UNITED STATES ARMS CONTROL AND DISARMAMENT AGENCY

Washington, D.C. 20451

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OFFICE OF (45 FR 31393)
THE DIRECTOR

April 11, 1980

MAY 1 4 1980 Docketing & Service
Branch

Dear Mr. Ahearne:

The Arms Control and Disarmament Agency appreciates the invitation, extended in your letter of March 12, to contribute to the Nuclear Regulatory Commission's rule-making proceeding on the disposition of radioactive wastes. Although ACDA has no direct programmatic responsibilities in this area, discussions related to the back end of the nuclear fuel cycle have important nuclear nonproliferation implications, and, as such, are of considerable interest to this Agency. Accordingly, we participated in both the International Nuclear Fuel Cycle Evaluation (INFCE) and Interagency Review Group (IRG) analyses of methods for managing and disposing of nuclear waste materials, including, especially, spent nuclear reactor fuel.

With respect to your first two questions, we note that the IRG and INFCE reports concluded that permanent disposal of radioactive waste is technically feasible, and that President Carter has established a schedule which calls for the first full-scale repository to be operational in the mid-1990's.

Your third question dealt with on-site storage of spent fuel in the event of the unavailability of an off-site capability at that time. We understand that the technology for storage of spent fuel in water-filled pools is well-established and has been proven through extensive experience. We know of no evidence that would preclude the use of this storage technology for extended periods. In addition, reliance on dry techniques for long storage periods also appears to be feasible.

We believe it would be useful to make several additional comments. As you know, for reasons associated primarily

Mr. John F. Ahearne U.S. Nuclear Regulatory Commission Washington, D.C.

4/18.. To OGC for Appropriate Action... Cpys to: RF...80-0783