



## Your Comments Sought In LANL Request to Increase Hazardous and Radioactive Waste Storage Limits

Los Alamos National Laboratory (LANL) is proposing to increase the storage of hazardous and radioactive waste to support continued mission operations. Your comments are being sought for a proposed hazardous waste Permit Modification Request (PMR) to store more mixed transuranic (TRU) waste at Tech Area-55. The PMR proposes to add three hazardous waste storage units – one outside and two inside of Plutonium Facility-4. The reason given was because TRU waste shipments from LANL are not expected to resume until September 2017. And it was stated that the number of shipments available to LANL would not meet projected generation rates until the new ventilation is completed at WIPP, which is currently forecasted for 2020. Projected waste shipment estimates are much less than historic practices at WIPP because that facility is struggling to reopen fully. With the TA-55 current inventory and projected waste generation rate of one shipment per week, it will take years to dispose LANL's TRU and mixed transuranic (MTRU) waste inventory.

A large number of the TRU waste inventory at TA-55 includes Pipe Overpack Containers (POCs) containing combustibles that exceed new limits. According to the new criteria, updated in July 2016, POCs containing combustible material above the new limits are not accepted at WIPP. Apparently, new testing on the POC "integrity" led to this ban. There were 300 of these non-compliant, combustible POCs sitting around waiting to be re-packaged. This was half of this type of container that is in inventory at TA-55. And LANL did not want to move the non-compliant POCs down to their new TRU waste storage, TA-63, because that would be "ineffective." So LANL plans to store, at its nuclear bomb component production facility, containers with combustibles that are too dangerous to ship to WIPP, a 2100-foot deep geological repository.

It is claimed that the addition of the three proposed units would result in an only a 2% increase in the Facility's storage capacity. By "Facility" they mean all of LANL's 38 square miles and dozens of Tech Areas. This is an important distinction, because a more than 25% increase in stored waste requires a Class 3 PMR, which requires much more public participation. When compared to just the waste storage capacity of TA-55, the proposed additional increase is more like 60%. (Total LANL regulated storage capacity = 5.1 million gallons. TA-55 = 159,000 gal. Proposed additional request = 94,500 gal.) This is the "Facility" vs. "facility" argument before, but the codes are vague enough in this area.

A Class 3 request requires a public comment period, as well as an opportunity to request a public hearing and judicial review of the final decision. A public hearing is necessary because of the age of the Plutonium Facility, which was built more than 50 years ago; and the on-going public health concerns about the inadequate ventilation system for containing respirable particles of plutonium in emergency situations, among other issues.

Concerned Citizens for Nuclear Safety (CCNS) has prepared a sample public comment letter for you to use to the Environment Department to urge them to determine that the proposed permit modification is a Class 3, requiring more opportunities for public participation. [www.nuclearactive.org](http://www.nuclearactive.org)

The question DOE has not answered is why does LANL continue to generate hazardous, toxic and radioactive waste associated with manufacture of plutonium triggers for nuclear weapons.

The Permit Modification Request is here.  
<http://permalink.lanl.gov/object/tr?what=info:lanl-repo/epr/ESHID-602143-01>

To read more:

*Los Alamos National Laboratory's Hazardous Waste Backlog May Take Years To Unload*, LA Daily Post, by Roger Snodgrass, March 12, 2017  
<http://www.ladailypost.com/content/los-alamos-national-laboratory%E2%80%99s-hazardous-waste-backlog-may-take-years-unload>

*LANL seeks permission to store more nuclear waste on-site*  
Santa Fe New Mexican, Saturday, March 11, 2017, By Rebecca Moss  
[http://www.santafenewmexican.com/news/local\\_news/lanl-seeks-permission-to-store-more-nuclear-waste-on-site/article\\_169f3934-21a2-5ede-9d21-cfd2946e2bdb.html](http://www.santafenewmexican.com/news/local_news/lanl-seeks-permission-to-store-more-nuclear-waste-on-site/article_169f3934-21a2-5ede-9d21-cfd2946e2bdb.html)

Comments are due April 5, 2017 at 5pm.

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