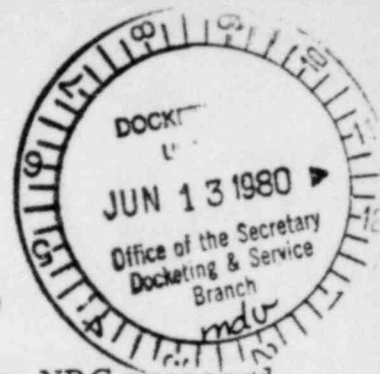


DOCKET NUMBER

PROPOSED RULE

PR-60 (7)

(45 FR 31393)



Attention: Docketing Division, Samuel Chilk
U.S. Nuclear Regulatory Commission
Office of Public Affairs
Washington, D. C. 20555

June 11/1980

RE: Comments on NRC proposed
rulemaking on Technical Criteria
for regulating geologic disposal
of high-level waste, release No. 80-92
Federal Register May 13, 1980

Dear Sirs:

Objection is hereby given in to storing high level nuclear wastes in rock formations. Nuclear wastes should be secured to the best present state of the art, be that in glass, or in other containers, but always with the option of retrieval.

Geology is not an exact science. It is a science in a constant state of flux, evidenced in reality in continental drift. Some of the high level wastes proposed for disposal will require isolation from the environment for 100,000 years or more. Neither the USGS, nor the NRC, nor DOE can guarantee stability of geologic formations, much less predict where and when earthquakes can occur. Modeling for stable ~~geologic~~ geological sites does not insure stability. Models only provide theoretical configurations.

In section 4. Treatment of Uncertainties you state "First, geologic disposal is an entirely new enterprise ~~is~~ - no experience exists with geologic disposal." The USSR has attempted geologic disposal. Perhaps the NRC should await the results of their initial attempts before committing the U.S. to this "disposal" method.

Section 5. Human Intrusions. The NRC would not have to be concerned about human intrusions in any high-level nuclear waste repository IF you were completely honest in telling the public the dangers associated with these wastes both qualitatively and quantitatively. The NRC and DOE have been very remiss in this and have simply put off the problem by promising a waste management and/or disposal program always sometime in the future.

Section (7) Human Intrusion Problem. "Simply stated, human intrusion cannot be prevented;" If you can NOT keep humans from intruding, HOW can you possibly guarantee the stability of the geologic formation, or the expected behavior of a repository, or the waste/rock interaction? If humans, subject to will and reason, cannot be controlled, how do you expect a human to be able to control an inanimate rock formation?

High Level wastes should be kept, as stated above, in retrievable storage facilities, until a genuine disposal method is found, not a "disposal" that is simply one of "Out of sight, and (hopefully) out of mind". A genuine "disposal" method is one that would render the nuclear wastes completely harmless to man and his environment.

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Acknowledged by card.. 6/13/80..mdv.