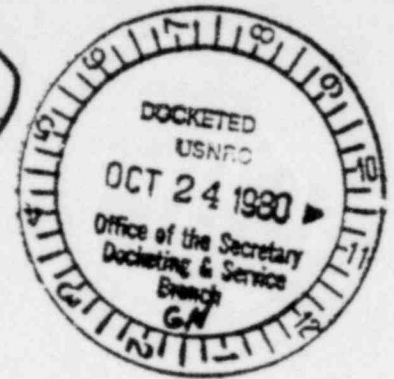


DOCKET NUMBER
PROPOSED RULE PR 20
(45 FR 67018)

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October 22, 1980

424 Laurel Drive
Hershey, PA 17033

Secretary of the Commission
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Docketing and Service Branch

Dear Mr. Secretary:

This is in response to the proposed Rule 10 CFR Part 20--Standards for Protection Against Radiation--"to permit licensees greater leeway in disposing of liquid scintillation media and animal carcasses containing tracer levels of hydrogen-3 (tritium) or carbon-14".

I must protest in the most strenuous terms any weakening of the present regulations. The environment does not need any further assault on it. Even though these radioactive substances are used in hospitals and in research, they are, nonetheless, radioactive for many decades, even if at low levels. The Commission knows full well that these substances are cumulative in the environment. The impact is not in the present time frame, but in the future (20 to 30 years hence). Just because the Commission "believes that the rule making would have little adverse impact from a radiological health standpoint" does not prove that it will not and does not address how little is "little" and how medically and scientifically sound it is to dump this into the environment.

I believe that in this case, as with any radioactive material of any kind, it is much better to be very conservative in our approach to disposal, to not release anything into the environment, or to not produce it at all. Let those who use these materials pay for their proper disposal or find ways to perform the test without these substances.

Thank you for giving me the opportunity to express my concerns.

Sincerely,

Warren L. Prelesnik
Warren L. Prelesnik

1-4-1/14.20

Acknowledged by card... 10/24/80

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