

**Subject: WIPP Permit Modifications**

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Comments on Proposed Class 2 Modifications to the Hazardous Waste Facility for the WIPP

The proposal for testing groundwater for specific nuclides should be approved. That way, the search for leakage from disposed waste will not be confused by naturally occurring radioactivity.

The proposal to use data for organic compounds that correspond to the type being analysed for also is appropriate.

The other proposals concern analysis for headspace gas, and decisions regarding whether radiography without opening of containers is sufficient. While we are not familiar with the details of these methods, we strongly endorse any changes that will make the acceptance process more efficient and less costly to the taxpayer. We point out that this waste has all been safely stored in Idaho without elaborate analysis. After it is underground and sealed off, it should continue to be safe.

John E. Tanner, Jr., Secretary,  
on behalf of Coalition 21

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