

DOCKET NUMBER 20
REVISION

Medical Center

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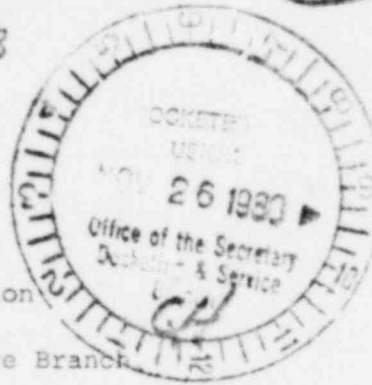


Veterans
Administration

45-FR67018

November 21, 1980

Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
ATTENTION: Docketing and Service Branch



Dear Sir:

I strongly favor the NRC proposed rule (Federal Register Vol. 45, No. 197, October 8, 1980) to permit licensees to dispose of liquid scintillation media and animal carcasses containing tracer levels of tritium or carbon-14. The chemical toxicity and flammability of the liquid scintillation media and the potential pathogenicity of stored animal carcasses are the characteristics that should be considered in the disposal rather than the tracer amount of radioactivity. Incineration is safer and more cost effective than disposal by shipment to the limited burial sites.

The proposed rule should be expanded to include 0.05 uCi/gm of Bactec blood culture media containing carbon-14. Incineration is safer than disposal by release into the sanitary sewerage system. Shipment of the numerous Bactec vials to burial sites is expensive and wastes space that should be reserved for significantly radioactive materials.

I strongly favor the NRC proposal to increase the annual limits for disposal of tritium and carbon-14 by release into the sanitary sewerage system.

Sincerely,

Milton Gross

MILTON GROSS, M.D.
Chief, Nuclear Medicine Service

DEC 2 1980
DIRECTOR

11/24/80