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PR-50-51

November 21, 1979

Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Att: Docketing and Service Branch

#### NOTICE OF INTENT



The Hanford Conversion Project hereby serves notice of its intent to participate fully in NRC's proceedings to reassess its degree of confidence that radioactive wastes produced by nuclear facilities will be safely disposed of (44 Federal Register 61372). At present, HCP intends to have Mr. Norman Solomon represent it at these proceedings, although HCP reserves the right to appoint a different representative.

As a broadly-based, region-wide organization in the Pacific Northwest, Hanford Conversion Project is uniquely qualified to address this issue. It is at present the sole organization which has been involved at the grassroots level of the nuclear waste issue as it relates to the entire Northwest region. HCP has previously represented the public interest in testimony before the U.S. Senate Energy & Natural Resources Committee, and elsewhere.

Our tentative position is that NRC does not have the authority to promulgate a rule addressing on-site storage after license expiration. We have found nothing in any statute which would give NRC authority to do anything under these circumstances other than to revoke the facility license in order to foreclose the possibility that wastes will be stored after expiration.

It is the further opinion of the Hanford Conversion Project that the NRC is attempting to circumscribe this issue far too narrowly. We believe the issue goes far beyond merely a decision as to which of two possible rules will be adopted.

Yours truly,

*Creg Darby*

Creg Darby  
for HCP Coordinating Committee

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