

ENTERED

208 Alta Vista Street
Santa Fe, New Mexico 87505
August 14, 1998

Robert S. Dimwiddie, Manager
NMED Hazardous and Radioactive Materials Bureau
RCRA Permits Management Program
2055 Galisteo, P.O. Box 26110
Santa Fe, New Mexico 87502

Dear Mr. Dimwiddie;

Because the Department of Energy's new waste sampling and analysis plan constitutes a very significant modification to their permit application for WIPP waste disposal, **please extend the public comment period.** Please characterize this new modification as constituting a fully-new permit application and implement all appropriate review steps and timelines so that the public may review and comment on the actual plans of the DOE and not some earlier version's non-applicable intentions. Please have the NMED issue a modified draft permit that contains the new plan.

Among the concerns brought to light by the existing WIPP permit are:

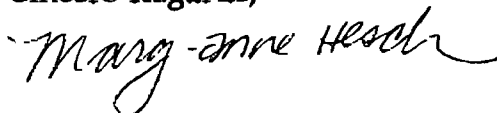
- The instability of panel 1 because of salt bed pressure. Because it was excavated well in advance of waste placement instead of immediately prior as was planned, I believe its instability makes it unsafe for workers.
- The incompleteness and inaccuracy of the DOE's records is insufficient to constitute "acceptable knowledge" of waste content. Physical analysis of all waste barrels is essential. This is not a trivial issue when safety for so many thousands of years is at stake.

Thank you for your work on the permit process, especially for:

- The RH-TRU exclusion. Please continue to insist on the highest standards for the DOE to study and document waste "behavior" and related safety before permitting it.
- Required NMED approval of out-of-state waste characterization.

Please retain the last two items in the final permit. Thank you.

Sincere Regards,



Margaret Anne Hesch

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