



M. S. Tuckman
Executive Vice President
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August 17, 2000

Mr. David L. Meyer, Chief
Rules and Directives Branch
Division of Administrative Services
Office of Administration
Mail Stop T-6 D59
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Comments on Petition For Rulemaking 10CFR72 and 150
Docket Number PRM-72-2
65FR37712, dated June 16, 2000

Dear Mr. Meyer:

Duke Energy offers the attached comments relative to the solicitation for public comments regarding the Petition For Rulemaking pursuant to 10CFR 72 and 150, "Interim Storage For Greater Than Class C Waste," Docket Number PRM-72-2, as published in the June 16, 2000 Federal Register.

Please address any questions to Jeff Thomas at (704) 382-5826.

Thank you for the opportunity to provide these comments.

Very truly yours,

M. S. Tuckman

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**Interim Storage For Greater Than Class C Waste
Petition For Rulemaking
Docket PRM-72-2
Duke Comments**

It is desirable that Greater Than Class C Waste (GTCCW) be authorized for storage in ISFSI facilities. However, it is also important that waste generators and Low Level Waste (LLW) disposal facilities, as authorized by NRC or Agreement States, have the flexibility to manage this waste using any other method determined to be in the best interest of public safety. In the past, GTCCW has been approved for disposal at licensed LLW disposal facilities on a case by case basis. This practice should be allowed to continue.

Duke Power recommends a rule that provides flexibility in determining the best way to manage greater than Class C waste.

U. S. Nuclear Regulatory Commission

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