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Subject: class 3 mod

Date: Wed, 26 Sep 2001 11:40:22 -0600

From: Penny McMullen <pmsl@osogrande.com>

To: Steve Zappe <steve_zappe@nmenv.state.nm.us>

Dear Mr. Zappe:

The Sisters of Loretto in New Mexico strongly oppose the Class 3 Modification to the WIPP permit. We respectfully request that NMED deny this modification.

WIPP was opened with the promise that waste drums would never be opened there. This provision was a vital aspect because it is meant to prevent contamination of the WIPP facility. Bob Kehman testified Feb. 22, 1999, that "not opening the container, keeping the containers sealed, is a major strategy in our protection of human health and the environment." To change this provision is to drastically change WIPP's mission, and opens the door for citizen groups to sue to require compliance with the permit.

If both characterization and confirmation are not done at the generator site before shipping to WIPP, it is possible that prohibited items will be sent to WIPP and will have to be shipped back. This is not what we would call cost effective, and the extra shipping of prohibited items further endangers people and the environment along the route. Also, each site has its own specific history, so it is more accurate for each site to conduct its own confirmation.

Increasing the waste storage area by one-third and extending storage time would increase the danger of accidental releases at WIPP.

DOE's stated reason for requesting this modification is to save money, but they do not provide any economic analysis to support this assumption, for the public to review. The regulations are in place to protect public health, and that is the top priority, not saving money.

So please deny this modification, which greatly endangers public health and the environment. Thank you for your attention to this grave matter.

Sincerely,
Penelope McMullen
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