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COLLEGE OF MEDICINE  
DEPARTMENT OF RADIOLOGY  
DIVISION OF NUCLEAR MEDICINE

November 21, 1980

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

Attention: Docketing and Service Branch

Gentlemen:

I am writing this letter in strong support of the Nuclear Regulatory Commission's plans to amend its regulations regarding low-level radioactive waste disposal. The shortage of space in low-level waste disposal sites is becoming a critical national problem. Solutions to the problem seem to be well in the future, and the lack of adequate disposal space is hampering both clinical and research activities to the detriment of nuclear medicine.

The Nuclear Regulatory Commission is acting correctly in addressing this problem by providing licensees greater flexibility in the disposal of low levels of carbon-14 and hydrogen-3. Any possible adverse environmental impact from the NRC's proposal would be far outweighed by the beneficial impact on the public of keeping available the diagnostic studies requiring these radiotracers.

The NRC could perform a valuable additional service by modifying 10 CFR 20 further so as to establish a de minimus level for each of the commonly used radiotracers other than C-14 and H-3. This level could be established on the basis of the potential environmental toxicity, based on the physical, chemical, and biological attributes of the radiotracer. Even

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PROPOSED RULE PR 20  
45FR67018



Acknowledged by comm.

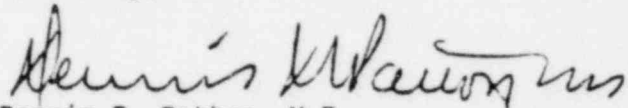
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if such de minimus levels were established only for I-125,  
it would represent a significant improvement in the low-level  
radioactive waste disposal problem.

Sincerely,



Dennis D. Patton, M.D.  
Director, Division of Nuclear Medicine

DDP:re

cc: Captain William H. Briner, M.D.  
Henry S. Ernstthal  
Timothy Goldfarb  
Fred J. Savaglio