

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.

DOCKETED  
USNRC

DOCKET NUMBER

PROPOSED RULE **PR 2,19,20 et al**  
(64 FR 8640)

**Attention NRC:**

99 JUN 15 P2:59

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:

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RULEMAKING AND  
ADJUDICATION STAFF

→ 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: NO YUCCA MT

→ 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 1000 MI

Comments: Keep it out of Nevada

→ 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 X 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: What About Children

Additional Comments:

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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.** Address appears on reverse side. Fold, tape, stamp, and mail.

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Acknowledged by card

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