

**Subject: DAC class 2 permit mod comment**

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A Class 2 permit mod was the subject of a public meeting held in Santa Fe on January 11, 2001. The class 2 permit mod submittal proposed new drum aging criteria (DAC) that are generally beneficial to TRU waste generators' actual packaging configurations. However, for pipe over pack containers (POCs) it included only a worst case packaging configuration that requires headspace gas sampling directly from the POC instead of the headspace of the drum. This would cause unnecessary personnel exposure to neutrons when gas sampling POCs of sealed sources at Los Alamos National Lab (LANL).

Further, the DAC for the worst case POC configuration in the proposed permit mod would purportedly be very long. This will preclude shipment of any sealed sources until the DAC is completed. This would cause additional, unnecessary radiation exposure to LANL storage area personnel.

The LANL sealed source POC configuration is much simpler than the single, worst case considered in the proposed mod. The actual container configuration is much simpler. The sealed sources are placed directly in the POC with no layers of confinement. The sealed sources consist of actinides sealed in two metal jackets. Consequently, there won't even be any volatile organic compounds that emitted by this waste stream.

To avoid unnecessary radiation exposures and achieve ALARA, perhaps the permit mod should include options for:

1. sampling the headspace of the drum containing the POC, and
2. a much shorter DAC that corresponds to the much simpler POC configuration used by LANL and other TRU waste generators.

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