

Medical Surveillance for Respirator Users

HPPOS-117

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Title: Medical Surveillance for Respirator Users

See the open letter from R. B. Minogue to All Licensees and Other Interested Persons dated March 14, 1978. This letter states that the NRC does not require complete physical examinations of each respirator user, only an initial medical examination and annual reviews of medical status. Licensees can obtain proof from contractors that determinations of medical status were made on contractor employees. 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 and HPPOS-103 contain related discussions.

NRC Regulation 10 CFR 20.103 (c) [or 10 CFR 20.1703 (a)] permits licensees to make allowance for the use of respirators provided that the equipment is used as stipulated in Regulatory Guide (RG) 8.15. Licensees who make allowance for respirators are required by RG 8.15 to determine:

"... prior to assignment of any individual to tasks requiring the use of respirators that such an individual is physically able to perform the work and use the respiratory protective equipment. A physician is to determine what health and physical conditions are pertinent. The medical status of each respirator user is to be reviewed at least annually."

The purpose of the requirement is to protect the health of workers who might have to use respirators. It must be noted, however, that the NRC does not require a complete physical examination of each respirator user, only an initial medical examination and an annual review of medical status. The physician might or might not require a physical examination as part of his health assessment.

It is not necessary that the licensees' physician determine the medical status for the employees of contractors at the licensee's sites. Licensees can meet the requirement for making the determinations by obtaining proof from their

contractors that the required examinations of medical status have been made.

Currently, there is no standard method for medical surveillance of this type. [Note: ANSI Z88.6-1984 was developed to provide guidance and information for physicians and other professionals to determine the suitability of personnel for respirators.] NUREG-0041, "Manual of Respiratory Protection Against Airborne Radioactive Materials," offers suggestions that a licensee's physician may wish to follow.

Regulatory references: 10 CFR 20.103, 10 CFR 20.1703, Regulatory Guide 8.15

Subject codes: 8.10

Applicability: All