



SOUTHWEST RESEARCH AND INFORMATION CENTER

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January 2, 2018

Todd Shrader
WIPP Site Manager
Carlsbad, NM

VIA EMAIL to: Todd Shrader todd.shrader@cbfo.doe.gov and
WIPP.EA@WIPP.ws

RE: Draft Environmental Assessment - EA-2064: ABOVE GROUND STORAGE
CAPABILITY PROJECT AT THE WASTE ISOLATION PILOT

Dear Todd and others,

Southwest Research and Information Center (SRIC) requests an extension of the public comment period for at least two weeks or until at least two weeks after missing references are made available.

A fundamental purpose of the National Environmental Policy Act (NEPA) is:

“NEPA procedures must insure that environmental information is available to public officials and citizens before decisions are made and before actions are taken. The information must be of high quality. Accurate scientific analysis, expert agency comments, and public scrutiny are essential to implementing NEPA.” 40 CFR §1500.1(b).

Furthermore,

“No material may be incorporated by reference unless it is reasonably available for inspection by potentially interested persons within the time allowed for comment.” 40 CFR §1502.21.

While that reference requirement is specific to environmental impact statements, references that are not available to the public are fundamentally contrary to the purposes of NEPA, including regarding environmental assessments (EAs).

The draft EA states:

“The Waste Isolation Pilot Plant Above Ground Storage Capability (AGSC) Project Preliminary Documented Safety Analysis (416-500655-BD-SE-00305) provides an assessment of hazards associated with normal, abnormal, and accident conditions involving handling and disposal operations with CH TRU mixed waste and RH TRU mixed waste in shielded containers.” at 3-18.

Clearly, that draft Documented Safety Analysis is a fundamental reference for the draft EA, and it is essential that the document be available for public review during the comment period for the draft EA. However, the document is not posted on the WIPP website. The document is not found through a google search.

The draft EA states:

“A recent geotechnical investigation was performed at WIPP for a proposed filter building due east of the proposed above ground storage facility location. Several geotechnical tests were performed and the general conclusion was there are no soil constraints (e.g., expansive soils) that would preclude the development of the new filter building. The report did recommend the removal of surficial dune sand and soils to the Mescalero Caliche to support foundations (Golder Associates, 2016). The same assumptions would be applied to the above ground storage facility location.” at 3-8.

Integral to the adequacy and safety of the proposed Surface Storage pad is its foundation and the ability of the soil at that site to fully support the pad. Thus, it is essential that the Golder report reference be available for public review during the comment period for the draft EA. However, the document is not posted on the WIPP website. The document is not found through a google search.

SRIC urges that the two missing, essential references be made available immediately. In the meantime, the public comment period should be extended for at least two weeks.

SRIC will provide further comments on the draft EA, but full comments requires the availability of the two missing references.

Thank you very much for your careful consideration of, and your response to, this request. Please advise me of your actions in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Don Hancock". The signature is written in a cursive style with a large initial "D".

Don Hancock