

EDISON ELECTRIC INSTITUTE

The association of electric companies

1111 19th Street, N.W.
Washington, D.C. 20036-3691
Tel: (202) 778-6400

June 1, 1989

SCP Comments
Yucca Mountain Project Office
U.S. Department of Energy
Box 98518
Las Vegas, Nevada 89193-8518

Attention: Carl P. Gertz

Re: Comments on Department of Energy Site Characterization
Plan for Yucca Mountain Site (53 Fed. Reg. 53,057; 54
Fed. Reg. 11,436)

Dear Mr. Gertz:

The enclosed comments on the Department of Energy's (DOE's) Site Characterization Plan (SCP) for the Yucca Mountain Site are offered by the Edison Electric Institute (EEI) and the Utility Nuclear Waste and Transportation Program (UWASTE). EEI is the association of the nation's investor-owned electric utilities. UWASTE is a group of electric utilities providing active oversight of the implementation of federal statutes and regulations related to radioactive waste management and nuclear transportation.

Overall, we have found the SCP to be a thorough, fundamentally sound document. It is considerably more extensive and detailed than the plans, descriptions and information specified in the Nuclear Waste Policy Act and applicable Nuclear Regulatory Commission (NRC) regulations required. The SCP provides a comprehensive basis for proceeding with site characterization work. However, modification of certain areas would greatly enhance the site characterization effort.

As emphasized in the enclosed comments, EEI/UWASTE urges that DOE begin developing an approach for evaluating site suitability as characterization proceeds. While there is no basis for concluding, at this time, that the Yucca Mountain site is

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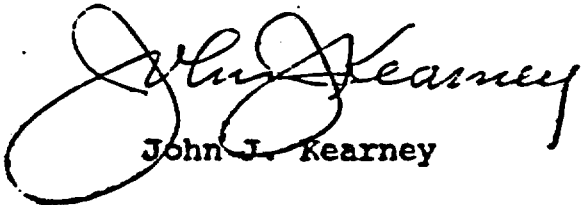
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unsuitable, the site is geologically complex. Any possibility -- however remote -- that the site could be found unsuitable or unlicensable should be addressed as early as possible, and not after years of characterization work and the expenditure of billions of dollars. DOE should conduct its site characterization program in a manner that will provide an early warning of any factor or set of factors indicative of fundamental site unsuitability, and factors favorable to site suitability.

New site characterization work should be resumed as soon as the NRC's Objection concerning DOE's Quality Assurance program is resolved, and the Department has considered the NRC's comments on the SCP as presented in the Site Characterization Analysis. The repository program is now at the point where further refinement of the Site Characterization Plan can benefit significantly from information and data gathered through surface and subsurface exploration at the actual repository horizon. Timely, competent site characterization is in the interest, not only of electric utilities, but the State of Nevada and the public as a whole.

EEI/UWASTE appreciates the opportunity to review the SCP and hope our comments are helpful. Please let us know if you have any questions or if we may otherwise be of further assistance.

Sincerely yours,



John J. Kearney

JJK/chi

Enclosure