

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

DOCKET NUMBER
PROPOSED RULE **PR 2,19,20 et al.** ATTENTION NRC:
(64 FR 8640)

'99 JUN 15 P3:00

OFFICE OF
RULEMAKING AND
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: GROUND WATER SHOULD BE MEASURED SEPARATELY

- * 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: CAUTION SHOULD BE THE RULE

- * 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: AS LONG AS CONSTRUCTION DOESN'T AFFECT THE UNDERGROUND STORAGE BEING USED.

- * 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: SHOULD INCLUDE CHILDREN IN THE STANDARD.

Additional Comments: _____

Name ROBERT WEAVER Signature Robert Weaver
Address P.O. Box 835
City/Zip HAWTHORNE, NV 89415 Date 6/9/99

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

Acknowledged by card JUN 22 1999

Template = SECY-067

SECY-02