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July 3, 1979

Kitty S. Dragonette
Low Level Waste Licensing Board
Division of Waste Management
Washington, D.C. 20555

Re: Revision 1, Branch Position
"Low Level Waste Burial Ground
Site Closure and Stabilization

Dear Kitty:

The following are comments regarding Revision 1 of the Branch Position Low-Level Waste Burial Ground Site Closure and Stabilization. These comments in no way should be interpreted as a waiver of Illinois' position that it is the applicant at Sheffield which maintains ultimate responsibility for the site rather than the state. These comments are submitted because Revision 1 is a generic document applying to all low level sites.

In making funding arrangements an applicant should insure both the availability and the adequacy of funds. (Reference: Performance Objective 3).

The third sentence in Performance Objective 6 referring to parking lots should be eliminated. The use of Low-Level Waste Site for such a purpose may effect the permeability of the trench cover. An applicant should be required to demonstrate that such use would have no deleterious effects rather than to assume by way of example that such an activity as a parking lot is appropriate.

Performance Objection 12's example of a fence as an acceptable possible security system should be eliminated. In many situations a fence may not be an adequate passive security system.


Performance Objective 14. Not only must corrective measures be implemented by the licensee to deal with radionuclide migration but these measures must be successful. (See, letter of Ed Reis of NRC Staff, April 10, 1979 to the Sheffield licensing board).

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Conditions 10, 11 and 16 from the letter of Ed Reis of April 10, 1979 to the Sheffield licensing board should be generic requirements incorporated into the branch position. Each of these requirements will contribute to the public health and safety.

Very truly yours,



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