

Docket: 50-267

FEB 14 1984

Mr. O. R. Lee, Vice President
Electric Production
Public Service Company of Colorado
P.O. Box 840
Denver, Colorado 80201

Dear Mr. Lee:

We are in receipt of your January 13, 1984, letter (P-84023), but are unable to take the requested action due to the incompleteness of the application. As indicated in your letter, 10 CFR Part 20.302 provides a provision for requesting methods of the disposal of licensed material in a manner not otherwise authorized in the regulations. This regulation continues, however; "Each application should include a description of the licensed material and any other radioactive material involved, including the quantities and kinds of such material and the level of radioactivity involved, and the proposed manner and conditions of disposal. The application should also include an analysis and evaluation of pertinent information as to the nature of the environment . . . ; and procedures to be observed to minimize the risk of unexpected or hazardous exposures." Since none of this information was provided, we can take no action on your request.

Your letter also makes reference to 10 CFR Part 20.306 (which allows the disposal, without regard to the radioactivity, of 0.05 microcuries or less of hydrogen-3 or carbon-14, per gram of medium, used for liquid scintillation counting) as the justification for the similarly restricted disposal of sulphur-35. This regulation, which was published on March 11, 1981, (46 FR 16234), was provided to allow hospitals and medical research institutions greater leeway in disposing of liquid scintillation media and animal carcasses containing tracer levels of hydrogen-3 or carbon-14 (the two most commonly used radionuclides in biomedical research). The 0.05 microcurie per gram concentration limit was accepted by the Commission as a level that would cover most biomedical research involving tracer use in animals and also adopted for liquid scintillation media, as an administrative simplification. For further details on this regulation, see the statements of consideration, 48 FR 16230.

If you wish to pursue the disposal of sulphur-35 at the Fort St. Vrain station, we request that you provide an application which, in addition to fulfilling the requirements of 10 CFR 20.302(a), complies with the provisions of 10 CFR 50.90 and 10 CFR 170.22. We further request that appropriate restrictions, for the quantities of material involved and the method of disposal, be proposed as Technical Specification limitations to expedite our evaluation of your request.

RPB1 *ew*
PWagner/dsm
2/7/84

RPB1 *ew*
EJohnson
2/10/84

DRRP&EP/RIV *RM*
RDenise
2/14/84

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Mr. O. R. Lee

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FEB 14 1984

If you have any questions on this subject, please contact the NRC project manager.

Sincerely,

Original Signed By
E. H. Johnson

E. H. Johnson, Chief
Reactor Project Branch 1

cc: See attached list

bcc distrib. by RIV:

RPB1

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Fort St. Vrain
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