

SD 9011



STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION

STATE OFFICE BUILDING HARTFORD, CONNECTICUT 06115



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July 14, 1980

Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
ATTN: Docketing and Service Branch



Dear Sir/Madam:

I have had an opportunity to review the Draft Technical Criteria for Regulating Geologic Disposal of High Level Radioactive Wastes.

Although my knowledge of geologic repositories is limited, I believe that the list of considerations adequately identifies the relevant issues involved in disposal of high level waste.

I believe that a rule structured along the lines of the referenced draft rule will reasonably deal with the issues in an appropriate manner.

I was pleased to see that priority consideration is being given to retrievability.

I do not believe that the exposure limits in Title 10 CFR-Part 20 as they apply to the general population are appropriate for this type of facility. In fact I do not believe that they will be in agreement with the standards being developed by the U.S. Environmental Protection Agency. I believe that the facilities can be designed and constructed to operate in a manner that will produce a significantly lower exposure to the public.

Very truly yours,

Arthur T. Heubner
Director, Radiation Control

ATH:mp1

Radiation Control Unit
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ACKNOWLEDGED BY CARD 7/30/80 mdv.

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