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PROPOSED RULE PR 20  
(59FR9146)

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GENETICS  INSTITUTE

May 25, 1994

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

The Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Attention: Docketing and Service Branch

Dear Sir/Madam:

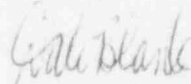
Genetics Institute wishes to provide the following comments regarding the Advanced Notice of Proposed Rulemaking for "Disposal of Radioactive Material by Release into Sanitary Sewer Systems", published in the Federal Register on February 25, 1994. Genetics Institute is a leading biopharmaceutical firm engaged in the discovery and development of human pharmaceuticals through recombinant DNA and other technologies. The company has a diversified portfolio of licensed and proprietary pharmaceutical products at various stages of development, including treatments for anemia, hemophilia, cancer, bone damage, heart disease, inflammatory conditions and immune system disorders. Disposal of radioactive materials to the sewer is performed in accordance with existing regulations and conditions of our NRC license.

Radioactive materials, utilized in our laboratory research and development efforts, generate a large quantity of low-activity high-volume aqueous radioactive waste. A large portion of this waste is soluble and readily dispersible biological material which is disposed of directly to the sanitary sewer system. Any changes to the regulations that would place new restrictions or further limit disposal by way of the sanitary sewer system would have a significant negative impact on Genetics Institute's radioactive waste management program, and upon our research and development efforts.

Reduction in the amount of radioactive material released to the sewer would present a significant financial burden to the biotechnology industry in that liquid waste may need to be solidified for land disposal. This would be tremendously expensive given the current cost of disposal of solid radioactive wastes. In addition, access to burial sites may no longer be available to facilities such as Genetics Institute. More importantly, increased handling of this liquid waste would result in a greater potential for spills and higher radiation doses to the waste technicians; directly in opposition to our ALARA program.

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,



Dale Blank  
Radiation Safety Officer and  
Vice President,  
Facilities & Technical Services

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