

SEP 17 1991

MEMORANDUM FOR: John A. Grobe, Chief
Nuclear Materials Safety
and Safeguards Branch, RIII

FROM: John E. Glenn, Chief
Medical, Academic, and Commercial
Use Safety Branch
Division of Industrial and
Medical Nuclear Safety
Office of Nuclear Materials Safety
and Safeguards

SUBJECT: TECHNICAL ASSISTANCE REQUEST: UNIVERSITY OF CINCINNATI
CONTROL NUMBER 91046

This memorandum responds to a Technical Assistance Request from Region III, dated August 13, 1991, asking for guidance in the University of Cincinnati's request to permit decay-in-storage of iodine-125 labeled tissue samples for a period of 5 half-lives. The University of Cincinnati has assured that at the time the tissue samples are removed from the body, the samples will contain no more than 0.02 microcuries of iodine-125. At the present time, the University incinerates all biological waste.

This request should be denied because the University of Cincinnati has not demonstrated a need for an amendment granting relief from applicable NRC regulations. Specifically:

1. The request does not meet the baseline requirements as outlined in Policy and Guidance Directive FC 90-03, "Licensing of Low-Level Radioactive Waste Storage By Materials And Fuel Cycle Licensees" in that the licensee has not demonstrated that the volume of waste is large enough to create a burden.
2. The University of Cincinnati is already licensed to incinerate this class of waste.

If there are further questions, please direct them to Sally Merchant of the staff at FTS 492-0637.

~~Original~~ Signed By:

John E. Glenn, Chief
Medical, Academic, and Commercial
Use Safety Branch
Division of Industrial and
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