

# SAINT BARNABAS MEDICAL CENTER

DOCKET NUMBER  
PROPOSED RULE PR 20  
(59FR 9146)

RONALD J. DEL MAURO  
President and Chief Executive Officer

'94 MAY 27 P 3:20  
DEPARTMENT OF RADIATION ONCOLOGY  
LOUIS SANFILIPPO, M.D., Chairman  
(201) 533-5630

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

May 20, 1994

25

Secretary of the Commission  
United States Nuclear Regulatory Commission  
Washington, D.C. 20555

Attn: Docketing and Service Branch

Gentlemen:

It is with great concern that I respond to the proposed rulemaking published on February 25, 1994 in 59 FR 9146. I am specifically referring to the possibility that the Commission may drop the exemption for patient excreta to sanitary sewage systems. This course of action may very well lead to the extinction of Clinical Nuclear Medicine in the United States. Hundreds of thousands of these procedures are done safely each year. Should the exemption be dropped, the resulting radioactive waste storage problem would be enormous, both in logistics and cost. Hospitals would be forced to either collect and store urine and fecal material, or to build elaborate holding tanks with monitoring systems. The handling of patient excreta presents a greater biomedical hazard than the radioactive portion, which is minimal if at all existent. Many facilities have reduced clinical procedures, especially RIA, due to the lack of low-level radioactive waste disposal sites. Dropping the current exemption would create a crisis orders of magnitude higher, as every hospital with a Nuclear Medicine Department would be affected. Many would be forced to stop providing this vital patient service.

An additional concern is the thousands of procedures that are done on an out-patient basis. Would these patients have to store their own excreta at home? Would they be required to bring it back to the facility where they were scanned? Would the facility be responsible for picking up the waste and transporting it back? Again, the storage and transportation problems would be enormous.

9406090031 940520  
PDR PR  
20 59FR9146 PDR

OLD SHORT HILLS ROAD • LIVINGSTON, NEW JERSEY 07039 • (201) 533 5000

DS10

There is no conceivable rationale for dropping the exemption. The exposure to individuals from this source is far below any current regulatory limit. As instrumentation becomes more sophisticated and sensitivity increases, it is indeed true that materials used in clinical procedures can be detected. However, just because something is detectable does not necessarily make it hazardous and consequently subject to regulation. Again, I feel that adding storage areas, handling, and monitoring excreta would introduce a greater hazard than currently exists. I urge the Commission to carefully consider the consequences of this proposal, and to maintain the exemption for patient excreta.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Ira M. Garelick".

Ira M. Garelick, M.S.  
Health Physicist

IMG/aj