



DEPARTMENT OF VETERANS AFFAIRS

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OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

THRU: Docketing and Service Branch

SUBJ: Docket No. PRM-20-22; Petition for Rulemaking - Northeast Ohio Regional Sewer District.

1. We would like to log our concerns with this petition for rulemaking. The following points should be emphasized regarding aqueous radioactive waste disposal into sanitary sewage systems:

a) Although the incident described in the Petition is regrettable, it is not indicative of a larger transgression by NRC licensees as a whole. This contamination occurred due to one or some other small number of individual licensee's circumvention of existing rules. Why penalize the vast majority of radioactive material users who operate in a responsible, appropriate manner?

b) Imposing the requested restrictions would severely limit our ability to safely conduct routine clinical and research radioactive material activities at our medical center. Clinical studies involving patient excreta are often done on an emergency basis. Twenty-four hours of notice would be practically impossible in these cases.

c) This rule would require us to pool and store radioactive liquid waste for intermittent, infrequent disposal. An unnecessary increase in personal radiation dose to workers, patients, and visitors would result. The probability of local contamination would increase, along with its attendant internal human contamination.

d) What about human waste contaminated with short half-life radioactive materials? This material is always filled with dangerous pathogens, and collecting and handling it would be very biologically hazardous to personnel.

e)... Many patients leave our facility immediately after ingestion or injection of radiopharmaceuticals. They are no longer under our control after this. Will they be exempt from notification before visiting their toilet at home?

f) What about naturally occurring and accelerator-produced radioactive materials? Presumably, these would be handled according to existing regulations. Will sewage districts be required (or be able to) sort out these components from public effluents?

g) The newly-revised 10 CFR Part 20 contains restrictions on sewer disposal or non-biological, insoluble materials. This appears to have been the culprit in the Northeast Ohio Regional Sewer Districts contamination. Adherence to the new regulations would help prevent future similar occurrences. Enacting a wide-ranging rule such as the one proposed would be unnecessarily oppressive.

2. We sincerely hope you take these and similar concerns of the licensee community into account in your upcoming rulemaking.



Thomas A. Schumacher
Radiation Safety Officer