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Donald F. Schnell
Senior Vice President
Nuclear

Mr. Samuel J. Chilk
Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
Attention: Docketing and Service Branch

Dear Mr. Chilk:

15 FR 15034 DATED 4/24/92
RECEIPT OF BYPRODUCT AND SPECIAL NUCLEAR MATERIAL

I can assure you that we view the subject proposed rule as a welcome change to NRC's regulations and fully support the proposed rule as written. The rule is consistent with NRC's previous policy encouraging low-level waste volume reduction and represents the safest, most cost effective solution.

Our ability to receive back our own low-level radioactive waste after treatment to reduce volume is crucial if we are to maintain adequate on-site storage capacity prior to start-up of a Midwest Compact disposal facility. Without the ability provided by the proposed rule, large expenditures would likely be required to build additional storage facilities, with no corresponding health or safety benefit to the public or our employees.

We also applaud your timely action in addressing this issue. Before issuance of the proposed rule, Union Electric planned to initiate preparation of a license amendment application requesting allowance to receive back wastes generated at our Callaway Plant. I suspect other licensees were planning the same course of action. Significant industry and NRC effort was saved by addressing this issue on a generic basis.

Very truly yours,

Donald F. Schnell

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