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SOUTH Dakota Office of
Executive Management
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46 FR 51776

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Low-Level Waste Licensing Branch
Division of Waste Management
Office of Nuclear Material Safety and Safeguards
Nuclear Regulatory Commission
Washington, DC 20555

DOCKET NUMBER
PROPOSED RULE PR-61

(46 FR 51776)

RE: SAI# SD811020-E15, Volumes 1-4
DRAFT EIS on 10 CFR Part 61 "Licensing Requirements for Land Disposal
of Radioactive Waste"


Dear Sirs:

Thank you for the opportunity to review and comment on your draft environ-
mental impact statement on 10 CFR Part 61 "Licensing Requirements for
Land Disposal of Radioactive Waste."

Attached are some notations made by the South Dakota Department of
Water and Natural Resources during the course of their review. You may
want to take their comments into consideration when you prepare your
final report.

Overall, South Dakota agencies felt your impact statement deserved
recommendation for approval.

Sincerely,


Tony C. Merry
Commissioner
STATE PLANNING BUREAU

DSIO
5/11
R. Dale Smith

Acknowledged by ca d. 12/15/81 emp

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COMMENTS: 10 CFR 61 PROPOSED RULES

The South Dakota Department of Water and Natural Resource's Radiation Program has reviewed the summary volume of DEIS 10 CFR 61, and we recommend approval. The following are comments relative to minor discrepancies.

1. Volume 1, page 5, section 2.1, paragraph 3.

The word "generated" should be replaced by "produced" because it may create confusion regarding fuel cycle power "generation", and the "generation" of LLW. Therefore, the last sentence should read: Institutional LLW production will account for about 19% of the non-fuel sources.

2. Volume 1, page 9, paragraph 3, line 12.

"The most important . . .". The use of "geometric means" should be justified in lieu of arithmetic means.

3. Volume 1, page 19, Table S.5.

The column heading "Costs & Impacts" should define units in column (i.e. dollars, etc.)

4. Volume 1, page 27, paragraph 2, line 8.

The use of the term "daughters" should be replaced by "progeny" likewise throughout the proposal.

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The following comments pertain to Volume 1, Attachment A, Proposed Rule 10 CFR 61: Licensing Requirements for Land Disposal of Radioactive Waste.

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1. Volume 1, Attachment A, page 38082, column 1, paragraph 3, line 6.
The word "numbr" should read "number".

2. Column 2, paragraph 1, line 11.
"nonradio-active" should read "nonradioactive".

3. Volume 1, Attachment A, page 38084, Column 1, paragraph 1, item(5)
"Stability - " The statement appears too generalized and vague. It should read: Stability - Stability of the disposal site over the long term (100 years) is mandatory to prevent loss of site integrity; The potential for migration and transport of wastes to offsite areas should be virtually eliminated. (As an example).

4. Volume 1, Attachment A, page 38084, Column 2, line 24.
The word "if" should read "it".

5. Volume 1, Attachment A, page 38085, Column 1.
The classification scheme presented covers present waste streams but contains no provisions for future waste stream developments. If a "miscellaneous" class "C" which is characterized by activity can be included it should provide a time-buffer for future amendment needs.