

7

23

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.