

DOCKET NUMBER
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PR-70(44FR46960)
Pu Powered Pacemakers

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Mr. Ralph J. Jones, Chief
Transportation and Product Standards Branch
Office of Standards Development
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Sir:

I am very pleased to provide comment on Supplement 1 to NUREG-0060, "Final Generic Environmental Statement on Routine Use of Plutonium-Powered Cardiac Pacemakers." It was a most prudent and commendable step for the NRC to issue this supplement, reflecting recently available information on the lithium-powered pacemaker as a long-lived alternative to the Pu-238 pacer.

The Supplement states (p. 6) that the cost of nuclear-powered units is more than double that of lithium-battery units (\$5500 vs. \$2500), yet the cumulative survival of lithium cells is in excess of 95% after 45 months (p. 3). The Supplement also states that the number of U.S. manufacturers of plutonium-powered pacers has dropped from five in 1976 to two in 1978, page 5.

I have previously commented (NUREG-0060, pp. 130-132) that in view of the unique potential for terrorist/criminal misuse inherent in Pu-238, it would constitute lunacy to approve such a widespread, conspicuous, poorly safeguarded, and medically trivial application. Needless to say, the first accidental or malevolent dispersal could incite public enemies and increase the probability of further unfortunate incidents. Also needless to say, such events would have a negative impact on the public's acceptance of other nuclear technologies, and might lower the public's esteem for the Nuclear Regulatory Commission.

Permission for the implantation of nuclear-powered cardiac pacemakers should be revoked, and their manufacture in the United States should be terminated. The Commission is to be congratulated for circulating Supplement 1, "Update of Information on Power Sources for Pacemakers."

Appreciatively,

L. Douglas DeNike

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