

NRC
Central

October 7, 1982

Mr. Kurt Scheuermann
KS Processing Co., Inc.
1606E Manning Boulevard
Levittown, Pennsylvania 19057

Dear Mr. Scheuermann:

As I promised during our telephone conversation today, I am enclosing a copy of the Statement of Consideration on Biomedical Waste Disposal that was published in the Federal Register when the Commission adopted 10 CFR [Code of Federal Regulations] 20.306. The Statement of Consideration explains the scope of the regulation and the reasons for its adoption and provides at its conclusion the text of the regulation.

The regulation permits disposal of liquid scintillation media containing less than 0.05 microcuries of hydrogen-3 (tritium) or carbon-14 per gram of medium without regard to radioactivity. As noted in the Statement of Consideration (46 Fed. Reg. at 16233),

Licenseses may dispose of liquid scintillation media containing this concentration of hydrogen-3 or carbon-14 without regard to its radioactivity. Scintillation vials themselves are not radioactive. Rather, it is the scintillation media remaining in the vials that contains the radioactivity. The rule covers that material. Therefore, it would be permissible to dispose of the used vials along with the media."

The Commission found that adoption of 10 CFR 20.306 would not pose an unreasonable radiological risk to public health and safety and to the common defense and security.

Of course, as indicated in 10 CFR 20.306(d), the NRC's regulation does not relieve persons from complying with other applicable requirements of other federal, state, or local agencies regarding other toxic or hazardous characteristics of such material.

I trust that this information will help you understand the scope and intent of the Commission's regulation.

Sincerely,

Distribution:
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Subject
Burns chron

Stephen G. Burns, Attorney
Office of the Executive
Legal Director

bcc: John Glenn, RI

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