

Mr. K.W.Han, Scientific Secretary  
 Division of Nuclear Fuel Cycle  
 and Waste Management  
 International Atomic Energy Agency  
 Wagramerstrasse 5  
 P.O. Box 100, A-1400  
 Vienna  
 AUSTRIA

JUN 17 1993

Re: 642-T2-CT-0810

Dear Mr. Han:

Thank you for affording the U.S. Nuclear Regulatory Commission an opportunity to comment on the latest draft of the International Atomic Energy Agency (IAEA) Safety Guide, "Siting of Near-Surface Disposal Facilities", Safety Series No. 111-G-3.1, April, 1993.

The draft document parallels U.S. practice and does not conflict with Part 61 of Title 10 of the Code of Federal Regulations, by which near surface disposal of radioactive waste is regulated in the U.S. We offer one area of suggested change, as follows:

Par. 330 concerns the continuation of studies during construction and operation of the facility, and Par. 331 concerns updating of safety and environmental assessments at the time of facility closure. Both are important activities, but seem to be out of place in a document concerning activities related to the selection of a disposal site. We suggest that the words "Although not a direct part of the siting process" be added at the beginning of each paragraph to address this issue.

Thank you again for the opportunity to offer comment on this draft Safety Guide.

(Original Signed by \_\_\_\_\_)

Paul H. Lohaus, Chief  
 Low-Level Waste Management Branch  
 Division of Low-Level Waste Management  
 and Decommissioning  
 Office of Nuclear Material Safety  
 and Safeguards

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