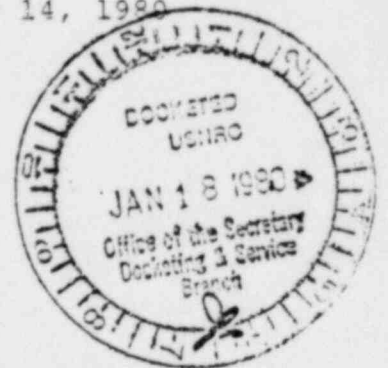


DOCKET NUMBER <sup>18</sup>  
PROPOSED RULE PR-32(44FR6853)

January 14, 1980



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

Attention: Docketing and Service Branch

Gentlemen:

Fenwal Incorporated, Division of Walter Kidde Corporation, produces smoke detectors which are sold exclusively for use in professionally installed fire alarm and fire suppression systems. These products are not marketed at retail for consumer purchase, installation or use in residential applications.

These products are specified by professional architects or installers with the benefit of detailed technical data furnished on our technical data sheets. Prospective customers know in advance of purchase if the smoke detectors contain radioactive material by virtue of the fact that our specification sheets advise them of:

- 1) The name of the radionuclide and quantity of activity
- 2) A statement that the device contains radioactive material
- 3) Identification of Fenwal as the manufacturer

The purchasers of these products are professional fire protection specialists. They make a deliberate choice between ionization type detectors and other smoke detectors when designing their systems. They are well-aware of the presence of radioactive material when they make this choice.

The concern for the alleged inadequacy of existing methods of marking may be valid for products which are sold at retail, but it is not valid for the class of product which is intended for professional installation in systems application.

We see no advantage to labeling the packaging and the detectors since no decision to install or not to install a device containing radionuclide will be made at the point of time when the device arrives at the construction site or the point of installation and no benefit will derive from such labeling.

~~Manufactured by card: 1115~~

ELECTRIC TEMPERATURE CONTROL, DETECTION AND INDICATING DEVICES

THERMOSWITCHES

AUTOMATIC FIRE AND EXPLOSION DETECTION AND SUPPRESSION SYSTEMS

DETECT-A-FIRE

8006170 781

Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
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We, therefore, recommend that the new marking requirements proposed for 10CFR32.26b(10) and 10CFR32.29b(1) be restricted to application to residential smoke detectors intended for sale at retail. In particular, we recommend that proposed Paragraph 32.26b(10) be revised to read as follows:

"The methods of labeling or marking of each unit and if the unit is packaged individually and intended for marketing at retail, each point of sale package:"

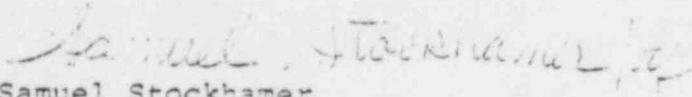
We recommend that proposed Paragraph 32.29(b) be revised to read as follows:

"After (date) provide each single or multiple residential unit intended for marketing at retail with:"

We appreciate your consideration of these comments and look forward to a favorable ruling on this matter. If further information is required, please do not hesitate to contact us.

Sincerely,

FENWAL INCORPORATED

  
Samuel Stockhamer  
Product Manager  
Protection Systems Division

SS/tmf