SYNOPSIS OF REMARKS TO BE PRESENTED BY JERROLD L. CAPLIN
AT PUBLIC MEETING HELD BY NIOSH-MESA ON 30 CFR PART 11,
RESPIRATOR APPROVALS (AT DEPT. OF LABOR NOV. 29, 1977)

Personal and employment information.

As a health physics professional and a member of the NRC staff I welcome
the opportunity to offer constructive suggestions for improving 30 CFR 11.

The NRC is responsible for protecting workers from airborne radioactive
materials that are within its statutory purview.

NRC standards permit the use of respiratory protective equipment and
require the use of NIOSH-MESA approved equipment. While the NRC supports
work on respirator performance for its specific needs, we look chiefly
to NIOSH-MESA for the availability of approved respirators for licensees' use.

Equipment that is currently available under 30 CFR 11 serves well for
some uses. However, there are many deficiencies in 30 CFR 11 that should
be improved upon for NRC's regulatory needs. Some of the main deficiencies
or areas that might be improved are:

1. lack of quantitative performance requirements and approvals
   for each type of respirator (anthropometrically selected test
   panels, protection factors)

2. lack of schedules for the approval of needed equipment
   (supplied-air suits, air-purifying respirators for radioiodines)

3. need for more complete or improved performance specifications
   and tests (filters and sorbents against a variety of test
   agents, permissible differential between inhalation and
   exhalation pressures in certain supplied-air apparatus)

4. need for a more understandable, up-to-date and available listing
   of approved devices (three facepieces approved under same
   approval number yet have different quantitative performance
   characteristics)

There is a need for cooperation among the various governmental agencies that
have responsibilities for respiratory protection in developing, as far as
possible, uniform and consistent government policies on the approval of
respiratory protective equipment. I hope that some mechanism can be established
to enable us to work more closely with other agencies toward that end than has
been the case in the past.