

August 14, 1998

MEMORANDUM TO: L. Joseph Callan  
Executive Director for Operations

FROM: John C. Hoyle, Secretary /s/

SUBJECT: STAFF REQUIREMENTS - COMSECY-98-020 - NRC ISSUES WITH THE ENVIRONMENTAL  
PROTECTION AGENCY'S DRAFT YUCCA MOUNTAIN STANDARD (40 CFR PART 197)

The Commission has approved the proposed list to be provided to the White House Office of Science and Technology Policy with the following changes.

1. Items 1 and 2 should be reversed in order. The opening of new item 1 should be revised to read: "The U.S. EPA's groundwater protection requirement uses an approach making compliance ...." The opening of new item 2 should be revised to read: "Furthermore, EPA's groundwater protection requirement will not improve public health and safety ...."
2. New item 1, second bullet -- The following sentence should be added to the end of the paragraph. "Therefore, demonstration of compliance may require a degree of assurance beyond what science can provide and result in a protracted licensing hearing process with no commensurate benefit to public health and safety."
3. New item 2, third bullet -- The following sentence should be added to the end of the paragraph. "If background radiation dose levels at the point of compliance are found to be at or above the 4 mrem/yr limit then, in essence, the limit would be a 'zero-release' limit."
4. Item 3, first bullet, line 1 -- Replace 'a limit of 25' with 'an all-pathways dose standard in the range of 25 to 30.'

cc: Chairman Jackson  
Commissioner Diaz  
Commissioner McGaffigan  
OGC  
CIO  
CFO  
OCA  
OIG  
Office Directors, Regions, ACRS, ACNW, ASLBP (via E-Mail)  
PDR  
DCS