

158

RECORD #158

TITLE: 20.303(d) - Disposal by Release Into Sanitary Sewerage System

FICHE: 68579-251

20.303 DISPOSAL BY RELEASE INTO SANITARY SEWERAGE

SYSTEMS

(d)

DISCUSSION

INSPECTION ELEMENTS

- A. A literal interpretation of §20.303(d) of Part 20 appears to indicate that the maximum quantity of radioactive material that a licensee may release to sanitary sewerage is one curie per year. While this is essentially true, this also implies that the sum total for all geographical sites under one license may not exceed the above limit, even if a licensee has 10 or 100 facilities spread throughout the country. We have been advised by OGC that the words in the regulation, "... radioactive material released into the sewerage system may not exceed..." (emphasis added) could be construed to mean that no more than one curie may be released into any one sewerage system by a licensee. "Sewerage systems" are generally local (e.g., city) so that if a licensee maintains facilities in several cities, each facility could release up to one curie per year, provided separate sewerage systems are involved. OGC has also advised us that this interpretation is consistent with the intent of the regulations, i.e., to maintain releases at a minimum to a sewerage system in the interest of precluding any significant health problems. By contrast, a much worse situation could be conceived where a thousand licensees use the same sewerage system, which is perfectly legal under the present regulations, but would appear to be of greater significance than the above considerations.

20.303-1

2/26/73

10317/7