

813 - 447-2511



P. O. BOX 6440

CLEARWATER, FLORIDA 33518

January 11, 1980

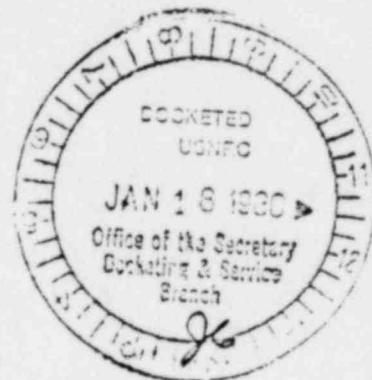
DOCKETED  
PROPOSED

16  
-32(44FR 68853)

U. S. Nuclear Regulatory Commission  
Washington DC 20555

Attention: Docketing and Service Branch

Subject: Comments on NRC Proposed Rule 10CFR Part 32



Dear Sir:

As a manufacturer of radioactive smoke detectors, we appreciate the opportunity to make the following comments on the proposed rule.

1. We feel that there is more definition needed on the marking of the external surface of the smoke detector. We would object, from an aesthetic standpoint, to the marking being visible after installation. We presently mark the rear surface of our detector with the proposed information.
2. We would also question the value of marking the detector and package with the name of the radionuclide and the quantity of activity since this would be of little value to the average person.
3. We also object to the use of the word "significant" in the phrase, "detector contains radioactive material which presents no significant hazard to health if used in accordance with the instructions" for the following reasons: First, there has been no evidence (to our knowledge) that the amount of radioactive material in one smoke detector is harmful. Secondly, this type of wording could bias a person to the point where they would not purchase a smoke detector. This would deprive him (and his family) of the protection which is so badly needed.

As a general comment, I would like to indicate that we presently include the following information on the rear of our smoke detectors:

1. The statement, "Contains radioactive material".
2. The name of the radioclide and the quantity of activity.
3. Recommended disposal instructions with name of company and address.

The impact of this regulation on our company would be hard to ascertain at this time because of the lack of specific guidelines regarding where and how the marking would be applied; however, at the very least, it would require us to incur tooling costs and the revision of our labels, and possibly scrapping

... by C. D. ... 1/18

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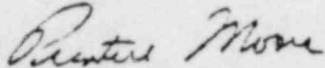
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US Nuclear Regulatory Commission  
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of outdated labels.

We appreciate the opportunity to comment on this regulation and would ask that we would have the opportunity to comment on the final draft before enactment.

Sincerely,



Prentice Moore  
Sr. Project Engineer  
Electronics Division  
PM/md

cc: C. Draper  
J. Hampton  
D. Maxwell - LEX

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