

DOCKET NUMBER

PROPOSED RULE

PR 20

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Veterans
Administration

October 27, 1980

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



Attention: Docketing and Service Branch

Dear Sir:

This is written in response to the new proposed rules as published in the Federal Register of October 8, 1980. I am certainly in favor of removing trace amounts of C-14 and H-3 from the present requirements for waste disposal. In fact I would like to see the rules extended to include:

- A. "Bactec" vials containing less than 2 microcuries of C-14 per vial. These are now being used by the thousands in many hospitals. We alone use nearly 1,000 per month. Each vial is larger than a liquid scintillation vial and has .06 to .07 microcuries per gram in it.
- B. Perhaps concentration should be expressed per gram of total material burnt per burn rather than per animal, as this is what will effect air concentrations of the labeled CO₂ or H₂O released.
- C. This rule could also be extended to animals containing tracer amounts of short half-lived isotopes such as I-125, I-131, P-32, etc., which are also used in many research procedures.

I hope that some of the above comments might be added to the new rules. However, I would rather the rules be passed as is than have any further delay.

Thank you

Walter J. Henderson
Walter J. Henderson,
Radiation Safety Officer
VA West Side Medical Center

10/31/80
ACKNOWLEDGED BY CARD.....

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