

FP 805-4

R.I. (BOB) NEWMAN

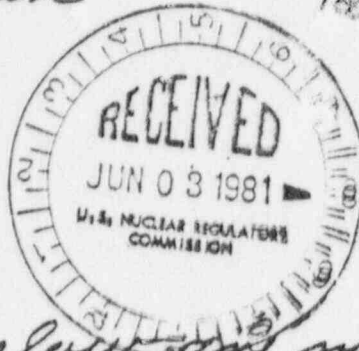
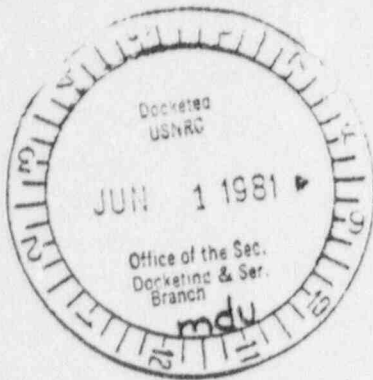
388 WAHOO DRIVE
FRIPP ISLAND, S.C. 29920

DOCKET NUMBER
PROPOSED RULE

PR-Misc Notice
Reg Guide

5/26/81

Gentlemen



Re: Draft Standard Format
and content of Site
Characterization Reports
for High-Level Waste
Repositories

Below are my comments on
subject Draft Regulatory Guide.

They are:

- I am not a geologist, but it appears to me that testing for a number of site characteristics, if taken to the extremes that some people would require, will reduce its integrity. I believe test holes can be sealed, but nothing is perfect and the chance of a seal leaking goes up directly with the number of holes. Provision should be made for weighing the value of more detailed knowledge against the

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comment

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THIS DOCUMENT CONTAINS
POOR QUALITY PAGES

Acknowledged by card. 6/1/81. mdv.

potential reduction in integrity. It should be possible, with less than complete knowledge to bound site characteristic values adequately to define site performance.

- Related to the above and more grist for the mills of those who would object principally to delay is the lack of specificity in requirements. The use of words without greater definition such as "adequate", "sufficient", "accurate", "extent practicable", "credible", "appropriate" and "vicinity" is simply an invitation to disagreement. Not only will those trying to delay progress apply their own definition, but we would suggest that even different NRC reviewers would do likewise. If quantitative

requirements can not be given, at least the objective can be better defined to minimize differences in interpretation.

- The word "isolate" is used a number of times in the Draft. The word "isolate" implies a degree of absolutism that is not only not necessary but is impossible to prove. All that should be required is a degree of confinement adequate to hold the waste below national limits. We realize that Federal agencies have not yet set these limits, but such an action must be given very high priority, as no one can say a repository will serve its intended function until that function is quantified.
- On Sections 3.5.5 and 6.2.2, time periods of 10,000 years are

used. Such long periods of time serve no real purpose but only perpetuate the absurdity that toxic materials which decay with long half lives require greater care in disposal than other toxic materials which do not decay or reduce in toxicity regardless of time. In other places in the Draft, time periods of 50-100 years are used. Such periods, or in some cases, 500 years relate to real needs rather than emotion.

I would appreciate receiving copies of other comments on this Draft as well as any revisions of the Draft

Sincerely

R. J. Turner