



SOUTHWEST RESEARCH AND INFORMATION CENTER

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December 7, 2020

Reinhard Knerr

DOE Carlsbad Field Office Manager

Via email: Reinhard.Knerr@cbfo.doe.gov

RE: WIPP 700-C fan restart

Dear Mr. Knerr:

Southwest Research and Information Center (SRIC) is providing initial questions to be answered during the town hall tomorrow. We are continuing to review the existing documents and will have additional questions. We also expect that presentation slides or other materials used in the Tuesday town hall will be available in advance of the meeting.

Because of public interest, SRIC requests another interactive public meeting with more advance notice and more materials detailing the restart plan before the 4-hour test occurs.

The previous town hall format may accommodate people in the room, but it did not provide adequate time for questions and follow up to those that were online. We look forward to more interaction at tomorrow's town hall and subsequent meetings. We appreciate that you are considering how to improve stakeholder communications and involvement and welcome opportunities to participate and provide suggestions.

Initial questions regarding the December 4, 2020 documents at: <https://wipp.energy.gov/700c-restart.asp>

1. Why the delay in releasing documents that were dated months ago? The CRESP report is dated May 28, 2020. The NWP white paper and rationale are dated August 2018. The Rick Fuentes letter is undated but is presumably from an even earlier time when restart of both 700-B and C fans was being considered.

2. Why the fundamental change in how to provide underground ventilation? The September 30, 2014 WIPP Recovery Plan was predicated on preventing further radiation releases by not using the 700 fans and restoring ventilation through a three-phase process of interim ventilation, supplemental ventilation, and permanent ventilation. The first two phases are operating, but the permanent system, now called SSCVS, will not meet the Fiscal Year 2021 operational date. Why the SSCVS has failed is not discussed in the documents, nor its revised schedule and costs. The fundamental change to disperse, not contain, contamination is not justified.

3. What are the criteria for which the test is evaluated to “pass” or “fail”? We see no clear discussion of what such criteria are and what specific evaluation process will be used for the resulting data. How such data will be made publicly available is not discussed.
4. Where is the documentation about the structural and maintenance status of the 700-C fan, what structural issues will be evaluated during the tests, and what are the budget and costs of the restart and two years of operations of the 700-C fan?
5. Where is the documentation about what additional amount of airflow is provided in excess of the existing IVS system and what specific accomplishments will be achieved as a result of that additional airflow by the end of FY 21? What documentation would be made available during the expected two years of the restart to evaluate the actual accomplishments?
6. What amount of reduced chemical exposure to underground workers will be achieved? The rationale does not include the range of chemical exposures received by underground workers in Fiscal Year 2020 and the expected amount to be received by underground workers when the 700-C fan operates. How will the actual worker exposures be measured and data publicly available?
7. How will air monitoring be publicly available? The fact sheet states that CEMRC will continue its normal air monitoring activities during the restart, which SRIC supports. However, CEMRC has not posted its 2018 and 2019 Annual Reports, nor any recent air monitoring data. How will the DOE and CEMRC monitoring data before, during, and after the restart be made available in a timely manner?
8. When will the Radiological Monitoring Plan (RMP) be publicly available?
9. When and where will the following reference from the White Paper be publicly available? Archer, J., Sanchez, R., Strait, A., Underground Flow Measurement and Particle Release Test, Revision 0, December 1998.

Thank you very much for your careful consideration of, and your response to, these comments.

Sincerely,



Don Hancock