

Mr. Steve Zappe
New Mexico Environment Department
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Dear Mr. Zappe:

I am writing to strongly oppose the Class 3 Modification to the WIPP Permit because it greatly endangers public health and the environment.

I request that NMED deny the modification because:

1. The mission of WIPP has always prohibited the opening of waste drums. That prohibition was an integral part of the WIPP permit to prevent contamination of the entire facility. That prohibition must be maintained to protect public health and the environment.
2. DOE's justification for the modification is that their "economic assumptions" were wrong so it can now save money by opening drums at WIPP. That justification is invalid as it does not meet the legal requirement to protect public health and the environment. Further, the modification request provides no actual economic analysis necessary to support the justification. Moreover that justification is hypocritical given the dramatic increases in funding for nuclear weapons programs (which will generate more waste) and cuts to cleanup and NMED DOE oversight in this state.
3. Full waste characterization and "confirmation" must be done at the generator/storage sites to ensure that prohibited items are not shipped to WIPP. NMED should not approve any request to change that fundamental principle of the permit. The modification also states that NMED's audit and surveillance program at storage sites would eventually cease. Given DOE's notorious environmental track record such audits are necessary and must be maintained.
4. Expanding the waste storage area by 33 percent and extending the storage time to one year is inappropriate and unnecessary. Such storage increases the danger of accidents and releases of waste at WIPP. The waste can be safely stored at other DOE sites.
5. I am concerned that DOE will become habituated to periodically changing WIPP's mission. This can be a dangerous precedent in the event that the Yucca Mountain repository is rejected for disposal of high level waste.

Please deny the modification!

Thank you,

Jay Coghlan
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