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OFFICE OF SECRETARY  
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May 26, 1994

The Secretary of the Commission  
 Attention: Docketing and Service Branch  
 U.S. Nuclear Regulatory Commission  
 Washington, D.C. 20555

Reference: Proposed Rule on "Disposal of Radioactive Material by  
 Release into Sanitary Sewer Systems 10 CFR part 20 (RIN 3150 - AE 90)

Dear Sir/Madam:

I believe that the approach of limitation based upon an individual being exposed by the ingestion of water from the sewer outfall (2 liters/day at the point of release) is unrealistically stringent. Insead, the commission should consider other locations such as the sewage treatment plant (STP) or the nearest residential area, in determining the protection to be provided. Incoming sewage<sup>slopes?</sup> should be routinely monitored at some distance from the Sewage Treatment Plant (STP).

The use of a dose limit approach with total quantity and concentration values in a regulatory guide to facilitate compliance seems most appropriate.

It is my opinion that patient excreta which may contain radioactive materials as a result of nuclear medicine diagnosis or treatment, should be excluded from sewer release limits, because the radioactive materials used in these studies are short lived and decay rapidly, resulting in doses to individuals well below the NRC dose limit for members of the public.

The current regulation is adequate and any radionuclides detected in excreta are usually of very low concentrations. Consequently it is appropriate to continue the exception for patient excreta.

Sincerely,

*Chris Constantinou*

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