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HOSPITAL DISTRITO UNIVERSITARIO  
CENTRO MEDICO DE PUERTO RICO  
SAN JUAN, PUERTO RICO 00935

DIVISION DE MEDICINA NUCLEAR

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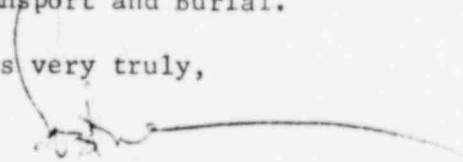
November 26, 1979

Dr. James P. O'Reilly, Director  
U. S. Nuclear Regulatory Commission  
Region II  
101 Marietta St., N.W., Suite 3100  
Atlanta, Georgia 30303

Dear Dr. O'Reilly:

Enclosed please find plan of action and schedule of the University of Puerto Rico Medical Sciences Campus with regard to Items 1 through 8 of the IE Bulletin 79-19, "Packaging of Low-Level Radioactive Waste for Transport and Burial.

Yours very truly,

  
Samuel Sostre, M.D., F.A.C.P.  
Director  
Nuclear Medicine Division

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Enclosure

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cc Dr. Pedro J. Santiago, Dean  
UPR, School of Medicine  
San Juan, Puerto Rico

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RESPONSE TO IE BULLETIN NO. 79-19 "PACKAGING OF LOW LEVEL  
RADIOACTIVE WASTE FOR TRANSPORT AND BURIAL"

The University of Puerto Rico - Medical Sciences Campus - does not generate low level radioactive waste which need be transferred and shipped to any waste burial facilities located in the Main Land.

The Mo-99 columns removed from Tc-99m Generators, the H-3 and C-14 solid radioactive wastes are not suitable for incineration and the H-3 and C-14 liquid radioactive waste usually remain in storage until the collected amount justifies the organization of special shipment for burial and final disposal. Calculations based on the present and near future workload at the laboratories handling long-lived radionuclides, and on the small size of the Mo-99 columns collected at the Nuclear Medicine Laboratory, indicate that a shipment of low level radioactive waste has not to be organized for many years.

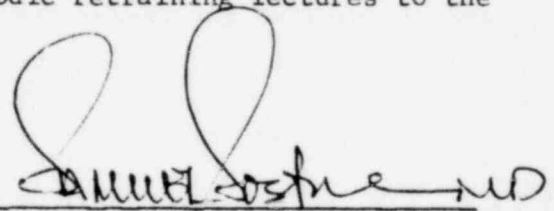
Nevertheless, a twofold action has been taken in regard with low level radioactive waste collection, packaging and transport activities, i.e.:

a) Copies of the 49 CFR Parts 100 to 199 - Transportation, and the 10 CFR Parts 0 to 199-Energy are already available for consultation at the Health Physics Office.

b) Review of the radioactive waste collection and disposal procedures as established on the NRC License Application, Medical Sciences Campus, University of Puerto Rico, October 1977, Addendum to Item 15, is always one of the main topics discussed during the periodic retraining lectures to the employees.

Date 26 Nov 79

Signed by



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