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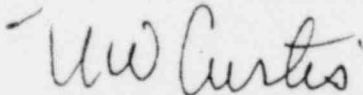
Director
Division of Waste Management
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Re: 45FR13105

Dear Sir:

Attached are PP&L's comments on the proposed 10 CFR Part 61 regulations concerning burial of low-level radioactive waste.

Very truly yours,



N. W. Curtis
Vice President - Engineering & Construction

TEG/psb

COMMENTS ON 10 CFR PART 61: DISPOSAL OF LOW-LEVEL RADIOACTIVE WASTE AND LOW-ACTIVITY BULK SOLID WASTE

1. This proposed regulation does not provide sufficient flexibility for a waste producer to bury his waste at the site origin as evidenced by the following comments.
 - a. We do not agree that waste sites shall be sited only on federal or state lands. Why not have a provision that allows turning the site over to the Federal Government when the user can no longer perform monitoring and secure access to the land? For example, a nuclear reactor complex may end its useful generating life after 40 years but the site may still be controlled by the utility for other power generating purposes. As long as the appropriate care and monitoring is performed by the utility, there is no need to have a site on government land.
 - b. The requirement that nearby operations shall not mask the environmental surveillance program may rule out sites on or near a waste producing facility. Why not simply include the effluent tech specs for such a facility in the burial license? In that way, the total emissions would not exceed a specific site effluent limit.
2. The regulation lacks specificity in the following areas.
 - a. The plans for coping with emergencies germane to disposal operations should not be addressed by Appendix E to Part 50. The terminology "appropriate elements" is too subjective for consistent implementation.
 - b. Item (3) of Section 61.54 on page 36 is too open ended. What constitutes a "demonstration program"? One could never demonstrate the adequacy of the design without waiting 100 years to see if any substantial migration occurred. Suggest that demonstration program guidelines be delineated and applied in application stage.
 - c. Page 55 -- At what pH is a liquid considered to be noncorrosive?
 - d. Page 55 -- What is the criteria that will be used in Section 61.86(f) for determining the time a liquid waste remains a radiological hazard?
 - e. Section 61.88 should not be applied to the disposal facility. It is incumbent upon the NRC and the licensee that produces the waste to provide volume reduction techniques at the source of the waste.

- f. Section 61.94 contains too many references to potential EPA environmental standards. Obviously Part 20 standards, drinking water standards and EPA guidance do not correspond. The NRC should set the numerical standards using the EPA guidance.
- g. Section 61.104(4) should be changed to twice background which is the same as the radon standard for mill tailings.
- h. Subpart J -- The NRC should deal with the waste processor requirements when it handles the processor's license; not when a disposal company is attempting to obtain a license.