

From: [Maestas, Ricardo, NMENV](#)
To: [McLean, Megan, NMENV](#); [Biswell, David, NMENV](#); [Tellez, Hernesto, NMENV](#)
Subject: FW: Union of Concerned Scientists Comments on WIPP Draft Permit
Date: Thursday, September 20, 2018 2:58:16 PM
Attachments: [wipp_permit_comments_UCS_9_20_18.pdf](#)



From: Edwin Lyman <ELyman@ucsusa.org>
Sent: Thursday, September 20, 2018 2:55 PM
To: Maestas, Ricardo, NMENV <Ricardo.Maestas@state.nm.us>
Subject: Union of Concerned Scientists Comments on WIPP Draft Permit

Dear Mr. Maestas,

I am pleased to submit these comments on behalf of the Union of Concerned Scientists. Please see the attached PDF file. Thank you for your consideration.

Sincerely,

Edwin Lyman
Union of Concerned Scientists
Washington, DC
elyman@ucsusa.org



September 20, 2018

Mr. 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
By email: Ricardo.maestas@state.nm.us

Comments of the Union of Concerned Scientists (UCS) on the WIPP Draft Permit

The Union of Concerned Scientists (UCS) strongly supports the draft Hazardous Waste Facility Permit for the Waste Isolation Pilot Plant (WIPP). The draft Permit would change the way that transuranic waste (TRU) waste volume is calculated for the purpose of compliance with the Land Withdrawal Act (LWA) limit on the total TRU volume that can be disposed of in WIPP. Simply put, the proposed change is a common-sense fix that would allow the Department of Energy (DOE) to only include actual TRU waste, and not empty space and packaging structural materials, in its calculation of the TRU waste volume that is counted against the LWA statutory limit. This would enable the DOE to more efficiently utilize scarce WIPP capacity, and to safely and securely dispose of the U.S. “excess” (i.e. “waste”) plutonium inventory in a deep geologic repository.

The proposed change to the calculational method for TRU waste volume in the draft Permit would not have a direct impact on the safety and security of the WIPP repository. The draft Permit would allow the DOE to dispose of a greater quantity of TRU waste in terms of its activity (curie content) than under the current Permit without exceeding the LWA volume limit. However, to ensure safety, any increase in radioactive inventory could only occur in compliance with all applicable environmental laws and regulations. And additional approvals would be required to excavate new panels if an increase in the physical volume of repository space were needed to accommodate additional TRU inventory. By itself, the proposed change in the draft Permit would not allow the DOE to significantly increase the TRU activity loading in WIPP.

Even so, we believe that the draft Permit will ultimately result in a significant decrease in the overall risks that the DOE’s waste plutonium inventory poses. The change would facilitate the geologic disposal of many thousands of nuclear bombs’ worth of plutonium that the U.S. no longer wants or needs. This would allow this dangerous material to be expeditiously transferred from temporary surface storage, where it poses long-term safety and security risks, to deep geologic disposal, where it will be isolated and significantly less inaccessible for weapons use. The DOE’s plan for disposal of this waste plutonium is to blend it down with an inert diluent and to emplace small quantities of the mixture in standard TRU waste drums. Each drum would contain only about 300 grams of plutonium. The actual TRU waste volume would be a small fraction of the volume of the disposal drum. If the proposed change in the draft Permit is authorized, the corresponding reportable LWA TRU waste volume could be reduced by a factor of 100 or more. This fix would enable the DOE to dispose of the entire remaining waste plutonium inventory currently in surface storage—roughly 50 metric tons—while only increasing the volume of emplaced TRU waste by less than one percent of the LWA limit.

The State of New Mexico has played a critical role in the history of the nuclear age. Now it has the opportunity to leverage a unique asset—the WIPP repository—to help the U.S. honor its commitment to reducing its nuclear weapons stockpile. Approval of the draft Permit is a critical first step down this path.

Thank you for consideration of our views.

Sincerely,

A handwritten signature in black ink, appearing to read "Edwin S. Lyman". The signature is fluid and cursive, with a long horizontal stroke at the end.

Edwin S. Lyman, PhD
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