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Docket No.

PDR

LPDR

Mr. Hubert J. Miller
Chief, Repository Project Branch
Division of Waste Management
U.S. Nuclear Regulatory Commission
Mail-Stop 623-SS
Washington, D.C. 20555

Distribution:

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Re: Notice of Availability of Draft Issue-Oriented Site Technical Positions in the High-Level Waste Program (49 Federal Register 45,278)

Dear Mr. Miller:

These comments are submitted on behalf of both the Edison Electric Institute ("EEI") and the Utility Nuclear Waste Management Group ("UNWWMG") in accordance with Mr. James B. Hall's letter of December 26, 1984. We have reviewed the above-referenced Issue-Oriented Site Technical Positions ("ISTP's") and -- while generally supporting the concept of ISTP's as useful to the site characterization process -- believe that the waste program would be better served if the NRC did not proceed with finalization in their present basic form.

Overall, the issues presented in the five draft ISTP's are similar and generic -- rather than site specific -- in nature. The identification of issues in general terms not related to particular, site-specific conditions, however, is of only limited usefulness.

Similarly, the ISTP's do not distinguish among issues in terms of their relative importance. All issues within every hierarchy are ranked equally. Clearly, site-specific NRC Staff guidance as to what it considers to be critical licensing issues would be of considerable value.

Based on the foregoing, EEI/UNWWMG recommend that the ISTP's not be finalized now, but be redrafted after specific sites have been selected for characterization. Issues listed in the ISTP's should be identified in terms of the characteristics of individual sites, and areas of particular importance noted. The development of a limited number of highly particularized ISTP's would be more cost effective and useful than the issuance of five, largely generic, documents. In the meantime, pending the selection of

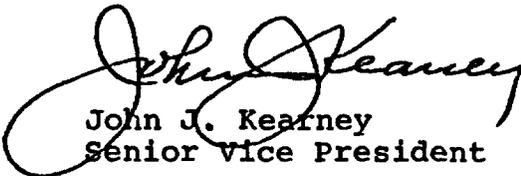
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specific sites for characterization, resources could be more productively concentrated on the finalization of Revision 1 to Regulatory Guide 4.17: Standard Format and Content of Site Characterization Plans for High-Level Waste Geologic Repositories (see 50 Federal Register 10,331), which is of more immediate importance.

Sincerely yours,



John J. Kearney
Senior Vice President

JJK:jhd