

2300 West Alameda Street, Unit D3
Santa Fe, New Mexico 87507
January 28, 2004

Mr. Steve Zappe
State of New Mexico Environment Department
Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303



RE: Public Notice No. 03-12

Dear Mr. Zappe:

I am in favor of the agency-initiated modification to the hazardous waste facility permit for the Waste Isolation Pilot Plant. (WIPP). WIPP by nearly all accounts is an experimental facility. It is the first of its kind. Failure to function as intended could have grave consequences for public health. Remediation of failure is very difficult, if not impossible, after closure. The facility needs to prove itself over a long period of time before any changes to its original approved list of materials is added to or altered.

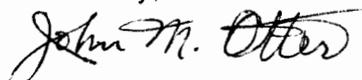
I am concerned that alterations would not be subject to as stringent analysis as the originally approved conditions with regard to public safety. The suspected alterations do not appear to include provision for such analysis. Without such analysis the safety of the facility could be degraded.

I am also concerned that the consideration of alterations of the basic sort such as stored materials will require great taxpayer expense to consider in an adequate manner. The proposed agency-initiated modification would assure that there is not a continual series of request to add to the original list of identified materials for storage, obviating the additional expenditures for consideration of those.

It has been obvious to me since before the initial approval of WIPP that the DOE would take every opportunity to try to seek to dispose of other types of waste by trying to include them in WIPP because of the difficulties in obtaining approval of other disposal sites. The proposed modification will save a lot of time and effort in the future.

I was a nuclear physics analyst for over 24 years.

Sincerely,


John M. Otter

040145

