



June 3, 2024

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Re: Comments on the Waste Isolation Pilot Plant (WIPP) facility Proposed Class 2 Permit Modification Request (PMR) for the addition of Four New Shielded Containers and to Revise Site Certification Audit Scheduling from Annual to a Graded Approach

Dear Ms. McLean

Nuclear Watch New Mexico appreciates the opportunity to provide comments on the WIPP Proposed Class 2 PMR for the addition of Four New Shielded Containers and to Revise Site Certification Audit Scheduling from Annual to a Graded Approach.

The mission of Nuclear Watch New Mexico is to promote safety and environmental protection at nuclear facilities; mission diversification away from nuclear weapons programs; greater accountability and cleanup in the nation-wide nuclear weapons complex; and consistent U.S. leadership toward a world free of nuclear weapons.

The purpose and need of the proposed new containers must be explained with more detail. This PMR must clearly state why the proposed new containers are needed. The PMR states, "The changes described in this PMR are needed to add four new shielded containers to the Permit to support and continue the management of RH TRU mixed waste as CH TRU mixed waste at the WIPP facility." This does NOT answer the question of why the proposed new containers are needed.

The PMR must explain if more, or less, room will be needed for operations at WIPP to dispose of the maximum volume of waste by using the proposed new containers. The PMR must explain if more, or less, time will be needed for operations at WIPP to dispose of the maximum volume of waste by using the proposed new containers. The PMR must explain how the new containers will affect the overall shipping schedule of waste to WIPP.

This PMR must state how the proposed new containers will be safer than the existing container. Have there been any improvements in shielded container technology since the design of the original shielded container?

This PMR must state how the proposed new containers will affect the budget. Is there a cost savings for using the proposed new containers? If so, how much?

The need to *Revise Site Recertification Audit Scheduling from Annual to Graded Approach* must be explained with more detail. This PMR must clearly state why the proposed audit scheduling changes are needed. The PMR states, “This modification is needed to add graded approach-based criteria (consistent with DOE documents) for scheduling small quantity generator/storage site recertification audits.” This statement does NOT answer the question of why the proposed audit scheduling changes are needed.

This PMR must state how the proposed audit scheduling changes will affect the budget. Is there a cost savings for using the proposed new containers? If so, how much?

Thank you for your careful consideration of our comments. Should you have any questions and want any more information, please feel free to contact Scott Kovac at [scott@nukewatch.org](mailto:scott@nukewatch.org)

Sincerely,

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