



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

FORM 0020

October 18, 1989

Mr. James M. Taylor  
Acting Executive Director for Operations  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Mr. Taylor:

SUBJECT: LOW-LEVEL WASTE PERFORMANCE ASSESSMENT METHODOLOGY

During its 14th meeting, October 11-13, 1989, the Advisory Committee on Nuclear Waste met with representatives of the NRC staff to discuss a report prepared by R. John Starmer, Lynn G. Deering, and Michael F. Weber on a "Performance Assessment Strategy for Low-Level Waste Disposal Sites" (see Reference).

This report is well written and provides guidance on a subject that is fundamental to the conduct of licensing reviews of proposed LLW disposal facilities. To ensure that it receives the attention it deserves, we recommend that the NRC staff consider updating and issuing the report as an NRC technical position, as a guidance letter, or in another suitable form. Revisions should include expression of the dose limits in the report in both International System of Measurement (SI) and English units and should include the use of the concept of "effective dose equivalent." The requirements and goals in this report should also be made comparable to those in other related NRC documents. In addition, the issue of how uncertainties should be assessed warrants attention.

The NRC staff reported to us that the resources currently available for this work are minimal. We believe that this effort is important, and we urge that additional resources be made available to support this program.

Sincerely,

A handwritten signature in black ink that reads "Dade W. Moeller".

Dade W. Moeller  
Chairman

Reference:

Report by R. John Starmer, Lynn G. Deering, and Michael F. Weber during the Tenth Annual DOE Low-Level Waste Management Conference, August 30-September 1, 1988 in Denver, Colorado, "Performance Assessment Strategy for Low-Level Waste Disposal Sites"