

CHARM SCIENCES INC.

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May 20, 1994

Secretary of the Commission
US Nuclear Regulatory Commission
Washington, DC 20555

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH
PR 5/17/94
(59FR 9146)

Attn: Docketing and Service Branch

Sir/Madam:

This is in response to the request for comments on the current policy for disposal of radioactive material by release into sanitary sewerage systems. Following is our position on this issue:

(1) Form of material released: The most recent regulations restrict sewerage disposal to materials that are soluble or readily dispersible biological materials. We believe that any prior concerns for concentration of non-biological readily dispersible material are resolved by the new restriction to biological materials and are unaware of any significant problems with soluble material. We therefore recommend continuation of this allowed release form.

(3) Types of limits: The present method of limitation based on an individual being exposed by ingestion of water from the sewer outfall seems to be sufficiently conservative to satisfy all needs, particularly in view of the new lower release concentrations. This is readily controllable in the workplace and is easily understood for radionuclide users.

(4) Exemption of Patient Excreta: Continuation of this important exemption is encouraged as a significant ALARA consideration. Collection and control of patient excreta would result in the deliberate reconcentration of a significant waste stream with the potential for worker exposure, spills, and emergency issues that have been avoided through the judicious use of this exemption. The rapid dispersal of this soluble waste stream of short-lived material seems the most practical approach of this issue and we strongly recommend the continuation of the exemption in its current form.

We thank the commission for the opportunity to comment on this important issue and look forward to commenting on any proposed regulations that are forthcoming.

Sincerely,
Charm Sciences Inc.

David R. Legg
David R. Legg
Quality Assurance Manager

DRL/cw

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