

**From:** [Maestas, Ricardo, NMENV](#)  
**To:** [McLean, Megan, NMENV](#); [Biswell, David, NMENV](#); [Tellez, Hernesto, NMENV](#)  
**Subject:** FW: WIPP Draft Permit  
**Date:** Thursday, September 20, 2018 9:12:45 AM

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-----Original Message-----

From: Chris Fischahsø <[cfischahs@comcast.net](mailto:cfischahs@comcast.net)>  
Sent: Wednesday, September 19, 2018 8:17 PM  
To: Maestas, Ricardo, NMENV <[Ricardo.Maestas@state.nm.us](mailto:Ricardo.Maestas@state.nm.us)>  
Subject: WIPP Draft Permit

- > No, the requested volume change should not be approved.
- >
- > The outer container is the system, structure or component (SSC) which is safety credited to provide confinement of the radioactive hazards within the drum and/or pipe overpack container (POC). As such, the outer container and its volume is the final confinement protecting the public, workers and the environment from radioactive and other hazards.
- >
- > Overpacking is done because the inner container is suspect, damaged or leaking. Obviously, in a degraded condition, the volume of material in the inner container should not be used for determining the volume calculation for these containers as the inner container can not be safety credited to contain the radioactive hazard from release.
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- > Similarly, the effectiveness of POCs are based upon their proper assembly within an outer container. Without their packaging within an outer container, POCs are not safety credited to provide confinement of radioactive and other hazards. In other words, the outer container and its volume (again) is the final confinement protecting the public, workers and the environment.
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- > I do not support this request, and I urge that this change not be adopted.
- >
- > Respectfully submitted,
- > Christopher Fischahs
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