



State of New Mexico
House of Representatives
Santa Fe

ENTERED

MAR 12 2018

COMMITTEES:
Judiciary
Taxation & Revenue

CATHRYNN N. BROWN
R - Eddy
District 55

1814 North Guadalupe Street
Carlsbad, NM 88220
Phone: (575) 706-4420
E-mail: cath@cathrynnbrown.com
c.brown.nm55@gmail.com

March 7, 2018

Mr. Ricardo Maestas
New Mexico Environment Department
2905 Rodeo Park Drive East - Building 1
Santa Fe, NM 87505

RE: WIPP Volume of Record

Dear Mr. Maestas,

The Waste Isolation Pilot Plant (WIPP) is located within my legislative district, and I greatly appreciate the important work that is accomplished there on a daily basis. By isolating transuranic (TRU) nuclear waste from the environment permanently and securely, WIPP serves the national interest. Congress specified a distinct mission and certain parameters within which WIPP shall operate, including the placing of a limit on total waste volume. Exactly how waste volume should be reckoned has been subject to debate and interpretation, and officials to date have chosen to take the easy path and simply measure by outer packaging. I think it's good that someone has finally "called the question," as this presents an opportunity for the New Mexico Environment Department to use logic and common sense to clarify what exactly "waste" volume means.

I strongly support the U.S. Department of Energy's application for a permit modification clarifying that void space is not factually or technically TRU waste. Common sense tells us that air is not transuranic waste; therefore, air should not be factored in waste volume. Since historical data and records exist to differentiate between TRU waste and void space (e.g., empty space occasioned by overpacking), it will not be hard to re-figure the actual TRU waste volume at WIPP.

It is a good government measure and makes economic sense to redeem space at WIPP by approving the requested Class 2 permit modification.

Sincerely,

Cathrynn Novich Brown

180402.08

