

# STATIFACTS

SMOKEGARD® DISTRIBUTOR NEWSLETTER — PUBLISHED BY STATITROL® CORP.

## *Special Edition:*

SUBJECTS: CONSUMER REPORTS MAGAZINE...and THE NADER GROUP COMPLAINT.

### A. EVALUATION OF SMOKE DETECTORS BY CONSUMER REPORTS:

We have received many questions about the October 1976 issue of CONSUMER REPORTS, which contains an article on residential smoke detectors. We feel that this article does not tell the whole story.

1. The Consumer's Union evaluation was made primarily on the basis of speed of response of the smoke alarms tested. In the flaming paper test, the smoldering wood strip test, and the polyurethane foam test, the Guardion FB-1 (which was check-rated by CONSUMER REPORTS) did not function appreciably faster than the other ionization units tested. In the fourth test, which was smoldering upholstery material, the Guardion unit responded faster than both photoelectric and other ionization alarms. Why? Because the Guardion FB-1 is an extremely sensitive SINGLE CHAMBER alarm.

This represents a complete turnaround in philosophy for Pyrotronics, from their consistent recommendation of DUAL CHAMBER alarms. There is an industry trend away from the single chamber design which, because of its sensitivity, has a greater tendency to false alarms.

This false-alarming problem was mentioned---but quickly dismissed---in the Consumer's Union report (page 556, second column). We do not feel the nuisance alarm problem should be so casually treated. Statitrol has spent thousands of dollars to develop our patented "Duo-Centric" chamber concept to provide sensitivity within the allowable UL limits and still maintain a stable product. Continual nuisance alarms defeat the purpose of the smoke alarm, and reduce confidence in it. The result is consumer dissatisfaction ...perhaps even (worst of all conditions) a disconnected alarm, which removes the very protection we're trying to provide.

2. The report states, "With the GE Home Sentry, a warning flag pops out at the first low-battery beep, and stays out until you push it back into the unit."

We examined the latest GE battery-powered alarm at the May 1976 Chicago Housewares Show, and found---to our surprise---that GE has removed the automatic pop-out feature. Their unit now functions just like the Guardion: the red flag is not visible until the battery has been physically removed from the smoke alarm.

Thus, the "SmokeGard" Model 800A remains the only unit tested which positively assures the homemaker (via our blinking LED) that the batteries are good and the unit is operating...WITHOUT HAVING TO PUSH A TEST BUTTON, which is often inaccessible.

3. The Ratings Summary indicates that the "SmokeGard" is designed for ceiling mounting only. All "SmokeGard" battery and AC models have been UL tested and are suitable for either wall or ceiling mounting. Owner's Manuals now being furnished indicate this fact. We are notifying Consumer's Union of this error.

In summary, the Consumer's Union evaluation is based primarily on sensitivity alone...which does not tell the quality story of the "SmokeGard" alarm. In an evaluation based on only one factor, other qualities tend to be obscured, unfortunately. For example, Kwikset 911 is listed in the ratings as "approximately equal in overall quality", but it does not bear the UL label and it may not pass several of the UL test requirements.

In your sales presentations and in discussions of the CONSUMER REPORTS evaluation, it is important that you stress positive sales points, such as:

- \* Since introduction of the "SmokeGard" 800A, we have shipped well over a quarter of a million smoke alarms... with a return rate of less than 1% (for any reason)...this outstanding quality record means top dependability and reliability from the customer's point of view.
- \* We are currently in the process of applying for Factory Mutual approval. When we receive it, "SmokeGard" will be the **ONLY** battery-powered smoke alarm to earn both UL listing and FM approval.
- \* To insure dependability, every unit is 100% tested, in maximum environmental conditions, with the actual batteries the customer will receive. To our knowledge, we are the only manufacturer which goes this far.
- \* The Model 800A has features such as patented battery monitoring and the "Duo-Centric" ionization chamber (combining the simplicity of a single chamber with the dependability of a dual chamber), which have been proven in service. The Guardion is the first single-chamber alarm ever produced or sold by Pyrotronics; its long-term stability has yet to be proven.

- \* A properly-handled Employee Off-the-Job Safety Program includes not only the opportunity to buy our smoke alarm at a reduced price, but a complete educational program, covering all aspects of home fire safety, including the practice and techniques of prevention, home fire escape planning and drills...plus the service and advice of a local, experienced "SmokeGard" distributor.
- \* Due to our commitment to this professional Off-the-Job Program, we have deliberately withheld the "SmokeGard" alarms from the mass distribution "retail" market. So you can assure your safety program prospects they will not see this unit advertised in discount stores at prices substantially lower than their employees are expected to pay on a group-purchase basis. In contrast, other alarms are being offered as "loss leaders"; the FB-1 is being offered in group programs in the mid-\$30 range... and at the same time, is being offered nationally by a private individual (as many of you have seen on the "Today" show) at less than \$26. We feel that price "footballing" like this destroys the quality credibility of the product.
- \* One "plus" created by the CONSUMER REPORTS article is its evaluation of radiation as a potential "hazard"...it helps refute the Nader contention, as you will note in the following article. CONSUMER REPORTS states on page 558, "We checked the surface of each assembled unit with a Geiger counter and could not detect any radiation beyond ordinary background radiation."
- \* We believe that by stressing the quality and features of "SmokeGard" alarms...and the length of our experience in this field, you can sell "reputation" and "reliability", despite the rating advantage given to Guardion by the CONSUMER REPORTS article. Our product is a proven "winner" and your positive attitude will keep it so.

## B. THE NADER REPORT

At right, you will find a copy of the latest official response to the Nader Group by the Nuclear Regulatory Commission.

Note that this is a strong and emphatic denial of their request to halt licensing and recall existing ionization detectors.

