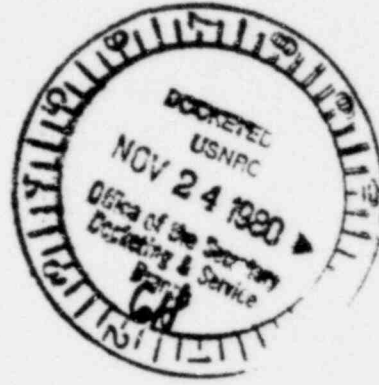


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DOCKET NUMBER PR 20
PROPOSED RULE 45 FR 67018

**Doctors
Hospital**

November 20, 1980

Docketing and Service Branch
Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Sir,

This letter is written regarding the proposed rules published in the Federal Register on October 8, 1980, concerning disposal of liquid scintillation media and animal carcasses containing tracer levels of tritium and carbon-14.

The proposed rules listed in the Federal Register offer a reasonable solution to the disposal problems surrounding lightly contaminated animal carcasses and scintillation cocktails. I feel, however, that the proposed rules are incomplete in that they only address tritium and carbon-14 when many other isotopes are in common use in medical facilities.

The basic problem is that there is no uniform definition of what constitutes radioactive waste material. The Department of Transportation states in its regulations that material with a specific activity of less than 0.002 microcurie per gram is not radioactive while the NRC and the Arizona Radiation Regulatory Agency (ARRA) have no such lower limit for solids and consider anything above background radioactive. Frequently, inspectors from the ARRA will survey hospital waste receptacles with sensitive NaI scintillometers and will cite the hospital if even a few nanocuries of a short-lived isotope are found. Additional problems arise from the I-125 solid wastes from the in-vitro laboratories which must be held for decay or shipped to a licensed repository even though the specific activity is well below 0.002 microcurie per gram. Some alternative disposal method should be allowed for these extremely low-level wastes.

I would like to propose, therefore, that 10 CFR 20 be further modified to include a de minimus level for solid radioactive materials based on each isotope's radiotoxicity, half-life and its behavior in the environment. This system would be more flexible than the current DOT standard in that it would allow individual release levels for each isotope and could be

acknowledged by card... 11/24/80

L-4-1, PR 20

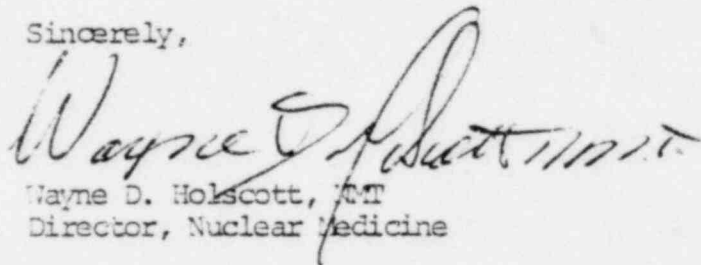
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Docketing and Service Branch
November 20, 1980
Page Two

easily added to Appendix B in rear of Part 20. We feel that these changes would be complementary to the proposed rules listed in the October 8 Federal Register and would provide a more complete solution to disposal of very low-level radioactive wastes.

Thank you for considering my comments on these proposed rules.

Sincerely,

A handwritten signature in cursive script, appearing to read "Wayne D. Holscott".

Wayne D. Holscott, M.D.
Director, Nuclear Medicine

WDH/br