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PO Box 2210

Seabrook, NH 03874

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Secretary of the Commission
U.S Nuclear Regulatory Commission
Washington D.C. 20555-0001

OF

AD

Attn: Rulemakings and Adjudication Staff
Re: Interim Storage of GTCC Waste

I wish to go on record as supporting this change. The evidence is clear that GTCC waste stored in this fashion poses no greater threat to public health and safety than the interim storage of spent fuel. This change will, in the interim, resolve the problem of GTCC waste at decommissioning facilities.

I must however also state that I believe NRC guidance is inconsistent with respect to ALARA and the segregation of GTCC waste from shutdown reactors. Decommissioning facilities expend significant personnel radiation dose segregating small quantities of GTCC material from reactor internals when this material would be better off left in place and blended (or averaged) with the lower activity material surrounding it and encapsulated. Clearly encapsulated reactor internals within a sealed reactor vessel pose no threat to the public when disposed of as low-level waste provided that the package when averaged does not exceed class "C". Therefore I contend that for the NRC to require utilities to segregate small quantities of GTCC from reactor internals expends excessive dose and is not ALARA. I believe that additional rulemaking and/or guidance is necessary on the blending of reactor internals GTCC waste with the reactor vessel and non-GTCC internals to reduce worker dose. If collectively, 50 rem is accrued segregating GTCC waste from a decommissioning reactor, what projected collective dose to the public is offset by not blending the GTCC waste with the reactor and internals as a unit for low-level waste burial? We would probably be hard pressed to project >1% of this dose to the public resulting from this scenario. How does ALARA factor into this scenario, yet this is what we do? We should learn from the decommissioning experience at Yankee Rowe, Connecticut Yankee, and Trojan and do the right thing with this perceived GTCC hazard.

Thank you for your time in this matter

Sincerely
William E. Cox

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