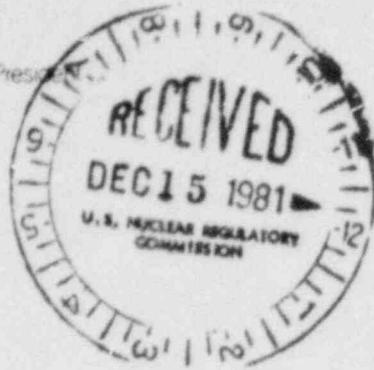




Portland General Electric Company

Bar D. Withers Vice President



'81 DEC 14 P4:42

emp

December 11, 1981

SECRETARY
& SERVICE
BRANCH

Trojan Nuclear Plant
Docket 50-344
License NPF-1

Secretary of the Nuclear Regulatory Commission
ATTN: Docketing and Service Branch
Washington, DC 20555

DOCKET NUMBER PR-60
PROPOSED RULE

82

(46 FR 35280)

Dear Sir:

TROJAN NUCLEAR PLANT
Comments on Proposed 10 CFR 60

Proposed Nuclear Regulatory Commission rule 10 CFR Part 60, Disposal of High-Level Radioactive Wastes in Geologic Repositories, has been reviewed by Portland General Electric Company, resulting in the following comments:

1. Alternative 1, the setting of a single performance standard for the entire repository system, is much more desirable than setting performance objectives for each major system element (Alternate 2), or prescribing detailed numerical criteria on critical engineering alternates of the system (Alternate 3). The overall objective of the repository system is to limit radiation exposure to the public through isolation of high-level wastes from the biosphere until such time and in such quantities as to present minimal risk. Multiple barrier performance objectives and prescribed detailed engineering criteria needlessly restrict the designer's flexibility in producing an integrated design to best meet the overall objective.
2. The requirement to be able to retrieve wastes 110 years after placement (30 years of operation, 50 years to final decision, 30 years to retrieve) is excessive. The 50-year decision period following cessation of operation and sealing of the shaft is after the maximum thermal output has been reached for the first-placed canisters. It is at this point that problems resulting from excessive heat would manifest themselves. The 50-year period is also after the canister-monitoring program in operation during placement has been terminated. As geologic and groundwater considerations would not allow transport of radionuclides to the biosphere within 50 years of shaft sealing (assuming complete canister

DSIO s/o Add: Frank Asenault John B. Martin Regis Boyke
Paul Goldberg Joe Donoghue Hubert Miller
J.R. Walt Micheah Bell

12/15/81 *emp*

Portland General Electric Company

Nuclear Regulatory Commission

December 11, 1981

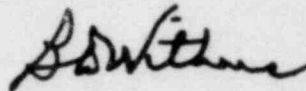
Page two

failure), the 50-year decision period is unnecessary. Retrieval design criteria, if any, should be based on the time of operation of the facility plus the time to remove all waste if a problem in the first canisters were found when the last canister was implaced, a total of no longer than 60 years.

3. As population estimates for the time periods in question are largely supposition, population considerations should not be made a part of the rule. Any population residing in the vicinity of a disposal facility would already be protected by the original design criteria limiting radioactive material release.

I hope that these comments will be of use in formulating the final rule.

Sincerely,



Bart D. Withers.
Vice President
Nuclear