

FRANKLIN and MARSHALL COLLEGE  
LANCASTER, PENNSYLVANIA 17604

~~TEPA~~  
TEPA

DEPARTMENT of BIOLOGY

December 7, 1979

Boyce H. Grier, Director  
Nuclear Regulatory Commission  
Region I  
631 Park Avenue  
King of Prussia, Pennsylvania 19406

Dear Mr. Grier:

I am responding to a letter received from you on November 1, 1979, regarding IE Bulletin 79-19. I had not received bulletin 79-19 which was sent on August 10, 1979, and I am responding to that bulletin with this letter.

Low-level radioactive wastes generated under our license No. 37-11185-04 (see refs. 37-11185-02 and 37-11185-03) will be packaged and transported to a licensed burial site by a commercial disposal company (Teledyne Isotopes, Westwood, New Jersey). Teledyne Isotopes is a licensed company and follows the rules and guidelines established by the U.S. Nuclear Regulatory Commission (NRC) and the U.S. Department of Transportation (DOT). We generate less than 5 mCi of low-level wastes per year which is mixed with toluene-based scintillation fluid; that waste will be packaged, transported, and disposed of by Teledyne Isotopes. Most of the remainder of the used isotopes are water soluble and in small quantities which are disposed of in the sanitary sewer according to procedures established in our application for a byproduct material license. For the last four years, we have acquired less than 4 mCi of radioactive materials per year which generate low-level wastes.

The use and storage of all byproduct materials that would generate any low-level wastes are under my direct supervision. I am aware of DOT and NRC regulations regarding the storage and transfer of low-level isotope wastes, and I have ordered additional copies of bulletins 49 CRF Parts 170-179 and 10 CRF Parts 19 to 71. We currently have procedures for training and retraining all persons who use isotopes and generate low-level wastes. I audit all isotope use and disposal. Low-level radioactive wastes when mixed with toluene-based scintillation fluids) are stored in a 5-gallon steel drum, until they are packaged, transported and disposed of by Teledyne Isotopes. I will not store more than 10 mCi of low-level wastes at any time. Solid wastes are seldom generated, and would not exceed 1 mCi. The solid wastes are stored in a steel drum, prior to packaging and disposal by Teledyne Isotopes. All isotopes and isotope-wastes are kept in a separate room which is secure and in an isolated portion of our building.

2177 206

7912280176

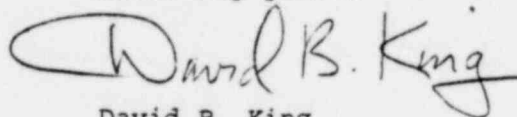
December 7, 1979

The following questions were stated in bulletin No. 79-19 and I have added my responses for 1978 and the first six months of 1979:

- (1) How many low-level radioactive waste shipments did you make? None
- (2) What was the quantity (curies) of low-level radioactive waste shipped?  
None
- (3) Did you generate liquid low-level radioactive wastes? Yes

The total waste generated was considerably less than 2 mCi. Most of that waste was disposed of in the sanitary sewer and did not exceed the concentrations specified in Section 20.303 of 10 CRF 20. The remainder was in a mixture with toluene-based liquid scintillation fluid and was stored in a steel drum.

Sincerely yours,



David B. King  
Associate Professor of Biology  
and Chairman of the Department

DBK:m

cc: Office of Inspection and Enforcement  
Division of Fuel Facility and  
Materials Safety Inspection  
Washington, D. C. 20555

2177 207