

December 12, 1979

TICKET NUMBER 32  
PROPOSED RULE -32(44FR68853)



Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Attention: Docketing and Service Branch

Dear Mr. Secretary:

Subject: COMMENTS ON PROPOSED RULE 10 CFR 32 - SPECIFIC  
DOMESTIC LICENSES TO MANUFACTURE OR TRANSFER  
CERTAIN ITEMS CONTAINING BY-PRODUCT MATERIAL  
FEDERAL REGISTER, V.44, NO. 232, 11/30/79,  
PP 68853-54

The purposes of the new labeling requirements are laudatory. Citizens in this country should be aware of the contribution that products and techniques involving radioactivity make to their daily lives. Certainly, smoke detectors are one application utilizing radioactivity that is particularly noteworthy.

I am assuming that NRC intends always to properly inform and guide the public relative to radioactivity, never under any circumstances to create undue and unnecessary fear over radioactivity, or ever to purposely impose blocks that could discourage the beneficial use of any radioactive material. I imagine that these kinds of objectives are behind the reason for the changes proposed for 10 CFR 32.

In this regard I suggest that the proposed labeling be more specific, as long as it is to indicate to the public the presence of a radioactive material, by a label or marking on the outside of the device. Namely, paragraph 32.29(b)(1)(i) should contain the following statement: CONTAINS A RADIOACTIVE MATERIAL. Similarly with paragraph 32.29(b)(2)(i) the statement should read: THIS DETECTOR CONTAINS A RADIOACTIVE MATERIAL WHICH PRESENTS NO SIGNIFICANT HAZARD TO HEALTH IF USED IN ACCORDANCE WITH THE INSTRUCTIONS. No changes are suggested for the other paragraphs.

Your efforts to highlight the beneficial use of radioactivity to the public are commendable, and I appreciate the opportunity to comment.

Sincerely,

*Robert G. Clark*  
Robert G. Clark, P.E.  
Senior Research Scientist  
1618 W. Clearwater St.  
Kennewick, WA 99336

1763 215

Acknowledged by card.....

8001170 512