Stop Wasting New Mexico

The Department Of Energy (DOE) has plans to ship more radioactive waste to New Mexico, where we have done our share to start the nuclear age and have the scars to prove it. But three of seven sites under consideration in new plans for disposal of nuclear power plant waste and disused radioactive sealed sources used in medical treatments and other applications are in New Mexico. This includes the possibility of adding it to the inventory of waste headed for WIPP outside Carlsbad. A second site near WIPP is also on the list of possible locations, as well as Los Alamos National Laboratory.

New Mexicans and people in other states can again say no to DOE's proposals for commercial radioactive waste disposal. While it's frustrating to once again have to say what has been repeated, now is the time to do so. We can stop wasting NM!

The waste in question is referred to as Greater-than-Class C (GTCC) low-level radioactive waste (LLRW), which is technically categorized as "low level," but is sufficiently dangerous that federal rules call for burying it underground. The notion to dispose of GTCC includes seven different sites and four different methods. This equals over 25 different options - None of them are good. With all these alternatives, DOE does not have a preferred alternative. WIPP is the only site considered for a deep geologic repository.

New Mexico Recommendations

- Do not send GTCC to DOE sites. Nation-wide, DOE sites are still facing 100's of billions of dollars and decades worth of cleanup from the Cold War.
- Finish the original mission at WIPP.
    - Safely operate WIPP to meet the "start clean, stay clean" standard
    - Meet commitments to clean up about 20 DOE nuclear weapons sites
    - Safely close, decontaminate, and decommission the WIPP site, beginning in about 2030 or earlier.
- Commercial wastes must be stored safely at the power plants for the decades that they operate and longer. The GTCC EIS document should consider Hardened On-Site Storage to improve safeguards for the wastes. DOE rejected that advice, saying that it is only considering disposal, not storage.
- Examine a second repository. The legal requirement for another repository exists, yet the alternative of putting the GTCC waste into that repository is not even mentioned.
- Decisions now about disposal sites and technologies are premature. There is time to learn from experience.
    - At least 85 percent of existing reactors and any new ones are expected to operate beyond 2030, which means GTCC waste disposal could not begin for years after that.

No Time To Waste at Los Alamos

Estimates for cleanup of Cold War legacy radioactive contamination at Los Alamos National Laboratory (LANL) range from $2 to $30+ billion. This wide range has to do with the type of cleanup that the State approves for the Lab, which range from "cap-and-cover" to exhumation. A legally binding agreement requires DOE and LANL to investigate and clean up decades worth of contamination across the lab's 40-square-mile property by 2015. Signed in 2005, the Consent Order lays out cleanup milestones and requires the federal government to pay fines if LANL fails to meet them. The Lab must focus on this cleanup and not bring any more waste, including Greater-than-Class C (GTCC), to the Lab.

The largest cleanup site (Where the Lab's preferred option is to leave the waste in place) at LANL is at TA-54, which is where DOE is considering disposing of the GTCC waste. The options at LANL include: intermediate-depth borehole disposal, enhanced near-surface trench disposal, and above-grade vault disposal. Required acreage is 110 acres, 50 acres, and 60 acres respectively. In order to have enough acreage to evaluate the alternatives, a GTCC "reference location" at LANL is composed of three areas within Technical Area 54 (TA-54) and TA-51, on Mesita del Buey. The reference location was selected primarily for evaluation purposes for this EIS. The actual location would be identified on the basis of follow-on evaluations if and when it is decided to locate a land disposal facility at LANL.

Shipment of all GTCC waste to LANL is estimated at 12,600 truckloads involving a total distance of 22 million miles. The estimated peak annual doses from the use of contaminated water within 10,000 years of disposal of GTCC at LANL were calculated to occur between 500 years and 1,100 years. These times represent the time after failure of the cover and engineered barriers (which is assumed to begin 500 years after closure of the disposal facility).

Los Alamos Recommendations

- The location of the Lab in a seismic fault zone between a rift and a dormant volcano is not the place for radioactive waste that is dangerous for tens of thousands of years.
- Sending GTCC waste to LANL would go against its current mission of cleanup and footprint reduction.
- Heed the American Indian Text
    - Pueblo people believe that :
        - Plant roots will eventually penetrate the GTCC facility.
        - There is a need for a cultural mineral assessment and study to identify the existence of minerals of cultural significance and use.
        - Groundwater is being contaminated by LANL.

More information can be found at: *www.gtcceis.anl.gov* *[April 26, 2011]*