Additional support for our position is found in the **CONSUMER REPORTS** article previously covered, which states that CU "checked the surface of each assembled unit with a Geiger counter and could not detect any radiation beyond ordinary background radiation."

You might be interested to know that the human body emits over 100 times as much radiation as a "SmokeGard". You're safer sleeping with our alarm than with your wife!

We hope you can see that smoke alarms do not present a radiation problem to the public.

Our position on the Nader Report remains the same. This group feeds on publicity; to maintain his reputation and to continue to sell books and receive contributions, Mr. Nader must stay in the public eye...by making dramatic pronouncements about unseen "hazards" imposed on the general public.

You may wonder why we don't "go after" him with a major lawsuit. Top public relations consultants advise us that such a suit or major discrediting statement would only help his real cause, by giving him increased publicity. Such added publicity would hurt sales, since the public would be further exposed to the radiation argument and the suggestion of an invisible hazard, creating additional worry and doubt. Our best course, they say, is to "ride out the storm", defend the safety of our devices with scientific documentation, and exert our efforts to restore public confidence and stimulate sales. Let's not contribute further publicity to his allegations. Use this information only to answer specific questions raised by your customers.

United States  
Nuclear Regulatory Commission  
Washington, D.C.

September 28, 1976

Public Citizen  
Health Research Group  
ATTN: Dr. Sidney Wolfe  
Ms. Deborah Green  
Mr. John Abbotts  
Ms. Margaret McCarthy  
2000 P Street, N. W.  
Washington, D.C. 20036

Gentlemen:

This is in response to your letter of September 15, 1976 and enclosed report in which you request an immediate halt to NRC licensing of manufacturers and distributors of ionization type smoke detectors and recall of such units currently in use or in channels of commerce.

Your report does not provide the bases for the action you request. It excludes relevant technical information which, when considered in a competent technical analysis, leads to quite different conclusions about risk from ionization type smoke detectors than those you implied.

The two principal bases for your request are (1) ionization type smoke detectors are no more effective than a photoelectric alternative which does not use radioactive material, and (2) ionization type smoke detectors, which contain americium 241, needlessly subject persons to risks involved in radiation exposure.

With respect to your contentions, the report does not provide any supporting data to permit the reader to determine the validity of our statement that ionization type detectors are no more effective than photoelectric detectors. Nevertheless, we do not consider arguments about effectiveness to be of significant importance in view of the negligible radiation exposures associated with the use of ionization smoke detectors. The choice of whether a photoelectric or ionization detector should be used in homes should be left to judgment of the individual consumer after consideration of the relative merits of each type based on recommendations made by independent testing laboratories and fire protection authorities.

Prior to authorizing the distribution of the smoke detectors on a license exempt basis, we performed a thorough radiation safety analysis considering both normal conditions and credible accidents. We found that radiation exposures were very small and well within acceptable limits. For example, on the conservative assumption that a person would be within 25 centimeters (about 10 inches) of a detector for eight hours a day, the annual radiation exposure to such a person from the detector would be less than 0.5 millirem. For comparison purposes, the normal background radiation exposure is on the order of 100 millirem per year. A person flying round trip across the United States receives a dose of about five millirem because of the increase in radiation at high altitudes.

Exposure to contamination or airborne radioactivity from the radioactive source is highly unlikely. The radioactive material, which is in the insoluble oxide form, is firmly bound between laminated layers of gold and silver foil. Under normal conditions, radioactive material is not removed from the foil as contamination. Tests have shown that under abnormal or accident conditions, such as a fire, only a very small fraction of the radioactive material is likely to be released. If exposure to such a small release occurred, radiation dose of persons near the scene of a fire would be negligible.

It should be noted that the regulatory requirements which permit distribution of smoke detectors containing radioactive material were established in 1969, after having gone through a rule making proceeding which afforded opportunity for public comment. We believe these regulatory requirements which deal with the matter of design, use and disposal of smoke detectors containing small quantities of radioactive material provide an adequate basis for public health and safety.

Specific comments on your report are contained in the enclosure to this letter. Also enclosed is a copy of a typical radiation safety analysis for an ionization smoke detector containing americium 241. (Not available)

In summary, the report contains no new information. It is incomplete and reaches conclusions not justified by specific data and analysis. We are concerned that the creation of unjustified apprehension and confusion in the minds of the public on the matter of smoke detectors will result in risk to life and property through precipitous removal of the detectors.

Sincerely,

Kenneth R. Chapman  
Director  
Office of Nuclear Material Safety  
and Safeguards

Enclosures:  
Discussion of Report  
Radiation Safety Analysis

[This was retyped from the U.S. Nuclear Regulatory Commission's letter dated September 28, 1976.]

**A POSITIVE NOTE:**

Look for the November issue of GOOD HOUSEKEEPING, which should carry an article on smoke alarms, with a favorable mention of our product. Also, we have been promised our news release will be in the October issue of CEE (Contractors Electrical Equipment), and it's possible we'll have a release and photo in the November issue of SAFETY PRODUCT NEWS (on our new line-cord model).


We are trying to see that some of the news is "fit to print"! We're sure you understand how difficult it is to get product news releases into print...unfortunately, most news media tend to regard them as "advertising", unless the magazine originated the idea for the story.

**AND A SPECIAL NOTE FROM SALES:**

"We are still receiving calls from distributors who express surprise that we have stock on the shelves ready for delivery! We suggest now is a good time to place that order and bring in those profit dollars!

Good Selling!"

Ken Klapmeier

 **STATITROL**<sup>®</sup>  
140 SOUTH UNION BOULEVARD  
LAKEWOOD, COLORADO 80228

First Class  
U.S. Postage  
**PAID**  
Permit No. 1147  
Denver, Colorado