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(59FR9146)

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May 5, 1994

Dr. George E. Powers
Office of Nuclear Regulatory Research
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Dr. Powers:

I would like to make the following comment concerning revising regulations that govern the release of radioactive materials to sanitary sewer systems.

Exemption of Patient Excreta - The NRC states that it "currently believes that the present regulation is adequate but recognizes that radionuclides used in nuclear medicine have been detected in very low concentrations on occasion at treatment facilities. Therefore, the Commission invites comments regarding the appropriateness of continuing the exemption for patient excreta."

I fully agree with the above statement by the NRC and support it. However, I also believe that the category of patient excreta should be extended to cover vomitus from a patient in order to avoid any confusion on what should be included as patient excreta.

I also feel that it should not be necessary to survey and monitor excreta for patients given clinical doses of radionuclides. The procedure creates undue anxiety on the patient and generates added work to an already overburdened nursing staff. The survey readings have proved not to be high enough to present any type of concern.

We appreciate the opportunity to comment on revision of rules.

Sincerely yours,

J. G. Llauro, M.D.
Chief, Nuclear Medicine

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