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UNIVERSITY OF MARYLAND HOSPITAL

DEPARTMENT OF DIAGNOSTIC RADIOLOGY

JOSEPH E. WHITLEY, M. D.
Chairperson

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DOCKET NUMBER PR 20
PROPOSED RULE 45 FR 67018



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

ATTN: Docketing and Service Branch
Docket No. PR 20 (45 FR 67018)

Dear Mr. Chilk:

This letter comments on Docket No. PR 20 (45 FR 67018) which relates to proposed rules for disposal of liquid scintillation counter media containing trace levels of hydrogen-3 and carbon-14. I am a diagnostic imaging physicist in the Department of Radiology, University of Maryland Medical School, holding an appointment as Assistant Professor.

I favor the prompt adoption of these proposed rules. The documents 45 FR 67018 and SECY-80-415 (September 9, 1980) show transparently that the saving in public costs and radioactive waste disposal volume outweigh the possible hazard of radioactive release involved by such a large ratio that counter-arguments can be based only on a highly hysterical fear of radioactive materials coupled with a blindness to their natural levels.

The Commission may find it appropriate to apply these rules retroactively to the Barnwell, Beatty and Richland sites: permit them to exhume and dispose of the liquid scintillation wastes and animal carcasses previously buried there to recover the highly valuable disposal space they now counterproductively occupy.

Sincerely yours,

Theodore L. Houk
Theodore L. Houk, Ph.D.

TLH/ks

~~Administrative~~ 11/24/80

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