

Pennsylvania State Association of Township Supervisors

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OFFICE OF THE
DOCKETING & SERVICE
BRANCH

April 22, 1987

Secretary
Nuclear Regulatory Commission
1717 H St., NW
Washington, DC 20555

Attn: Docketing & Service Branch

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

Gentlemen:

We wish to offer comments on the proposed redefinition of high level waste. This association represents 1,458 Townships of the Second Class in this Commonwealth. These "local jurisdictions" comprise 95% of the land area in Pennsylvania. It is without doubt that every low level radioactive waste disposal facility established in the Appalachian LLRW Compact states and situated in Pennsylvania will be in a township.

Class C low level waste should be reclassified as High Level waste. Disposal of Class C waste should become a federal responsibility and should occur at the high level waste repository. A 1984 Department of Environmental Resources (DER) survey shows that 281.6 cubic feet or .13% of all Pennsylvania generated LLRW is Class C waste. This tiny volume of waste however accounts for over 93% of the currie content of Pennsylvania's LLRW!

We believe that this relationship of Class C volume and currie content is typical of the experience other states and compacts will encounter. To "over" plan and build many regional facilities to address the special concerns associated with Class C waste is both wasteful of resources and broadens the potential for environmental damage.

The additional burden to the federal government to dispose of Class C wastes at a High Level Repository is less than the sum of the costs which states and compacts will carry if Class C is "left" to them. Class C should become "low-end" waste in the high level spectrum.

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Pennsylvania State Association
of Township Supervisors

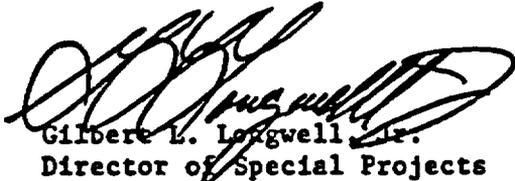
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- 2 -

April 22, 1987

We believe Class C low level waste should be reclassified high level radioactive waste.

Sincerely,



Gilbert L. Longwell, Jr.
Director of Special Projects
Member, Pa. Public Advisory
Committee on Low Level
Radioactive Waste Disposal



Bernard Hoffnar
Vice President
Bedford County Association
of Township Officials
Member, Pa. Public Advisory
Committee on Low Level
Radioactive Waste Disposal

OFFICE NUMBER
PROPOSED RULE PDJ -60
(52 FR 5992) (6)

April 24, 1987

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

Attention: Docketing and Service Branch

OFFICE OF THE SECRETARY
DOCKETING AND SERVICE
BRANCH

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DOCKETING
BRANCH

Gentlemen:

The current effort at redefining high level wastes has failed. This failure has resulted from lack of recognition of the underlying need for a new definition.

In the first place, current needs have no place for the term high level waste. There are two types of radioactive waste--those which require permanent isolation and those which do not. Within the category of those requiring permanent isolation, there are gradations of radioactivity content, radiation emission, and heat generation. The significance of these factors has to do with how the material is packaged for permanent isolation and the degree of protection for the workers that is required for handling. Furthermore, assigning a specific value for any of the above to arbitrarily distinguish between high level waste that must be permanently isolated and a lower level waste that must be permanently isolated is almost surely of no measureable benefit. Current practice requires that those packages which generate a substantial, but unspecified, amount of heat must be encased in a long-lived container; those packages generating less than this unspecified quantity (as in transuranic waste) may be contained in a unit having a life only long enough to allow recovery within about 50 years after emplacement.

In the second place the proposed redefinition relies on the upper limit for low level waste as the lower limit for high level waste. The problem with this technique is that 10 CFR 61 is flawed, outdated, and inconsistent with 40 CFR 191. This latter regulation seems to have an understandable rationale behind it. The other regulation takes note of only a limited number of radionuclides and places no stipulated limit on quantities which may be released to the accessible environment. It is obvious that this inconsistency should be corrected.

Yours very truly,



Alvin R. Irvine
12168 Warrior Trail
Knoxville, TN 37922

ACKNOWLEDGED BY CARD..... MAY 06 1987