



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
ADVISORY COMMITTEE ON NUCLEAR WASTE  
WASHINGTON, D. C. 20555

July 1, 1988

The Honorable Lando W. Zech, Jr.  
Chairman  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Dear Chairman Zech:

SUBJECT: PROPOSED RULE ON STORAGE OF SPENT NUCLEAR FUEL IN CASKS AT NUCLEAR  
POWER REACTOR SITES

During the first meeting of the Advisory Committee on Nuclear Waste, June 27-29, 1988, we met with the NRC Staff to discuss the proposed rule on "Storage of Spent Nuclear Fuel in NRC Approved Storage Casks at Nuclear Power Reactor Sites" (referenced).

Overall, we endorse the development of this rule. Formulation of regulations designed to address this subject on a generic basis will be constructive. We offer the following specific comments:

1. The portion of the rule that restricts the storage of spent fuel at a given site to only fuel that was produced at that site should be re-examined. Since a utility with multiple nuclear power plant sites may desire to centralize its storage of spent fuel at one location, it appears useful to include in the rule guidance for obtaining approval of such an approach.
2. Since the above approach would require that the fuel be transported and ultimately all such fuel will need to be shipped to a site for final disposal, it would appear useful to design the casks with the safety of, and doses associated with, subsequent operations in mind.
3. Finally, since several NRC offices will be responsible for implementing this rule, we urge that careful attention be addressed to the division of responsibilities within the NRC.

Sincerely,

A handwritten signature in cursive script that reads "Dade W. Moeller".

Dade W. Moeller  
Chairman

Reference:

U. S. Nuclear Regulatory Commission, Proposed Rule dated June 6, 1988 (7590-01), "Storage of Spent Nuclear Fuel in NRC Approved Storage Casks at Nuclear Power Reactor Sites"