

# SAINT BARNABAS MEDICAL CENTER

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RONALD J. DEL MAURO  
President and Chief Executive Officer

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DEPARTMENT OF RADIOLOGY  
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May 24, 1994

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

Secretary of the Commission  
United States Nuclear Regulatory Commission  
Washington, DC 20555

PROPOSED RULE PR 20  
(59FR9146)

Attn: Docketing and Service Branch:

Gentlemen:

I am very concerned about the proposed rulemaking published in 59 FR 9146 on February 25, 1994, specifically the possibility that the Commission may eliminate the exemption for disposing of patient excreta into the sanitary sewage systems. It is no exaggeration to state that this action would lead to the elimination of clinical nuclear medicine practice in the United States. Should the exemption be dropped, hundreds of gallons of urine and feces would have to be stored in the elaborate holding tanks with extensive monitoring systems in every clinical installation, hospital, clinic, or office. The biomedical hazards would be enormous, the radioactive hazard minimal, though greater than the nonexistent hazard currently posed by disposal into the sanitary sewage system.

Outpatient studies would pose additional problems. Would patients be required to store their excreta at home, or be required to bring it back to the facility where they were scanned? Would the homes of patients have to be monitored by government officials for proper waste disposal?

The logistics of the proposed policy would be ridiculous, the costs untenable if implemented, and likely result the curtailment of valuable clinical evaluations and the obliteration of a well recognized and safe medical specialty. There is no public health threat created by the current exemption. Please consider the consequences of this proposal, and maintain the current common sense and scientifically defensible policy.

Sincerely yours,



Letty G. Lutzker, M.D.  
Chief of Nuclear Medicine  
Department of Radiology

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