

Intervals Between Physical Examinations for Respirator Users

HPPOS-219

PDR-9111220025

Title: Intervals Between Physical Examinations for
Respirator Users

See the letter from M. C. Thadani to H. W. Keiser (Senior Vice President-Nuclear, Pennsylvania Power and Light Company) dated May 30, 1989. This letter states that physical examinations for respirator users are prescribed every 12 months by 10 CFR 20.103 (c) (2). However, a physical examination conducted every 9-15 months, provided that three consecutive exams do not exceed 39 months, is consistent with NRC staff interpretations of interval requirements. This health physics position also applies to "new" 10 CFR 20.1703 (a) (3) (v).

A written request was made for exemption from the requirement of 10 CFR 20.103 (c) (2) regarding the 12 month time interval for physical examinations to assure an individual is physically able to use respiratory protective equipment. Specifically, Pennsylvania Power and Light Company requested an exemption to permit physical examinations every 9-15 months, providing that the total time of the three consecutive physical examinations does not exceed 39 months.

It was determined that the request was consistent with the NRC staff's position on implementation of the time interval requirements of 10 CFR 20.103 (c) (2), and therefore, an exemption was not needed.

Regulatory references: 10 CFR 20.103, 10 CFR 20.1703

Subject codes: 1.1, 8.10

Applicability: All