

August 13, 1990

Ross A. Scarano Nuclear Regulatory Commission, Region V 1450 Maria Lane, Suite 210 Walnut Creek, CA 94596

> Re: DEIR/S on proposed Needles siting of Low-Level Waste Repository

Dear Mr. Scarano:

I write to ask that the deadline for public comment on the DEIR/S filed by U.S. Ecology be extended to allow time to aggress the following concerns:

The proximity of the proposed waste site to the Colorado River (13 miles) is tdangerous. A flash flood occurred in recent years, and local people depend on wells for water.

Low level nuclear waste should not be stored in a shallow pit repository at all, but held on site by the utility producing it, except when located in areas of high seismic instability, such as the Diablo Canyon facility. Legislation should be introduced assigning responsibility for waste storage to its producer.

The BEIR/S does not address wastes from other states outside the compact despite Governor Deukmejian's offer to accept waste from New York. The NRC's deregulation of low-level waste may also force California to accept waste from other states due to reduced volume, leaving only the most dangerous wastes at the site.

Nuclear wastes which live up to 300 years require regulations monitoring safety of the site for that long. California could be saddled with extensive clean-up and liability costs if wastes migrate offsite after the federally required 100year monitor period expires.

Proposed "BRC" policy--and accordingly this DEIR/S--does not the burial of nuclear waste mixed with toxic wastes. This is a potentially lethal situation.

Genuine good faith efforts to gain public input require that more than one group which focuses critically on nuclear waste be informed. According to Section 10 on page 9 of the DEIR/S the Sierra Club was the only national or regional group contacted. 9010300146-XA

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These are among the reasons the comment deadline should be extended. The location of a nuclear waste site is a critical decision, one which should be made responsibly and not hurriedly.

Yours truly,

Dr. William Loran

Senator Alan Cranston / And Senator Pete Wilson Representative Barbara Boxer