

Mr. Ricardo Maestas
New Mexico Environment Department
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Santa Fe, NM 87505
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RE: WIPP "Volume Reduction" PMR

Dear Mr. Maestas:

I strongly oppose the "Volume Reduction" Permit Modification Request (PMR) that the Waste Isolation Pilot Plant (WIPP) permittees submitted on January 31, 2018, according to the public notice.

What the request calls a "clarification" is actually a very substantial change in the Permit that would "reduce" the amount of waste in WIPP by 26,362 cubic meters! The effect would be to immediately increase WIPP's capacity by that amount. The capacity increase would become greater as more waste is emplaced.

Such a major change is unacceptable, and the PMR should be denied.

Alternatively, NMED must determine that the request must follow class 3 modification procedures because there is significant public concern from me and many other New Mexicans.

The Department of Energy (DOE) for years has told not only New Mexicans, but Congress, that the waste volume at WIPP is measured by the size of the outer container. That is the way waste volume has been measured for decades. Because DOE has "lost" more than 30,000 cubic meters of its permitted capacity, because of its inefficiencies and the radiation release in February 2014, it is running out of room.

So DOE wants to expand the underground panels and the amount of waste that is allowed. I reject and oppose that request.

WIPP has failed to fulfill its "Start Clean, Stay Clean" mission. NMED should not allow such an expansion and unjustified and unneeded change in the Permit.

Thank you for your consideration.

Sincerely,