



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

June 2, 1992

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

Dear Mr. Taylor:

SUBJECT: RULEMAKING ON DESIGN BASIS EVENTS FOR GEOLOGIC REPOSITORY
OPERATIONS AREA

During its 43rd meeting, May 28-29, 1992, the Advisory Committee on Nuclear Waste met with members of the Office of Nuclear Material Safety and Safeguards (NMSS) staff to review the proposed rulemaking on "Disposal of High-Level Radioactive Wastes in Geologic Repositories--Design Basis Events for the Geologic Repository Operations Area."

On the basis of our discussions with the staff, and our detailed reading of the supporting documents, we believe that the NMSS staff has prepared this proposed rule in a competent manner. Our principal comments follow:

1. The staff has indicated that the four classes of design basis events will be described in the "Statement of Considerations" that will accompany the rule. We suggest that further consideration be given to incorporating this descriptive information into the rule itself.
2. One of the bases for establishing the 50-mSv (5-rem) dose limit at the boundary of the "controlled-use area" is to ensure protection of the onsite workers at the repository. This goal should be clearly enunciated in the proposed rule.

Some time ago, we were told that similar rulemaking would be undertaken to resolve a number of key issues related to the licensing of a high-level radioactive waste repository. We recommend that the use of the rulemaking process be pursued to resolve these other key issues in a timely manner.

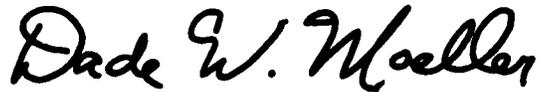
Mr. James M. Taylor

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Detailed comments regarding this subject can be found in the transcript of our meeting. We endorse publication of this proposed rule for comment, taking into account our recommendations.

Sincerely,

A handwritten signature in black ink that reads "Dade W. Moeller". The signature is written in a cursive style with a large, prominent 'D' at the beginning.

Dade W. Moeller
Chairman

Reference:

Memorandum dated April 29, 1992 from B. J. Youngblood, Nuclear Material Safety and Safeguards, transmitting Draft Proposed Rulemaking, "Disposal of High-Level Radioactive Waste in Geologic Repositories--Design Basis Events for the Geologic Repository Operations Area"