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57FR29105

USNRC 6/30/92
OFFICE OF ADMINISTRATION

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Vice President - Nuclear Group

September 15, 1992
92 SEP 21 P3:30 (15)

Chief, Rules and Directives Review Branch
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: "Technical Position on Concentration Averaging and Encapsulation," proposed revision to the 1983 Staff Technical Position on Radioactive Waste Classification

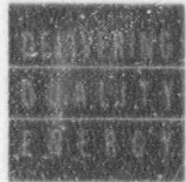
Duquesne Light Company (DLC) would like to submit the following comments for consideration in response to the Nuclear Regulatory Commission's (NRC) request. A notice of availability of a proposed revision, in part, of the 1983 Staff Technical Position on Radioactive Waste Classification, "Technical Position on Concentration Averaging and Encapsulation," was published in the June 30, 1992 Federal Register (57FR29105).

The industry generally supports the establishment of standard criteria to provide consistency in waste classification practices throughout the country. Uniformity in approach to low level waste (LLW) classification among the states and NRC is important, especially considering these criteria will be used to distinguish between Class C waste (a state responsibility) and greater-than-Class C waste (a Department of Energy responsibility). However, we have some concerns regarding the criteria proposed by NRC in the draft technical position.

A major concern is that, for activated or contaminated components and cartridge filters, the proposed revision unnecessarily establishes new isotopic concentration averaging guidelines that are more restrictive than current practices. The proposed technical position restricts the practice of radionuclide concentration averaging within a waste package in a manner that does not appear to be justified given the exposure scenarios and other assumptions that serve as the basis for 10 CFR Part 61.

The Edison Electric Institute Utility Nuclear Waste and Transportation Program (EEI/UWASTE) has developed comments to the proposed technical position. The comments have been prepared with technical support from the Electric Power Research Institute (EPRI) which has evaluated the proposed technical position as part of its research project on low-level waste radionuclide concentration averaging.

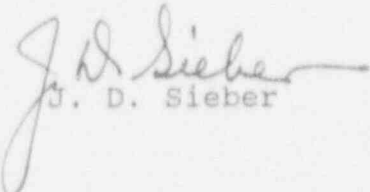
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and Encapsulation," proposed revision to the
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Waste Classification
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As a member of the EEI/UWASTE Low-Level Waste Working Group, we have
provided input to the development of the EPRI comments and concur
with them.

Sincerely,


J. D. Sieber