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PROPOSED RULE 45 FR 67018

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

ATTN: Docketing and Service Branch

Dear Sir:

This letter is in reference to Docket # PR 20 (45 FR 67018), regarding the disposal of hydrogen - 3 and carbon - 14. I would comment that the proposed ruling is a step in the right direction; however, the proposed limits in the new ruling may still be too low. I would like to remind those who formulate proposed regulations and policies of the excellent earlier work International Commission on Radiological Protection (ICRP), Committee V, entitled, Handling and Disposal of Radioactive Materials in Hospitals and Medical Research Establishments (1964). Specifically, this commission indicated that "occasional releases up to 100 microcuries of radionuclide other than those in Group 1 would also be non-hazardous." In light of this earlier recommendation by the ICRP, it may be reasonable to increase the proposed concentration of hydrogen - 3 and carbon - 14 in scintillation media and animal carcasses to 0.1 or 0.2 microcuries per gram.

Sincerely,

N.A. Detorie, Ph.D.
Radiation Safety Officer

NAD:km

Acknowledged by card... 11/24/80

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