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



(40)

# Arizona Safe Energy Coalition

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ATTN: ANDREA BYRD

June 28, 1999

Secretary  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

RE: Proposed Rule: Disposal of High-Level Radioactive Wastes in a Proposed Geological Repository at Yucca Mt., Nevada

Dear NRC Staff:

We OPPOSE the Proposed Rule: Disposal of High-Level Radioactive Wastes in a Proposed Geological Repository at Yucca Mt., NV. We believe this particular rule would cause many more members of the public to be exposed to radiation, unnecessarily, than if the EPA set the limits. The Energy Policy Act of 1992 requires the EPA to set standards for upper limits for radiation releases, environmental protection and public health. Therefore we believe this proposed rule is not in the public interest.

This proposed rule change should be withdrawn until the EPA has set the standards. Then the NRC should write its repository licensing rules to conform with EPA standards.

We question whether the proposed rule would adequately protect the health of future generations. We believe it greatly underestimates the potential risks regarding future human intrusion. In addition we are concerned about radiation leakage to aquifers and ground water. Earthquakes and other natural phenomenons can create many other uncertainties. Because the repository must continue to function for 10,000 years, the standards should be far more stringent.

We believe there is a serious design omission not to prescribe a limit for thermal energy output per unit area for the high-level radioactive waste storage. It is an obvious safety risk that should be properly addressed in the environmental assessment.

We believe the standards for a permanent repository of high level radioactive waste should be more stringent than the standards for WIPP.

The public perceives that the NRC is an extension of the nuclear industry. It is time that the NRC functions to protect the public health in more aggressive ways. The nuclear technology is most unforgiving.

Sincerely,  
*Betty Schroeder*  
Betty Schroeder, Co-Chair

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Acknowledged by card JUN 29 1999

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