

Barbara Chatterjee

Subject: Comment on WIPP Renewal Draft Permit and Request to speak at next hearing

As NMED weighs the experience we all have had with WIPP from its inception and 1999 opening, I add my voice to those who urging caution in changing the terms of WIPP operation.

Commitments were made to the people of New Mexico that 6.2 million ft³ maximum [i.e. possibly less] of Transuranic [TRU] contaminated materials would be placed at WIPP in properly packed drums for permanent storage from its opening until about 2024. Thereafter 10 years were allocated to finish packing and sealing the site for the next 10,000 years.

Now we have history with WIPP. The most troubling event occurred in February 2014 when improperly packed drums exploded within one of WIPP's panels [i.e.vaults], contaminating the area and workers. The result of this unacceptable error included 3 years of closure for cleanup, sections of WIPP made permanently unusable, and no assurance that Los Alamos National Lab [LANL] where the error was made had corrected oversight of its procedures so this or something similar could not occur again. Trust was broken. Our nation has some regrettable habits of going cheap and fast on infrastructure. That leads to incidents like this explosion followed by much hand-wringing, excuses that we could not have known the risk and similar. Furthermore, too often monies are allocated for cleanup that is delayed, or never done. We have other examples too at LANL and Kirtland AFB near Isleta Pueblo, where plumes of deadly contaminants are working their way toward or into water our aquifers. You, and we New Mexicans, DO know the risks.

Against this background, I applaud the NMED's current effort, along with the recent enactment of SB53, to place the safety of New Mexicans first. Please include these conditions in the new permit:

- Guard against and take into account any compromise of the WIPP area geology. Increased oil and gas extraction and other industrial activity and a larger population are now much closer to the project. Furthermore, experience with earthquakes and similar side effects from fracking procedures used in some extraction threatens to destabilize the area geology, a key factor in originally choosing the WIPP site.
- Limit the transport of any plutonium in powdered form within NM to the extent of NMED authority. If unavoidable, assure that it is fully enclosed and sealed in non-breachable form and containers to prevent worker and public exposure or contamination.
- Require annual issuance of public reports that demonstrate new, permanent nuclear waste storage sites are being planned, evaluated and built in other states.
- Continue reinforcing the highest performance standards in packing, labeling, transporting and sealing TRU into storage on WIPP operators and all parties sending materials to the site, so that NMED can hold them responsible and accountable.
- Maintain clearly identified date limits to keep WIPP operation within the boundaries of the original commitments made to our state. If the project must be extended beyond these dates to add materials plus 10 years to seal and close, assure that specific date deadlines are set.

You have the support of persons like myself, to establish firmer controls on the handling of nuclear waste in our state and to receive more resources to do your work. Thank you for considering these

concerns in your deliberations. Please put me on the speakers list for the upcoming permit hearing.

Barbara F. Chatterjee

Tel. 1-505-820-7587 [Landline, No text]

Alta Vista Street, Santa Fe, NM 87505

Email: barbaracnm@aol.com

Date: April 19, 2023

To: New Mexico Environment Department [NMED]—Mr. Ricardo Maestas and Staff

Subject: Comment on **WIPP Renewal Draft Permit** and **Request** to speak at next hearing

As NMED weighs the experience we all have had with WIPP from its inception and 1999 opening, I add my voice to those who urging caution in changing the terms of WIPP operation.

Commitments were made to the people of New Mexico that 6.2 million ft³ maximum [i.e. possibly less] of Transuranic [TRU] contaminated materials would be placed at WIPP in **properly packed drums for permanent storage** from its opening until about 2024. Thereafter 10 years were allocated to finish packing and sealing the site for the next 10,000 years.

Now we have history with WIPP. The most troubling event occurred in February 2014 when improperly packed drums exploded within one of WIPP's panels [i.e.vaults], contaminating the area and workers. The result of this **unacceptable error** included 3 years of closure for cleanup, sections of WIPP made permanently unusable, **and no assurance that Los Alamos National Lab [LANL]** where the error was made had corrected oversight of its procedures so this or something similar could not occur again. **Trust was broken.** Our nation has some regrettable habits of going cheap and fast on infrastructure. That leads to incidents like this explosion followed by much hand-wringing, excuses that we could not have known the risk and similar. Furthermore, too often monies are allocated for cleanup that is delayed, or never done. We have other examples too at LANL and Kirtland AFB near Isleta Pueblo, where plumes of deadly contaminants are working their way toward or into water our aquifers. You, and we New Mexicans, DO know the risks.

Against this background, I applaud the NMED's current effort, along with the recent enactment of SB53, to place the safety of New Mexicans first. Please include these conditions in the new permit:

- **Guard against** and take into account any **compromise of the WIPP area geology**. Increased oil and gas extraction and other industrial activity and a larger population are now much closer to the project. Furthermore, experience with earthquakes and similar side effects from fracking procedures used in some extraction threatens to destabilize the area geology, a key factor in originally choosing the WIPP site.
- **Limit** the transport of any **plutonium in powdered form** within NM to the extent of NMED authority. If unavoidable, assure that it is fully enclosed and sealed in non-breachable form and containers to prevent worker and public exposure or contamination.
- **Require** annual issuance of **public reports that demonstrate new, permanent nuclear waste storage sites** are being planned, evaluated and built in other states.
- **Continue reinforcing the highest performance standards** in packing, labeling, transporting and sealing TRU into storage on WIPP operators and all parties sending materials to the site, so that NMED can hold them responsible and accountable.
- **Maintain clearly identified date limits** to keep WIPP operation within the boundaries of the original commitments made to our state. If the project must be extended beyond these dates to add materials plus 10 years to seal and close, assure that specific date deadlines are set.

You have the support of persons like myself, to establish firmer controls on the handling of nuclear waste in our state and to receive more resources to do your work. Thank you for considering these concerns in your deliberations. Please put me on the speakers list for the upcoming permit hearing.

With best regards

Barbara Chatterjee