



DCS

North Carolina State University

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PR 61
(43 FR 49811)

Tanke
Paul
6-2-80

Office of the Chancellor

April 17, 1980

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

Re: Disposal of Low-level Radioactive Wastes

Dear Director:

The scientists involved with radioactive protection and investigation at North Carolina State University have reviewed the preliminary draft regulations concerning 10CFR Part 61 for disposal of low-level radioactive wastes. We are of the opinion that the preliminary draft document represents a positive approach to solving the low-level waste situation as it now exists. We would encourage the Commission to include in a redraft of the regulations provisions related to establishing a de minimus level to be used for waste disposal purposes for certain radioisotopes used in research in medicine. We particularly would urge you to establish a de minimus level for a broad spectrum of materials, and would emphasize that consideration of de minimus levels include ¹⁴C and ³H even though these isotopes are long-lived. It is our feeling that at a research university conducting large scale biological research, ¹⁴C and ³H are used, but the levels of radioactivity in the waste are usually extremely low and consequently represent low-level radioactive waste that should be covered by de minimus standards.

We would appreciate an opportunity to review any further drafts of proposed regulations concerning low-level radioactive wastes. Thank you for an opportunity to comment on the present version.

Sincerely,

Clauston Jenkins
Executive Assistant
to the Chancellor

CLJ/lis

cc: E. C. Theil
L. T. Caruthers