

THE UNIVERSITY OF ARIZONA

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COLLEGE OF ENGINEERING
DEPARTMENT OF NUCLEAR ENGINEERING

PROPUSED BULE PR-60 (45 FR 31393)

June 26, 1980



Secretary of the Nuclear Regulatory Commission Washington, DC 20555

Attn: Docketing and Service Branch

Dear Sir:

Attached are some comments and questions relative to 10 CFR Part 60 as requested on the Federal Register Vol. 45, No. 94, Tuesday, May 13, 1980.

The proposed regulation, in general, is comprehensive, well written and much needed.

Sincerely,

James G. McCray Acting Director Wuclear Yuel Cycle Research Program

JGM/km

Enc.

Acknowledged by card . 7/1. 80 . mdv ...

Comments:

1. Ref \$60.122 (a) (2) (i) and \$60.122 (a) (8)

100 kilometers is very arbitrary. The geologic setting could be such that the horizontal extent of investigations would be adequate within 25 kilometers of the operations area. The requirement should indicate detailed investigations to the horizontal extent necessary to define actual and potential, natural and human, impacts.

- 2. Ref §60,122 (b) (1) What about large populations?
- 3. Ref §60.122 (b) (2) (vii) Substitute "heat flux" for "gradient" in that gradients vary due to changes in thermal conductivity and boundary conditions.
- 4. Ref §60.122 (b) (3) What about endangered ecosystems or biota? What about archeological or historical sites?