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PROPOSED RULE (51FR 22288) (11)

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The Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: 10CFR Part 60
Disposal of High Level Radioactive Wastes in
Geologic Repositories; Conforming Amendments
Proposed Rule

Dear Sir:

In the Federal Register Volume 51 No. 118 dated July 19, 1986 the Nuclear Regulatory Commission published for public comment the subject proposed rule. Duke Power Company submits the following comments for consideration by the Commission prior to finalizing this rule.

1. This proposal seems to imply that a currently stable geologic area will also be stable after deposition of the high-level radioactive waste. Since heat (generated by the deposited material), pressure, and time (in this case at least 1,000 years) are the variables associated with metamorphosis of rock formations, it seems an unlikely assumption that the rock formation will not change. Thus, original analysis of potential pathways of radionuclides may be inaccurate at some future time.
2. Provisions for groundwater monitoring and associated calculation of pollution risk seem vague. Extensive research must be completed before knowing the hydro-geology of an area and especially before knowing how radionuclides will be transported through that area over time. As depicted in the previously published NRC Technical Report entitled Radionuclide Migration in Ground Water, (NUREG/CR-4030), there remains much uncertainty in the area of radionuclides in groundwater.
3. The idea of multiple barriers, both engineered and natural (51FR22296), for the repository is an excellent protective measure.

Very truly yours,

Hal B. Tucker

H.B. Tucker
JSW/58/jgm

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WM Record File
105.3.1

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Acknowledged by card..... AUG 27 1986

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