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PETITION RULE PR-32 (44 FR 68813)

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

Attention: Docketing and Service Branch

Gentlemen:

On January 17, 1980 the Ionization Smoke Detector Information Bureau met in Washington to discuss a wide variety of topics, one of them being proposed changes to 10 CFR Part 32, specifically paragraph 32.29 regarding the labeling of ionization smoke detectors. The Bureau, as you may or may not know, represents the following manufacturers of ionization detectors:

Pyrotronics
BRK
General Electric
Emerson
Honeywell
Firex

As a group these manufacturers account for 90% of the ionization detectors sold and distributed in the United States.

After considering the proposed changes to 10 CFR Part 32, the Bureau, by consensus vote, made the following recommendations which we wish to submit to you now:

1. Delete the phrase "readily visible" from paragraph 32.29 (b) (1). Right now most manufacturers place a radioactive label on the back of the detector's base where it can be seen at the time of installation. UL has accepted this practice, and many manufacturers have automated their assembly lines to affix the label at a reasonable production cost. If the label had to be placed on the thin walled side of a detector, automatic placement would be nearly impossible

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FIRST IN FIRE WARNING
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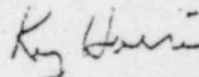
for some manufacturers and the label itself would be 4 - 6 inches long just to accommodate all the text currently required by UL and NFPA. If the label were on the cover of the detector, it would be an eyesore and probably would be forcibly removed by consumers.

The only "justification" for the "readily visible" requirement might be identification of the unit after installation. Given the fact that detectors are typically ceiling mounted, no one could read the label text under normal circumstances. If a consumer were cleaning the unit during a yearly maintenance check, the cover would be removed or opened in most cases and the "radioactive caution" label or marking on the chamber would be visible. Clearly, there would be no need for another side mounted label.

2. Delete the box labeling requirement in paragraph 32.29 (2). All studies and risk/benefit analyses of ionization smoke detectors have shown them to be completely safe from a public health point of view. The NRC's most recent study, "Environmental Assessment of Ionization Chamber Smoke Detectors Containing Am-241" is a case in point. With a risk benefit ratio of 15,000 - 51,000:1 ionization detectors appear to be one of the most beneficial consumer products ever marketed. Why require a warning label which might discourage the purchase of a life safety device? The NRC itself is considering the elimination of all disposal requirements. The Atomic Energy Control Board of Canada already has eliminated such requirements.
3. Lengthen the compliance period to at least one year. Many manufacturers purchase labels and boxes on a once/year basis for certain products. A six month compliance period would be a hardship.

Several Bureau members wish to add comments on their own. You should receive them shortly.

Sincerely yours,



King Harris
Chairman
Ionization Smoke Detector
Information Bureau