

Subject: WIPP mods

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From: Penny McMullen <pmsl@osogrande.com>

To: Steve Zappe <steve_zappe@nmenv.state.nm.us>

CC: Joni Arends <jarends@earthlink.net>, Don Hancock <sricon@earthlink.net>



Dear Mr. Zappe:

Here are my comments on the three DOE modification requests for the current comment period.

Regarding increasing the temporary surface storage space:

I am opposed to this because I do not believe that any waste should be stored at the surface regardless of length of time. The original design was to have the trucks unload the Trupact containers in rooms with air locks so the containers could be unloaded safely. This is not being done because of design mistakes. The mistakes should be fixed and the original plan should be implemented so that there would be no need to store waste at the surface.

Regarding consolidation of container description:

I see no problem with this.

Regarding the drum age criteria modifications:

This request should be denied. NMED recommended in their March 26, 2002, letter that DOE resubmit their DAC mods as a class 3 modification "due to its complex technical nature." A class 3 request would require a public hearing, thus giving citizens who are potentially at risk a greater chance to learn and comment about the proposed changes.

Specifically, I am not convinced that the sites can obtain the required information necessary to determine appropriate DACs. DOE proposes three sampling scenarios, but I think there are more.

DOE explained at the Jan. 11, 2001, meeting that the purpose for this request is to hurry up the process for moving waste from INEEL. Since WIPP is considered to be a permanent waste disposal site and the waste is being transported through many local communities, safety and not speed should be the top priority. Any mistake leading to contamination would affect generations to come. We must take the time to do it right.

Thank you,

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