



DEPARTMENT FOR HUMAN RESOURCES
COMMONWEALTH OF KENTUCKY
FRANKFORT 40621

(260)

RULE NUMBER PR 20
PROPOSED RULE 45FR67018

BUREAU FOR HEALTH SERVICES

November 26, 1980

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

ATTN: Docketing and Service Branch

Gentlemen:



This is in reference to the proposed changes to Part 20 concerning radioactive waste disposal of H-3 and C-14 in liquid scintillation media and animal carcasses.

In general Radiation Control is in favor of such changes. This waste currently takes up a large volume at our disposal sites. It has long been felt that a chemical problem would exist more than a radiation problem concerning this matter. However, the following questions are raised.

1. How did the value or limit of 0.05 microcuries per gram arise?
2. What chemical problems would arise from liquid scintillation vials being disposed of in sanitary land fills?

Would the chemical forms of the material pose problems? A consideration would be the possibility of these materials making their way into the ecosystem. Would the materials need to go to an authorized chemical waste site instead of a sanitary land fill?

3. I have found that in vitro testing, using I-125, poses problems for our licensees in Kentucky with regard to waste disposal. At present, the policy in Kentucky is hold to background, survey and then dispose. There is some material (I-125) left in the test tubes.

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If a limit of activity per gram could also be set for I-125 in vitro test tubes, this would help to alleviate some cumbersome storage problems for our licensees. I believe this could be done.

Please accept these remarks as comments from Radiation Control in Kentucky.

Sincerely,



Roy P. Osborne
Section Supervisor
Radiation Control

RPO:smb