

# Capital-Area Groundwater Conservation Commission

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PROPOSED RULE

PR-Misc Notice  
Reg Guide

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

ATTENTION: Docketing and Service Board



Ref: Draft Regulatory Guide and  
Value/impact  
Statement Task GS027-4  
--Section 5 HYDROGEOLOGY

Dear Sir:

My comments are limited to the HYDROGEOLOGY Section and where appropriate I may refer to the Section on GEOLOGY.

In general the text adequately addresses the Hydrogeologic needs; however, in order to assure across the board consistency, I suggest that the ground-water definitions in U.S. G. S. Water Supply Paper 1988 be presented.

The Section deals solely with ground water and requires the reader to Section 7. Would it be possible, because of the interaction of ground water and surface in the same section, under separate subheadings?

In regards to Hydrogeology stress should be placed on "in situ" measurements and thus requiring pumping tests and other field observations.

The most obvious weakness in this document is the lack of requirements for confining beds especially clays or shales. The most complex issue that may control the rate and path of movement of water and radionuclides is "clay hydrology."

Finally the document should stress the need for modeling, such as three dimensional, two dimensional, solute transport, etc. Modeling should be used not only as a predictive tool but to determine data needs -type, where, etc.

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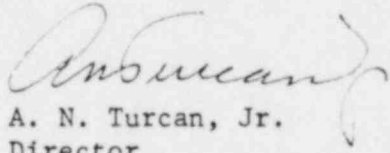
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These comments are offered in recognition of the fact that it is most difficult to design a nationwide guide that will satisfy all.

Thanks for the opportunity to comment.

Very truly yours,



A. N. Turcan, Jr.  
Director

ANT/ebo  
cc: Dr. L. Hall Bohlinger