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DIRECTOR  
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HEALTH PHYSICIST  
WINBORN D. GREGORY, M.S.

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

Attention: Docketing and Service Branch

Dear Sir:



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This is in reference to the proposed change to 10CFR20 concerning disposal of waste containing tritium and Carbon-14. We would encourage such a change, and would like to see this broadened to include other isotopes as well.

As the proposed changes are presently written there may be some confusion over the term scintillation medium. I think the intent is to include the contaminated vials in this change, but it sounds as if only the scintillation fluid is exempt. We currently empty the vials at the user level, and the vials are compacted with a hammermill. The activity is certainly lower than 0.05 microcuries per gram and it is a waste of land burial space to consider these crushed vials to be radioactive.

We also dispose of many other types of vials which have contained tritium and Carbon-14. A major component of our waste is a heavy culture vial which contains 1.5 microcuries of Carbon-14 culture media. The liquid is disposed in the sanitary sewer and the culture bottles are crushed and disposed as radioactive. These should also qualify under the proposed change except that the wording specified "scintillation counting". It would be beneficial to allow for regular disposal as non-radioactive of all vials or bottles used in "kit" type assays.

Very truly yours,

*Winborn D. Gregory*

Winborn D. Gregory, Health Physicist

WDG:kf

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Acknowledged by card.....

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