



State of New Mexico
House of Representatives
Santa Fe



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May 18, 2013



Ms. Trais Kliphuis
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, N.M. 87505

Via e-mail: trais.kliphuis@state.nm.us

Via First Class Mail (original)

RE: Requested Modifications to the Hazardous Waste Facility Permit for the
Waste Isolation Pilot Plant (Class 3)

Dear Ms. Kliphuis,

Please know that I am in full support of the Class 3 modifications applied for by the U.S. Department of Energy to the hazardous waste facility permit under which the Waste Isolation Pilot Plant (WIPP) operates. I have read extensively about and been briefed about the proposed changes and believe that they are acceptable, and I encourage the New Mexico Environment Department to approve them.

Having followed WIPP for nearly thirty years, I consider myself to be fairly knowledgeable about the project. The fact that the repository is located inside the boundaries of my house district means that I am particularly vigilant about any proposed changes in operations. I stay abreast of nuclear waste and environmental issues as a member of the Radioactive and Hazardous Materials Committee of the New Mexico Legislature; furthermore, I have just recently been appointed to the Nuclear Work Group of the National Council of State Legislatures (NCSL).

The overarching value at WIPP is **worker safety**, and on that score there is and can be no compromise. All three of the proposed permit modifications will result, in some form

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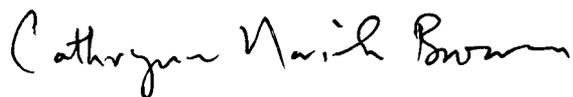
or fashion, in less risk to WIPP employees, and these worker benefits justify adopting the requested changes. Briefly,

- (1) modifying the WIPP panel closure system design to use run-of-mine salt instead of pouring concrete bulkheads to close off panels will lessen industrial risk to workers. Salt bulkheads will perform just as rigorously as concrete bulkheads and cost far less to construct (an added bonus);
- (2) revising the location of panels 9 and 10 is preferable to enlarging the main access drift for waste emplacement from the standpoint of mine worker safety; and
- (3) modifying DOE's process for monitoring volatile organic compounds (VOCs) will lead to a more accurate picture of risk factors germane to worker safety.

I think that the changes the Department of Energy has requested are workable and wise. The proposed modifications are refinements that will enhance worker safety at the site and keep WIPP firmly on course in protecting the environment and the public at large.

I endorse the Class 3 permit modification request package and urge NMED to modify the WIPP hazardous waste facility permit accordingly. I appreciate the opportunity to express my opinion on this matter, and I look forward to NMED's decision.

Sincerely,

A handwritten signature in cursive script that reads "Cathrynn Novich Brown".

Cathrynn Novich Brown