

EDISON ELECTRIC INSTITUTE

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June 9, 1981

The Honorable Joseph M. Hendrie
Chairman
U.S. Nuclear Regulatory Commission
1700 H Street
Washington, D.C. 20055

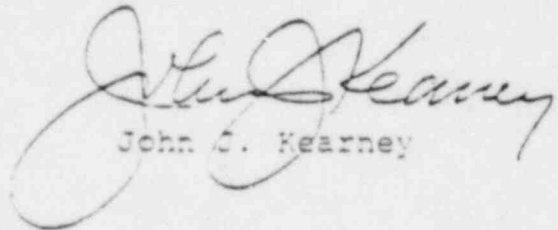
Dear Chairman Hendrie:

RE: SECY-81-267

We recommend that the draft regulation, 10 CFR Part 60, "Disposal of High-Level Radioactive Wastes in Geologic Repositories: Technical Criteria" not be issued, even for comment, in its present form. Our concern over this regulation is that there are potentially serious licensing pitfalls in setting quantitative numerical objectives which cannot be proven, such as the 1000 year package and 10^{-5} release criteria. In addition, such component criteria appear too arbitrary and may restrict trade-offs between component performance and total system safety.

Mr. John Martin has recently established a dialogue with various interested groups which we consider very constructive. We think that the further development of this dialogue is an effective mechanism for a resolution of outstanding differences regarding the proposed rule. We urge that Mr. Martin and his staff be given the time to further develop this dialogue with the expectation that it will result in a much better rule.

Sincerely,



John C. Kearney

JJK:rs1

6/9...To DGC for Appropriate Action...Cpys to: Chm, Cmrs, OPE, EDO, SECY
81-0785

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