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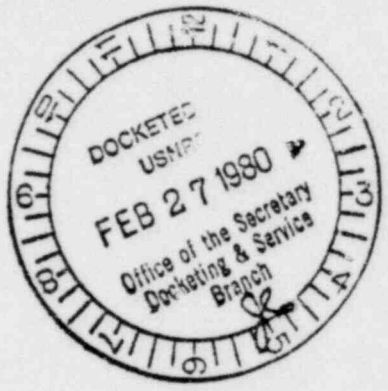

Secretary of the Nuclear Regulatory Commission
Washington, D.C. 20555

ATTENTION: Docketing and Service Branch

Dear Sir:

Following a recent discussion with Mr. Seth M. Coplan of the Nuclear Regulatory Commission, I have reviewed the Proposed Licensing Procedures for Disposal of High-Level Radioactive Wastes in Geologic Repositories, as they appeared in the Federal Register Vol. 44 No. 236, pp. 70408-70421, of Thursday, December 6th, 1979. I would like to comment as follows:

1. Multiplicity of sites for characterization

It will be necessary to essentially complete characterization of at least 3 sites before submitting a request for licensing of one of the sites as a repository. It could well arise that all the sites were found to be suitable for licensing as repositories, perhaps with varying levels of engineered barriers. In such an event it seems logical to license all suitable sites. This may be possible under the proposed regulations, but it is not clear whether, for example, 2 or more sites must be rejected for each one accepted. This would be an unnecessary restriction.

Considering the cost of repository excavation and exploration it should be noted that all U.S. commercial nuclear waste generated to the year 2000 could be accommodated in 2 national repositories. It should be noted that repositories found unacceptable or unnecessary for nuclear waste, although not ideally suited for alternative use, could possibly be put to good effect in other applications, e.g., strategic oil storage, pumped hydro-electric power, etc. In this way the cost of multiple site characterization may be reduced.

It may also be that a site originally intended as a large repository could be made acceptable if redesigned on a more modest scale, e.g., by the addition of engineered barriers.

The proposed regulations should not eliminate the above possibilities.

Acknowledged by card. 3/7

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