

PDR



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

CHAIRMAN

July 8, 1982

Mrs. Anne M. Gorsuch
Administrator
Environmental Protection Agency
WSM-W1200, Mail Code A100
401 M Street, SW
Washington, D.C. 20460

Dear Mrs. Gorsuch:

I am writing you to urge issuance of the proposed EPA standards for management and disposal of high-level waste, 40 CFR Part 191, which are under development.

The United States Court of Appeals for the District of Columbia Circuit has recently vacated NRC rules which govern the treatment of uranium fuel cycle environmental impacts in individual nuclear power reactor licensing proceedings. Natural Resources Defense Council, et. al. v. NRC, No. 74-1586 and consolidated cases (April 27, 1982). The principal concern of the Court involves our treatment of releases from high-level radioactive waste repositories and the attendant uncertainties. This court decision could affect a large number of nuclear power reactors. The NRC staff has informed me that the proposed EPA standard for high-level radioactive waste, and its supporting documentation, may provide critical information and release limits needed to address the Court's concerns.

In addition, we are nearing completion of our own regulations for high-level radioactive waste disposal which are required to implement the EPA standards. Accordingly, at this point we urgently need the EPA standards to confirm that our regulations comply with these requirements.

I urge you to do what you can to expedite promulgation for public comment of these critically needed EPA standards. Please let me know if the Commission or its staff can be of any assistance in this regard.

Sincerely,

Nunzio J. Palladino
Nunzio J. Palladino

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