

4/19/23

NM Environmental Public Health Network member

I'm Teresa Seamster, MS EdS, former school administrator and teacher in Santa Fe County since 1990. I currently serve as a member of the NM Environmental Public Health Network, NM Forest & Watershed Health Coordinating Group (EMNRD-State Forestry), and the TriChapter Health Committee (Navajo Nation). The concerns the health, environment and academic communities have regarding the proposed Draft Permit to expand WIPP and significantly change the type of waste to be stored there are:

- 1) Highly radioactive Plutonium waste from the manufacture of nuclear weapons pits is a significantly more hazardous cargo to ship across NM (and 11 other states) than TRU mixed low radioactive waste. THE PUBLIC IN GENERAL IS NOT BEEN MADE AWARE OF THIS DIFFERENCE AND THE GREATER RISK IT POSES TO ALL USERS AND COMMUNITIES ON THE WIPP "ROUTE". INFORMATION IN ALL LANGUAGES USED BY NEW MEXICO RESIDENTS SHOULD BE SENT, BROADCAST AND NOTICED IN PUBLIC LOCATIONS THAT ACCURATELY DESCRIBES THIS DOE PERMIT REQUEST AND ITS RAMIFICATIONS.
- 2) The DOE has not been able to secure any agreement with any state for the construction and operation of a permanent nuclear waste repository. This request to expand WIPP and change the type of storage away from LANL "legacy waste" "high level nuclear waste" will likely "force" NM to become that repository UNLESS A DECISIVE REFUSAL TO PERMIT THE DOE CLASS 3 REQUEST IS MADE NOW BY NMED. Any approval of the Draft Permit requests for more waste, different waste, longer permit period with no closure date will open the door to WIPP for all future nuclear storage.
- 3) The state of NM, the EPA and DOE have all failed to provide the public - especially the pueblos, communities and individuals that live near the WIPP Route - with ANY clear analysis of the risks of a nuclear waste transportation accident or a release of hazardous chemicals including powdered Plutonium - which cannot be mitigated when released into the environment. There are no evacuation plans (except to shelter in place or try to drive away from the contaminated zone), no trained response team to evaluate and "clean up" a "spill", and no accurate information on public risk because there is no precedent. No operation with this many shipments sent across this many miles and this deadly in nature has been attempted before. WIPP is only the endpoint of this untried project and must be kept to the original mission of storing LANL legacy waste and close in 2024.
4. The recent bill(SB53) signed into Law directing NMED to prohibit any storage of high level nuclear waste, unless a national permanent storage repository was in operation, should guide this decision.

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8/21/23

Thank you for the public facing information on the 8/15 meeting and the Table of Changes on the Proposed Final Permit for WIPP.

The concerns and testimony I heard yesterday, August 21, at the RHMC Interim meeting in Los Alamos highlighted the following unresolved issues for the expanded permit for WIPP:

1. The expansion of LANL as the new national "dirty lab" for plutonium manufacturing will generate millions of tons of high level radioactive waste in Los Alamos with no additional waste storage proposed except WIPP for the foreseeable future. Allowing the pit production to proceed at the current 24-hour schedule guarantees that WIPP will both expand and accept all the waste - despite the current permit restrictions. **The alternative of storing it in unsecured areas is unacceptable and the projected need is for 50 such waste sites nationally.**

Action: Reiterate the recommendations presented by scientists, engineers and inspectors from multiple agencies and organizations to RHMC to **pause pit production** until a) Pu waste storage issues are equally shared by other states and that b) the national security decision re: pit production in 2 sites (NEVER recommended by NNSA's 2017 decision) is reassessed and only 1 pit production site is chosen (Savannah River is the clear winner for location and safety).

2. **Environmental health risks allowed by the WIPP Permit are too high** according to the HAZ MAT Response expert as the permit allows the transportation of high level chemical waste & powdered Pu through rural /urban communities in NM north and east transportation corridors (where 63% of New Mexicans reside) that have no adequate response teams-training-funding to deal with Pu releases.

Action: **Implement the recommendations** presented to RHMC by HMR Director Craig Tucker for additional funding and time to ready appropriate public safety measures before such hazardous shipments to WIPP are allowed to proceed.

There was so much critical testimony provided at the RHMC that must not be ignored.

a) the inadequate scope of the WIPP permit, b) the inadequate facilities and safety procedures at LANL PF-4, c) the inadequate funding, time and personnel to respond effectively to any radioactive incidents/accidents/releases, d) the inadequate assessment of impacts to the Region of Impact (ROI in northern NM) in terms of economic burden of required county services (schools, hospitals, housing, roads, police, fire, contamination clean up, health issues) without adequate county revenue, and e) inadequate assessment of purpose and need for pit production for national security - when current warheads are warranted for another 40 years and the stockpile is already greater than all nuclear weapons globally.

NMED is our fragile buffer between the DOE and New Mexico - 'The sacrifice state'. We support all efforts to control this flood of misappropriated "political" money and mission that is putting ourselves and our communities at high risk of irreparable damage in our state.

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