

Richard Rushforth 5/14/23

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I respectfully submit these comments on the WIPP Renewal Draft Permit

Dear New Mexico Environment Department,

Like many of my fellow 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.

Please add, retain or strengthen the following:

1. Prohibit any new waste streams, including Surplus Plutonium.
2. No WIPP Expansion. No Permit Extension. No PITTs. No Triggers. No Plutonium shipments. No South Carolina shipments. No Pantex shipments. No Hanford shipments. No Idaho shipments. No Transuranic wastes shipments. No new "replacement panels".
3. Revoke any Permit if waste volume is increased by Congress.
4. WIPP is done receiving nuclear waste in 2024. No Permit Extension.
5. Retain the requirement prioritizing New Mexico Waste. No PITTs. NO Triggers. No Transuranic waste.
6. Retain conditions that support an increase in reporting, transparency for the public, and increased public involvement.
7. Strengthen the requirement to site another repository in a state other than New Mexico; require progress and include consequences.
8. No changing the original mission statement. No Transuranic waste.
9. No shipments from South Carolina. No Pantex shipments. No Hanford shipments. No Idaho shipments. No Rocky flats shipments.
10. Include: Third party Water monitoring, Aquifer monitoring and Air monitoring. Free community health for cancers, hematologic, gastrointestinal, and neurologic symptoms for all affected communities.

Stop funding War. Stop building Bombs. Negotiate for peace. 'Léétsoh dooda'

A society unable to recognize the nuclear danger, a society that fails to take the steps necessary for survival, is a sick society. Indeed the best evidence of this fact is a dark cloud, the menace, the warning signs which continue to hang over us. But there are other risks as well. A people that chooses to go on living in daily ignorance of such a threat develops other social and psychological problems which are greatly damaging in and of themselves - without a bomb ever going off. Hence it is not just the deployment of nuclear weapons, but their very existence, which threatens mankind.

Mordechai Vanunu  
Ashkelon Prison, Jerusalem  
July, 1987

TABLE 7-1 Transuranium Nuclides of Potential Biological Significance

Element  
Isotope  
Half-Life (yr)

Neptunium  
 $^{237}\text{Np}$   
 $2.1 \times 10^6$  Half-Life (yr)

Plutonium  
 $^{238}\text{Pu}$   
86 Half-Life (yr)

$^{239}\text{Pu}$   
24,400 Half-Life (yr)

$^{240}\text{Pu}$   
6,580 Half-Life (yr)

$^{241}\text{Pu}$   
13 Half-Life (yr)

$^{242}\text{Pu}$   
379,000 Half-Life (yr)

Americium  
 $^{241}\text{Am}$   
458 Half-Life (yr)

$^{243}\text{Am}$   
7,370 Half-Life (yr)

Curium  
242Cm  
0.45 Half-Life (yr)

244Cm  
17.6 Half-Life (yr)

Californium  
252Cf  
2.7a Half-Life (yr)

Einsteinium  
252Es  
0.5 Half-Life (yr)

a: Includes energy of fission fragments, neutrons, and gamma rays.

Health risk of Radon and other Internally deposited Alpha-emitters: National library of medicine  
NIH

Thank you in advance for your consideration. In cooperation,

4/19/23

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2. No WIPP Expansion. No permit Extension. No PITTS. No Triggers. No Plutonium shipments. No Pantex shipments. No Transuranic wastes shipments. No new "replacement panels".
3. Revoking the any Permit if waste volume is increased by Congress.
4. Add a condition to require a defined end date for waste disposal in 2024. WIPP is done in 2024.
5. Retain the requirement prioritizing New Mexico Waste. No PITTS. NO Triggers. No Transuranic waste.
6. Retain conditions that support an increase in reporting, transparency for the public, and increased public involvement.
7. Strengthen the requirement to site another repository in a state other than New Mexico; require progress and include consequences.
8. No changing the original mission statement. No Transuranic waste.
9. No shipments from South Carolina. No Pantex shipments. No Hanford shipments.
10. Third party Water monitoring, Aquifer monitoring and Air monitoring. Free community Health testing cancer testing and monitoring near affected communities.

Thank you in advance for your consideration. In cooperation,

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TABLE 7-1 Transuranium Nuclides of Potential Biological Significance

Element	Isotope	Half-Life (yr)	Mean $\alpha$ Energy (MeV)
Neptunium	237Np	2.1 $\times$ 10 <sup>6</sup>	4.7
Plutonium	238Pu	86	5.6
	239Pu	24,400	5.2
	240Pu	6,580	5.3
	241Pu	13	5.1
	242Pu	379,000	5.0
Americium	241 Am	458	5.6
	243Am	7,370	5.4
Curium	242Cm	0.45	6.0
	244Cm	17.6	5.9
Californium	252Cf	2.7	6.2 a
Einsteinium	252Es	0.5	6.7

a: Includes energy of fission fragments, neutrons, and gamma rays.

Health risk of Radon and other Internally deposited Alpha-emitters: National library of medicine NIH

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