

PROPOSED RULE PR 20  
(45 FR 67018)

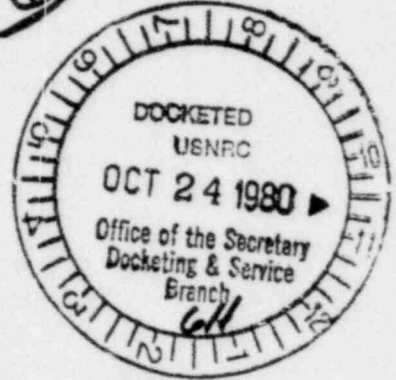
College of Physicians & Surgeons of Columbia University | New York, N.Y. 10032

DEPARTMENT OF RADIOLOGY  
Radiological Research Laboratories

630 West 168th Street

October 22, 1980

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Secretary of the Commission  
Attn: Docketing and Service Branch  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

This is written in support of your notification in the FEDERAL REGISTER No. 197 Vol. 45 in which you propose to grant permission for simplified disposal of certain low level wastes. These are the products of biomedical research which is of vital importance to national health. The disposal by conventional means cannot cause significant environmental hazards because the dilution which must occur in any reasonable disposal would result in specific activities that are not substantially different from those already existing in air, water, and soil.

Current regulations require shipment of these materials that typically exceeds 1000 miles and in our situation exceeds 3000 miles. The waste of time and materials is prodigious and clearly out of proportion with any hazard. It should also be realized that a not insignificant expenditure of energy is involved at a time when this nation is committed to energy conservation and the burning of liquid scintillation media in the furnaces of hospitals and other institutions would, in fact, provide a slight increment in heat energy. It should also be appreciated that in the substantial long distance transportation that is currently required, accidents are bound to happen. Although the radiological hazards are non-existent, death and injury may, nevertheless, occur with a probability which is doubtless greater than that which would be attendant to any type of disposal of these materials.

Finally, it should be noted that disposal by currently mandated methods entails severe costs which for this institution alone are estimated to exceed \$100,000/yr. Clearly, this money would be better spent in meaningful research rather than needless transportation.

Yours sincerely,

*Harold H. Rossi*

Harald H. Rossi  
Professor of Radiology  
Chairman, Joint Radiation  
Safety Committee

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Acknowledged by card 10/24/80