

PR-20

Docket Date
11-28-80

259

45FR67018



the University of Alabama in Birmingham | UNIVERSITY STATION / BIRMINGHAM, ALABAMA 35294

November 21, 1980

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

RE: Docket No. PR20
(45FR67018)

ATTENTION: Docketing and Service Branch

Gentlemen:

I am in full support in the amending of the Nuclear Regulatory Commission regulations to permit licensees greater leeway in disposing of liquid scintillation and animal carcasses containing tracer levels of hydrogen-3 or carbon-14. I would like to bring attention to the fact that carbon-14 used under general licensure (10CFR, Part 31) for certain in vitro clinical or laboratory testing are not regulated as to disposal limits by Part 20 of Title 10 of the Code of Federal Regulations (see 31.11f). Limits presented by Section 31.11a (3) are in the use of unit quantities of 10 microcuries each. The unit limit of hydrogen-3 is 50 microcuries. Neither carbon-14 or hydrogen-3 are limited to the total possession limits of 200 microcuries spelled out for certain other radionuclides in Section 31.11c(1). Therefore, a general licensee can possess any number of unit quantities of these two isotopes and generate considerable amount of radioactive waste for disposal to regular trash.

Although we have not been releasing radioactive materials into the sanitary sewage system, except by the small amounts in our investigator's wash water, the part of the amendment allowing annual limits for these two isotopes will help generate a program that will result in a significant savings here.

The total savings for the approval of this amendment will be in the

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neighborhood of thirty thousand dollars for UAB.

Sincerely,


William B. Bass
Radiation Safety Officer
UNIVERSITY OF ALABAMA IN BIRMINGHAM

WBB:rs

cc: Mr. Aubrey V. Godwin, Division of Radiological Health