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COMMENTS OF OHIO CITIZENS FOR RESPONSIBLE ENERGY, INC. ("OCRE")
ON PRM-60-4, "DEFINITION OF THE TERM 'HIGH-LEVEL RADIOACTIVE WASTE,'" 55 FED. REG. 51732 (DECEMBER 17, 1990)

OCRE is not taking a position in favor of or in opposition to PRM-60-4. With regard to the definition of "high-level radioactive waste," it is OCRE's position that the current definitions of "high-level" and "low-level" wastes are arbitrary and artificial. In particular, the term "low-level" waste implies "low-hazard," which may not be the case for many "low-level" waste streams.

The protection of the public health and safety and the environment would be enhanced by abandoning the current terms "high-level" and "low-level" and devising different radioactive waste classification schemes which are commensurate with the risks posed by the waste materials. The goal of radioactive waste management must be the isolation of radioactive wastes from the biosphere for the duration of their hazardous lives. This can be done in the most cost-effective manner if waste streams are segregated, as they are generated, as much as possible.

It is not clear that PRM-60-4 will achieve the goals stated above. It may be more appropriate to classify the entire contents of the tank wastes as "high-level" wastes than to declare a portion of them as "low-level." However, the waste characterization requirements in the petitioners' proposed Appendix A to Part 60 are essential for beginning to solve the legacy of poor waste management practices at the DOE's Hanford, Washington site. OCRE also believes that NRC oversight and regulation of the DOE facilities, both for their cleanup and operation, is essential. The lack of any independent regulation of the DOE facilities is the root cause of their past environmental contamination and general poor performance.

Respectfully submitted,

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