



UNITED STATES
NUCLEAR REGULATORY COMMISSION
ADVISORY COMMITTEE ON NUCLEAR WASTE
WASHINGTON, D.C. 20555

ACNWR-0074

PDR

June 2, 1992

Mr. James M. Taylor
Executive Director for Operations
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Taylor:

SUBJECT: PROPOSED RULEMAKING ON EMERGENCY PLANNING LICENSING
REQUIREMENTS FOR INDEPENDENT SPENT FUEL STORAGE
FACILITIES (ISFSI) AND MONITORED RETRIEVABLE STORAGE
FACILITIES (MRS)

During its 43rd meeting, May 28-29, 1992, the Advisory Committee on Nuclear Waste met with representatives of the NRC staff to discuss the proposed rulemaking on 10 CFR Part 72, "Emergency Planning Licensing Requirements for Independent Spent Fuel Storage Facilities (ISFSI) and Monitored Retrievable Storage Facilities (MRS)."

Overall, we believe that the proposed rule has been well developed and should be published for public comment. In the way of specific comments, we suggest the following:

1. The discussion in the rule should be expanded to clearly state that the reason for enhanced emergency planning at an MRS is the larger number and types of fuel handling operations anticipated at such a facility, as compared with those at offsite ISFSIs.
2. A statement should be added to the proposed rule to place limitations on the number and types of fuel handling operations that can be conducted at ISFSIs.
3. The text of the proposed rule should be revised to explain that the limit for the ingestion of soluble uranium is based on its chemical toxicity. Similar limits should be specified for other radioactive elements, if appropriate.

We hope these comments will be helpful.

Sincerely,

Dade W. Moeller

Dade W. Moeller
Chairman

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Mr. James M. Taylor

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Reference:

Memorandum dated March 4, 1992 from Warren Minners, Office of Nuclear Regulatory Research, transmitting "Proposed Amendments to 10 CFR Part 72 to Establish the Emergency Preparedness Licensing Regulations for Independent Spent Fuel Storage Facilities (ISFSI) and Monitored Retrievable Storage Facilities (MRS)"