



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

September 12, 1989

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file: IAEA
(HLW)

NOTE TO: Margaret Federline, OCM/KC
Janet Kotra, OCM/JC ←
Susan Bilhorn, OCM/KR
Jack Scarborough, OCM/KR
Maria Lopez-Otin, OCM/TR

THRU: James L. Blaha, EDO *JLB* 9/13/89.
FROM: Robert M. Bernero, NMSS

Enclosed is a short position statement I suggest for the Chairman to take to the September IAEA Board of Governors meeting. I have talked to EPA and I believe they will hold a similar view.

Robert M. Bernero
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Enclosure: As stated

cc: H. Denton, GPA
J. Shea, IP
E. Jordan, AEOD

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PDR COMMS NRCC
CORRESPONDENCE PDR

The USNRC reserves its position on the draft IAEA Safety Principles and Technical Criteria for the Underground Disposal of High-Level Radioactive Wastes pending completion of staff review and Commission consideration. A number of factors combine to warrant this reservation of position:

1. This draft which is dated April 1989 was not received in NRC until late August, only a few weeks before this meeting making it difficult to complete staff and Commission review.
2. Preliminary review indicates that the draft still uses the earlier ICRP Report 26 mortality risk coefficient of 10^{-7} /Sv which results in an estimated 10^{-5} /a risk based on a dose of 1 mSv/a. Previous comment from the U.S. and current thinking suggest use of a mortality risk coefficient about an order of magnitude higher which would equate a dose of 0.1 mSv/a to a 10^{-5} /a latent cancer fatality risk. We understand that the ICRP is planning to issue a revision to its fundamental radiation protection guidance (ICRP 26) sometime next year; we expect it to support the latter suggested risk coefficient.
3. The draft still seems to contain no recognition of alternate standard forms such as release quantity limits which are proposed in the U.S. in conjunction with individual exposure limits.
4. There may be a need for significant clarification in the wording used to relate disruptive process, random events, probabilistic analysis and risk.