

**Subject:** class 2 mods  
**From:** Penny McMullen <pmsl@osogrande.com>  
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**To:** Steve Zappe <steve\_zappe@nmenv.state.nm.us>



Sisters of Loretto  
324 Sanchez St.  
Santa Fe, NM 87505

Sept. 24, 2002

NMED Environment Dept.  
2905 Rodeo Park Drive East, Building 1  
Santa Fe, NM 87505



Dear Mr. Zappe:

These are my comments for the Sisters of Loretto regarding the seven class 2 proposed modifications for WIPP. My comments will be brief because of my tight schedule this year. In summary, I oppose all seven modifications because each is incomplete and most should be classified as class 3.

1. Data Management: I thought that NMED had determined that this modification should be classified as a class 3. The "brief description" of proposed changes uses over 60 pages to describe - that alone indicates that this is not a class 2. The DOE fact sheet admits that this modification would be "extensive" and "affects many portions of the Waste Analysis Plan." Since about 20,000 documents pertaining to Triassic Park were lost using "data management," we are not at this time convinced that it is adequate. It also might be easier for data to be falsified with an electronic system. A class 3 determination would make this request go through a more rigorous process.

2 & 3. Control Charting and Radiography: These are so complicated, interrelated and connected to the drum age criteria, which was class 3, so they should also be class 3. I thought that radiography was recommended to be a class 3 by NMED when the first attempt as a class 2 was withdrawn. Is DOE still relying on the 8-drum test, which is not a statistically significant sample? Does the resubmission adequately answer all of NMED's 29 points listed in their Technical Adequacy Comments?

4 & 5. HalfPACT and U134: Proposal incomplete, with changes conflicting with unchanged parts.

6. Classified Information: This constitutes a fundamental change in waste characterization and auditing. According to current law, nothing is supposed to be classified at WIPP, so this proposal changes WIPP's mission. This is obviously a class 3 mod.

7. New Containers: This would require new waste handling practices at WIPP and therefore should be class 3. For example, leaking containers could not be overpacked because they are too large, and WIPP isn't equipped to do patching.

Thank you for your consideration of these issues.

Sincerely,  
Penelope McMullen, SL

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