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Mr. Victor Stello
Executive Director for Operations
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Stello:

SUBJECT: ACRS COMMENTS ON "STANDARD FORMAT AND CONTENT" (NUREG-1199)
AND "STANDARD REVIEW PLAN" (NUREG-1200), GUIDANCE DOCUMENTS
FOR THE PREPARATION OF A LICENSE APPLICATION FOR A LOW-LEVEL
WASTE DISPOSAL FACILITY

During the 323rd meeting of the ACRS, March 5-7, 1987, we met with the NRC Staff to discuss "Standard Format and Content" (NUREG-1199) and "Standard Review Plan" (NUREG-1200), guidance documents for the preparation of a license application for a low-level waste disposal facility. These documents were also discussed during a meeting of the ACRS Subcommittee on Waste Management on February 19 and 20, 1987. On the basis of this review, we offer the following comments.

In general, we conclude that both of these documents are overly detailed and stringent. Both require applicants to submit information and to develop capabilities that do not appear to be warranted by the public health risks associated with a low-level radioactive waste disposal facility.

While too detailed in some respects, the reports are not clear enough in others (for example, in the definition of a "buffer zone"). They contain requirements that may exceed current technical capabilities (such as the verification of the class of a given waste sample, and a determination of whether it contains hazardous toxic chemicals). They also contain discussions of certain topics (such as environmental monitoring) that are so dispersed throughout the reports that they are difficult to follow. Compounding these problems is the fact that, while these two reports cite International Commission on Radiological Protection (ICRP) Publication 30 as the basis for associated radiation dose assessments, the referenced NRC regulations, 10 CFR Part 61, are based on ICRP Publication 2 and the standards for radiation protection as prescribed in 10 CFR Part 20.

We recommend that the NRC Staff simplify and clarify these two documents. It may be useful in this effort for the NRC Staff to review any comparable U. S. Environmental Protection Agency reports prepared for the review of facilities for the disposal of toxic chemical wastes.

Sincerely,

William Kerr
Chairman

