

Boston University Medical Center

Radiation Protection Office

88 East Newton Street, D-604 Boston, Massachusetts 02118-2594 617-638-7052

United States Nuclear Regulatory Commission Licensing Branch Washington, D.C. 20555

December 14, 1993

CONTROL NO. 117842

Gentlemen,

We have received approval on our license to incinerate radioactive materials at 700 Albany St. We have been advised by the Regional office to submit to Headquarters separately the request to incinerate radioactive waste from institutions affiliated with Boston University Medical Center. This request is not unusual as you have previously approved Harvard Health Services in Boston to pick up radwaste from their affiliated institutions.

We are specifically requesting at this time to incinerate radioactive waste from 2 affiliated institutions: Boston University license no. 20-00805-11 and Boston City Hospital license no. 20-00275-08. The new research building where the incinerator is located is owned by Boston University. Boston City Hospital is a major teaching hospital of Boston University Medical Center and located across the street from this facility in the South End. In fact many of the staff are similar for both institutions. We are asking these 2 affiliated institutions be added to our license for radioactive incineration of their radwaste. We do not feel the addition of these facilities changes the scope or reflects commercialization of this incinerator. However each institution will be responsible for amending its NRC license for change in their radwaste operations if they desire to have our institution provide radwaste incineration.

We anticipate that the amount of radwaste emanating from both affiliated institutions for incineration at BUMC is small. Both institutions generate almost no radioactive animals. We anticipate that combined solid long-lived radwaste from both institutions amounts to 60 $\rm f^3$ a year principally $^3\rm H$ and $^{14}\rm C$ with activity levels comparable to ours and other institutions performing medical research at this volume.

Transportation and packaging of radwaste would be in accordance with DOT regulations and be licensed by NRC. We expect that we would pick up this radwaste at these facilities in a dedicated licensed vehicle but either one of these institutions could transport their radwaste in one of their vehicles if they are licensed by NRC for this purpose.

We feel we have demonstrated a long history of a successful and conscientious radiation protection program of which radioactive incineration is an integral part. In summary, we feel approval of this amendment represents optimizing a current technology that will significantly reduce our low level radioactive waste to our affiliates as we together pursue our mission of performing top quality medical research using radioisotopes during a time of radwaste crisis in the United States.

Sincerely

Victor Evdokimoff, CHP
Director Radiation Protection, BUMC
Assistant Clinical Professor Oral
Radiology and Environmental Health

cc: Region I (David Mann)