



Veterans Administration

November 21, 1980

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

Medical Center

2215 Fuller Road
Ann Arbor, MI 48105



DOCKET NUMBER DD
PROJECT FILE #

240

Y5FR67018



Dear Sir:

The NRC proposed rule (Federal Register Vol. 45, No. 197, October 8, 1980) to permit licensees greater leeway in disposing of liquid scintillation media and animal carcasses containing tracer levels of tritium or carbon-14 is the most practicable approach toward resolving the problem of low level radioactive waste disposal. The chemical properties of liquid scintillation media and potential pathogenicity of animal carcasses pose a greater disposal hazard than the tracer level of radioactivity. Incineration is preferable to shipment of this type of waste to rapidly diminishing burial sites. Other media besides liquid scintillation cocktail and animal carcasses, and other radionuclides commonly used in research should be included in the proposed de minimus level of 0.05 uCi/gm. Inclusion of carbon-14 blood culture media and chromium-51 in this rule would undoubtedly present a non-substantial and insignificant impact upon the environment.

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

Sincerely,

Frederic Eckhauser

FREDERIC ECKHAUSER, M.D.
Acting Chief, Surgery Service

Acknowledged by card.....

L-4, Pt. 20

POOR ORIGINAL

8012110/66