

April 16, 2018



To Ricardo Maestas,
WIPP Project Manager Hazardous Waste Bureau - New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303
Phone: (505) 476-6000 Fax: (505) 476-6030
E-mail: ricardo.maestas@state.nm.us

Dear Mr. Maestas:

I appreciate the opportunity to comment on the Class 3 proposal to change the panel closure design at the Waste Isolation Pilot Plant. This proposal has been vetted thoroughly at every level. There is no need for any hearing at this point and I would appreciate the New Mexico Environment Department's prompt approval.

The NMED has reviewed this topic extensively twice now, as has the Environmental Protection Agency. Members of the public, over the past six years, have had numerous opportunities to comment and ask questions.

The NMED's current proposal for panel closure at WIPP calls for a concrete monolith and an explosion-isolation wall to be placed outside of each drift. The explosion wall was part of the design to address the potential build-up of hydrogen and the possibility of an explosion during operations. From a radionuclide perspective, the concrete monolith was included to isolate one panel from another, mainly to isolate brine flowing from one panel to another.

WIPP has long ago proven that the monolith and explosion wall are expensive and not necessary. This credible information has been provided to the public on multiple occasions. WIPP's proposal of bulkheads and run-of-mine salt (at Panel 10) have been established as a responsible way to move forward. Using salt as the closure is a simple, efficient design that continues to protect our workers throughout WIPP's lifecycle. Members of the Carlsbad community are very familiar with this topic, and here are a few points worth noting:

- More than 1000 air samples from all interior reaches of WIPP Panels 3 and 4 have been collected. Every methane sample has had a "Non Detectable" result at a minimum detection levels of about 30 parts per million. Generated hydrogen in these same samples was also well below the action levels specified in the permit. The monitoring results indicate that the initial WIPP planning was overly conservative and that explosion walls and robust panel closures would not be needed during the operational lifetime of WIPP.



- The original design is extremely expensive. Each explosion-isolation wall costs around \$1.5 million dollars, while the concrete barriers would cost in the \$10 million range. Additionally, the design elements of the currently-required concrete barrier do not appear to be practical.
- One of the panel closure purposes is to protect the workers from exposure to harmful volatile gases in the waste. But measurements prove that levels are well below health concerns even without these big panel closures. It is ironic that building the panel closures to the origin design will create a lot more industrial safety risk than the new design – just the opposite of what they are supposed to do. The likelihood of accidents and equipment failures is proportional to the effort expended, and the original design will take a lot more effort and engineering to accomplish, but with no added protection for workers, the public and the environment. WIPP’s workers will not face any increased risk if this modification is approved. Actually, operational and construction risks would be less for the new design.
- WIPP has a number of infrastructure needs, and if worker safety is the issue, the money could be much better spent meeting those needs. Money spent on mine equipment, fire trucks and road maintenance, for example, is a legitimate investment toward ensuring the continued safety of WIPP’s employees. The nation benefits from the NMED handling this issue in a timely manner. Resolution of this issue allows WIPP to focus on waste disposal and cleanup.
- Finally, ventilation in the mine is desperately needed and a quick resolution of this PMR will allow air flow to be eliminated from the south end resulting in more air for working areas.

Salt does a wonderful job of isolating by itself- that’s why WIPP is located in salt. This proposed change has no significant effect when it comes to WIPP’s long term isolation performance. Let’s move forward

Sincerely,

John Heaton,

Carlsbad Mayor’s Nuclear Task Force