

Dear Mr. Maestas and other decision makers,

Nuclear waste and the processes that produce, transport, and hide it out of sight in rural areas have always been insane, from a public health and safety perspective. Really, from any perspective. WIPP should never have been foisted on rural New Mexico and New Mexico workers. It should not be renewed or expanded.

How many more workers and square miles need to be poisoned before we acknowledge the insanity of nuclear power and weapons? How many more "accidents" need to occur?

The risks and hazards of WIPP renewal and expansion are unacceptable, and include, as Sasha Pyle wrote:

1. Processes that can lead to off-site migration of radioactive and chemical contaminants have been well documented and studied using various modeling techniques and detailed understanding of the region's hydrology and geology. WIPP's location above a highly pressurized brine reservoir and below the crucially important Rustler aquifer, which feeds local tributaries, the Pecos River, the Rio Grande and the Gulf of Mexico, virtually guarantees that waste will eventually migrate off-site to some or all of those bodies of water. The duration of the waste's lethal health impacts (the plutonium in transuranic waste can cause illness and death for up to 240,000 years) means even the 10,000-year control period is not sufficient, but that is what has been mandated and must be met.
2. The processes by which waste will escape the site will be accelerated and exacerbated both by a longer disposal phase and by the introduction of additional waste streams. The supposed efficacy of the site was based on "undisturbed salt beds." Every elevator or ventilation shaft that is sunk, every disposal panel carved out, every year of rumbling trucks, vibrations, human activity above and below ground further fracture and destabilize the anhydrite layers on which the repository's entire design was based. Because thermal activity draws water TO the site, accelerated degradation and decomposition of the metal containers and their contents will continue to drive ever higher temperatures and faster breakdown. For this reason, 'surplus plutonium,' not included in the original agreement, must not become part of WIPP's inventory. For this reason, waste characterization and regulation--disregard for which has led to accidents and shutdowns already experienced at WIPP, at great taxpayer expense--must be stringently reviewed and the process by which wastes are deemed acceptable for WIPP storage must be strengthened, not weakened.
3. The poorly conceived design of the WIPP facility, which calls for its decommissioning and abandonment with no way ever to retrieve the wastes, becomes an even greater liability when the pathways for escape and the rate of contamination are thus accelerated.
4. WIPP's basic model would never have received certification before or after it did. The science was not settled; the site selection was politically motivated (let's prey on a poor state by offering jobs). No sooner was WIPP opened than global scientific consensus shifted to the concept of Hardened On-Site Storage (HOSS) in which the waste is kept in a secure, monitored, retrievable location. So WIPP would likely never have been approved at a later date either. As a result, New Mexico is stuck playing host to an outdated concept which will inevitably pollute our natural resources. And now we are being asked to enlarge that danger

and those consequences, also for political reasons. See 5.

5. More than 30 years ago, we recognized the link between a disposal facility and the push to keep the door open for continued weapons and waste production. WIPP was sold to us as a “pilot” facility; no attempt is being made to site weapons-waste disposal anywhere else. It was sold to us as an answer to Cold War legacy wastes; we feared then and clearly see now that it was chiefly intended as a path to continued manufacturing of nuclear weapons and the resulting creation of more and more weapons waste. That it is, in fact, the ILLUSION of a solution rather than a dedicated attempt to rid the biosphere of wastes going back to WWII. Nuclear weapons waste, rather than being a finite problem to clean up, becomes an infinite problem, with WIPP serving to conceal that essential fact from public view.

6. Just because the facility was allowed to open operationally does not mean that the well-documented original concerns about very real risks to the environment and resources of our state should be erased from public and regulatory awareness. If anything, human-error-caused accidents and shutdowns have demonstrated during operations that the rosier performance projections were inaccurate all along.

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