

DEPARTMENT OF HEALTH SERVICES

714/744 P STREET

P.O. BOX 942732

SACRAMENTO, CA 94234-7320

(916) 323-2759

(57FR32743)

DOCKETED  
USNRC



'92 OCT 19 P4:30 October 7, 1992

OFFICE OF THE SECRETARY  
DOCKETING AND SERVICE  
BRANCH

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Secretary of the  
U.S. Nuclear Regulatory Commission  
Attention: Docketing and Service Branch  
Washington, D.C. 20555

Dear Sir:

The Radiologic Health Branch of the California Department of Health Services offers the following comments on Docket No. PRM-61-2, regarding proposed rulemaking on 10 CFR Part 61:

1. If this petition is accepted, Class C waste will not be dropped off in near-surface disposal sites. That means all the present low-level radioactive waste (LLRW) sites (three) will be unable to accept Class C waste. The future sites, such as Ward Valley in California, will also be affected.

Problems Created:

- a. New LLRW disposal sites will have to be designed and developed.
  - b. There will be no Class C disposal sites during the interim.
  - c. Extended storage of Class C waste will be hazardous and costly.
2. The petitioner cited that the original environmental impact statement (EIS) was based on a 500 mrem/year dose to "inadvertent intruders", and with the present change of NRC limits to the general public of 100 mrem/year dose, this EIS should be re-evaluated.

Problems Created:

- a. Supplemental EIS, if required, would be costly.
- b. Other EIS's based on 500 mrem/year dose have been done for other projects. If this sets the precedence of requiring a retroactive supplemental EIS, the same question could be raised for other projects.

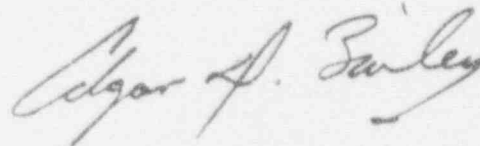
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Secretary of the U.S. NRC  
October 6, 1992  
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Therefore, this office is opposed to the proposed rulemaking as petitioned.

Sincerely,

A handwritten signature in cursive script, reading "Edgar D. Bailey". The signature is written in dark ink and is positioned above the typed name and title.

Edgar D. Bailey, C.H.P., Chief  
Radiologic Health Branch