Comments on Proposed Class 2 Modification
7-Part Package (Submitted June 28, 2002)
To the Hazardous Waste Facility Permit
For the U.S. Department of Energy's Waste Isolation Pilot Plant

Over the years since WIPP was first discussed, I have attended and observed many hearings. In addition, I have visited the WIPP site two times. In my judgment, things are going well. I attended the hearing in Santa Fe to see what is being proposed. Unfortunately, I could only attend discussions on 1) Classified Information, 2) Adding U-134 and a portion of 3) Data Management.

As a general comment, I would have liked to see more quantitative information. Examples would be: 1) Proposed cost reductions; 2) Reduction in manpower; 3) Amount of paper reduction; 4) Drums of waste in proposed new plan. With some thought, I could come up with other examples. In addition, a statement about the risk of the proposed change and general statements about the rewards.
In the discussion on U134 it was mentioned that the change would affect about 1000 drums. This would have bounded the impact on waste.

In data management, the idea of prequalifying the instrument, operator, and calibration sounds much better than checking out a paper trail after the analysis is conducted.

Keep up the good work

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