

SENATOR CAESAR TRUNZO
CO-CHAIRMAN
STATE OFFICE BUILDING
HAUPPAUGE, NEW YORK 11787
(516) 979-5336
EDWARD N. CANTOR
CO-DIRECTOR



218

ASSEMBLYWOMAN MAY W. NEWBURGER
CO-CHAIRWOMAN
43 S. MIDDLE NECK ROAD
GREAT NECK, NEW YORK 11021
(516) 482-7722
SARAH J. MEYLAND
CO-DIRECTOR

NEW YORK STATE
LEGISLATIVE COMMISSION
ON WATER RESOURCE NEEDS
OF LONG ISLAND

DOCKET NUMBER
PROPOSED RULE PR 20
45FR67013

November 21, 1980

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

Attention: Docketing and Service Branch

Dear Sir/Madam:

I would like to comment on the proposed changes in NRC regulations for the disposal of low level radioactive wastes generated by hospitals and laboratories. While it may be good management to save scarce land burial sites for the more hazardous radioactive wastes, there are situations where disposal of any radioactive materials may be inappropriate. Areas which must receive special consideration and protection are those which are sole source aquifers or those primarily dependent on groundwater as a drinking water source. These areas typified by Long Island, New York are especially vulnerable to contamination and every effort is being made to avoid the deposit or disposal of radioactive materials which may ultimately leach into or otherwise reach the groundwater. Additionally, in groundwater dependent areas, discharges to sewer systems can lead to groundwater contamination by way of: a) direct leakage from sewer lines into the surrounding soils; b) discharge of sewage into land discharge basins; and c) collection of sludge which is composted and applied to the land.

I urge you in considering any changes in your regulations to keep in mind the fragile nature of groundwater systems and the relationship between land-use/land-discharge practice and groundwater



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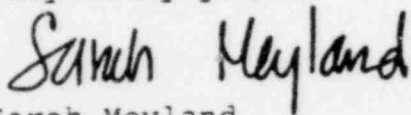
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quality. Any regulatory changes that offer the opportunity of radioactive constituents reaching groundwater supplies must be avoided and strongly resisted.

I would be happy to supply you with additional information on this issue.

Very truly yours,

A handwritten signature in cursive script that reads "Sarah Meyland". The signature is written in dark ink and is positioned above the typed name and title.

Sarah Meyland
Co-Executive Director

SM/rcm