive measure for this concern. WIPP's routine air sample collection for target gases down to part per billion sensitivity, and the process of isolating rooms when they are filled, is a vastly superior approach and is much more protective of the worker than chemical sampling of the waste containers

themselves at a distant laboratory. Solids sampling by coring through solidified (usually cement) serves no useful purpose, because knowledge of the chemical content of the drums is known and because there is no liquid in the mine, there is no natural pathway for a solid to escape its matrix. Drilling into solids at the distant laboratory also puts workers there at risk unnecessarily.

Another key to understanding this proposed change is the fact that it will in no way alter the rigorous requirements of what can be sent to WIPP. The historical data and records of what is in the drum (called acceptable knowledge), radiography (X-ray) and/or visual examination, and radioactivity measurement requirements remain the same and have been proven to be sufficient to show whether a drum meets the requirements for shipment to WIPP. A waste drum that does not meet these requirements is not sent to WIPP.

The option of chemical sampling is still available, if needed, and the transportation system will independently confirm no flammable or explosive contents are in any shipment. The funding saved from this change should be invested in needed improvements at WIPP, such as infrastructure.

Most significantly, a monitoring system at WIPP ensures that WIPP's waste handlers and miners are not being exposed to dangerous levels of chemicals. WIPP's rigorous commitment to safety, if this permit change is approved, will be as strong as it always has been.

To read the entire proposed permit modification, please visit http://www.wipp.energy.gov/rcradox/rfc/com_menu.htm. If you want to submit a comment to the state, you can do so by sending an email to Trai.Kliphuis@state.nm.us by Feb. 18.

The Department of Energy is also going to soon submit another permit modification request related to repository reconfiguration, panel closure design and VOC gases. Several members of the mayor's task force are currently reviewing these documents and asking questions. WIPP has an outstanding safety record, and the men and women who work out there have always displayed a professional commitment to safety, but we also believe it is our responsibility to

keep ourselves educated in order to fulfill our responsibility to the citizens of Carlsbad.