

Request for Clarification of Guidance Regarding Physicians
Determination for Physical Qualification of Respiratory
Equipment Users
HPPOS-103

PDR-9111210235

Title: Request for Clarification of Guidance Regarding
Physicians Determination for Physical Qualification of
Respiratory Equipment Users

See the memorandum from D. A. Allison to M. M. Shanbaky dated July 19, 1985. This memo states that physicians need not sign all forms regarding physical fitness. But, the physician should be involved in the supervision of the fitness program, the review of overall results and individual cases that fall outside certain physical parameters, and the supervision of personnel performing the tests. Simply establishing the program with no further involvement is not adequate. The health physics position was written in the context of 10 CFR 20.103, but it also applies to "new" 10 CFR 20.1703. HPPOS-061 contains a related topic.

In regards to determining compliance with the 10 CFR 20.103 (c) (2) requirement of who physically signs "fitness" forms, the intent is to have physicians screen individuals for health problems prior to respirator use. An acceptable compliance situation, however, could involve a trained nurse who physically administers medical testing and documents and signs the required forms. This situation is acceptable provided the results of the tests are within a range established and approved by a physician, and the physician agrees to retain full responsibility. If the results of the physical tests fall outside the acceptable range, the individual's case should be referred to the physician for more direct attention and testing. [Note: The above 10 CFR 20.103 (c) (2) requirement is now found in 10 CFR 20.1703 (a) (3).]

Each form does not necessarily need to be signed by a physician; however, the physician should be involved in the supervision of the fitness determination program. Physician supervision of the program is indicated by the review of overall results, the review of individual cases that fall outside established ranges, and the general supervision of personnel actually performing the physical assessments. Simply establishing acceptable ranges for the

tests, with no further involvement, is not adequate.

Regulatory references: 10 CFR 20.103, 10 CFR 20.1703,
Regulatory Guide 8.15, NUREG-0041

Subject codes: 8.10

Applicability: All