

MERCK SHARP & DOHME

RESEARCH LABORATORIES

185  
Docket NUMBER PR 20  
PROPOSED RULE 45 FR 67018

DIVISION OF MERCK & CO., Inc. • P. O. BOX 2000, RAHWAY, NEW JERSEY 07065

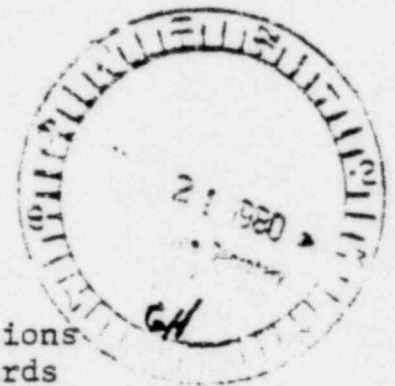
STANLEY J. FIDELMAN  
VICE PRESIDENT  
ADMINISTRATION AND PLANNING  
201 574-9328

November 19, 1980

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

Attention: Docketing and Service Branch

Re: Comments on Proposed NRC Regulations  
Amending 10 CFR Part 20 - Standards  
for Protection Against Radiation -  
Appearing in 45 FR 67018, October 8, 1980



Dear Sir:

Merck & Co., Inc. is a pharmaceutical company actively engaged in research and development and, therefore, vitally interested in the question of radioactive waste disposal. The Nuclear Regulatory Commission is proposing to amend its regulations to permit licensees greater leeway in disposing of liquid scintillation media and animal carcasses containing tracer levels of tritium or carbon-14. Under the proposal, the licensee could dispose of specified concentrations of these materials without regard to their radioactivity. In addition, the annual limits for disposal would be raised for the purposes of release to sanitary sewerage systems.

As a holder of licenses for both tritium and carbon-14, Merck considers the proposed rule responsive to the needs of medical research in the United States. In addition, the proposal would greatly simplify disposal problems and would reduce the burdensome costs to licensees of packaging and shipping.

We are aware that the proposed rule would not relieve licensees from complying with applicable Federal, state and local regulations regarding the disposal of non-radioactive materials. The Resource Conservation and Recovery Act, for example, and its implementing regulations for disposal of hazardous wastes,

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U.S. Nuclear Regulatory Commission  
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administered by the EPA, are designed to assure adequate and safe disposal of regulated materials. Thus, it is commendable for the NRC to recognize that licensees can fulfill their health and safety obligations with regard to these materials, in the quantities specified, by complying with the regulations of a single Federal agency (EPA). Accordingly, we endorse the NRC proposal as written.

It is our understanding that under NRC regulations, by the final rule, affected persons would be allowed to incinerate the low level tritium and carbon-14 waste material without the need to procure NRC permission to do so via amendment to current licenses. All other Federal, state and local requirements for disposal would, of course, be applicable. You may wish to state this in the preamble to the final rule.

We hope that the NRC finds the above comments useful. We trust they will be given careful consideration.

Very truly yours,

Stanley J. Fidelman

/mdm