



"Tony Price on Site at Yucca Flats" ©Elliott McDowell 2017, Thanks!

***Will Otero County Become The Nation's High Level
Nuclear Waste Dump?***

The Department of Energy's Deep Borehole Project
A Test, or a Radioactive Trojan Horse?

We have a narrow window of opportunity to stop nuclear proliferation in our back yard. Let's take positive action to stop the nuclear waste disposal project before the cancer spreads into Otero County. Make your opposition loud and clear.

Say NO to the DOE Borehole !

Otero County Deep Borehole Test – A Test or a Trojan Horse?

Opinions by Walt Coffman, 1014 NM Hwy 24, Weed, NM 88354, February 8, 2017

Summary

The “test” project is almost certainly a prelude to a nuclear waste dump. The project will impact County roads, emergency services, air quality, aquifers, land fill, etc. Benefits are minimal. The likely eventual nuclear waste dump will devastate the County. In other Counties the Department of Energy (DOE) has taken a Board of County Commissioners (BOCC) supporting ordinance as local “consensus” to proceed. In Quay County (NM) it turns out that while the BOCC endorsed the project, the people did not. The Quay BOCC will revisit the issue. **I suggest that the DOE project not receive Otero BOCC endorsement, and in fact that the BOCC express disapproval (“no support”), based on DOE history, available information, and the numerous uncertainties. The Commission at the same time should reaffirm its support of private property rights.** This BOCC “no support” memo is necessary. DOE's deceptive use of the word “consent” (see below) makes resident's protest irrelevant to them. The BOCC should step up. Private citizens should be encouraged to express their concerns to the BOCC. The BOCC should ask DOE for a definition of “consent” and ask to see how “consent” will be measured in the affected communities.

The County Commission should also explore ways to maintain control should DOE decide to bring nuclear waste to the County over local objections.

Project Background and Outline

We must recognize what is driving this project. The Deep Borehole Test project was born out of the need to dispose of radioactive waste. It is not about pure science or geothermal energy. Waste includes highly radioactive spent fuel rods from nuclear power plants as well as waste from bomb making. The nuclear power industry generates about 2,300 tons of used fuel per year with no permanent disposal available. We have 80,000+ tons sitting in “temporary” storage at power plants. In addition, bomb making has generated huge quantities of hazardous and radioactive waste. Again, with no permanent disposal (although WIPP is used for some waste types). Places like Hanford, WA, Savannah River Site, GA and Los Alamos threaten the environment from radioactive “leaks”. There are 100+ million gallons of hazardous liquid waste alone from government bomb projects. Other government radioactive waste is measured in the thousands of tons.

Yucca Mountain Nuclear Waste Repository (which started in 1987) was to be “the” national disposal site. But politics killed it in 2011. The Government Accountability Office stated that the 2011 closure was **for political**, not technical or safety reasons. Note that “political” factors set the location, just as they would in Otero County. No one wants the waste in their backyard, especially the States with the nuclear power plants.

Meanwhile the waste piles up and up. DOE signed agreements to dispose of power plant nuclear waste. They did not honor those agreements. Lawsuits against the DOE took off in 2004. Settlements are reaching 5 - 6 billion dollars each year. The amounts are staggering. These suits are concerned with nuclear waste disposal. DOE has demonstrated that they will not honor contracts. DOE whistle blowers have been fired for reporting corruption (Goggle it). DOE corruption combined with poor contractor performance is wide spread in the agency operations. For example; New Mexico's Environment Department fined Los Alamos National Laboratories \$36.6 million in early December 2014, finding it had violated two dozen rules and regulations. Governor Martinez hand-delivered the notice of the fine to Energy Secretary Ernest J. Moniz. The DOE response? In January 2015 the DOE asserted that the state lacks legal jurisdiction to issue the fine. Note that they did not deny the violations. Should we trust an agreement signed by the Department of Energy?

The County Memorandum Of Agreement with the DOE is likely to be worthless based on DOE past performance and the example set by the massive on-going litigation. DOE has demonstrated indifference to contracts and arguably to the rule of law. The County must find another approach to insuring resident's safety and to maintain control by the County.

What is the site selection process, is it fair? The Deep Borehole Test project is all about disposal of radioactive waste. That is its focus. After the political failures at Yucca Mountain, the nuclear power States resistance to disposal in their backyard, and the recent rebellion in rural Pierce County, ND (where locals feared the Borehole project would result in a nuclear waste dump) the DOE revised the site selection process. DOE wants to attract rural communities and lure them into becoming a disposal site. This DOE scheme is called “Consent Based Siting”. This is disingenuous, as the so called “consent” is not defined and can mean anything DOE wants. In fact DOE itself recognizes the pretense, **“Essentially, if a community does not have the option to demonstrate non-consent, then the true consent cannot be achieved.”** - Melissa Bates (Nuclear Fuel Storage and Transportation Planning Project, 9/15/16). The DOE “Consent Based Siting” grand statement: “We want to engage in a process that allows us to work collaboratively with the public, particularly with communities, with tribes, with state governments, to get to the point where we have willing and informed host communities that stepped forward and agreed to host the necessary facilities.” **NOTE: DOE “Necessary facilities” would include a Deep Borehole nuclear waste disposal site.**

DOE states: “The Department has initiated a process to obtain public feedback to help design a “consent” based process. **The process will be used to site future nuclear waste facilities - which could include a deep borehole.** The consent-based process will be transparent, phased and adaptive.”

