

RECEIVED

May 20, 2000

Steve Zappe
NMED
Hazardous and Radioactive Materials Bureau
2044A Galisteo St.
Santa Fe, NM 87505

Dear Steve,

First let me say that I really appreciated and enjoyed the convivial atmosphere in the Hilton, the fruit I believe of the continual working together of the key players in this struggle between concerned citizens and the people representing the DOE, most of whom are basically really nice people...and it is in that same spirit of conviviality that I write, with only the one proviso that it is an enjoyable surface for an extraordinarily grave subject, with monstrous consequences if we do not follow the most strict precautions and even then, we can't foresee what could happen. You of course are aware of this.

What was not discussed at this meeting was the Class I modification that was apparently agreed to with no public input, allowing the DOE to put waste approved under the permit in the same rooms with waste self-regulated by the DOE. This condition was considered very critical to protect public health by the Hearing Officer and the NMED, but now the NMED has approved it. In my experience with the DOE, and with Los Alamos, it has appeared that they are not capable of self-regulation. But just as importantly, that the public process was bypassed to effect this serious lowering of the standards of safety is cause for grave concern.

COMMENTS ON PROPOSED CLASS 2 MODIFICATIONS TO THE HAZARDOUS WASTE FACILITY PERMIT

1. Changes in determining how many waste containers must be opened for visual examination.

It seems only obvious that reducing the number of drums to be examined increases the likelihood of prohibited materials being disposed of at WIPP. As it is, Don Hancock found drums ready to be shipped that were not allowable under the permit. As a taxpayer, I prefer that my money goes to increased security of already existing waste rather than to the making of more.

2. No sampling for VOCs in the headspace of containers if information about the waste generating process shows that the waste doesn't contain VOC-related hazardous wastes.



I am informed that there is not enough information in the records that accurately determines the amount of VOCs in the waste. Therefore this modification should not be allowed.

It is truly frightening to realize in what callous disregard the citizens are held by the DOE, as observed by the early mining procedures on Indian lands, the plutonium experiments, the tests in Socorro with depleted uranium, the plan to drive the waste through the center of Santa Fe, the inadequate scientific study determining WIPP to be "safe", despite the Karst topography, the drilling and the chance of earthquake. Now the effort to lower the standards further to allow waste to be buried more quickly and more cheaply seems the height of foolhardiness. Not only because speeding up the process increases the chances for human error, or outright corruption, but the number of dangerous waste shipments would increase, statistically increasing the chance of a catastrophic accident on the road. I have understood that the Trupac containers have not been adequately tested for all contingencies.

As Don Brayfield said at the meeting, we are counting on you to maintain the highest standards at WIPP.

Sincerely,
Shelley Buonaiuto

A handwritten signature in cursive script, reading "Shelley Buonaiuto". The signature is written in black ink and is positioned below the typed name.