



UNITED STATES
NUCLEAR REGULATORY COMMISSION 50-280/281
WASHINGTON, D.C. 20555-0001

September 3, 1998

Mr. J.P. O'Hanlon
Senior Vice President - Nuclear
Virginia Electric and Power Company
5000 Dominion Blvd.
Glen Allen, Virginia 23060

SUBJECT: SURRY POWER STATION, UNITS 1 AND 2 - EXEMPTION FROM
10 CFR 20.1703(a)(1), 10 CFR 20.1703(c) and 10 CFR PART 20, APPENDIX A,
PROTECTION FACTORS FOR RESPIRATORS, FOOTNOTE d.2.(d), AND
AUTHORIZATION TO USE CERTAIN RESPIRATORS FOR WORKER
PROTECTION INSIDE CONTAINMENT (TAC NOS. M98382 and M98383)

Dear Mr. O'Hanlon:

By letter dated March 27, 1997, as supplemented by submittals dated July 28, 1997, March 3, 1998, and May 5, 1998, Virginia Electric and Power Company (VEPCO) requested authorization to use certain respirators for worker protection inside containment that have not been tested and certified by National Institute for Occupational Safety and Health/Mine Safety and Health Administration (NIOSH/MSHA) for use with an enriched oxygen-nitrogen mixture. VEPCO also requested an exemption from 10 CFR 20.1703(a)(1), 10 CFR 20.1703(c), and 10 CFR Part 20, Appendix A, Protection Factors for Respirators, Footnote d.2.(d), which require that only NIOSH/MSHA-certified respiratory protection equipment be used.

The NRC staff has reviewed the information provided in support of your request for the authorization and exemption. Based on 1) testing of the Self-Contained Breathing Apparatus (SCBA) conducted for VEPCO by its contractors, 2) VEPCO's safe use history, and 3) the existing NIOSH/MSHA certification for the SCBA, the NRC staff has concluded that reasonable assurance exists that the Mining Safety Appliances, Inc. (MSA) SCBA models Model 401 (with either brass or aluminum parts), Ultralite (with aluminum parts) and Custom 4500 Dual-Purpose SCBA (with aluminum parts) meet the intent of the regulatory requirements and would not result in undue hazard to life or property.

Pursuant to 10 CFR 20.1703(a)(2), the staff authorizes the use of the SCBAs listed above inside containment. Further, pursuant to 10 CFR 20.2301, the exemption requested by you from the requirements of 10 CFR 20.1703(a)(1), 10 CFR 20.1703(c), and certain parts of 10 CFR Part 20, Appendix A, Protection Factors for Respirators, Footnote d.2.(d), is granted. The authorization and exemption apply to both Unit 1 and Unit 2.

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A copy of the exemption has been forwarded to the Office of the Federal Register for publication.

Sincerely,

A handwritten signature in black ink, appearing to read "G.E. Edison". The signature is written in a cursive style with a large initial "G" and "E".

G.E. Edison, Sr. Project Manager
Project Directorate II-1
Division of Reactor Projects I/II
Office of Nuclear Reactor Regulation

Docket Nos. 50-280 and 50-281

Enclosures: 1. Exemption
2. Safety Evaluation

cc w/encls: See next page

A copy of the exemption has been forwarded to the Office of the Federal Register for publication.

Sincerely,

Original signed by:

G.E. Edison, Sr. Project Manager
Project Directorate II-1
Division of Reactor Projects I/II
Office of Nuclear Reactor Regulation

Docket Nos. 50-280 and 50-281

Enclosures: 1. Exemption
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A copy of the exemption has been forwarded to the Office of the Federal Register for publication.

Sincerely,

Original signed by:

G.E. Edison, Sr. Project Manager
Project Directorate II-1
Division of Reactor Projects I/II
Office of Nuclear Reactor Regulation

Docket Nos. 50-280 and 50-281

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Mr. J. P. O'Hanlon
Virginia Electric and Power Company

Surry Power Station

cc:

Mr. Michael W. Maupin, Esq.
Hunton and Williams
Riverfront Plaza, East Tower
951 E. Byrd Street
Richmond, Virginia 23219

Office of the Attorney General
Commonwealth of Virginia
900 East Main Street
Richmond, Virginia 23219

Mr. E. S. Grecheck, Site Vice
President
Surry Power Station
Virginia Electric and Power Company
5570 Hog Island Road
Surry, Virginia 23883

