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Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
OCT 30 2017



Mr. Tom Church
Cabinet Secretary
New Mexico Department of Transportation
P.O. Box 1149
Santa Fe, NM 87504

Subject: Request to Change the Designated Primary and Alternate Routes to the Waste Isolation Pilot Plant for the National TRU Programs Southern Transportation Corridor

Dear Secretary Church:

Currently shipments from Savannah River Site (SRS) and Oak Ridge National Laboratories (ORNL) utilize the designated primary Southern Corridor approach entering New Mexico on US 285 from Pecos, Texas, through Carlsbad to the Waste Isolation Pilot Plant (WIPP) Site. The negotiated primary route approved for use is as follows:

Starting at the TX/NM border on US 285 from Pecos TX, proceeding north on US 285 to the junction with US 62/180 in Carlsbad NM, then proceeding east on US 62/180 to the intersection with the WIPP North Access Road, then traveling south on the WIPP North Access Road and terminating at WIPP site.

Since 2008 due to issues on US 285 beginning with required box culvert repairs and later concerns with the potential sinkhole at the intersection of US 285 and US 62/180, it has been necessary to maintain designated alternate routes for the final approach to WIPP. The State Transportation Commission has provided an annual reauthorization to the WIPP to utilize three alternate routes in Southeastern New Mexico. During calendar year 2015 these alternate routes were not utilized during the ongoing recovery effort at the WIPP and lack of shipping activities, subsequently the alternate routes were not reauthorized.

With the resumption of TRU Waste shipments, State Transportation Commission, Resolution No. 2017-01 authorized the temporary use of and created the "Hobbs Alternate Route" for the estimated 23 shipments departing from Waste Control Specialists (WCS) in Andrews, Texas destined for the WIPP facility in Southeast New Mexico. The negotiated alternate route approved for use in Resolution 2017-01 is as follows:

With the point of origin at the WCS Andrews site, in Texas approximately 150 yards from the TX/NM border, proceeding west on NM 76 to the junction of NM 18, then traveling north on NM 18 to the Hobbs South Bypass to US 62/180, proceeding west on US 62/180 to the intersection with the WIPP North Access Road, then traveling south on the WIPP North Access Road and terminating at WIPP site.

After 6 months concurrent use of both the designated primary Southern Corridor approach from SRS and ORNL, and the Hobbs Alternate Route from WCS, it has become readily apparent that the traffic and road conditions along the Hobbs Alternate Route afford a far greater level of safety for WIPP destined transports in the shipping of TRU waste.



The congested traffic conditions, ongoing construction, narrow shoulders and bridges, and frequent turnouts along U.S. 285, a two lane road with many blind curves and hills, between Carlsbad and Pecos, TX presents far more threats and hazards to the safe transport of TRU waste than the predominately 4 lane divided highways of NM 18 and US 62/180.

Pursuant to the controlling federal rules under the Code of Federal Regulations (CFR) Title 49, Section 397, and in accordance with the provisions of the Western Governors' Association (WGA) WIPP Program Implementation Guide (WIPP-PIG), and the exclusive authorities granted to the STC by the Radioactive and Hazardous Materials Act, NMSA 1978, Sections 74-4A-1 through 74-4A-14 (1991) to designate highway routes for the transportation of radioactive material; the USDOE desires to permanently designate the Hobbs Alternate Route as the "Primary Southern Corridor Approach" to the WIPP site for all future shipments entering the state of New Mexico from the south and east (Southern Corridor); and designate the Pecos/ 285/Carlsbad/62/180 route as the "Alternate Southern Corridor Approach".

Authorizing the use of the Hobbs Alternate Route as the Primary Southern Corridor Approach will help comply with Federal Motor Carrier Safety Requirements preferring routes that limit risk to the public by maximizing use of divided highways. Use of this route will also address concerns raised by the State Transportation Commission regarding the use of the more rural roads currently utilized, where heavy oil field traffic, construction and lack of shoulders have been often cited.

Thank you for your consideration of our request. Should you require further information, please contact me at (575)234-7300 or Mr. James Mason, Institutional Affairs Manager, at (575) 234-7335.

Sincerely,



Todd Shrader, Manager
Carlsbad Field Office

cc:

J. Carswell, CBFO	*ED	A. Johnson, WTS	ED
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