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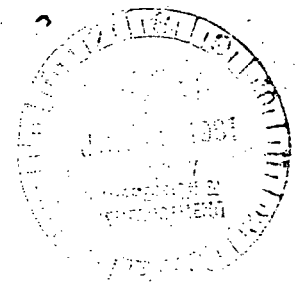
RECORD #160

TITLE: Disposal of Radioactive Wastes

FICHE: 68586-223

0714/81

JUL 2 1981



FCMLB:JH

MEMORANDUM FOR: John B. Martin, Director
 Division of Waste Management, NMSS

FROM: Richard E. Cunningham, Director
 Division of Fuel Cycle and
 Material Safety, NMSS

SUBJECT: DISPOSAL OF RADIOACTIVE WASTE

In our joint memorandum dated July 3, 1980, (WM Policy 15), we agree with the need for close coordination on licensing cases involving burial of radioactive waste. We are currently reviewing a case that involves burial of radioactive waste and relates to the recent rule changes that allow disposal of certain carbon-14 and tritium wastes without regard to radioactivity. This memorandum describes how we plan to handle this case and similar cases.

Ohio Agricultural Research and Development Center wishes to bury scintillation fluids, animal carcasses, plant tissue, paper, milk, gloves, eggs, and other materials containing carbon-14 and tritium. The scintillation fluids and animal carcasses are covered by 10 CFR 20.306, published March 11, 1981. The other materials are not covered; however, they meet the 0.05 microcuries per gram limits specified in 10 CFR 20.306. The issues are (1) whether burial of the scintillation fluids and animal carcasses requires a license amendment, and (2) whether burial of other materials should be permitted. We plan to handle this case and similar cases as follows:

1. All licensees inquiring about disposal of carbon-14 and tritium covered by the amendments published March 11, 1981, will be informed that no license amendments are necessary to dispose of these materials, regardless of how their current license reads. In other words, any licensee can change his waste disposal methods to take advantage of the new amendments without amending his license.
2. We plan to grant this request and similar requests to bury carbon-14 and tritium wastes other than scintillation fluids and animal carcasses, if they meet the following guidelines:

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- a. The total quantity buried per year does not exceed 1 curie of carbon-14 and 5 curies of tritium. These limits are the same as those in 10 CFR 20.303 for sewer disposal. Under the old 10 CFR 20.304, 1.2 curies of carbon-14 and 12 curies of tritium per year could be buried.
- b. The radioactivity concentration in the waste is less than 0.05 microcuries per gram.
- c. The location of burial is away from the water table, and there is no readily available pathway to man.
- d. The burial is on the licensee's property, the location is marked, and at least 4 feet of dirt cover the waste.
- e. A record is kept of the burial, including the location and quantities of each radionuclide buried.
- f. The licensee is an established institution or organization which does not appear to be disposing of waste immediately prior to termination of its license.

Applications not meeting all of these conditions will be coordinated with your division. We will, of course, continue to work with your division on any other waste management issues as they arise. Your comments on our proposed plan to handle this case are welcome.

Original Signed by
Richard E. Cunningham

Richard E. Cunningham, Director
Division of Fuel Cycle and
Material Safety, NMSS

SEE PREVIOUS CONCURRENCES

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DATE	6/10/81	6/12/81	6/15/81	6/11/81 7/2/81	6/12/81	7/1/81