

ACRS-1123



UNITED STATES
NUCLEAR REGULATORY COMMISSION
ADVISORY COMMITTEE ON REACTOR SAFEGUARDS
WASHINGTON, D. C. 20555

March 13, 1985

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

Dear Dr. Palladino:

SUBJECT: ACRS COMMENTS ON PROPOSED AMENDMENTS TO 10 CFR 60, "DISPOSAL OF HIGH-LEVEL RADIOACTIVE WASTE IN GEOLOGIC REPOSITORIES"

During its 299th meeting, March 7-9, 1985, the Advisory Committee on Reactor Safeguards discussed the proposed amendments to the licensing procedures for 10 CFR Part 60, "Disposal of High-Level Radioactive Waste in Geologic Repositories." This subject was also discussed during the ACRS Waste Management Subcommittee meeting on February 15-16, 1985.

As a result of these discussions, we offer the following comments:

1. As presently written, the proposed amendments could be mistakenly interpreted to mean that the NRC does not plan to issue a Site Characterization Analysis (SCA). Since it is only the draft SCA that will not be issued, we recommend that the rule be rewritten to reduce the possibilities for such a misinterpretation.
2. The proposed rule, Paragraph 60.17, part (a)(3) (Page 2589, Reference 1), leaves open the question as to what restoration is required for a site which, although suitable, was not selected for use as a repository. This matter should be clarified. In addition, we believe that the phrase, "site restoration," would be a more accurate description to use than the phrase, "decontamination and decommissioning." Also, it would be helpful to note in this same paragraph that the site characterization guidance, as stated in the "Standard Format and Content of Site Characterization Plans" (Reference 2), still pertains.
3. In response to Commissioner Asselstine's "Additional Views" as contained in the Federal Register announcement (Page 2588, Reference 1), we offer these comments:
 - a. The NRC Commissioners have approved the guidelines prepared by the Department of Energy for the screening and selection of repository sites. Consequently, we believe that the NRC need monitor the application of the guidelines only. There is no need for the NRC to conduct an independent evaluation of the relative merits of the several sites.

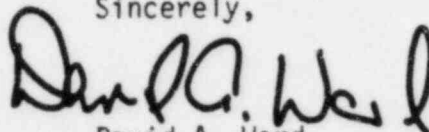
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- b. In view of the many existing opportunities for public input into the review process, we believe that issuance of an SCA in draft form is not necessary.

We trust these comments will be helpful to you and members of the NRC Staff.

Sincerely,



David A. Ward
Chairman

References:

1. U. S. Nuclear Regulatory Commission, 10 CFR Part 60, "Disposal of High-Level Radioactive Waste in Geologic Repositories: Amendments to Licensing Procedures," Federal Register, Vol. 50, No. 12, January 17, 1985, 2579-2590
2. U. S. Nuclear Regulatory Commission, Proposed Revision 1 to Regulatory Guide 4.17, "Standard Format and Content of Site Characterization Plans for High-Level Waste Geologic Repositories," dated February 1985