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November 19, 1980

US NRC  
DISTRIBUTION SERVICES  
BRANCH

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

Attn: Docketing and Service Branch

Re: Comments to Proposed Rules Regarding Standards for  
Protection Against Radiation

Dear Mr. Chilk:

On October 8, 1980, the Nuclear Regulatory Commission published in the Federal Register (45 CFR 67018) proposed rules that would permit licensees greater leeway for the disposal of liquid scintillation media and animal carcasses containing tracer levels of hydrogen-3 (tritium) or carbon-14. American Critical Care, Division of American Hospital Supply Corporation, is actively engaged in research and development of new and unique therapeutic agents. American Critical Care currently holds a valid By-product Materials License and utilizes several radionuclide tracers including hydrogen-3 and carbon-14 during the conduct of our biomedical research. Therefore, American Critical Care is particularly interested in this proposed rulemaking and wishes to submit the following comments.

American Critical Care would first like to express our support of this proposed rulemaking. We are in agreement with the intent and specific proposed amendments as offered by the Nuclear Regulatory Commission regarding disposal of liquid scintillation media and animal carcasses containing less than 0.05 microcuries of hydrogen-3 or carbon-14 per gram without regard to their radioactivity. We also agree with the proposal that would allow the disposal by release to a sanitary sewage system of up to 5 curies of hydrogen-3 and 1 curie of carbon-14 per year. However, we would request that the Nuclear Regulatory Commission consider expanding the scope of this proposal to include one additional area involving dry, solid waste contaminated with tracer amounts of carbon-14 or hydrogen-3.

American Critical Care believes that the environmental, safety and health arguments offered in support of this October 8, 1980 proposed rule are valid for the disposal of dry, solid waste contaminated with carbon-14 or hydrogen-3. This is especially true for the scintillation vials that once contained the liquid media meeting the

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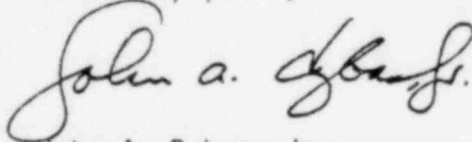
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0.05 microcuries per gram concentration limits for hydrogen-3 or carbon-14. Unless a licensee crushes the glass scintillation vials prior to disposal, the volume and cost required for burial would not be significantly reduced by the provisions of this proposed rule. Therefore, we recommend that the Nuclear Regulatory Commission include the provision that licensees can dispose of scintillation vials without regard to their radioactivity if they are contaminated with 0.05 microcuries or less of hydrogen-3 or carbon-14 per gram.

American Critical Care, for similar reasons, would also request the Nuclear Regulatory Commission make provisions for licensees to dispose of other dry solid waste; e.g. paper, cardboard, gloves, plastic, and glassware, without regard to radioactivity if they are contaminated with 0.05 microcuries or less of hydrogen-3 or carbon-14 per gram. These expanded provisions would conserve valuable burial space without significantly increasing health and safety hazards.

We trust the foregoing comments have been meaningful. We are willing to discuss any of them at greater length should you so desire.

Sincerely yours,



John A. Dybas, Jr.  
Director, Government Affairs

JAD:leb