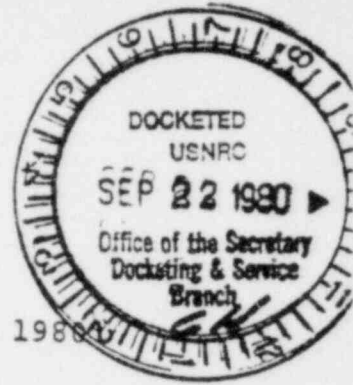




Department of Energy
Washington, D.C. 20585



September 19, 1980

Marshall E. Miller, Esq.
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Re: Proposed Rulemaking on the Storage
and Disposal of Nuclear Waste (Waste
Confidence Rulemaking), NRC Docket
No. PR-50,51 (44 FR 61372)

Dear Mr. Miller:

Reexamination of technical documents used in preparing the United States Department of Energy's Statement of Position (DOE PS) in the above-entitled proceeding just has revealed that DOE PS, Figure II-1 (at page II-12) is incorrect. See also DOE CS at II-72. Apparently, a preliminary author's draft was used inadvertently in the Department's Position Statement. Accordingly, the attached erratum provides a figure, taken from the paper by J. W. Voss cited as the source for the figure, DOE PS, Ref. II-25, that should be substituted for that now appearing in the Position Statement.

The impact of this correction is to provide a further degree of conservatism in supporting the containment and isolation objectives proposed by the Department. The incorrect figure shows that spent nuclear fuel in a repository would decay to a concentration of a 1% uranium ore deposit in 3,200 years. The correct figure indicates that this hazard actually will be reached in 1,200 years. Similarly, it shows that a period of 31,000 years will be required to reach a hazard measure equivalent to 0.1% ore rather than the 36,000 years originally shown. Because of this correction, the 3,200-year figure that now appears in the Department's Cross-Statement, DOE CS at II-72, also should be changed to 1,200 years.

Very truly yours,

Omer F. Brown, II

Omer F. Brown, II
Attorney
Office of the General Counsel

Attachment

cc: As indicated on
attached service
list

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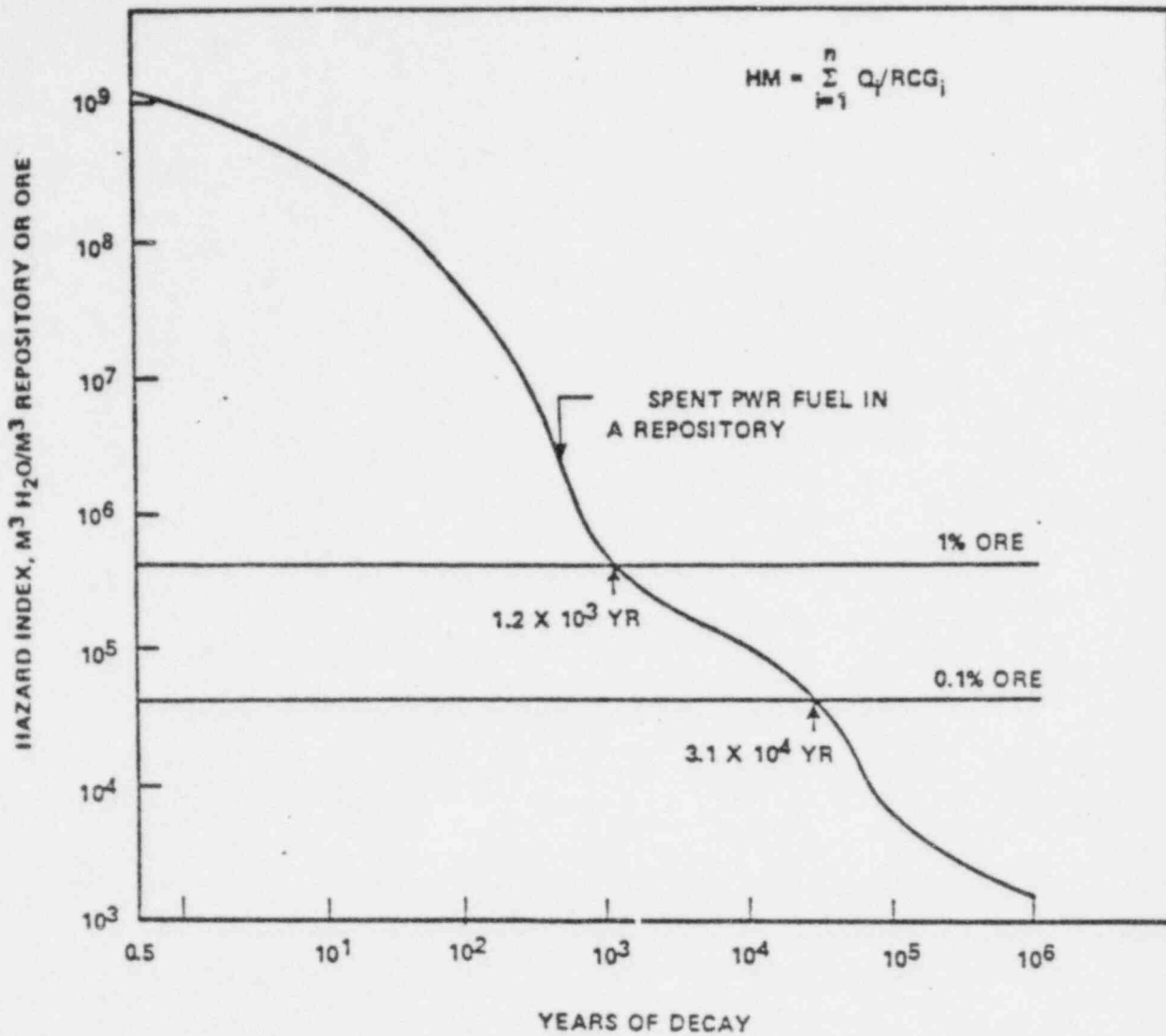


FIGURE II-1 HAZARD INDEX OF URANIUM ORE AND VOLUME-EQUIVALENT OF SPENT NUCLEAR FUEL REPOSITORY

[PWR calculations using ORIGEN (Bell, 1973); 3.3 percent enriched fuel; 30,000 Mwd/11THM]