Mr. J. H. McCarthy, Manager
Nuclear Licensing & Operations
Support
Innsbrook Technical Center
Virginia Electric and Power Company
5000 Dominion Blvd.
Glen Allen, Virginia 23060

Senior Resident Inspector
Surry Power Station
U. S. Nuclear Regulatory Commission
5850 Hog Island Road
Surry, Virginia 23883

Mr. R. C. Haag
U.S. Nuclear Regulatory Commission
Atlanta Federal Center
61 Forsyth St., SW, Suite 23T85
Atlanta, Georgia 30303

Chairman
Board of Supervisors of Surry County
Surry County Courthouse
Surry, Virginia 23683

Mr. W. R. Matthews, Site Vice President
North Anna Power Station
P. O. Box 402
Mineral, Virginia 23117

Dr. W. T. Lough
Virginia State Corporation
Commission
Division of Energy Regulation
P. O. Box 1197
Richmond, Virginia 23209

Regional Administrator, Region II
U. S. Nuclear Regulatory Commission
Atlanta Federal Center
61 Forsyth Street, SW, Suite 23T85
Atlanta, Georgia 30303

Robert B. Strobe, M.D., M.P.H.
State Health Commissioner
Office of the Commissioner
Virginia Department of Health
P.O. Box 2448
Richmond, Virginia 23218

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)	
)	
Virginia Electric and Power Company)	Docket Nos. 50-280
)	and 50-281
Surry Power Station, Unit Nos. 1 and 2)	

EXEMPTION

The Virginia Electric and Power Company (VEPCO, the licensee) is the holder of Facility Operating License Nos. DPR-32 and DPR-37, which authorize operation of the Surry Power Station (SPS), Unit Nos. 1 and 2. The licenses provide, among other things, that the licensee is subject to all rules, regulations, and orders of the Nuclear Regulatory Commission (the Commission) now or hereafter in effect.

The facility consists of two pressurized-water reactors at the licensee's site located in Surry County, Virginia.

II

Title 10 of the Code of Federal Regulations (10 CFR), Section 20.1703, "Use of individual respiratory protection equipment" requires in subsection (a)(1) that "... the licensee shall use only respiratory protection equipment that is tested and certified or had certification extended by the National Institute for Occupational Safety and Health/Mine Safety and Health Administration (NIOSH/MSHA)." Further, 10 CFR 20.1703(c) requires that "the licensee shall use as emergency devices only respiratory protection equipment that has been specifically certified or had certification extended for emergency use by NIOSH/MSHA," and 10 CFR Part 20, Appendix A, Protection Factors for Respirators, Footnote d.2 (d), states that "... the protection factors apply for atmosphere-supplying respirators only when supplied with adequate respirable air. Respirable air shall be provided of the quality and quantity required in accordance with

NIOSH/MSHA certification (described in 30 CFR part 11). Oxygen and air shall not be used in the same apparatus." By letter dated March 3, 1998, as supplemented May 5, 1998, the licensee requested an exemption from certain requirements of 10 CFR 20.1703(a)(1), 10 CFR 20.1703(c) and 10 CFR Part 20, Appendix A, Footnote d.2 (d).

Pursuant to 10 CFR 20.2301, the Commission may, upon application by a licensee or upon its own initiative, grant an exemption from the requirements of the regulations in Part 20 if it determines that the exemption is authorized by law and would not result in undue hazard to life or property.

III

The SPS 1&2 containments are designed to be maintained at subatmospheric pressure during power operations. The containment pressure can range from 9.0 to 11.0 pounds per square inch absolute (psia). This containment environment could potentially impact personnel safety due to reduced pressure and resulting oxygen deficiency. Such environment requires the use of a Self-Contained Breathing Apparatus (SCBA) with enriched oxygen breathing gas. The licensee initially purchased Mine Safety Appliances, Inc. (MSA) Model 401 open-circuit, dual-purpose, pressure-demand SCBAs constructed of brass components which were originally intended for use with compressed air. The licensee qualified the Model 401 cylinders for use with 35% oxygen/65% nitrogen following the recommendations of the Compressed Gas Association's Pamphlet C-10, Recommended Procedures for Changes of Gas Service for Compressed Gas Cylinders, which established procedures to utilize these devices with an enriched oxygen mixture. The licensee is currently using these SCBAs with 35% oxygen/65% nitrogen instead of compressed air. The MSA Model 401 SCBA has received the NIOSH/MSHA certification for use with compressed air, but has not been tested for 35% enriched oxygen applications. Using these SCBAs without the NIOSH/MSHA certification covering such

applications requires an exemption from 10 CFR 20.1703(a)(1), 10 CFR 20.1703(c) and 10 CFR Part 20, Appendix A, Protection Factors for Respirators, Footnote d.2.(d).

