

DS09

College of Engineering and Mines  
Department of Nuclear and Energy Engineering

THE UNIVERSITY OF  
**ARIZONA**  
TUCSON ARIZONA

*Robert Burner*  
*57FR10508*

Tucson, Arizona 85721  
(602) 621-2551  
FAX (602) 621-8096

April 15, 1992

92 APR 20 4 14Z  
RECEIVED  
NRC  
ATOP  
MAY 1 1992

*3/26/92*  
*(2)*

Mr. David L. Meyer  
Chief, Regulatory Publications Branch  
Division of Freedom of Information and Publications Services  
Office of Administration  
USNRC  
Washington, DC 20555

Subject: Comments on Draft Guidance Clarification of RCRA  
Hazardous Waste Testing Requirements for Mixed Waste,  
March 1992

In general, the subject Draft Guidance is a good effort and much needed. I have only a few minor comments as follows:

1. I think the title in the Federal Register is better than on the document.
2. You have addressed the problem of testing mixed waste and the possible exposure to employees but you have made no mention of the possible impact of the associated radioactive contamination of equipment and facilities.
3. It appears to me that the upper right hand box in Figure 3, page 20 is incomplete. If this waste is radioactive as noted in a, then it can go to an AFA licensed facility if it meets subpart C of 40CFR61 as non-hazardous.

*James G. McCray*  
James G. McCray  
Adj. Assoc. Professor

JGC/rr

# FORD 1

## REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:9204220025 DOC.DATE: 92/03/18 NOTARIZED: NO DOCKET #  
 FACIL:50-312 Rancho Seco Nuclear Generating Station, Sacramento Mu 05000312  
 AUTH.NAME AUTHOR AFFILIATION  
 YUHAS,G.P. Region 5 (Post 820201)  
 RECIP.NAME RECIPIENT AFFILIATION  
 SHETLER,J. Sacramento Municipal Utility District

SUBJECT: Forwards insp rept 50-312/92-03 on 920224-27.No violations noted.

DISTRIBUTION CODE: IE06D COPIES RECEIVED:LTR 1 ENCL 1 SIZE: 3+6  
 TITLE: Environ & Radiological (50 DKT)-Insp Rept/Notice of Violation Respons

### NOTES:

	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL		RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	
	PDNP LA	1	0	PDNP PD	1	1
	BROWN,S.	1	1			
INTERNAL:	ACRS	2	2	AEOD/ANDERSON,R	1	1
	AEOD/DSP	1	1	COLLINS,D RGN 2	1	1
	NMSS/SGTB 4E4	1	1	NRR/DLPQ/LPEB10	1	1
	NRR/DREP/PRPB10	2	2	NRR/PMAS/ILRB12	1	1
	NUDOCS-ABSTRACT	1	1	OE DIR	1	1
	OGC/HDS1	1	1	REG FILE 02	1	1
	RES	1	1	RGN5 DRSS/RPB	1	1
	RGN5 FILE 01	1	1	RGN4 MURRAY,B	1	1
EXTERNAL:	EG&G SIMPSON,F	2	2	NRC PDR	1	1
	NSIC	1	1			

R  
I  
D  
S  
/  
F  
O  
R  
D  
  
1  
  
D  
O  
C  
U  
M  
E  
N  
T

TOTAL NUMBER OF COPIES REQUIRED: LTTR 25 ENCL 24