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RECORD #117

TITLE: Medical Surveillance for Respirator Users

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20535

March 14, 1978

NOTICE TO ALL LICENSEES AND OTHER INTERESTED PERSONS

SUBJECT: MEDICAL SURVEILLANCE FOR RESPIRATOR USERS

In view of a number of inquiries that we have received, the following information is provided on Nuclear Regulatory Commission (NRC) requirements for the medical surveillance of respirator users.

The NRC's regulation, 10 CFR Part 20, § 20.103(c), permits licensees to make allowance for the use of respirators provided that the equipment is used as stipulated in Regulatory Guide 8.15. Regulatory Guide 8.15, "Acceptable Practices for Respiratory Protection," § C.4.h., does require for those licensees who make allowance for the use of respirators "...determination 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."

This NRC requirement is similar to that of the Occupational Health and Safety Administration (OSHA) (29 CFR § 1910.134(b)(10)) and to the recommendations of the American National Standards Institute (ANSI Z88.2, 1969, § 3.7). The purpose of the requirement is to protect the health of workers who might have to use respirators. The use of a respirator imposes particular physiological demands on the wearer. These demands could jeopardize the health or even the life of a user who has special medical problems. A medical determination identifies these special problems so that they can be taken into account in providing proper respiratory protection for a worker without endangering his health or life. For some medical problems the kinds of respirators that may be used might have to be limited. For more serious medical problems such as those that might lead to inability to breathe, heart "failure," vascular accident, or seizure, the use of respirators might be precluded entirely.

Please note that the NRC's guidance does not require a complete physical examination of each respirator user--only an initial medical determination and an annual review of medical status. The determining physician might or might not require a physical examination as a part of his determination of an individual's medical status. For example, a physician might decide to make most determinations by reviewing questionnaires or by examination of medical records, and might wish to physically examine only those individuals whose questionnaire or records indicated possible significant health problems.

In related questions some licensees have asked whether it is necessary for their physicians to make the determination of medical status for the employees of contractors at the licensees' sites. It is not necessary that a licensee's physician make the determination. Licensees can meet the requirement for making the determinations by obtaining proof from their contractors that the required determinations of medical status have been made.

There is no currently developed standard method for medical surveillance of this type. As part of the work under a technical assistance contract the NRC has asked the Los Alamos Scientific Laboratory (LASL) to review the problems of medical surveillance of respirator users and assist in the development of more definitive guidance.

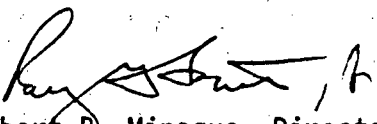
The ANSI Z88.2 Committee is also reviewing its recommendations for medical surveillance as a part of the up-dating of the 1969 ANSI standard. If more specific information on medical requirements can be developed, NRC guidance will be changed as appropriate.

Current NRC guidance, then, requires a determination of medical status (not necessarily a physical examination) as set out in Regulatory Guide 8.15, § C.4.h. The performances of physical examinations mentioned in § 7.4.3 of NUREG-0041, "Manual of Respiratory Protection Against Airborne Radioactive Materials," are suggestions that a licensee's physician might or might not wish to follow.



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