

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.

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

**Attention NRC:** '99 JUN -2 P3:52

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 (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 DOE's Waste Isolation Pilot Project in N.M., 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 *Not at All - Ever*

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: *It should be based on the risk to a new born baby and a person 95 years old.*

Additional Comments: *I feel it is unfair for all the other states to gang up on one state and put their nasty poison in our front yard.*

Name *Nancy Loudon* Signature *Nancy Loudon*  
Address *PO Box 211207*  
City/Zip *Crescent Valley NV 89821* Date *May 20, 99*

Return to: Secretary, U.S. Nuclear Regulatory Commission, Washington DC 20555-0001 Attention: Rulemaking and Adjudications Staff. **Comments must be received by June 30.** Address appears on reverse side. Fold, tape, stamp, and mail.

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Acknowledged by card JUN - 9 1999  
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