

# PUBLIC SUBMISSION

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**Docket:** NRC-2011-0012  
Low-Level Radioactive Waste Disposal

**Comment On:** NRC-2011-0012-0078  
Guidance for Conducting Technical Analyses for Low-Level Radioactive Waste Disposal

**Document:** NRC-2011-0012-DRAFT-0129  
Comment on FR Doc # 2015-06536

*3/26/2015*  
*80 FR 15930*

## Submitter Information

*(9)*

**Name:** Roger Seitz

## General Comment

Please find attached my comments on the proposed guidance.

Thank you for the opportunity to comment.

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RULES AND DIRECTIVES  
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## Attachments

roger seitz guidance

SUNSI Review Complete  
Template = ADM - 013  
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Add= *D. Lowman (tbl)*

**Comments from Roger Seitz**

**NRC's Guidance for implementation of proposed 10 CFR Part 61,  
DRAFT NUREG-2175  
Docket ID NRC-2015-0003**

I would like to express my appreciation and support for NRC staff efforts to provide the draft guidance for public review at the same time that the proposed regulation was released. The guidance was very helpful in providing insights regarding NRC staff views regarding expectations for implementation of the requirements of the proposed rule. However, the guidance also highlighted some significant concerns related to the proposed rule, which resulting in comments that were provided on the rule. For example, it appears that the guidance related to defense in depth analysis, stability analysis and for the protective assurance and performance periods will need to be significantly modified.

My comments and discussions from others during public meetings and at the recent briefing to NRC Commissioners suggest that there will be a need for significant modifications to the proposed 10 CFR Part 61, which would imply corresponding significant changes to the supporting guidance in NUREG-2175. I am concerned that once changes are made to reflect comments on the proposed rule, there will also be a need for significant changes to the guidance and it is not clear how the public will have a chance to review the updated guidance reflecting the updated rule language.

I strongly believe that an additional public review will be necessary for the guidance after it has been updated based on changes to the proposed rule. In this way, the public can provide feedback that is informed by an understanding of what the requirements actually will be, not only what the rule was proposed to be. Given the level of detail and extent of the proposed guidance, it seems appropriate to allow a comment period of at least 120 days to consider the updated guidance reflecting the updated proposed rule.