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Coalition for Nuclear Power Postponement

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Telephone (302) 999-7380 '87 JUL -1 P3:16

June 27, 1987

Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
Re: Redefinition of High Level Radioactive Waste

52 Federal Register 39:5992

Dear Sir;

After reading the proposals that concern the redefining of high-level radioactive waste, I have serious doubts about your intent. The comments published in February of this year conjure up memories of disastrous attempts at waste volume reductions that were tried years ago. Examples include your attempts to use radioactive metals in washers and refrigerators, and the disposal of biomedical wastes in local landfills.

I can only hope that your proposals do not come back to haunt us as quickly as the recent trouble with Uranium-tainted Cloisonne jewelry.

If your proposals are to succeed I would like to suggest several changes and clarifications to that end;

- 1) It is unfortunate that the aggressive nuclear weapons production of the Reagan Administration has saddled us with an inordinate and unconscionable amount of high-level waste. It would be wrong for your rules to allow these wastes or the hardware from irradiated assemblies to be classified as low-level waste.
- 2) It would be wrong to consider the resins and filters used in the TMI II decontamination to be classed as low-level waste solely because of their radionuclide concentrations.
- 3) I likewise do not agree with the possibilities that states would be saddled with more low-level waste if the criteria for concentration and hazardous half-life calculations are used. It should not be the states' responsibilities to contend with waste generated by Federally-licensed facilities
- 4) Definitions should be formulated to make long-lived portions of some low-level waste as high-level waste. Given the poor track record of both low- and high-level dumps nationwide, provisions should include only materials which will be hazardous for 100 years or less to be classed as low-level waste.

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ACKNOWLEDGED BY CARD



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All of these questions that I have regarding ultimate NRC policy leads me to suggest that the NRC should adopt regulations that retain all of the radioactive waste that is currently considered high-level in this category and that materials that are either long-lived or highly radioactive, or both, should be classed as high-level waste.

While these suggestions will not decrease the volume of waste requiring Federal scrutiny, as I am sure is the ultimate intent of the proposals, they will serve to define, for all to see, the extent of the problems we must contend with. When people begin to realize what these two failed technologies have in store for us, perhaps they will hasten the day when no more waste will be generated. The opportunity is before you, don't fail America now.

Yours truly;

A handwritten signature in cursive script that reads "Donald C. Frisco".

Donald C. Frisco, Chairman