



DEPARTMENT OF VETERANS AFFAIRS
Medical Center
Albany NY 12208

June 13, 1991

In Reply Refer To:

Director, Office of Enforcement
U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

RE: Docket No. 030-10026
License No. 31-02755-05
EA No. 90-209

Gentlemen:

This correspondence, with attachments, is forwarded in response to your letter, dated June 3, 1991.

VIOLATION E:

10CFR 20.303 describes requirements for the disposal of radioactive materials by release into the sanitary sewerage system. 10CFR 20.401(c)(3) requires that each licensee maintain records of disposals made under 10CFR20.303.

Contrary to the above, as of November 21, 1990, adequate records were not maintained, as required under 10CFR 20.401, of disposals in 1988 and 1989 of radioactive material released into the sanitary sewerage system. For 1988, the records were disorganized and confusing in that one record indicated that 24,014.9 microcuries were disposed while another record indicated that 971.4 microcuries were disposed. For 1989, no records were maintained.

ACTION: Disposal of radioactive materials by release into the sanitary sewerage system records are being monitored on a monthly basis by the Radiation Safety Officer and staff. Each Authorized User must submit a monthly inventory form, "Radioactive Material Utilization Log" (See Attachment I) for each different radionuclide and compound that he/she possess to the Radiation Safety Office in a timely manner. This form requires the Authorized User to list the amount he/she used or disposed of after each use and the method of disposal. Although this form was previously used and kept on file, the Radiation Safety Office did not verify that the User was submitting the correct information each month. As of January 1991, the Radiation Safety Office on a monthly basis verifies that the information received from each User is correct. The sewer disposal data is compiled, quarterly, for total hospital disposal, as well

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as by individual User. These forms are then filed under the appropriate Authorized User for future reference. In addition, each lab must retain a copy for their files.

The Radiation Safety Office monitors and enforces the use of the following two forms in areas where radioactive materials are disposed of via the sewerage drain system.

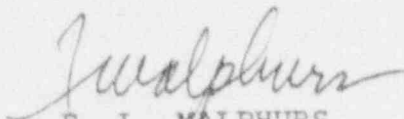
A. "Radioactive Material Sewer Disposal Log" form (Attachment II) affixed to their radioactive labeled sinks. Every time an individual disposes of any radioactive material down the drain the following information is added to this form: the date, isotope, form, and amount (in mCi).

B. "Sewage Disposal Of Radioactive Materials" form (Attachment III), which explains for each isotope the method and maximum daily amount that can be disposed of for the entire hospital. This form is posted near each radioactive labeled sink.

We are now in full compliance with this requirement.

Please communicate with us, if the above cited actions are not totally responsive to your specified request.

Sincerely,


F. L. MALPHURS,
Director

Attachments

 RADIOACTIVE MATERIAL UTILIZATION LOG

R.S LOG # _____

RADIONUCLIDE _____

DATE REC'D _____

COMPOUND _____

FOR _____

ASSAY DATE _____

DATE ISSUED _____

ASSAY SPEC. ACTIVITY _____

VENDOR _____

ASSAY ACTIVITY _____

LOT # _____

ASSAY VOLUME _____

DATE	AMOUNT Activity	USED Volume	BALANCE	USE (*)	INITIALS

* USE = In Vitro studies, In Vivo Animals studies, Human studies, other.

DISPOSAL RECORD

DATE	ACTIVITY DISPOSED	DISPOSAL METHOD (**)	ACTIVITY BALANCE	INITIALS

** DISPOSAL--- VENDOR: 1-Solids; 2-Liquids; 3-Liq. Scint.; 4-Animal Carcasses;
 DECAY-IN-STORAGE: 5-Solids or Liquids; 6-Animal Carcasses;
 SEWER: 7-Certain Liquids; 8-DEREGULATED H-3 & C-14 to Safety Officer or Industrial
 Hygienist; 9-HOOD RELEASE of Volatiles.



ATTACHMENT II

[illegible]

SEWAGE DISPOSAL OF RADIOACTIVE MATERIALS

<u>ISOTOPE</u>	<u>SEWAGE DISPOSAL OF RADIOACTIVE MATERIALS DISPOSAL METHOD*</u>	<u>MAX uC/DAY</u>
I-131 and I-125	If less than 1.0 uC is to be disposed, run water for 5 minutes. Run water 7 minutes for each additional uC disposed	200
Cr-51	If less than 1.0 uC is to be disposed, run water for 2 minutes. Run water 3 minutes for each additional uC disposed.	300
P-32	If less than 1.0 uC is to be disposed, run water for 2 minutes. Run water 4 minutes for each additional uC disposed.	1000
C-14	Same As Cr-51	1000
Fe-59	Same As Cr-51	200
S-35	Same As Cr-51	1000
H-3	If less than 1.0 uC is to be disposed, run water for 1 minute. Run water 2 minutes for each additional uC disposed.	2000
Co-57	Same as Cr-51	200

*The Yearly Gross Quantity Of Radioactive Material, Excluding H-3 and C-14, Released In The Sewer System By The VA Medical Center Shall Not Exceed One (1) Curie Per Year. In Addition, The Quantities Of H-3 And C-14 Released Into The Sewer System May Not Exceed Five (5) Curies Per Year For H-3 and One (1) Curie Per Year For C-14.

NOTE: THE ABOVE VALUES ARE FOR THE ENTIRE VA MEDICAL CENTER, AND THE DISPOSED RADIONUCLIDE WILL BE MONITORED BY THE RADIATION SAFETY OFFICER ON A MONTHLY BASIS TO MAKE SURE THAT THE AMOUNT STAYS WITHIN THE PERMITTED LEVEL.

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- REF.: (1) Attachment #1, Chief of Staff Memorandum No. 11-172-8 January 29, 1973.
 (2) 10CFR20 Appendix 23 B and C.
 (3) VA Medical Center Radiation Safety Manual, Page 4.15.