

Regarding Docket NRC-2011-0012

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2/22/2012

77 FR 10401

Comment 1

I do not agree that the period of compliance should be increased to 20,000 years. Further I do not agree that the period of compliance should be 10,000 years. I think a reasonable period of compliance for LLW disposal facilities should be no longer than 1,000 years. If the NRC used a 1,000 year period of compliance and required a site-specific performance assessment, it would line-up very well with the requirements currently used in DOE Order 435.1 (as of 3/8/2012).

Comment 2

10 CFR 61.55, Waste Classification is flawed. 10 CFR 61.55, (a),(6) reads, "Classification of wastes with radionuclides other than those listed in Tables 1 and 2. If radioactive waste does not contain any nuclides listed in either Table 1 or 2, it is Class A." This causes radioactive isotopes waste streams having long half-lives, to be classified as Class A waste streams.

I think rewriting 10 CFR 61.55 (a)(6) as follows will better serve to protect the public:

10 CFR 61.55, (a),(6) "Classification of wastes with radionuclides other than those listed in Tables 1 and 2. If radioactive waste does not contain any nuclides listed in either Table 1 or 2, a site-specific performance assessment of that waste stream is required. The site-specific performance assessment must include all radioisotopes already disposed at the disposal unit and any radioisotopes the disposal facility is expecting to accept for disposal before closing the disposal facility."

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