

DOCKET NUMBER
PROPOSED RULE **PR-60**

82

(52 FR 5992)

**VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261**

June 29, 1987

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**W. L. STEWART
VICE PRESIDENT
NUCLEAR OPERATIONS**

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Mr. Samuel J. Chilk
Secretary of the Commission
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555
Attn: Docketing and Service Branch

Serial No. 87-204
NO/JDH

Dear Mr. Chilk:

**VIRGINIA ELECTRIC AND POWER COMPANY
COMMENTS ON ADVANCED NOTICE OF PROPOSED RULEMAKING
REVISED DEFINITION OF HIGH-LEVEL RADIOACTIVE WASTES**

We appreciate the opportunity to comment on the proposed rulemaking concerning development of a revised definition of high-level radioactive wastes (52 FR 5992; 16,403). We endorse the comments, submitted separately, by the Edison Electric Institute (EEI) and the Utility Nuclear Waste Management Group (UNWGM).

EEI/UNWGM favor expanding the conceptual definition of high-level waste (HLW) to encompass certain wastes which are presently categorized as greater than Class C low-level waste. By doing so, the conceptual definition would operate to provide a specific location (i.e., the geologic repository) for disposal of some waste which currently lacks a specific disposal site. In addition, the conceptual definition represents movement away from the past practice of defining HLW primarily on the basis of the source of the material toward an approach emphasizing the degree of hazard associated with the waste.

Very truly yours,

W. L. Stewart
W. L. Stewart

cc: Mr. John J. Kearney
Senior Vice President
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