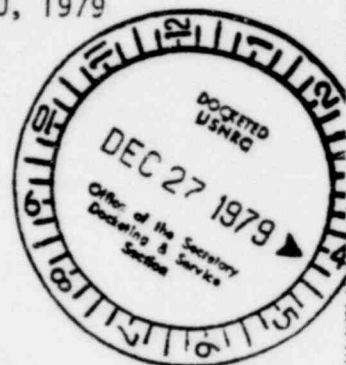




United States Department of the Interior

GEOLOGICAL SURVEY
RESTON, VA. 22092

December 20, 1979



Secretary of the Commission
Nuclear Regulatory Commission
1717 H. Street, NW
Washington, D.C. 20555
Attn: Docketing and Service Branch

Dear Sir:

The U.S. Geological Survey (USGS) wishes to be a full participant in the proposed rulemaking of the Commission on "Storage and Disposal of Nuclear Waste" [44 FR 61372-76 (October 26, 1979)]. Members of the USGS staff are engaged in a variety of research projects with applicability to the nuclear waste question. In addition, USGS staff members have served on numerous advisory and review groups dealing with this matter. Several USGS scientists helped prepare the background appendix on Alternate Technologies for the Interagency Review Group Report (IRG) which will be a key focus for the proceeding.

On matters of scientific fact, the position of the USGS staff is essentially that of the IRG report. We will take no position on what constitutes "safe disposal" as this judgement should be made through the licensing process; but we will comment on what we consider to be the knowledge needed to effectively estimate the risk of nuclear waste disposal in mined cavities. Our staff has cooperated with the Department of Energy to suggest ways in which specific sites in a variety of media may be selected for detailed testing and evaluation. The IRG report recommends, and the National Environmental Policy Act may require that selection of a site be made from among several alternatives. There are many factors besides technical ones which determine how long selection of several sites and licensing of one will take; therefore, we will take no position on when acceptable disposal of nuclear waste may be available.

Our principal concern is that all relevant scientific issues be addressed in the process of siting and constructing repositories and that this process take place in a conservative way, consistent with the fact that nuclear waste disposal is a new and untried technology.

Sincerely,

George DeBuchanan
Chief, Office of Radiohydrology

One Hundred Years of Earth Science in the Public Service



1738 024

0001110001