

June 20, 2000



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RECEIVED

505-737-5099

Dear Mr. Zappe and whomever;

I do hope that this is being submitted in a timely manner since, as I got it, June 25-6 is the deadline, this was the date printed on the announcement for the Santa Fe meeting which I attended, but other mailings seem to have an earlier date.

I plan to include <sup>2 pages of</sup> my original hand written comments about that meeting.

The proposed alternate method for groundwater testing is not acceptable to my standards of science. Because gross alpha, beta and gamma will hopefully provide the full spectrum of radioactive toxins. Much of what this waste will emit is daughter type elementals. The nitric acid, deturium, radioiodine, et al; there are hundreds whose names mix radio and chemical waste components, uranium oxide, uranium hexiflourine and plutonium dioxide, to name a few, will all add to the brew.

Of course I think the ground water needs to be tested for tritium, perhaps you too have noticed it tends to pop up in ground water. Has any real complete full spectrum analysis of each waste stream so that everyone is completely sure that it does not contain low level tritium, cobalt 60, ruthenium and other long lived radionuclides? How many samples per hundred are analyzed to this extent? Will waste with any low level contamination be disqualified from shipment to WIPP? It was totally annoying the way DCE\*WID disrespect life and health.

Anyway I thought there was drinking water type aquifers there, too which would not be high saline around the Pecos? stock tanks

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I feel that DOE claiming they have no good way to test for gross radioactivity in saline waters is basically their way of avoiding protection for their own workers and the communities around WIPP. Yes they can and should develop better methodology.

I also oppose the proposed modification to headspace gas sampling requirements for any types of waste at this point. Even if DOE can prove it has generally good acceptable knowledge about some waste streams, there are others which are nebulous. All acceptable knowledge is fuzzy regarding exact amounts and types of hazardous waste, especially those in gaseous form which are being generated in the containers. There are many older waste streams with no good or acceptable knowledge and at no time should waste acceptance criteria be let down. DOE is not the one who should determine how good their acceptable knowledge is. It must be proven for each and every batch. The waste now being produced in cleanup at other facilities under the supervision of open oversight might qualify for the homogenous solids sampling proposal, but remember how many homes in Grand Junction were contaminated with complete lack of acceptable knowledge. For now there is not enough evidence that such knowledge is accurate and it will take a lot of sampling of a lot of streams in the beginning, end and middle to prove any probable reason to believe.

Those sentiments are doubled regarding the need for frequent visual examination and frequent opening of random containers in all waste streams. Ideally there would be a big air tight room with a device to open and carefully spill the content of each drum onto a conveyor belt which could take it through a thorough chemical, metallic, material, radiologic and other appropriate analysis.

As it is, the ability to accurately characterize waste radiographically depends on the proper functioning of the radiography machine. Too often these machines have been used on low resolution or other less than fully operative conditions which pass for functional to the observer. Visual examination is an important cross check to an historically shoddy system. The overwhelming number of possible metallic, liquid, gaseous, elemental forms of hazardous and toxic (deadly) materials is outstanding.

I too think it unfair for workers at shipper sights to be exposed to dangerously high levels of haz mat of any variety. Better, cleaner, safer methods of sampling and examining must be researched and developed. Long overdue technology in this age of having our state's first haz mat waste pit smouldering in LANL. With the present primitive methods of sampling it is too dangerous, so better methods can be developed. A conveyor belt with lots of glove boxes or something? I think the whole messy procedure should be shutdown until better methods for visual examination are in place. When terrible dangerous stuff is found in a drum, are those others nearest it also subject to scrutiny? In most all LANL waste, each drum should be opened for visual examination. I've cited <sup>here</sup> Len Trimmer's pleading log #167, and any comments he will hopefully contribute to this process.

I completely agree with M. Card on the subject of the CLASS 1 MODIFICATION IN QUESTION. Hopefully this decision can be reversed and all revisions which substantially alter the functional interpretation of regulations be open for debate in the future.

Yours in peace,

*Bonnie Bonneau*

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Dear Mr ZAPPE.

I have sat through many long sessions with the G-men carrying concealed weapons, AND KNEW IT -

But last night i felt truly threatened by your friend Ritchie. He kept making hand motions of pulling his gun, twitching and too creepy. It is unfair to have the public threatened and intimidated but still, it has always been an underlying environment of these gatherings

During the hearings Mr KRYSZAL made menacing glares throughout the process & i thought people had guns there too. Is this true? (Perhaps they also make the deadlines intentionally confusing and mail out more modifications already.)

Bob Kehlman fell out in convulsive laughter when a citizen asked if the trucks will be required to obey the speed limit! Is this a sign of malfeasance?

Because nmed does not concern it self with the whole environment of this treachery, not the ceilings, not the transport, not the <sup>NUKES or</sup> workers, and everything is delegated to some other agency, no one is ready to take the responsibility for the entire mess. But there does need to be a responsible party and how can they laugh off public safety on our highways? Yours here,  
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