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TRAVENOL LABORATORIES, INC.

PR 61
(43 FR 49811)

8005140556

April 11, 1980

Deerfield, Illinois 60015

Director, Division of Waste Management
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Re: Comments to Draft Regulations on Low
Level Waste (10 CFR 61)

Dear Sir:

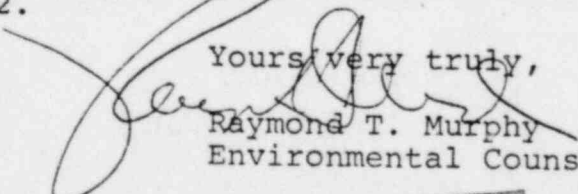
This letter is in response to a request for comment regarding the draft NRC regulations on the Disposal of Low Level Radioactive Waste (10 CFR 61, 45 CFR 13104) which appeared in the Federal Register of February 28, 1980. Specifically, we wish to address the matter of establishing a de minimis level for short half-lived substances used in medical, research and other applications. As a manufacturer of medical devices used in medical diagnoses, Travenol Laboratories, Inc. supports the concept of less restrictive requirements for low level radioactive wastes where no public health risk exists.

We would like to suggest that an exemption be created for solid and absorbed liquid wastes in concentrations of less than .5 microcuries per gram for isotopes having half-lives less than 180 days. This would exempt many of the wastes generated by hospitals and laboratories doing medical tracer work and should create no harm to the public.

In addition to exempting short-lived isotopes, we would recommend a similar consideration for longer half-lived isotopes where the concentrations are so low as to create no public health risk. Specifically, we would recommend an exemption for absorbed organic liquids (e.g. those used in scintillation counting vials) containing isotopes with concentrations of less than 0.005 microcuries per milliliter prior to absorption.

We hope that the foregoing comments will be useful to NRC in developing improvements to its regulations. If we can be of any further assistance in this area, please do not hesitate to call me at (312) 948-4952.

Yours very truly,


Raymond T. Murphy
Environmental Counsel

RTM:jk

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