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Date: Tue, Aug 29, 2000 8:15 PM
Subject: Comments on NRC Proposed Rule for Interim Storage for GTCCWaste

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In regard to the Federal Register (FR) Vol. 65, No. 117, dated Friday, June 16, 2000, in which notice of a Proposed Rule for Interim Storage for Greater Than Class C Waste was published, PGE, the petitioner, states its support for the proposed rule. PGE recognizes that the petition would be granted in part and denied in part by adopting the proposed rule as final and is concerned that a decision on the ultimate disposal of Greater Than Class C (GTCC) Waste is further postponed. If GTCC waste were defined as proposed in the petition, it could be ultimately disposed of with the spent fuel. However, the proposed rule makes sense and resolves the issue for the interim storage of GTCC although it does not assist the U. S. Department of Energy (DOE) in reaching a conclusion for permanent disposal. Based upon historical data, it is likely that 20 years hence, permanent disposal will still be an issue.

The FR Notice asked for responses to the following six questions, which PGE offers.

1. Should the storage of certain forms of GTCC waste and spent fuel in the same cask be prohibited? Or, should storage be permitted if performance criteria can be established? If so, what criteria should be established?

Response: Storage of GTCC waste and spent fuel in the same cask should not be prohibited. Performance criteria should be established that ensures public health and safety is neither threatened nor jeopardized.

2. Should the storage of explosive, pyrophoric, combustible, or chemically reactive GTCC waste be prohibited in either commingled or separate GTCC casks? Or should storage be permitted if performance criteria can be established? If so, what criteria should be used?

Response: Obviously, the storage of explosive, pyrophoric, combustible, or chemically reactive GTCC waste that could result in a threat to public health and safety should be prohibited in both commingled and separate GTCC casks. However, if it can be demonstrated that even under worst-case conditions, an accident resulting from an explosion, fire, or chemical reaction of GTCC waste and its effects on spent fuel would not endanger public health and safety, such storage should be allowed in either commingled or separate GTCC casks.

3. Should the storage of GTCC that may generate or release gases via radiolytic or thermal decomposition, including flammable gases, be prohibited in either commingled or separate GTCC casks? Or should storage be permitted if performance criteria can be established? If so, what criteria should be used?

Response: See response to 2. above. If GTCC waste generates or releases gases that could result in an accident with consequences affecting public health and safety, including its effects on spent fuel, such storage, whether commingled or separate, should be prohibited. However, if an analysis of such storage shows that public health and safety is not jeopardized, it should be allowed.

4. Should the storage of solid GTCC waste that may contain free liquid (e.g., dewatered resin) be prohibited in either commingled or separate GTCC casks? Or should storage be permitted if performance criteria can be established? If so, what criteria should be used?

Response: GTCC waste that may contain free liquid should not be commingled with spent fuel in storage. The storage of GTCC waste that may contain free liquid should be allowed in separate GTCC casks providing safety criteria are established and maintained. The criteria should be no threat to public health and safety.

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5. Should the storage of liquid GTCC waste be prohibited in either commingled or separate GTCC casks? Or should storage be permitted if performance criteria can be established? If so, what criteria should be used?

Response: Interim storage of liquid GTCC waste does not resolve problems with final disposal, i.e., where, how, etc.? Storage of liquid GTCC waste should be prohibited in both commingled and separate GTCC casks.

6. If reactor licensees, after termination of their 10 CFR Part 50 license, elect to store reactor-related GTCC waste under the provisions of 10 CFR Parts 30/70, is additional guidance needed to provide a more efficient licensing process?

Response: Yes.

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