

From: [Maestas, Ricardo, NMENV](mailto:Ricardo.Maestas@state.nm.us)
To: [Biswell, David, NMENV](mailto:David.Biswell@state.nm.us)
Subject: FW: Class 2 permit modification for WIPP, April 2018
Date: Wednesday, April 04, 2018 8:39:42 AM



From: Kathryn Albrecht [mailto:lapaz@zianet.com]
Sent: Tuesday, April 03, 2018 4:54 PM
To: Maestas, Ricardo, NMENV <Ricardo.Maestas@state.nm.us>
Subject: re: Class 2 permit modification for WIPP, April 2018

Dear Department:

I SAY: DO NOT APPROVE & PERMIT current modification request to HWFP for WIPP!!

- There are serious plans for all of the nation's commercial spent nuclear fuel to head to NM.
- WIPP has a major expansion in the works to allow even more radioactive waste into NM.

Today I ask you to join with others to stop a proposed major Waste Isolation Pilot Plant (WIPP) expansion. Officials at the WIPP are proceeding with a deluge of permit modifications to try to get as much weakening of the Hazardous Waste Permit as they can before 2019.

Because DOE is so far behind emplacing waste at WIPP, including because of the three-year shutdown from the 2014 radiation release, and they are running out of underground space, they want to change the way waste volume is measured. Since the 1970s, DOE has agreed that the amount of waste is the volume of the outer-most container. Now, DOE wants to estimate the amount of waste inside each container and use that lesser amount.

WIPP is now filling Panel 7 (of 10 originally proposed), which is about 70% of the space. But WIPP has only emplaced ~92,700 m³ of waste (about 53% of the 175,564 m³ allowed). DOE has "lost" more than 30,000 m³ of space by its inefficiency and contractor incompetence. Measuring the waste the proposed new way decreases the 'amount of waste' emplaced to date by ~26,000 m³.

The proposed modification is controversial and is part of a larger plan to expand WIPP, but is submitted as a Class 2 Permit Modification Request (PMR), which has lesser public input opportunities. The public has opposed WIPP expansion for years and decades. There is significant public concern and interest in the WIPP facility. This PMR should be a Class 3, which includes much more public input, a formal public hearing.

I SAY: DO NOT APPROVE & PERMIT!!

Sincerely,

Kathryn Albrecht

Trinity Test site vicinity and former Taos County downwinder of, respectively, WSMR &

180402.31



LANL

87832-0422

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Kathryn Albrecht
San Antonio, NM

"Do not be daunted by the enormity of the world's grief.
Act justly now. Love mercy now. Walk humbly now.
You are not obligated to complete the work,
but neither are you free to abandon it." - The Talmud