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USNRC

The Nuclear Regulatory Commission has issued a Proposed Rule 10 CFR Part 63, regarding the licensing of a proposed geologic repository at Yucca Mountain, Nevada.

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DOCKET NUMBER
PROPOSED RULEPR 2,19,20 et al.
(64FR8640)**Attention NRC:**

My/our major concerns and comments about the proposed criteria NRC is considering using to decide whether to license a repository at Yucca Mountain are:

→ Radionuclides released from Yucca Mountain will primarily be in the groundwater. The groundwater protection standard in the federal Safe Drinking Water Act is 4 millirems (mrem). The NRC proposing a 25 mrem standard overall which includes groundwater (63.113). Is this too high too low acceptable Comments:

→ The rule proposes determining compliance with the maximum radiation dose standard at a boundary 12 miles from the emplacement area. For comparison purposes, the Swedish government sets the boundary at the edge of the waste emplacement area. At DOE's Waste Isolation Pilot Project in New Mexico, the boundary is 5 kilometers (3 miles).

I believe the Yucca Mountain compliance boundary should be:

 at emplacement area 3 miles away 12 miles away

Comments:

→ The rule (63.41) says that NRC can issue the repository license to receive waste and allow waste to be put into the repository once it determines that there is enough underground storage space for "initial operation".

Do you think the rule should permit DOE to put waste in the repository before construction is completed? Yes ☒ No

Comments:

→ The proposed rule (63.115) states that the NRC allowable maximum standard is determined based on the risk to an adult. I agree disagree that the standard should be based on risk to an adult. Comment:

Additional Comments: The known seismic risks and other acknowledged dangers of storing high level nuclear wastes at Yucca Mountain preclude its consideration as a solution to a huge problem. Also the acknowledged risks and dangers of transporting such materials make discussion of Proposed Rule 10 CFR 63 a moot issue. The above-mentioned criteria don't really matter, because THERE IS NO RIGHT WAY TO DO A WRONG THING.

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Return to: Secretary, U.S. Nuclear Regulatory Commission, Washington DC 20555-0001, Attention: Rulemaking and Adjudications Staff. Comments must be received by June 30.

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