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## TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

*Protecting Texas by Reducing and Preventing Pollution*

June 9, 1994

U.S. Nuclear Regulatory Commission  
Attn: Mr. Thomas Bergman  
Project Manager  
Mail Stop OWFN 13 H 15  
Washington, D.C. 20555

Re: Texas Utilities Electric Power Company  
Comanche Peak Station  
Solid Waste Registration No. 33306  
Proposed Hazardous Waste Permit HW-50356-000

Dear Mr. Bergman:

Texas Utilities (TU) Electric Power Company has filed a hazardous waste permit application for its Comanche Peak Station located in Somervell County, Texas. The permit application proposes a container storage area to be used to store a mixture of hazardous waste and low-level radioactive waste, also known as "mixed waste". These wastes will be generated during the maintenance of the nuclear reactor facility.

Specifically, these wastes will consist of spent naphtha, varsol or isopropyl alcohol, acids and caustics, spent halogenated and non-halogenated solvents, lab chemicals, paint and paint solvent.

According to the application, the radioactive component of these mixed wastes generally will have an activity level of 10 millirems per hour in a 0.5 liter volume. The application further states that a typical waste would have a concentration of 0.1 millicuries in 55 gallons. A total of nine principal isotopes in the waste are listed in the application.

Also included is post-closure care for landfills located at the site, although these landfills do not have any known radioactive wastes associated with them.

The Permits Section of the Industrial and Hazardous Waste Division is conducting a technical review of this permit application and must establish jurisdiction for the portions of the application concerning low-level radioactive waste management, that is, the container storage area.

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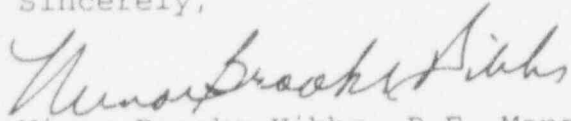
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We request a statement from the U.S. Nuclear Regulatory Commission (NRC) that describes what jurisdiction the NRC has in the case of an application for a mixed waste container storage area at the TU Electric-Comanche Peak facility.

If you have any questions or comments, please contact Mary McGill of this office at (512) 239-6624.

Sincerely,



Minor Brooks Hibbs, P.E. Manager  
Permits Section  
Industrial and Hazardous Waste Division

MBH/MMM/mmm

cc: TNRCC Region 4 - Arlington