



Waltham Weston  
Hospital &  
Medical Center

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OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

May 23, 1994

DOCKET NUMBER  
PDR 20  
(59FR9146)

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

Attn: Docketing and Service Branch

Gentlemen:

This is in response to your request for comments on the current policy regarding the disposal of radioactive materials by release into sanitary sewerage systems. Our position is described below:

(1) Form of Materials Released:

We feel that the new regulation restricting sewerage disposal to materials that are soluble or readily dispersible biological materials have resolved the issue of concentration of materials and therefore recommend the continuation of this policy.

(2) Total Quality of Material:

While the current limits appear easily attainable by most licenses the new restrictions on the forms of materials released and on the release concentrations should reduce the concern over reconcentration of materials, and so seems reasonable to consider easing release limits for large users.

(3) Types of Limits:

The present method of limiting releases into sanitary sewerage systems seems adequate, especially when the new reduced release concentration limits are considered.

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(4) Exemption of Patient Excreta:

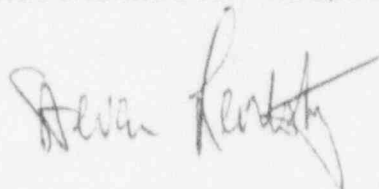
The discontinuation of this exemption would negatively impact the ALARA programs of licensees. The collection of excreta would result in a reconcentration of a large volume of waste. This would result in a significant increase in worker exposure and an increased risk of spills due to incorrect handling. This water soluble waste has a rapid dispersal rate and consists primarily of short lived nuclides. The most practical approach to disposal would be the continuation of the current exemption.

Thank you for the opportunity to comment on these issues.

Sincerely,



Denton E. MacCarty, M.D.  
Chief of Radiology &  
Radiation Safety Officer  
WalthamWeston Hospital & Medical Center



Steven Levitsky,  
Executive Vice President  
WalthamWeston Hospital & Medical Center

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cc: F.X. Masse & Associates  
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