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NOV 21 1980  
SERVICES  
November 21, 1980

DOCKET NUMBER PR 20  
PROPOSED RULE 45 FR 67018



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

RE: Docket No. PR 20 (45 FR 67018)

Dear Sir,

I have reviewed the October 10, 1980 communication concerning proposed regulations which would allow relaxed restrictions on disposal of H-3 and C-14 in the form of carcasses and LS vials, when concentrations are less than 0.05 microcuries per gram. Because of the now extreme cost of radioactive waste disposal, I favor the proposed regulations but feel they will be only of limited value to our medical center if retained in their present form.

I recommend that you consider exempting radioactive C-14 blood culture vials ("Batec" vials, 1.5-2 microcuries per 20 ml, .05-.07 microcuries/gram). The same logic that argues for LS vial exemption applies here. Disposal of these vials is a far greater financial burden on our medical center than disposal of LS vials, even though we have about 55 biomedical research groups using radioactivity. Uncapping of all these vials for sewer disposal is not a desirable alternative because of the time involved.

Secondly, I ask that you consider exempting animal carcasses containing less than 0.05 microcuries per gram of isotopes whose half-lives are much shorter than those of C-14 and H-3. At our institution a considerable amount of valuable blood flow research is done using labeled (Cr-51, Ce-141, Sr-85, Sc-46 at present) microspheres in dogs. This work has presented an enormous disposal burden. Since the half-life of isotopes used is generally less than three months, their disposal will have a much smaller long term environmental impact than disposal of like activities of C-14, which lives almost "forever".

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I do feel that prior to disposal it should be verified that the carcass presents no significant external hazard (by a GM survey) and, of course, the carcasses must not be consumed. Since upwards of 95% by volume of our carcass disposal consists of these shorter half-life materials, your proposed regulation would prove of little help to us in this regard.

Thank you for your help.

Sincerely,

*Kevin W Corrigan*

Kevin W. Corrigan, Ph.D.  
Radiation Protection Supervisor

cc: R.E. Henkin, M.D.  
Radiation Control Committee