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DOCKETING & SERVICE PROPOSED RULE PR 20
BRANCH 25 May 1994 (59FR 9146)

Secretary of the Commission
Nuclear Regulatory Commission
Washington, DC 20555 Attention: Docketing and Service Branch

re: Disposal of radioactive materials by release into the
sanitary sewer system

Sir:

I write to express concern about proposals to reevaluate the
sewer disposal limits of 10CFR20.

Although I have not had access to the contractors' reports, I
suspect most local accumulation in the sewers and treatment systems
can be dealt with locally and without specific attention of the
NRC, especially if the nature of the accumulation is such as to
reflect also the accumulation of other more hazardous,
nonradioactive materials as well.

For medical research and biotechnology laboratories, the
present sewer limits afford the major means for source reduction of
low-level radioactive waste. And the sewer system receives many
other forms of hazardous chemical and biological materials.

The *form* of permitted disposal must be evaluated in
relationship to the carriers - via nonradioactive, proven
accumulation. The *total quantity limits* presently applied are
adequate. The *limits* should be related to activity, not dose; if
a local dose exceeding limits is detected, local amelioration must
be accomplished. Ingestion of sewer outfall, of course, is an
absurd assumption. Patient excreta should continue exempted from
the limits; any local retention would be a rank violation of ALARA
principles and biologically unacceptable.

I support the Commission's belief that the present regulations
are adequate.

Sincerely yours,

David E. Drum, MD, PhD, CHP

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