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**Comments on Proposed Class 2 Modification to
Hazardous Waste Facility Permit for WIPP**

**To: Mr. Steve Zappe
N M E D**

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Thank you for having the public meeting. I had just returned to the area and caught a letter to the editor in the Reporter, later I met people who felt they should have known to go to the meeting, but didnt know about it. Was there enough media 'advertizing' to inform the public?

I assume the vendor of the new DR/CT technology is pressing for action. The agenda of the DOE, WIPP, and the generator sites seems transparent too-they must be putting pressure to set up the situation whereby the waste can be characterized at WIPP instead of the generator sites.

This improved technology DR/CT seems like it would bring about a pragmatic reality that would mean less exacting, less lawful, less safe management of the waste -because the waste would be brought to WIPP -where the brunt of the characterizing would take place -instead of getting it right at the generator sites. VE is what the public can trust and to lessen its use doesnt sit well.

What are the chances that much waste that arrives at WIPP would be sent back? Wouldnt pragmatic reality mean some re-packaging and making things work out



but not much sending back to generator sites because of the added exposure to drivers, etc?

The pressure to dispose of the waste that needs to get sent -everything everywhere -threatens to outweigh the safety rules. There are reputable professionals/scientist who say that WIPP cannot contain its radioactivity at all. So, better not change the rules in this pragmatic situation we are dealing with if there is any possibility of actual abuse- due to the pressure of "once its there -figure out a way to keep it there" kind of pressure.

In any case the need for VE does not go away. Certainly the meeting showed that PCB's could fall through the cracks more often without routine VE. The idea brought out in this meeting with the public -that research into robotic technology for making VE safer should be looked into seriously before investing in RT/CT.. *Please Look at this idea.*

Perhaps RT/CT technology can get to the point that it could be used at each generator site and/or through improved-robotic technology, VE could be used much, much more often. If the driving force is really for more accuracy and double checking -for more safety surely these will be the kind of goals we will begin to see- not just a premature permit change, to go with this vendor.

The public with its vested interest of safety in the environment - cannot help but worry that pragmatism will cause slip shod use of RTR, paper work and the ever decreasing use of VE to characterize the Waste. Much more dependence on a improved -robotic- VE and RT/CT at the generator sites, robotic VE at WIPP to discourage mistakes would inspire more public trust.

