

The Nuclear Regulatory Commission has issued a Proposed Rule 10 CFR Part 63 , regarding the licensing of a proposed geologic repository at Yucca Mountain, Nevada.

NOTIFIED
USNRC

DOCKET NUMBER
PROPOSED RULE

PR 2,19,20 et al. Attention NRC:
(64FR8640)

99 MAY 25 P4:14

My/our major concerns and comments about the proposed criteria NRC is considering using to decide whether to license a repository at Yucca Mountain are:

OFF
RULE
ADJUDICATION STAFF

→ Radionuclides released from Yucca Mountain will primarily be in the groundwater. The groundwater protection standard in the federal Safe Drinking Water Act is 4 millirems (mrem). The NRC proposing a 25 mrem standard overall which includes groundwater (63.113).

Is this ☒ too high ☐ too low ☐ acceptable Comments: SEE BELOW

→ The rule (63.115 and 63.113(b)) proposes determining compliance with the maximum radiation dose standard at a boundary 12 miles from the emplacement area. For comparison purposes, the Swedish government sets the boundary at the edge of the waste emplacement area. At DOE's Waste Isolation Pilot Project in N.M., the boundary is 5 kilometers (3 miles).

I believe the Yucca Mountain compliance boundary should be :

☐ at emplacement area ☐ 3 miles away ☒ 12 miles away

Comments: SEE BELOW

→ The rule (63.41) says that NRC can issue the repository license to receive waste and allow waste to be put into the repository once it determines that there is enough underground storage space for "initial operation".

Do you think the rule should permit DOE to put waste in the repository before construction is completed? ☐ Yes ☒ No

Comments: SEE BELOW

→ The proposed rule (63.115) states that the NRC allowable maximum standard is determined based on the risk to an adult. I ☐ agree ☐ disagree that the standard should be based on risk to an adult. Comment: SEE BELOW

Additional Comments:

DUMP THE NUCLEAR WASTE SOME WHERE ELSE!

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Return to: Secretary, U.S. Nuclear Regulatory Commission, Washington DC 20555-0001, Attention: Rulemakings and Adjudications Staff. **Comments must be received by June 30.** Address appears on reverse side. Fold, tape, stamp, and mail.

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