



1891 Green Forest Drive  
North Augusta, SC 29841  
January 23, 2004

Mr. Steve Zappe  
New Mexico Environment Department  
Hazardous Waste Bureau  
2905 Rodeo Park Drive East, Building 1  
Santa Fe, New Mexico 87505



Re: Proposed Change to the Waste Isolation Pilot Plant (WIPP) Permit by the New Mexico Environment Department (NMED)

Dear Mr. Zappe:

I wish to comment on the subject proposal as a 44-year resident of the state of South Carolina and after a 36-year career as a scientist at the Savannah River Site.

Such a change, as proposed by the NMED, to the operating permit for WIPP has nothing positive going for it. I can only believe that the state of New Mexico has made a unilateral decision to slow or even prohibit transuranic (TRU) waste from coming to WIPP. I also believe that the state of New Mexico is being highly uncooperative regarding a facility that belongs to every taxpaying citizen of the United States, although it happens to reside in the state of New Mexico and is permitted to operate by an arm of that state.

My comments, including a discussion of the negatives that are, apparently, a non-concern of the state of New Mexico in making this proposal, follow.

- a. The state of New Mexico has given no technical basis for making the permit change. If some change were necessary to better protect the human health of NM citizens and their environment, that change should be made. However, the change, as proposed, appears to be only one of bookkeeping with no substantive basis for reducing risk from WIPP. What the state of New Mexico is doing is increasing the risk to those of us living near weapons complex sites of the US Department of Energy (DOE).
- b. There are already sufficient safeguards in the WIPP Waste Acceptance Criteria (WAC) for any potential TRU waste that did not appear in the Baseline Inventory Report (BIR) as it existed on October 27, 1999. The Permit and its addenda, as they now stand, shall remain most protective no matter what new TRU waste might be produced and might come to WIPP if the WAC allow. I cite, as excellent examples of such waste, those that shall be coming from the proposed Mixed Oxide Facility and the proposed Modern Pit Facility.
- c. The state of New Mexico is being very myopic to make the WIPP facility limiting to only those wastes appearing in the BIR. WIPP has already proven to be a safe and

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secure national repository and has proven invaluable in allowing the Rocky Flats Plant to be closed according to schedule. Why should the US taxpayers, New Mexicans included, have to pay for another facility similar to WIPP if WIPP is not full according to its design basis?

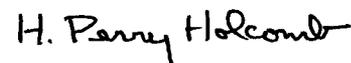
- d. This proposed change to the WIPP Permit by the state of New Mexico would adversely affect the current schedule for completing the Accelerated Cleanup Program for DOE Weapons Sites, including the one near me, the Savannah River Site. Prolonging or extending the current cleanup schedule will not only be more costly to all US taxpayers, but it will also continue to maintain the risks to residents near these DOE sites where TRU wastes remain in temporary storage.

As a very concerned citizen who lives 20 miles from the Savannah River Site boundary, I also request that the state of New Mexico hold a public hearing to hear comments, like those above, from all interested parties. In making this request, I speak not only for myself but for every US citizen who bears the same concerns as I.

Those so concerned need to have their voices heard in an open forum and need to hear further explanation by the state of New Mexico as to why this proposed permit change for WIPP is being made.

I submit to the state of New Mexico that their unstated reason for the proposed permit change is mostly political. If it is, then the state of New Mexico, as evidenced by its Environment Department, is being illiberal and self-seeking, especially with regard to the citizens that occupy the other 49 states of the Union.

Sincerely,



H. Perry Holcomb, Ph.D.

CC: The Honorable Spencer Abraham, Secretary, US Department of Energy  
The Honorable Robert G. Card, Under Secretary, US Department of Energy  
The Honorable Jesse Hill Roberson, Assistant Secretary, US Department of Energy  
The Honorable Bill Richardson, Governor of the State of New Mexico  
The Honorable Mark Sanford, Governor of the State of South Carolina  
Mr. Robert King, Deputy Commissioner, SCDHEC  
Mr. Jeff Allison, Manager, Savannah River Operations Office  
Mr. Bob Pedde, President, Westinghouse Savannah River Company  
Mr. Sam Kelly, President, BNFL Savannah River  
Mr. Charles E. Anderson, Deputy Manager, Savannah River Operations Office  
Ms. Alice C. Doswell, Assistant Manager, Savannah River Operations Office  
Mr. W. T. (Sonny) Goldston, SRS Solid Waste Planning & Technology