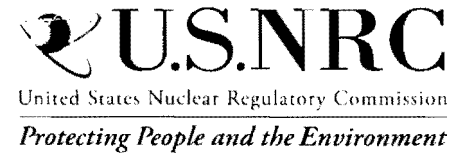


Proposed Draft Period of Performance



Proposed draft language: "...peak...within...20,000 years"

NRC primary considerations:

- Including climate cycling within the compliance period will encourage disposal of long-lived waste at more stable sites.
- A value of 20,000 years better captures radionuclide transport characteristics (compared to 10,000 or shorter time periods, especially for arid sites)
- While 20,000 years does not capture peak risk for all individual wastes, it captures more than shorter values. Possibly within 10x for depleted uranium.
- Diminishing returns for longer periods (affected by increasing uncertainty).

