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Mr. J. P. Hamric
Director, Nuclear Fuel Cycle
and Waste Management Division
U.S. Department of Energy
Idaho Operations Office
550 Second Street
Idaho Falls, Idaho 83401

Dear Mr. Hamric:

This is in reply to your letter of May 19, 1980, in which you requested comments on the U.S. Department of Energy (DOE) Program Strategy Reference Document for Airborne Waste Management, dated May 1980. Our comments are presented below.

1. In Section 2.3.6, Future Standards and Regulations, page 91, it should be noted that the proposed Procedural Rule for Disposal of High-Level Radioactive Wastes in Geologic Repositories was published for comment on December 6, 1979, and the Advanced Notice of Rulemaking was published on May 13, 1980.
2. The first sentence of the last paragraph on page 92, should be revised to read: "The current NRC position is (1) that the waste package shall be protected by the repository and shall contain the waste for at least 1000 years after decommissioning; and (2) that after the 1000 year containment period, the annual rate of release of radionuclides from the repository shall be as low as reasonably achievable but no more than 1×10^{-5} of the radionuclide inventory in the repository 1000 years after decommissioning."
3. The last sentence in the same paragraph should be revised to read: "The waste package is to be retrievable for 50 years after decommissioning."

Thank you for the opportunity to comment on this document.

Sincerely,

James C. Malero, Chief
High-Level Waste Licensing
Management Branch
Division of Waste Management

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