The Borehole “Test” site selection is obviously a precursor to later radioactive waste disposal. Rural America has been selected as a dump for the urban nuclear waste. Look at Yucca Mountain. Look at the site selection criteria and look where the waste is presently stored. Borehole disposal could be accomplished at the reactor or waste storage location. This would minimize handling and transportation costs, and risks to the public. Yet only rural areas are under consideration for a “test” hole. DOE has stated that there is proper geology over much of the USA, including where reactors and waste are located. Why then is the so called “test” being pushed in the rural West? Why rural Otero County? The DOE site selection criteria weights rural locations disproportionately (by a factor of 10x). The heavy weighting of rural areas is strange (unless the true intention is a nuclear dump in the “sticks”). The only explanation given by DOE is fear of annoying area residents. If this is a one time test, annoyance should be a minor factor, not a central one. Many places exist with proper geology and with good, existing infrastructure. Why a remote site without this infrastructure, unless future expansion is planned? States with nuclear waste from power plants include IL, OH, IN, MI, TN, FL, NC, SC, VA, GA and so on. All of which have suitable geology for a “test” borehole. Could it be that those States would not be willing to host a waste dump, while Otero County might be hoodwinked?

A U.S. Nuclear Waste Technical Review Board report dated January 2016 states that the “test” results will likely only apply to Otero County. If the results are “good” then we will be “it”. I quote the USNWTRB: “The DOE approach does not fully take account of the potential heterogeneity of the subsurface environment and the complex set of interactions and feedbacks among the engineering activities related to drilling the borehole and the conditions of the natural geologic system at depth, **nor does it fully consider how data from the potentially complex system at one site can be applied to another site.** Thus, even if the DOE assumptions are confirmed during the Deep Borehole Field Test, DOE runs the risk that information later found to be necessary to support its evaluation of the feasibility of the deep borehole disposal concept at other sites will not have been obtained during the test.”

What happens if Otero County is perfect for nuclear waste disposal? DOE expects to spend around thirty million dollars (\$30,000,000) to “test” holes in Otero County. These holes are three miles deep. DOE claims the project will be to test technology, but they will also discover if Eastern Otero County is suitable to store nuclear waste. If Otero County is found suitable, a demonstration well field, perhaps in a nearby location, complete with radioactive waste, is the next logical step. During the Alamogordo City Commission Meeting last week DOE's TerranearPMC (TPMC) presented information about the project. The TPMC geologist

(Peter Gram) stated (I Quote) (at 35:35 in the recording):

" . . . *if you are going to use this site in the far future for disposal* . ." Disposal in the "far" future?

“Doing the drilling and research for a disposal system just means that if the "tests" are successful, they have exactly one tested, ready to go site-HERE.” (thanks SD for this quote). Who really thinks DOE will put 30 million into a hole and just walk away? Anyone who doesn't see that after this "test" is successful the next step is a nuclear waste dump here in Otero County has their head in the (radioactive) sand. Should this “test” morph into nuclear waste disposal the County will quickly be overrun by Santa Fe and Washington, D.C. politics. Control will pass to the politicians and not the County.

Recall that DOE has the power of eminent domain should areas around the “test” site prove perfect for a national nuclear waste disposal site. Recall their history of dishonoring contracts.

More risks, little benefits, who manages? This project is an experiment. The whole of Otero County, land and residents, is the experiment. A report from Sandia National Laboratories (2011) states: ***“Although relatively simple in concept, actual implementation of deep borehole disposal requires assessment of many specific elements of the disposal system and has yet to be done or attempted.”***

The U.S. Nuclear Waste Technical Review Board recommended improvements in the DOE drilling plan: ***“Independent expert review-The Board recommends that DOE ensure the drilling program design and implementation are reviewed by experts with extensive experience in drilling and down-hole operations (e.g., logging, testing, well completion) and in designing and operating equipment for handling highly radioactive material. These experts should be independent of the Deep Borehole Field Test contractor and of the lead national laboratory on the project, and should be able to monitor the progress of the project and report on it to the Secretary of Energy.”***

DOE refused their recommendations.

Besides the risks from a future DOE radioactive dump, and their ongoing disingenuousness, there are real, up front risks associated with the drilling and maintaining multiple three mile deep holes (thus the recommendations listed above). Holes that are 8 – 17 inches in diameter and reach the crystalline base rock have risks. This drilling into the earth's crust is an experiment. Holes this size and deep are rare. We can not know what consequences there may be. DOE does not know, no one knows. These holes are not water wells nor are they oil wells. This is new, different, and experimental. An experiment that potentially affects the entire County. There are many known risks. Examples of well blowouts, lost drill strings and aquifer damage are common. Unlikely scenarios must be considered. The “unlikely” events still may result in major harm to Otero County. The site is close to old faults. If earth quakes start in five years who will have responsibility? What independent State oversight will there be? What County oversight? Who can shut down this project if risks to the County become too great? Who can shut down this project if risks to local residents become too great? What communication mechanism is there to alert the County and local residents of problems?

Drilling a hole this deep, even on private property, can cross over into a public health and safety crisis in seconds. The County Commission and State must not abrogate their responsibilities, waiting for hours or months to step in. Who will have responsibility and accountability? . . . DOE?

In the event of an “accident” the losers will be here in Otero County, not Los Alamos or Washington, D.C.. Otero County is at risk from this project. The BOCC must take a stand against it by a taking a public “no support” stance. This stance would not prevent the private property owner from leasing his land nor prevent DOE from drilling on his land.