20-22 (58FR54071) (11)

RISK MANAGEMENT AND SAFETY

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January 7, 1994

Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
attn: Docketing and Service Branch

Dear Sir:

As a Broad Material Licensee, the University of Notre Dame is writing in opposition to the request by the Northwest Ohio Regional Sewer District that the NRC amend 10 CFR 20.303 and 10 CFR 20.2003 to require not less than 24 hour advance notice to the appropriate sewage treatment plant before releasing radioactive material to the sanitary sewer system.

The regulations currently contained in 10 CFR 20.303 and 10 CFR 20.2003 set maximum permissible concentrations of radionuclides in sewage that should preclude contamination of any part of a sewage system. The University of Notre Dame currently disposes of approximately 456 gallons of aqueous radioactive waste per year. This waste is released over approximately 75 different disposals per year into our sewage system and each disposal is then diluted by our average daily sewage amount of 1,211,612 gallons. The diluted waste then goes to our local city sewage treatment plant. Wipe tests regularly performed on the drain area used for disposal of radioactive waste has never indicated contamination from any of the radionuclides disposed at that point (which is well before the waste mixes with the remainder of the sewage flow, and therefore receives the full benefit of dilution.)

With limited personnel, time to release aqueous waste is not something scheduled or routinely done. Whenever personnel have time and when we have waste that is ready for disposal (after sufficient decay of short half-life materials), we release our aqueous waste into the sewer system. Notifying the sewage treatment plant prior to waste disposal would not only be extremely inconvenient to the licensee, but in our opinion would serve no useful benefit to the treatment plant as there would be no practical means to treat the aqueous radioactive waste beyond the dilution that occurs before leaving the generator's facility.

For these reasons, we strongly oppose the requested amendments to 10 CFR 20.303 and 10 CFR 20.2003.

Sincerely,

Robert M. Zerr

Robert M. Zerr
Director/Radiation Safety Officer
Risk Management and Safety

RMZ/mlm