

05 June 2002
RECEIVED
To: Steve Zappe
NM Environmental Dept

From: Dr James Vernon Lewis
Vice President NM Citizens for
Clean Air and Water
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Albuquerque, NM
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Subject: Comments on modification
requests submitted to NMED on 28 June 2002

I approve of the 7 modification
requests submitted to NMED on
28 June 2002 and listed below.

On June 28, 2002, DOE submitted the following permit modification requests to the New Mexico Environment Department (NMED):

WHY:

1. **Improving Data Management to Streamline the Disposal of Transuranic Waste**, which would allow sites the option of electronic review, validation, and verification to manage and approve characterization information.
2. **Characterizing Repackaged Homogenous Solids as Retrievably Stored Waste**, would clarify certain permit provisions to allow generator sites to better manage their waste characterization and confirmation programs.
3. **Use of Radiography for Newly Generated Waste**, which requests approval for the use of radiography to confirm repackaged waste in lieu of visual examination. This would provide the same information currently obtained using visual examination, while increasing the safety of employees involved in the process.
4. **Addition of HalfPACT Shipping Container**, which would allow WIPP to receive shipments in the HalfPACT shipping container, thus reducing the total number of shipments to the facility. In November 2000, the Nuclear Regulatory Commission approved the HalfPACT as a type B shipping container.
5. **Addition of a New Hazardous Waste Number**, which would allow WIPP to handle, store, and dispose of certain transuranic debris waste from the Idaho National Engineering and Environmental Laboratory.
6. **Record Keeping and Auditing for Classified Information**, seeks approval for the safe storage of waste information involving classified information. This modification proposes that records deemed classified for national security reasons be stored at a facility capable of securing the information rather than at WIPP.
7. **Addition of New Waste Containers**, would allow the use of direct-loaded Ten-Drum Overpacks and direct-loaded 85-gallon drums and 100-gallon drums. Some larger debris waste exceeds the capacity of a 55-gallon drum. The additional waste containers would aid sites in packaging waste for shipment to WIPP. The addition of the containers would not require any changes to waste handling practices currently employed at WIPP.

Items 1 and 5 have been submitted requesting that NMED determine the appropriate classification, with a recommendation that the permit modification requests be processed as Class 2. The remaining items were submitted as Class 2 permit modification requests.



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