



CONFERENCE OF RADIATION CONTROL PROGRAM DIRECTORS, INC.

RESOLUTION

Relating to: **Shipment of De Minimis Levels of Radioactivity**

- WHEREAS:** The Nuclear Regulatory Commission adopted regulations in March, 1981, which allowed scintillation fluids and animal carcasses with concentrations of C-14 and Tritium below 0.05 microcuries/milliliter to be disposed of without regard to their radioactivity;
- WHEREAS:** Most of these materials are also classified as hazardous waste, and therefore must be managed in accordance with regulations adopted by the Environmental Protection Agency under the Resource Conservation and Recovery Act (RCRA);
- WHEREAS:** The Department of Transportation regulations still require the labeling of this material as radioactive for shipping purposes, thereby creating a reluctance for acceptance of this waste by RCRA permitted facilities;
- WHEREAS:** This situation has prevented the disposal of these waste streams by means other than licensed commercial low-level radioactive waste disposal sites;
- WHEREAS:** The Hanford site, which is the only disposal site currently accepting this waste, is still receiving large quantities, but a recent condition on the site operator's license will prohibit receipt of this material in the future;

NOW THEREFORE, BE IT RESOLVED:

That the Conference formally requests the Nuclear Regulatory Commission, the Environmental Protection Agency and the Department of Transportation to join with the Conference to take expeditious action to permit this type of waste to be shipped without a requirement that it be labeled radioactive.

Approved: May 20, 1984
Original signed by A. J. Hazle, Chairman