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Office of the Vice Chancellor for Medical Affairs

November 25, 1980

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

Attn: Docketing and Service Branch



Dear Mr. Secretary:

The Washington University School of Medicine is pleased to have the opportunity to comment on the proposed rule, Standards for Protection Against Radiation, 10 CFR Part 20 (Federal Register 45 : 67018-67020, 1980). This institution supports strongly the proposed rule which would remove NRC restrictions on the disposal of liquid scintillation media and animal carcasses containing less than 0.05 microcuries of ³H or ¹⁴C per gram and which would increase the quantities of these isotopes which can be released into the sanitary sewer system to 5 curies and 3 curies per year respectively. Such a rule will begin to alleviate the significant problems of low-level radioactive waste disposal and will save the research universities of this nation millions of dollars.

However, as the Commission points out in its explanation of the rule, burial of low-level radioactive waste containing toluene or other scintillation fluid, poses significant problems and these problems will remain unchanged regardless of whether the institutions use onsite burial or ship to an off-site location. The only reasonable method of handling these wastes is by incineration. In most cases, this will require changes in local ordinances or in obtaining special incineration permits. The Nuclear Regulatory Commission can and should play a critical role in persuading state and local governments as well as the general public that incineration is a safe and acceptable method of handling low level radioactive waste.

Sincerely,

Virginia V. Weldon

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Acknowledged by card... 12/1/80

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