



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

March 18, 1996

MEMORANDUM TO: Those on the Attached list

FROM: Donald A. Cool, Director  
Division of Industrial and  
Medical Nuclear Safety, NMSS

SUBJECT: ADDENDUM TO DRAFT POLICY AND GUIDANCE DIRECTIVE  
PG 8-10: GUIDANCE ON DISPOSAL OF INCINERATOR ASH  
AS ORDINARY WASTE

A previous memorandum, dated February 7, 1996, transmitted Draft Policy and Guidance Directive PG 8-10, "Guidance on disposal of Incinerator Ash as ordinary Waste." The following was included as part of the guidance in Draft PG 8-10:

The following isotopes: phosphorus-32 (P-32), sulphur-35 (S-35), technetium-99m (Tc-99m), iron-59 (Fe-59), and calcium-45 (Ca-45), were not assessed in the generic assessment because they have not been included in the RESRAD code. Therefore, requests for disposal of ash containing these radionuclides will need to be reviewed on a case-by-case basis.

The Division of Waste Management (DWM) has recently extended the original study on ash disposal to landfills to include the 5 isotopes mentioned above, and a copy of that study is attached. The conclusion based on the study results is that the above condition may be eliminated from the guidance. Therefore, P-32, S-35, Tc-99m, Fe-59, and Ca-45 that may be present in incinerator ash may be treated in the same manner as all other isotopes not explicitly named in the original study. That is, ash containing P-32, S-35, Tc-99m, Fe-59, or Ca-45 may be released as ordinary waste provided the concentration of any of these isotopes, if present alone, does not exceed the concentrations listed in 10 CFR Part 20, Appendix B, Table II, Column 2, expressed in units of  $\mu\text{Ci/gm}$  of ash. If more than one isotope is present in the ash, then the sum of fractions rule applies.

Draft PG 8-10 will be revised to reflect the changes noted above after the comment period expires. In the meantime, the above policy may be implemented as of the date of the memorandum.

Attachment: As stated

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