



University of Wisconsin-Madison

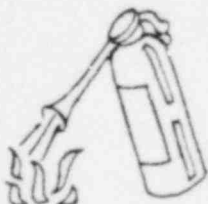
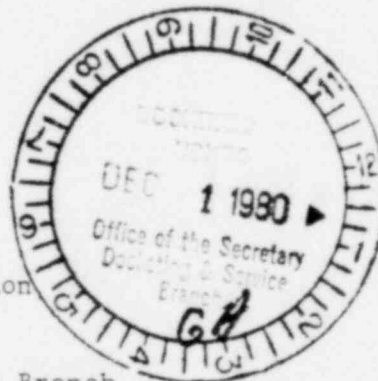
DOCKET NUMBER
PROPOSED RULE

PR 20
45FR67018

(277)

SAFETY DEPARTMENT
317 N. Randall Avenue
MADISON, WISCONSIN 53706
608 262-8769 - 262-0667

SAFETY IS OUR CONCERN...



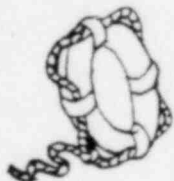
FIRE

November 24, 1980

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

Attention: Docketing and Service Branch

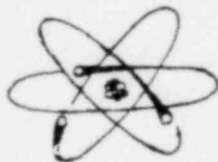
RE: Proposed Amendments to 10CFR Part 20 concerning
Disposal of Liquid Scintillation Media, Liquid Wastes
and Animal Carcasses



WATER

Dear Sir or Madam:

I would like to register my strong support for the proposed amendments to 10CFR20 as given in the Federal Register of Wednesday, October 8, 1980 (Vol. 45, No. 197). The analysis contained in the supplementary information does a very good job of presenting the case for adoption of the proposed changes. As described in that information, the proposed amendments will alleviate many of the difficulties faced by generators of such low-level wastes. It will also encourage alternate methods of disposal which are ecologically more attractive than those presently used.



RADIATION

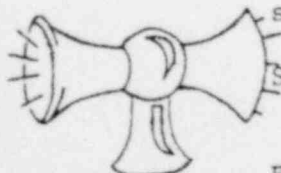
I believe, however, that the proposed regulations could be improved by broadening them beyond their present scope. As stated, they specify the physical form of the waste. Why, for instance, can't solid waste containing 0.05 μ Ci or less of C-14 or H-3 (or some specified concentration) be disposed of without regard to its radioactivity? Surely the fact that the waste consists of lab bench coverings and vinyl gloves does not make its disposal (without regard to its radioactivity) any more hazardous than the disposal of an animal carcass or of liquid scintillation "media".



INDUSTRIAL

The proposed regulations are also unnecessarily limited to C-14 and H-3. Basically, the NRC needs to define when something is considered (for regulatory purposes) radioactive.

Given the time required for broadening the regulations as suggested above, it is my opinion that the amendments should be adopted as an interim measure. They represent real progress and I endorse their intent.



Sincerely,

Elsa Nimmo

Elsa Nimmo

DISASTER CONTROL University Health Physicist

Acknowledged by card

12/1/80

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