



February 9, 2011

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

Subject: Proposed Class 2 permit modification to the Hazardous Waste Facility Permit for the Waste Isolation Pilot Plant (WIPP), Carlsbad, NM

Dear Mr. Zappe:

The Citizens' Advisory Panel (CAP) of the Oak Ridge Reservation Local Oversight Committee, Inc. (LOC) provides the following comments on the subject proposed Class 2 permit modification for WIPP. These comments have not been reviewed or endorsed by the LOC Board and should be attributed to the CAP only.

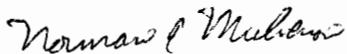
The CAP supports the four modifications proposed for the WIPP Hazardous Waste Facility Permit. As the transuranic (TRU) waste streams from the DOE complex are retrieved and processed, many are found to be atypical in their physical characteristics. In some cases, it may be much safer for site workers to dispose of them without significant additional manipulation, including size reduction, assuming that they otherwise meet WIPP's Waste Acceptance Criteria. This means that new shipping packages and disposal containers need to be approved. In cases where these are large or unwieldy, new equipment and storage areas may also be required.

The Oak Ridge Reservation has the largest inventory by curies of the remote-handled (RH) TRU waste in the DOE complex that is scheduled to be disposed of at WIPP. The site is currently attempting to determine how to best remediate the Molten Salt Reactor Experiment, which contains RH TRU fuel salts. If modifications to the WIPP permit are possible, this gives additional options to minimize exposure to our site workers. We hope that the New Mexico Environment Department will be flexible in approving such modifications that will enable more complete and safer disposal of some of DOE's most dangerous wastes.

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We appreciate the opportunity to comment on the proposed action. Should you have any questions, please contact the LOC office at 865-483-1333.

Sincerely,



Norman A. Mulvenon
Chair, LOC Citizens' Advisory Panel

cc: LOC Register
LOC Board
LOC CAP
Gerald Boyd, Manager, DOE ORO
John Eschenberg, Assistant Manager for EM, DOE ORO
John Owsley, Director, TDEC DOE-O
Pat Halsey, FFA Coordinator, DOE ORO
Jeff Crane, FFA Project Manager, EPA Region 4
Amy Fitzgerald, City of Oak Ridge
Ron Murphree, Chair, ORSSAB
Bobby St. John, WTS
Guy Wilson, MSRE Project Manager, BJC

The Oak Ridge Reservation Local Oversight Committee, Inc. (LOC) is a non-profit regional organization that reflects the interests of local communities regarding DOE's environmental management program and the operation of the Oak Ridge Reservation. The Board of Directors of the LOC is composed of the County Mayors/Executives of the seven counties surrounding or downstream of the Oak Ridge Reservation (representing over 600,000 residents), the Mayor of the City of Oak Ridge, the chair of the Oak Ridge Environmental Quality Advisory Board, and the chair of the LOC's Citizens' Advisory Panel (CAP). The CAP makes recommendations to the LOC board, the DOE, and state and federal regulators on technical and other matters of concern to local stakeholders.