Sandia National Laboratories

Operated for the United States Department of Energy
by National Technology & Engineering
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June 22, 2026

Mr. JohnDavid Nance, Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Bldg. 1
Santa Fe, New Mexico 87505

Dear Mr. Nance:

Subject: ***Comments: Agency-Initiated Permit Modification (AIM) for Waste Isolation Pilot Plant (WIPP) EPA ID NM4890139088-TSDF***

National Technology & Engineering Solutions of Sandia, LLC (NTESS) respectfully submits the attached comments on the above-captioned modification to the WIPP Hazardous Waste Facility Permit (Permit) proposed by the New Mexico Environment Department. The proposed AIM is designed to prioritize the emplacement of legacy transuranic (TRU) waste from Los Alamos National Laboratory; this will be detrimental to management of TRU and mixed TRU (MTRU) wastes at Sandia National Laboratories/New Mexico (SNL/NM). The effects are described in the enclosed comments.

NTESS opposes the proposed AIM, requests that it be rescinded, and requests a public hearing.

If you have any questions concerning the attached comments, please contact J. Ben Martinez at (505) 845-7448 or (505) 263-0076.

Sincerely,

Enclosure 1:
Comments Related to the Agency-Initiated Modification of WIPP Hazardous Waste Facility Permit, National Technology and Engineering Solutions of Sandia, LLC

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Enclosure 1
Comments Related to the Agency-Initiated Modification of
WIPP Hazardous Waste Facility Permit
National Technology and Engineering Solutions of Sandia, LLC

Sandia National Laboratories (SNL) is a multi-mission laboratory managed and operated by National Technology & Engineering Solutions of Sandia, LLC, (NTESS), a wholly owned subsidiary of Honeywell International Inc. for the United States (U.S.) Department of Energy (DOE).

NTESS is a small quantity generator of transuranic (TRU) and mixed TRU (MTRU) waste at Sandia National Laboratories/New Mexico (SNL/NM). Shipments of waste to WIPP occur on an as-needed schedule and may include legacy TRU and MTRU waste. Future shipments are anticipated every one (1) to three (3) years, depending on testing schedules, storage, characterization, containerization, and shipping requirements.

NTESS opposes the New Mexico Environment Department's (NMED) Agency Initiated Modification draft WIPP Hazardous Waste Facility Permit (Permit) and a public hearing is requested. NTESS requests that the AIM/draft Permit be rescinded.

Definition of Legacy and Projected Wastes

SNL/NM TRU and MTRU wastes include both legacy waste and projected waste under the proposed definitions (Part 1, Sections 1.5.23 and 1.5.24). SNL/NM also has TRU and MTRU wastes that do not fit in either category as defined (e.g., packaged or unpackaged wastes from ongoing activities and programs). The proposed definitions do not clearly address existing waste from ongoing programs or decontamination and demolition (D&D) activities; this is a significant gap.

Effect of Prioritizing LANL Legacy Waste Shipment and Emplacement

The proposed change in WIPP priorities (Part 4, Section 4.2.1.4) to focus on LANL legacy waste would cause delays in shipment of TRU and MTRU wastes from SNL. The severity of the delays would depend on the overall amount of waste shipped to and emplaced at WIPP to accommodate the mandatory 55% receipt of LANL legacy waste plus waste from other facilities.

SNL/NM currently has sufficient storage capacity for TRU and MTRU wastes (legacy, ongoing, and projected) considering the current WIPP schedule. Future SNL/NM activities (including D&D of aging buildings) could generate projected wastes that could exceed the current SNL/NM storage capacity. The focus on LANL legacy waste will likely delay SNL/NM shipments of TRU and MTRU wastes to WIPP, which will likely result in a delay of SNL/NM projects.

TRU and MTRU wastes at SNL/NM are stored in a manner that is protective of human health and the environment. However, SNL/NM is located near New Mexico's largest metropolitan area, which could lead to concerns about extended storage of TRU and MTRU wastes at SNL/NM.

Enclosure 1
Comments Related to the Agency-Initiated Modification of
WIPP Hazardous Waste Facility Permit
National Technology and Engineering Solutions of Sandia, LLC

Effect of Prioritizing Legacy Waste Shipment and Emplacement

The proposed change in WIPP priorities (Part 4, Section 4.2.1.5) to focus on legacy waste would require NTESS to prioritize shipment of legacy wastes over shipment of projected wastes from ongoing and future projects and D&D activities. This would have two main impacts:

- The SNL/NM inventory of legacy TRU and MTRU wastes is not large, but the imposed requirement for extended storage (due to focus on shipment and emplacement of LANL legacy wastes) will reduce future SNL/NM storage capacity for all TRU and MTRU wastes and will likely cause delays in activities as described in the previous item.
- TRU and MTRU wastes from ongoing activities would have a much lower priority for disposal at WIPP, regardless of waste volume. Ongoing and projected wastes would be stored at SNL/NM for extended periods, and future activities (including activities important to verifying the reliability of the nation's nuclear weapons) would likely be delayed due to lack of waste storage capacity.

Effect of Extended TRU and MTRU Waste Storage at SNL/NM

It is not possible to quantify the additional storage capacity needed at SNL/NM, as it would depend on the duration of the time that WIPP is unable to accommodate shipments of waste from small quantity generators such as NTESS.