

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

DOCKETED  
USNRC

DOCKET NUMBER  
PROPOSED RULE **PR 2, 19, 20 et al.**  
**(64FR8640)**

ATTENTION NRC:

'99 JUN 22 P 4 :26

OFFICE OF THE  
RULEMAKING  
ADJUDICATION STAFF

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:

- \* Radio nuclides 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 is proposing a 25 mrem standard overall which includes groundwater (63.113).

Is this  too high  too low  acceptable  
Comments: \_\_\_\_\_

- \* Rule [63.115 and 63.113(b)] 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 the Department of Energy's (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: \_\_\_\_\_

- \* 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: \_\_\_\_\_

- \* 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.  
Comments: \_\_\_\_\_

Additional Comments: Should be based on risk to foids, animals (wild) and children. (63.115)

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Comments must be received by June 29. Address appears on reverse side. Fold, tape, stamp, and mail.