

EASTMAN KODAK COMPANY

ROCHESTER 4, N. Y.

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*via* February 18, 1963 *fed*

U.S. ATOMIC ENERGY COMM.  
OFFICE OF THE SECRETARY  
PUBLIC HEARINGS BR.

Mr. Woodford B. McCool, Secretary  
Atomic Energy Commission  
Washington 25, D. C.

Dear Mr. McCool:

In a letter of February 15, 1963, from Mr. H. W. Morreall, permission was requested for representatives of the Committee on Radioactivity of the National Association of Photographic Manufacturers to attend the hearing in Olean, New York, on March 4, 1963, concerning approval of a proposed chemical processing plant in Cattaraugus County, New York. We wish to file the following information with the Commission as a statement of our interest in the case.

Shortly after the first atomic bomb tests, it was realized by the photographic industry that airborne radioactive particles could find their way into sensitized photographic materials at any stage of the manufacturing operation and cause defective product. The National Association of Photographic Manufacturers therefore established a Committee on Radioactivity to give consideration to this problem and seek out means by which the photographic industry could continue to supply materials of high quality.

A part of the responsibility of this Committee has been to consider the importance to photographic manufacturers of the proposed establishment of a nuclear chemical facility in New York State.

At the present time, western New York State has a greater concentration of photographic manufacturing than anywhere in the world. This includes the following companies who produce sensitized materials:

AnSCO Division, General Aniline and  
Film Corporation  
Bell and Howell Company  
DiNoc Chemical Company  
E. I. du Pont de Nemours and  
Company  
Dynacolor Corporation  
Eastman Kodak Company  
Xerox Corporation

Binghamton, New York  
Rochester, New York  
Honeoye, New York

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The manufacturing plants of all of these companies are situated in an easterly direction from the proposed nuclear chemical site in Cattaraugus County, and would thus be exposed to some degree to possible airborne radioactive by-products traveling in the direction of prevailing winds, and in some cases to water contaminants traveling from Lake Erie to Lake Ontario or through the New York State Barge Canal to the Genesee River and then to Lake Ontario. Over a long term, any potential contamination of underground water would also be most serious.

The level of contamination which can be damaging to photographic products, especially to x-ray film, is considerably below levels which are of concern for public health purposes. Particulate materials are the primary source of photographic defects. A particle of not more than one micromicrocurie of radioactivity, which may be less than one-half micron in diameter, will, if imbedded in x-ray film or in the packaging material, produce a visible spot within one week. During the normal storage period between manufacture and sale, which may be from two to six months, such small impurities will increase the size of defective spots to much larger diameters.

The best means of protection from radioactive fallout contamination has been excellent filtration of air and water entering critical manufacturing areas. All filtration systems, whether for air or water, remove a certain percentage of the radioactive contamination. This at no time can be considered to be 100 percent, although efficient systems have operated above 99 percent. Normal operating efficiency, however, is usually from 94 percent to 97 percent. It must be considered, therefore, that if there are any radioactive particles in the air or water, some will find their way into the product. Likewise, the smaller the amount of contamination, the fewer will be the number of defects found in the product. During periods of even moderately low levels of contamination of air and water by radioactive isotopes, therefore, the photographic industry finds it necessary to assume a costly burden of protective measures and monitoring tests to maintain a satisfactory level of manufacturing quality. In periods of excessively high air contamination such as might result from unexpected release from a nuclear plant in the area, it might be necessary to close down operations for an extended period of time to undergo complete changes of filter installations and thorough cleaning programs before manufacturing could be resumed.

We believe it is important to the industrial welfare of western New York State that adequate attention be given to the requirements for manufacturing sensitized photographic goods. It must be realized that concentrations of radioactive particles which are of little concern to public health could have a serious effect on this business. Any added problems or uncertainties introduced

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by atomic industry activity could result in a revaluation by photographic manufacturers of the desirability of continued expansion of manufacturing in this area. The objective of New York State to encourage increased business might thus result in greater loss than gain.

We also submit for your consideration that manufacture of high-quality films for aerophotography is of paramount importance to the common defense and security of the nation, and that x-ray films are highly important to public health and safety.

An additional reason for stating our position is so that you will understand our problems and will be able to take such action as may be required to avoid unnecessary damage and expense. The Committee on Radioactivity of the National Association of Photographic Manufacturers requests that the Atomic Energy Commission give careful consideration to these factors in connection with a permit for a nuclear chemical facility in Cattaraugus County.

Committee on Radioactivity  
National Association of Photographic  
Manufacturers

*Charles R. Fordyce*

Charles R. Fordyce  
Committee Member

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