

The Memorial Hospital

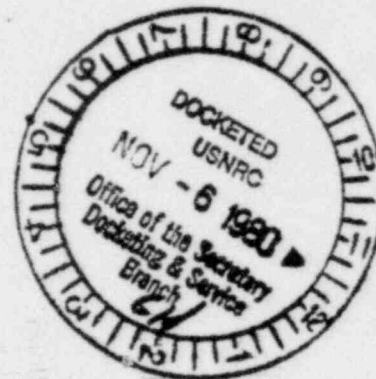
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DOCKET NUMBER PR 20
PROPOSED RULE 45 FR 67018

November 3, 1980



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

Attention: Docketing and Service Branch

This is to comment on your proposed rule governing disposal of certain low level radioactive wastes as published in the Federal Register, vol 45, pg 67018.

I strongly support amending the regulations to permit disposal of animal carcasses and scintillation fluids containing less than 0.05 uCi/gm of H-3 or C-14 without regard to their radioactivity.

In addition, I would urge you to set similar regulations for fluids besides scintillation media. As I read the proposed rule, solutions of low level activity which are not used for scintillation counting or are not soluble or dispersible in water must still be handled as heretofore. Such solutions, for example, might be the wastes from the analytical or preparative processing of labeled tracers in research. A large volume of very low level activity might be generated from column chromatography of labeled materials. It seems appropriate to deal with such solutions in the same manner as scintillation fluids. A chloroform solution containing 0.01 uCi/gm of a tritiated lipid is certainly no different a problem than a similar toluene solution.

In a similar vein, I would urge you to consider extending the proposed rule for handling animal carcasses to other solid very low level wastes such as column or thin layer chromatography media or paper towels, etc.

Sincerely,

Peter B. Schneider, M.D.
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A Major Affiliate of the
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Acknowledged by card.....

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