

Oak Ridge Environmental Justice Committee

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Mr. James P. Bearzi
NMED Hazardous Waste Bureau
2905 Rodeo Park Drive East, Bldg. 1
Santa Fe, N.M. 87505
Via email to: james.bearzi@state.nm.us

Dear Mr. Bearzi:

The Oak Ridge Environmental Justice Committee (OREJC) wishes to comment on the NMED Intent to Approve the Class III Modifications in the Permit for the Waste Isolation Pilot Plant Facility now under consideration (NM4890139088-TSDF). OREJC agrees that the approval is warranted for the following reasons:

1. The timely use of the WIPP facility is necessary for the safe and effective completion of several DOE site remediation programs including the program at the Oak Ridge Reservation (which creates suitable local repositories for many of its waste streams).
2. The safety and effectiveness of the WIPP site as a long term waste repository for many waste streams is vastly superior to any possible repository at sites that have exceedingly high water tables and rainfall such as Oak Ridge.
3. It is doubtful that after the extensive searching over several decades that a significantly better terrestrial site can be found within the USA
4. After years of study and open discussion, it is doubtful that any new long-term, significant weaknesses will be discovered.

OREJC concurs that the characterization of waste shipments should not be delayed until arrival at WIPP due to the ill-defined procedures for "failed" shipments.

OREJC is a small, open-membership committee dedicated to addressing any environmental problems related to the operation of the DOE Oak Ridge site. Do to its small size the committee attempts to address problems which fall between the scopes of the several other competent public participation groups or those problems which for some reason need another voice toward their resolution. Our scope is not limited to DOE and we are free to address 'sensitive' problems.

OREJC thanks NMED for the opportunity to comment on its licensing activities and hopes that WIPP will soon be fully operational.

Sincerely,

Alfred A. Brooks
Chair, OREJC