



Maestas, Ricardo, NMENV

From: Russell Hardy <rhardy@nmsu.edu>
Sent: Tuesday, November 01, 2016 11:28 AM
To: Maestas, Ricardo, NMENV
Cc: Russell Hardy; 'tim.runyon@cbfo.doe.gov'; 'bobby.stjohn@wipp.ws'
Subject: Public Comment - DOE Class 3 Permit Modification to Add a Concrete Overpack Storage Container Unit

Categories: Red Category

Good morning Ricardo, please accept the following public comment in regard to the Department of Energy's and NWP's request to modify the permit to add a concrete overpack storage container unit at the WIPP facility.

As the Director of the Carlsbad Environmental Monitoring and Research Center (CEMRC), as a member of the Carlsbad Mayor's Nuclear Taskforce, and as a resident of Carlsbad and Southeast New Mexico, I fully support the proposed class 3 permit modification submitted by the U.S. Department of Energy (DOE) and the Nuclear Waste Partnership (NWP) to add a concrete overpack storage container unit at the Waste Isolation Pilot Plant (WIPP). Following a careful review of the proposed permit modification in addition to attending several pre-submittal meetings and attending both public hearings on the subject, I believe that the addition of the concrete overpack storage container unit would better position the WIPP facility and provide much needed flexibility during planned facility outages and/or planned maintenance outages by allowing DOE generator sites to continue to prepare and to ship Transuranic (TRU) waste to the WIPP facility for ultimate disposal within the repository. I believe that the proposed permit modification will provide sufficient capacity for these planned outages by providing space to accommodate 408 concrete overpack containers with the capacity to hold approximately 65,280 cubic feet of contact-handled (CH) waste and to allow for one year (365 days) from the receipt of the waste in the storage facility to be permanently disposed of within the underground repository. The addition of the concrete overpack casks, in my opinion, helps provide an additional layer of safety to ensure that the waste is not at the mercy of the elements (fire, wind, rain,...) while in storage and awaiting permanent disposal. While we all agree that permanent disposal within the WIPP facility is the safest place for the waste to be, I believe the proposed permit modification provides a safe alternative to permanent disposal when waste emplacement is not feasible such as during a planned maintenance outage. Lastly, I understand that the proposed permit modification relates only to the storage aspects of the waste and not to the underground waste disposal unit; therefore, permit-related compliance monitoring requirements such as the periodic monitoring of VOC and/or radiological constituents are not considered as a part of this permit modification. Despite this technicality, I fully encourage the DOE and the contractor (NWP) to ensure that these periodic monitoring components are captured within the general envelope of the site-based industrial hygiene program to ensure that WIPP employees and/or the general public who may be present in the area near the facility are not exposed to dangerous levels of VOC gases and/or radiological hazards during the period of time that TRU waste is stored within the concrete overpack storage container unit.

Thank you for the opportunity to provide this public comment in support of this permit modification request and please let me know if you have any questions or need any additional information regarding this matter.

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