



ABBOTT

JACKET NUMBER
PROPOSED RULE

PR 20

237

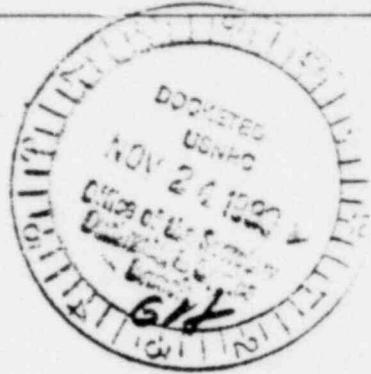
45 FR 67018

Office of
General Counsel

Abbott Laboratories
Abbott Park
North Chicago, Illinois 60064

SERVICES

November 18, 1980



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

Attention: Docketing & Service Branch

Re: 10 CFR Part 20 Proposal on Tracer Levels of Hydrogen-3
(Tritium) and Carbon-14, 45 FR 67018 (10/8/80)

Gentlemen:

Abbott Laboratories has the following comments in support of the above-referenced proposal. This proposal would greatly alleviate Abbott's radioactive waste disposal problems. Most of our radioactive waste involves hydrogen-3 or carbon-14 and would be covered by the proposed 0.05 microcuries per gram limit for liquid scintillation media and animal carcasses. Most of the waste material used could be released into a sanitary sewerage system without approaching the proposed limits of up to five curies of hydrogen-3 and one curie of carbon-14 per year, in addition to the presently allowed one curie per year for all radionuclides.

Abbott agrees with the Commission's assessment that any environmental impact is insignificant, that disposal in radioactive waste burial grounds is expensive and without benefit commensurate with the expense or with the risks involved in transportation of these wastes, and that this proposal would help alleviate waste burial capacity which is already in short supply.

Respectfully submitted,

Nathan J. Treinish
Attorney

NJT:bt

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