

Dear New Mexico Environment Department,

As a former New Mexican, like many New Mexicans I am deeply concerned about the Department of Energy's (DOE) 10-year Waste Isolation Pilot Plant (WIPP) Hazardous Waste Bureau Permit Application. I would like to thank the New Mexico Environment Department (NMED) for their rewriting of the DOE's original application to address several of my concerns. However, there are remaining issues and concerns that NMED must include in the final approved permit to truly protect New Mexico's people, lands, and economies.

First, any new waste streams, including surplus plutonium, must be prohibited. Alternatives to the only current plan of dealing with such surplus, i.e.: shipping large quantities of materials back and forth between Amarillo TX, Los Alamos NM, Savannah River SC, and WIPP should be identified, and a comparative evaluation conducted regarding costs, benefits, risks, and schedules. One possibly attractive alternative would be to install plutonium burning Liquid Fluoride Thorium Reactors (LFTR's) at Los Alamos and Pantex Plant to accumulate and use waste plutonium to create power and eliminate waste. In addition to the energy produced, a byproduct of the process would be PU238 which is valuable and useful for space operations power supplies. Since DOE is now funding advanced reactor research it could become a viable option, certainly one which the DOE should be tasked to fully evaluate prior to approval of the permit. Relevant on-line discussions of the technology can be found at https://youtu.be/YVSmf_qmkg and <https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0201757#>.

In addition, I recommend that:

1. New "replacement panels" be prohibited while the above analysis takes place.
2. The condition revoking the Permit if waste volume is increased by Congress should be retained.
3. A condition to require a defined end date for waste disposal should be added, preferably in 2024—at which time an estimated 10-year site closure period will begin.
4. The requirement prioritizing New Mexico Waste should be retained. language to prioritize Legacy Waste should be added.
5. Conditions that support an increase in reporting, transparency for the public, and increased public involvement should be retained.

I respectfully submit these comments on the WIPP Renewal Draft Permit. Thank you in advance for your consideration.

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