



STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION

STATE OFFICE BUILDING

HARTFORD, CONNECTICUT 06115



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November 27, 1978

Mr. Russell E. L. Stanford
Fuel Process Systems Standards Branch
Division of Engineering Standards
Office of Standards Development
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555



Dear Mr. Stanford:

This is in reply to your letter of November 2, 1978, regarding the proposed spent fuel storage regulation 10 CFR Part 72.

Members of the staff in our Radiation Control Unit have reviewed the document containing the proposed regulation which you sent to us.

In general the proposed regulation appears to be adequate to protect the public health and safety.

We would like to recommend, however, that Section 72.67 be revised downward to at least include the numerical guides that are used to meet the ALARA objectives for Light Water Reactors. A spent fuel storage installation at a reactor site must meet these numerical guides and it seems reasonable to apply them to all storage installations.

It is also suggested that Section 72.51b be revised to have the physical inventory coincide with the semi-annual Commission Material Status Reports.

We also feel that the regulation should contain specific requirements relating to financial protection and responsibility for public liability.

Sincerely,

Stanley J. Pac
Stanley J. Pac
Commissioner

SJP/mm

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