

**From:** Biswell, David, NMENV  
**Sent:** Monday, March 06, 2017 3:37 PM  
**To:** Allen, Pam, NMENV  
**Cc:** Maestas, Ricardo, NMENV  
**Subject:** FW: Don't Expand WIPP

February WIPP Correspondence

**From:** Biswell, David, NMENV  
**Sent:** Monday, March 06, 2017 1:28 PM  
**To:** Biswell, David, NMENV <David.Biswell@state.nm.us>  
**Subject:** FW: Don't Expand WIPP

**From:** Maestas, Ricardo, NMENV  
**Sent:** Monday, February 06, 2017 1:32 PM  
**To:** Biswell, David, NMENV <David.Biswell@state.nm.us>  
**Subject:** FW: Don't Expand WIPP

**From:** Joni Arends [<mailto:jarends@nuclearactive.org>]  
**Sent:** Friday, February 03, 2017 3:38 PM  
**To:** Maestas, Ricardo, NMENV <[Ricardo.Maestas@state.nm.us](mailto:Ricardo.Maestas@state.nm.us)>  
**Subject:** Don't Expand WIPP

Good afternoon,

Concerned Citizens for Nuclear Safety (CCNS), a Santa Fe-based non-governmental organization, makes the following public comments about the Class 3 permit modification request to add a 65,280 cubic foot waste container storage unit on the surface at the Waste Isolation Pilot Plant (WIPP).

CCNS opposes the Class 3 permit modification request for the following reasons:

1. It would increase the total amount of waste allowed on the surface by more than 500 percent from 434.1 cubic meters to 2,270.1 cubic meters.
2. The proposal is dangerous to workers. Because waste containers would be handled at least three times more than in the past, exposures to radiation and toxic chemicals would increase;
3. The proposal is illegal. Federal law makes WIPP an underground disposal site, and not for surface storage.
4. The proposal is not needed. A lesser amount (115.3 cubic meters) of "surge" surface storage has been allowed, but never all used. More surface storage is not needed for WIPP's underground operations.



5. The proposal is dangerous to the public. Expanding WIPP to allow high-level waste has long been a DOE goal. The surface storage pad is similar to what could be used for high-level waste. High-level waste transportation and storage would endanger people throughout New Mexico and dozens of other states.

CCNS incorporates into these comments emails, which Mr. Maestas had been copied on, about the lack of adequate information about WIPP's Class 3 permit modification request. Specifically, emails dated:

September 13, 2016 "CCNS Questions about AGSC PMR Pre-submittal"

October 19, 2016 "Re: CCNS Questions about AGSC PMR Pre-submittal"

November 4, 2016 "Time to focus on closure of south end of WIPP - Rock Fall Causes Precautionary Evacuation of WIPP Underground"

November 9, 2016 "AGSC PMR Pre-submittal and Closure PMR Pre-submittal"

November 30, 2016 "Re: CCNS Questions about AGSC PMR Pre-submittal"

November 22, 2016 "Resumption of normal operating status at WIPP???"

December 22, 2016 "Fwd: WIPP Stakeholder Notification Service"

January 18, 2017 "Re: CCNS Questions about AGSC PMR Pre-submittal"

January 25, 2017 "Re: CCNS Questions about AGSC PMR Pre-submittal" and

January 26, 2017 "Re: Response to comments," where CCNS thanks George Basabilvazo for finally - four months after submitting questions about the AGSC pre-submittal - providing answers - somewhat incomplete answers - to CCNS's comments.

If need be, I will forward the emails again as part of CCNS's public comment to ensure they are part of the permit's Administrative Record. Please let me know if that is necessary.

The public should not have to wait until almost the end of the public comment period (eight days to the end of the comment period) to receive answers to questions that were made during the pre-submittal meeting in September 2016.

Further, despite allowances in Section 3.1.1.3 and 3.1.2.4 of the hazardous waste permit for additional storage for 60 days, that storage was not used until the February 2014 shutdown when surge in the Waste Handling Building was used.

Again, the State of New Mexico should not allow the expansion of WIPP with a 500 percent increase in the amount of waste proposed for above-ground storage.

Sincerely,

Joni Arends, Executive Director

Concerned Citizens for Nuclear Safety

P. O. Box 31147

Santa Fe, NM 87594-1147

505 986-1973

[www.nuclearactive.org](http://www.nuclearactive.org)