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Samuel J. Chilk
The Secretary of the Commission
United States Nuclear Regulatory Commission
Washington, DC 20555
Attention: Docketing and Service Branch

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OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

RE: **Comments on Proposed Change to 10CFR20
Disposal of Radioactive Material into Sanitary Sewer
Systems**

References: Advance Notice of Proposed Rule Making in Federal Register
Vol. 59, No. 38, Page 9146 (BIN 3150-AE90)
NUREG/CR-5814, Evaluation of Exposure Pathways to Man from
Disposal of Radioactive Materials into Sanitary Sewer Systems

Dear Secretary Chilk:

The February 25, 1994, Federal Register announced advance notice of proposed rulemaking related to the disposal of radioactive materials to sanitary sewers. The FR asked for comment from interested parties; we offer these comments for consideration.

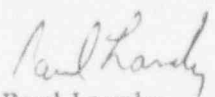
I am concerned that the Commission may significantly reduce the limits in Part 20.2003--Disposal by release into sanitary sewerage. I believe that, in many cases, sewer disposal of these materials results in the lowest reasonably achievable dose.

My concern with the notice of proposed rulemaking is that lower, perhaps much lower, numerical limits will be adopted into Part 20.2003. Agreement states will comply and some may further reduce these limits. Lowering the limits could place a significant burden on us; a burden that can not be justified if the ALARA concept is included.

If it is decided that the numerical limits (10CFR20.2003(a)(4)) are not providing adequate protection from radiation for workers or members of the general population, I suggest that the Commission consider extending the dose calculation concepts in Part 20.1203, Part 20.1204, and 10CFR50--Appendix I to the sewer disposal of radioactive materials. A simplified version of Regulatory Guide 1.111 could be developed to aid licenses and regulators to project and to demonstrate that routine releases comply with the dose limits of 10CFR20.

If I can be of further assistance please contact me at (510) 643-7976. Thank you for your considering this request.

Sincerely,


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