

Technical Information Project (52 FR 5992)

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June 27, 1987

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

OFFICE OF THE
DOCKETING
BRANCH

RE: 10 CFR Part 60, Definition of
"High-Level Radioactive Waste"

Dear Sir or Madam:

The Technical Information Project submits these comments in response to the Nuclear Regulatory Commission's call for input on the revision of the definition of "high-level radioactive waste," contained in 10 CFR Part 60.

We believe the rulemaking should be used (1) to clarify the vague and ambiguous definition that presently exists in NRC rules and (2) to move to a more rational and publically accepted regulatory framework for radioactive waste.

NRC's requirement that radioactive waste must be both highly radioactive and long-lived before it is classified as "high-level" is in error. Either of these two characteristics should be sufficient to make a waste "high-level."

The NRC should classify waste based on the "hazardous life" of the constituents in the waste. "Hazardous life" can be defined as the period of time required for a radioactive substance to decay to near background levels of radioactivity. Generally, the hazardous life of a radioactive waste would equal 20 times the half-life of the longest-lived isotope in the waste. Wastes having a hazardous life of 100 years or more (ie., the period of institutional control specified in NRC's rules for low-level radioactive waste disposal--10 CFR Part 61) should be considered "high-level" waste. All high-level wastes should be disposed of in a geologic repository, unless the waste is short-lived (ie., decays to background within 100 years). These shorter-lived, but highly radioactive wastes could be stored in a geologic repository until decay to background levels has occurred.

NRC should seek statutory clarification for regulation of NARM and NARM-generated wastes, rather than walk into the no-man's-land of regulating NARM without clear legal authority. We urge you to seek this statutory clarification immediately.

Thank you for the opportunity to comment. Please keep us informed of further rulemaking activities.

Sincerely,

Donald Pay

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