IV

Pursuant to 10 CFR 20.1703(a)(2), SCBAs that have not been tested or certified or for which certification has not been extended by NIOSH/MSHA require a demonstration by testing or reliable test information that the material and performance characteristics of the equipment are capable of providing the proposed degree of protection under anticipated conditions of use. VEPCO contracted with National Aeronautic and Space Administration's (NASA) White Sand Test Facility (WSTF) and Lawrence Livermore National Laboratory (LLNL) to conduct applicable oxygen compatibility testing. WSTF evaluated the compatibility of the MSA Custom 4500 SCBA (testing of the model "MSA Custom 4500" envelops the lower pressure applications of models "MSA Ultralite" and "Model 401") with an oxygen-enriched breathing gas mixture. Based on these evaluations, the licensee concluded that compatibility exists provided 1) all hydrocarbon contamination is removed, 2) the SCBAs are maintained so as to preclude the introduction of hydrocarbon contamination, and 3) the temperature of the system does not exceed 135° F when the regulator is first activated. LLNL also concluded that an MSA Custom 4500, equipped with the interchangeable silicone facepiece, meets the National Fire Protection Association Flame and Heat Test requirements whether operated with 35% oxygen/65% nitrogen breathing gas mixture or with compressed air.

The licensee has indicated that the above conditions are met as follows: 1) the MSA repair guidance which is followed stipulates that no hydrocarbon-based compounds are to be used within the pressure boundary during maintenance, 2) the SCBAs are stored and repaired in clean, dry locations free of chemical contamination, 3) containment average temperature, required by Technical Specification, is less than or equal to 125°F at SPS 1&2, and 4) under VEPCO procedural guidance, SCBAs using 35% oxygen/65% nitrogen breathing gas mixture are

equipped with a silicone facepiece. VEPCO has also stated that it has over 20 years of actual safe operating experience using SCBAs with 35% oxygen/65% nitrogen mixture with no incidents of oxygen-induced failure or equipment maintenance problems associated with the enriched oxygen operation.

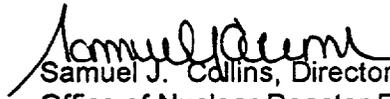
The combination of the existing NIOSH/MSHA certification of the SCBAs (with compressed air), the testing of the SCBA with the enriched oxygen-nitrogen mixture conducted for VEPCO by NASA and LLNL, and VEPCO's safe use history constitutes an adequate basis for granting the requested exemption to permit the use of MSA SCBAs Model 401, Custom 4500 and Ultralite with 35% oxygen-65% nitrogen breathing air mixture in the sub-atmospheric containments of SPS, Units 1 and 2.

Accordingly, the Commission has determined that, pursuant to 10 CFR 20.2301, the requested exemption is authorized by law, and will not result in undue hazard to life or property. Therefore, the Commission hereby grants the requested exemption from the requirements of 10 CFR 20.1703(a)(1), 10 CFR 20.1703(c) and 10 CFR Part 20, Appendix A, Footnote d.2.(d), for Surry Power Station, Unit 1 and Unit 2, provided VEPCO uses SCBAs identified and meeting the formal testing outlined above and follows the above described conditions.

Pursuant to 10 CFR 51.32, the Commission has determined that the granting of this exemption will not have a significant effect on the quality of the human environment (63 FR 45097).

This exemption is effective upon issuance.

FOR THE NUCLEAR REGULATORY COMMISSION


Samuel J. Collins, Director
Office of Nuclear Reactor Regulation

Dated at Rockville, Maryland,
this 3rd day of September 1998



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
FOR AUTHORIZATION UNDER 10 CFR 20.1703(a)(2)
AND EXEMPTION FROM CERTAIN 10 CFR PART 20 REQUIREMENTS RELATED TO
THE USE OF SELF-CONTAINED BREATHING APPARATUS WITH
ENRICHED OXYGEN IN SUBATMOSPHERIC CONTAINMENTS AT THE
SURRY POWER STATION, UNIT 1 AND UNIT 2
DOCKET NUMBERS 50-280 AND 50-281

INTRODUCTION:

