

February, 2006

Mr. James P. Bearzi
NMED Hazardous Waste Bureau
2905 Rodeo Park Drive, Building 1
Santa Fe, NM 87505

Dear Mr. Bearzi:

I strongly oppose major portions of the draft permit related to the Department of Energy (DOE) “monster” permit modification request for the Waste Isolation Pilot Plant (WIPP). I specifically ask that the New Mexico Environment Department (NMED) revise the draft permit to protect public health and the environment. I support the following changes:

- Maintain examination (characterization) of each waste container, as has been required for the past seven years. The hundreds of thousands of containers that DOE wants to ship to WIPP must be adequately examined – NMED should not allow just paperwork (acceptable knowledge), which can be highly unreliable, to be used to determine that the waste containers are acceptable at WIPP. DOE has still not presented the systematic analysis of the waste characterization activities and impacts of proposed changes that the National Academy of Sciences recommended in 2004.
- Prohibit remote-handled (RH) waste unless each container is repackaged and fully and carefully characterized at the generator site. Such waste is extremely dangerous, and poses extreme dangers to workers when it is handled at WIPP and to the public during transportation and surface storage at WIPP.
- Do not change the existing permit to allow additional surface storage capacity. The DOE proposal and the draft permit could lead to accidents and releases that would endanger the public. During the more than six years that WIPP has operated, there has been no showing that the current storage locations are not sufficient. There is no need to increase the storage capacity if all waste is fully and adequately characterized at the generator site, as required by the WIPP permit.

I do support the draft permit prohibition of waste confirmation at WIPP. Such “staging” would add a surface storage mission that is unnecessary and poses substantial dangers to public health and the environment.

NMED should also not rush through the permitting process, but rather it must fully incorporate the strong public opposition to the “monster mod” in its decisions.

As the only nuclear waste disposal facility of its kind in the world, WIPP will pose major health and environmental problems for thousands of generations. The NMED permit must continue to require adequate characterization procedures at the generator sites and stringent waste handling procedures at WIPP to protect public health and the environment and to ensure that WIPP operates as safely as possible.

Thank you for your careful consideration.