

Lawrence Livermore National Security (Robert Fischer)

Attached are comments from Lawrence Livermore National Security regarding the proposed NMED Agency Initiated Modification.

LLNS Comments on the NMED Agency Initiated Permit Modification of the WIPP Hazardous Waste Facility Permit

Lawrence Livermore National Security, LLC, the management and operating contractor of Lawrence Livermore National Laboratory (LLNL) respectfully opposes the permit action and requests a hearing pursuant to 20.4.1.901 NMAC. Our review indicates that NMED's proposed constraints on transuranic (TRU) waste shipment allocations to WIPP could create significant long-term operational and compliance challenges for LLNL. While immediate impacts appear limited, a sustained and prolonged reduction in LLNL's ability to ship waste would necessarily result in increased accumulation of TRU and mixed TRU waste onsite.

Current estimates suggest that storage capacity issues could arise within approximately 3 to 5 years.

In summary, the impacts of reduced TRU waste shipment allocations at WIPP are expected to be gradual but consequential as onsite TRU and mixed TRU waste inventories increase. Even if immediate compliance impacts appear limited, continued accumulation over several years could constrain storage capacity, reduce operational flexibility, and disrupt major DOE mission-related activities at LLNL.

LLNL-MI-2020587