

RULES AND DEPETIVES NUCLEAR REGULATORY COMMISSION WASHINGTON, D.C. 20555-0001

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University of Virginia

Comments

Regarding U.S. Nuclear Regulatory commission request for information on "How hospitals, universities, and others who use radioactive material in conducting research are affected by having limited access to low-level waste disposal facilities"

1. Have alternative technologies taken the place of radioactive material because of LLW disposal access, and if so, what have been the impacts, both positive and negative?

The University of Virginia is a large broad scope license with a teaching hospital and large medical research community. We have not seen alternative technologies adopted due to availability of LLW disposal. Gradually over the last 10-15 years we have seen researchers switch to use of non-radioactive labeling techniques and products, however, this was not due to disposal cost or availability. UVa does not directly charge researchers for disposal costs. These costs are borne by the Environmental Health & Safety Program and funded out of research overhead. Consequently waste disposal costs were not an incentive to discontinue using radioactive labels. The non-radioactive labels were cheaper to buy and are not as highly regulated.

2. In what State and LLW Compact is the research facility that you're addressing located?

We are located in the Commonwealth of Virginia -Southeast Compact

3. What kind of licensee uses the radioactive sources or material that are being addressed (university, hospital, private research, other)?

University Broad Scope and Medical.

4. How do you or did you disposition the spent sources or radioactive materials (LLW disposal facility, store onsite, return to manufacturer, or other)?

We have successfully utilized the Offsite Source and Recovery Program to dispose of several high activity sources. We have adequate secured storage space for the few small (size) sources we have chosen not to dispose of at this time. We also utilize return to vendor for gamma knife and HDR sources and unused seeds. We still have the ability to dispose of some sources through a waste broker that can utilize license transfer agreements.

5. Are you currently storing onsite radioactive sources or materials that would have been disposed of offsite had disposal access been available?

Yes, but we have very few of these types of sources. In 2007 we disposed of most of our higher activity unwanted sources in anticipation of fewer disposal options in the future. The sources were encapsulated and disposed of at Barnwell through a waste broker.

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E-RIDS = ADM-Q3 Add: J. Shaffner (JASII) 6. Has the lack of disposal access for either radioactive sources or materials caused you to re-evaluate research needs and techniques?

No, not at this time.

7. What adaptations have you made to reduce waste volume and improved the management of lowlevel radioactive waste disposal?

None recently. For many years our program has utilized decay in storage for most of our medical waste. We have continually evaluated our disposal program to find cost savings and alternate disposal options. For greater than 120 half-life and mixed waste we use a waste broker who contracts with a third party waste incinerator. For other very low activity waste we utilize a waste broker and the waste is disposed of at Energy Solutions in Clive Utah.

8. Has the cost of low-level radioactive waste disposal affected your research? If so, describe how.

No, we do not feel that the cost of disposal has affected our research community at this time.