



TP 916-1  
**LEPOCO**

DOCKET NUMBER PD  
PROPOSED RULE 11-32(44FRG8853) (13)



LEHIGH-POCONO COMMITTEE OF CONCERN

555 Main St  
XXXXXXXXXXXXXXXXXXXX

BETHLEHEM, PA. 18018

January 10, 1980

Secretary of the Commission  
etc.

Dear Friends,

This letter is in response to your consideration of adopting "new requirements for labeling the external surfaces of not only gas and aerosol detectors including smoke-detectors, but also the point-of-sale packaging for these detectors" per Nuclear Regulatory Commission Proposal Rule entry in the Federal Registry of November 30, 1979.

First, any effort to further alert the public to the fact that said smoke detectors contain a radioactive material is to be welcomed.

However, there are serious deficiencies in your specific proposals and in the overall regulations governing the sale of these devices.

To be distributing dangerous substances like americium-241 and its radioactive daughter isotopes to the general public, especially such a mass distribution, is grossly negligent and irresponsible. In fact, the public is being pressured by extreme psychological pressure (protect yourself and your family from fire) to purchase a product which may on the one hand protect them, but on the other hand present a serious long-term (and possibly short-term) threat to their health. This occurs when there are other comparable devices available to warn against a fire containing no radioactive material.

How can you realistically expect everyone, a majority, or even a small percent of the detectors containing americium-241 to be returned to the Nuclear Regulatory Commission or the manufacturer as requested inside the smoke detector? Most users of the detector will probably never see the instructions to take this action.

Under these circumstances we can most certainly expect large quantities of these detectors to end up in American garbage in a few years, as these products have an expected functioning life of 10-15 years. Americium is not an element we want to find airborne in any quantities, let alone the quantities these smoke detectors may produce (Homeowners are being urged to place several in their homes not to mention industrial usage.)

Of course, this entire discussion takes place in the context of no safe, satisfactory method having been found to contain americium-241 or other radioactive waste for the duration of their toxicity.

Your regulations are extremely weak in their attempt to inform the potential buyer. The point-of-sale packaging should note that "use in accordance with the instructions include returning the detector to the manufacturer for disposal and how this is done."

Revised by card... 11/8

Lepoco (continued)

The point-of-sale packaging should also tell the kinds of dangers americium-241 can pose, e.g. though americium 241 is not a gamma emitter and will not be harmful in a perfectly packaged container, if that packaging is damaged in shipping, storage, use, disposal, at any time, there is a risk that americium-241 could enter the food chain or a persons body. If that would occur americium-241 as an alpha emitter is very dangerous to the person who has inhaled or ingested it, even in very small quantities.

We appreciate your serious consideration of these comments and also, a copy of any new regulations which the commission may decide to put into effect.

Sincerely,



Mary M. Tone  
Vice-Chairperson for  
the Lepoco action meeting of January 9, 1980