



VOCKET FRAMER

PROPOSED RULE

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21 November 1980

REGISTRATION SERVICES DIVISION



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

Dear Sir:

The following comments on the proposed rule to allow licensees to dispose 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, are offered on behalf of the 15,000 members of the American College of Radiology. Our members are physicians and physicists specializing in the use of ionizing radiation and other forms of energy for the diagnosis and treatment of disease.

The College supports the proposed rule. The regulatory changes outlined by the commission will greatly alleviate the burdens that current requirements for disposal of liquid scintillation media and animal carcasses have placed on hospitals and medical research institutions. The disposal of these low level wastes through normal channels, as envisioned by the proposal, will not have any measureable or demonstrable radiological effect on the nation's health.

In the past, disposal of these low level wastes has been a significant cost for hospitals and medical research facilities. It is estimated that the rule change will reduce total disposal costs by \$16 million per year. The proposal, directly lowers the cost of medical research, which is vital to the quality of our nation's health care today and in the future.

In addition, the proposed rule will benefit the three U.S. radioactive waste burial sites, where space is in short supply. The rule eliminates the need for most liquid scintillation media and animal carcasses to be buried at these locations, thereby freeing approximately 480,000 cubic feet of space for other forms of radioactive waste.

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Acknowledged by card

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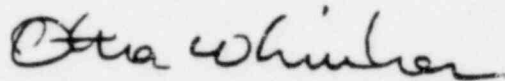
Secretary of the Commission

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Finally, we urge the commission to continue to study means for reducing the quantities of other forms of low level waste that must be disposed of by shipment to special waste burial sites. The expert committees of the College stand ready to assist the NRC in any appropriate manner.

Sincerely,

A handwritten signature in cursive script, appearing to read "Otha W. Linton".

Otha W. Linton

Director of Governmental Relations

OWL:js