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Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

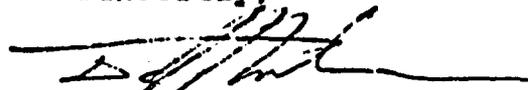
COMMENTS ON THE ADVANCE NOTICE OF PROPOSED RULEMAKING ON THE
DEFINITION OF "HIGH-LEVEL RADIOACTIVE WASTE".

1. The conceptual, revised definition of HLW given in IIB3: Conceptual Definition of "High-Level Waste", would exclude liquid radioactive waste, not from a facility for reprocessing irradiated reactor fuel, even if it contained both long-lived radionuclides in concentrations exceeding the values of Table 1 and short-lived radionuclides with concentrations exceeding the values of Table 2. This makes no sense since the same radionuclides in liquid form would be a greater hazard.

2. The basic philosophy of the ANPR, as expressed in II: Considerations for Defining "High-Level Radioactive Waste", is: "The Commission considers that these two characteristics, intense radioactivity for a few centuries followed by a long-term hazard requiring permanent isolation, are key features which can be used to distinguish high-level wastes from other waste categories." As noted in footnote 19, the elements whose isotopes have intense radioactivity for a few centuries can be chemically separated from those elements whose isotopes are a long-term hazard requiring permanent isolation. Thus, under this definition, most high-level waste could be removed from the category by chemical separation, although the danger inherent in the radioisotopes would not have changed at all. This makes no sense if "high-level waste" is to be a category of any use. A major rethinking of the purpose of having a "high-level waste" category is needed, especially since, as the ANPR notes, the Commission could require some "low-level waste" to be placed in a geological repository.

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Sincerely,



David M. Rosenbaum
President

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Acknowledged by card.....

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add'l 11/10
Richard 11-5-87*