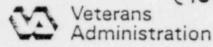
820 South Damen Avenue P.O. Box 8195 Chicago, IL 60680



Phone: (312) 666-6500, Ext. 604

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:

- "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-lifed 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

Radiation Safety Officer

VA West Side Medical Center

WJH/wew 537/115

in Reply Refer To:

1-4-1, 124.20