



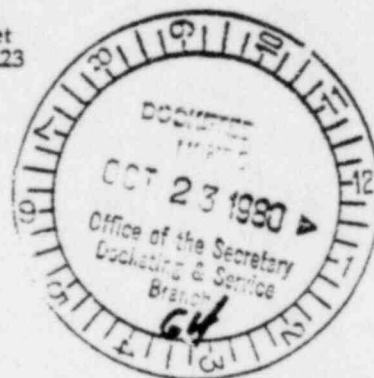
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PROPOSED RULE PR 20
(45 FR 67018)

October 17, 1980



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

Gentlemen:

I am taking this opportunity to comment on the proposed change to 10 CFR Part 20 which was published in the Federal Register of October 8, 1980. The proposal to exempt scintillation cocktail containing small concentrations of tritium and carbon-14, if enacted, will certainly decrease the volume of radioactive waste shipped by this institution. Increasing the amount of tritium and carbon-14 that may be disposed of via the sewer will effect less of a decrease in our waste volume, but still would be a desirable change, since any reduction in waste volume would benefit our institution. Since we are currently disposing of tritium-bearing animal carcasses, the proposed exemption for such carcasses would constitute a real and direct benefit to this institution.

While I obviously feel that the proposed rule is an excellent idea, I do have one question. Why not also exempt small concentrations of other nuclides, such as sulfur-35 and phosphorus-32? These radionuclides are assigned to the same relative radiotoxicity group as carbon-14 in ICRP Publication 5, and while they are not used as extensively as tritium and carbon-14, they are nonetheless used quite widely, and an appreciable further reduction in waste volume could be obtained without a measurable detriment to public welfare if they were to be exempted.

While the proposed rule will not eliminate the problem of radioactive waste disposal, it will at least make the problem smaller. I'm sure Radiation Safety Officers all over the country join me in urging the swift implementation of the proposed changes.

Sincerely,

Stuart Hinnefeld
Stuart Hinnefeld
Assistant Radiation Safety Officer

Acknowledged by card... 10/23/80

L-4-1, Pt. 2