

D851210

Honorable Nunzio J. Palladino
Chairman
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Dr. Palladino:

Subject: ACRS COMMENTS ON 10 CFR PART 60, DEFINITION OF HIGH-LEVEL
WASTE

During its 307th meeting, November 7-9, 1985, the Advisory Committee on Reactor Safeguards met with the NRC Staff to review their report, SECY-85-309, "10 CFR Part 60--Definition of the Term 'High-Level Radioactive Wastes'--Advance Notice of Proposed Rulemaking," dated September 17, 1985. This matter was also one of the subjects of a combined meeting of our Subcommittees on Waste Management and Metal Components held on October 24-25, 1985. As a result of these reviews, we offer the following comments.

Overall, we are pleased with the progress being made on this matter. The NRC Staff has conscientiously considered and has incorporated, for the most part, the suggestions and recommendations made in our letter of January 15, 1985 to Mr. Dircks. In the way of additional suggestions, we would offer the following:

1. Although radionuclide concentration should be a primary basis for the classification of radioactive wastes into various categories, we believe that, in terms of the overall management of such wastes, consideration should also be given to the total volume and total curies to be disposed of at a single site.
2. Before the establishment of any new waste category is confirmed, we recommend that the NRC Staff assure itself that there is a sufficient amount of the specific waste being generated to warrant the special attention such an effort would require.

We trust these comments will be helpful.

Sincerely,

David A. Ward
Chairman

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