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

OFFICE OF SECRETARY DOCKET NUMBER
DOCKETING & SERVICE PROPOSED RULE PR 20
BRANCH (59FR 9146)

ATTN: Docketing and Service Branch

REF: NUREG/CR-5814

We wish to comment on the Advance notice of proposed rulemaking referenced above and published in the Federal Register Vol. 59, No. 38. We support the current limits of total quantity, form and types of limits as listed in 10 CFR part 20. The studies conducted to determine those limits were in our view consistent with good practices in disposal of radioactive materials.

There is a real concern in our biotechnology industry that reduction in the sewer disposal limits as listed in the current version of 10 CFR part 20 is being considered. Currently, we are dealing with the difficulties in the management of low level radioactive waste (LLW) both within the Commonwealth of Massachusetts and in other states. One of the key elements of reduction of the volume of solid LLW is the conversion at the source of generation of that waste into low levels of water soluble liquid waste. Maintaining the waste as liquid waste which is disposed safely at the site of generation (ex. research laboratory sinks) eliminates many waste management problems and reduces the risk of exposure associated with that material when it would otherwise become absorbed solid waste material. Any significant change in the reasonable limits for sewer disposal would increase the amount of liquid and solid waste and increase risk of exposure associated with the handling of that waste.

We would hope that due consideration will be given to any changes in sewer disposal limits in relationship to the low level radioactive waste issue as a whole so as not to reduce risks of exposure in one media at the expense of increasing risk in another.

If you have any questions concerning our comments you may call me at (508) 872-8400, Ext. 2150.

Sincerely yours,



Richard Mattila
Director of Safety and Laboratory Services (RSO)

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