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RECEIVED MAY 2003 Hazardous Waste Bureau

Dear Mr Zappe,

NMED must strictly regulate the WIPP to protect public health and safety. I oppose continuing efforts of the DOE to change procedures in the WIPP permit to reduce existing regulatory requirements especially related to waste characterization. Therefore, I urge NMED to deny the modification requests for LANL sealed sources and DAC for 85- and 100-gallon drums and direct loaded ten-drum overpacks.

Neither modification request is complete and accurate, as required by regulations. Neither request is properly a class 2 modification. By eliminating headspace gas sampling for sealed sources, a basic characterization requirement of the permit would be dramatically changed, without the required public hearing. In addition, many of the sealed sources are not defense waste and cannot legally be disposed at WIPP. Yet the modification includes no adequate safeguards, nor NMED monitoring procedures to prevent such wastes from coming to WIPP.

The DAC for 55-gallon drums and standard waste boxes was modified only after class 3 procedures, including a

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public hearing, were used. The same public participation procedures must be used for larger containers. An adequate request must include experiments with actual large containers and proof that characterization equipment and procedures designed for 55-gallon drums produce accurate results for those larger containers. This waste remains radioactive for half a million years. There is a potential for hydrogen gas to build-up in the containers which contain the waste. Because this increases the potential for hydrogen gas explosions, please deny the modification requests for LANL sealed sources and the DAC for larger containers.

Thank you for your consideration.

Cindy Hong
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