Virginia Electric and Power Company (VEPCO, the licensee) in its letter dated March 27, 1997, as supplemented by submittals dated July 28, 1997, March 3 and May 5, 1998, requested authorization under 10 CFR 20.1703(a)(2) and an exemption from 10 CFR 20.1703(a)(1) and (c), and certain requirements of 10 CFR Part 20, Appendix A, Footnote d.2.(d), to use certain models of Mine Safety Appliances, Inc. (MSA) open-circuit self-contained breathing apparatus (SCBA). These SCBAs will provide the wearer with enriched oxygen while working in a subatmospheric, oxygen-deficient primary containment. While providing the worker with an adequate breathing supply (by using a gas mixture of 35% oxygen and 65% nitrogen) in an oxygen-deficient environment, the SCBAs fall outside the respiratory protection equipment certification issued by the National Institute for Occupational Safety and Health/Mine Safety and Health Administration (NIOSH/MSHA) required by 10 CFR Part 20. NIOSH/MSHA limits breathing air oxygen content to 23.5% for open-circuit SCBAs, in order to reduce and limit the probability of flammability/material problems during use.

In an effort to use an existing NIOSH-certified SCBA that would supply at least 35% oxygen to the user, the licensee evaluated the use of closed-circuit (rebreather) SCBAs. These units provide elevated oxygen levels to the user, sufficient to compensate for the effects of the subatmospheric containment. However, the results of the licensee's overall evaluation of these devices were negative, given the identified disadvantages, including the problem of high temperature of the supplied air to the user. The high-temperature breathing air provided by the closed-circuit device unnecessarily added to the worker's heat stress, and was uncomfortable to the wearer. This contrasts with the licensee's long history (21 years) of successful open-circuit SCBA use and widespread user acceptance of the open-circuit design at its facilities.

Under 10 CFR 20.1703(a)(1), the use of NIOSH/MSHA-certified equipment is required to limit worker intakes of radioactive materials. A licensee may seek authorization to use respiratory equipment that has not been tested and certified by NIOSH/MSHA pursuant to 10 CFR 20.1703(a)(2). This subsection requires the licensee to demonstrate by testing that a respirator is capable of safely providing the necessary level of protection under the anticipated

conditions of use. Additionally, 10 CFR 20.1703(c) requires that only NIOSH-certified equipment be used as emergency devices. 10 CFR Part 20, Appendix A, Footnote d.2.(d), in part, requires ".....Respirable air shall be provided of the quality and quantity required in accordance with NIOSH/MSHA certification (described in 30 CFR part 11)." The 30 CFR Part 11 requirement is that oxygen content be less than 23.5%.

The footnote further cautions "Oxygen and air shall not be used in the same apparatus". This prohibits the use of respirators that have been used with normal compressed breathing air, from later being used with enriched oxygen concentrations because of potential combustion/explosion hazards from buildup of oil contamination from normal compressed air. However, VEPCO is not seeking exemption from this requirement.

The fire brigade requirements in the licensee's approved fire protection program require the use of NIOSH approved, full scale, positive pressure SCBAs that provide the user with a rated minimum of 30 minutes of supplied air.

Test data and results to ensure material compatibility with enriched oxygen use, administrative controls to segregate the containment-use only (CUO) SCBAs, and a sustained period of successful use of similar SCBAs form the basis for the licensee's request for an appropriate Part 20 exemption and authorization to use various MSA SCBAs during normal and emergency conditions in primary containment. Criteria and background information used for the staff's evaluation include Section 20.1703(a)(2) of 10 CFR Part 20; Section 19.12 of 10 CFR Part 19; Regulatory Guide 8.15; NUREG/CR-0041; 30 CFR Part 11 and American National Standards Institute (ANSI) Z88.2-1992, "Practices for Respiratory Protection".

DISCUSSION AND EVALUATION OF TESTING

The subatmospheric containments at both VEPCO nuclear facilities present an oxygen deficiency challenge for the workers who enter that environment. The containment pressure can range from about 9 to 11 pounds per square inch absolute (psia), which equates to oxygen concentrations of 12-15% at normal atmospheric pressure. These containments thus constitute oxygen-deficient areas. Because open-circuit SCBAs sense ambient pressure (supplied breathing air pressure from the SCBA is proportional to that pressure), workers with SCBAs (with normal 21% oxygen breathing air) in reduced-pressure work areas will not receive adequate oxygen. In order for the workers to avoid oxygen deficiency problems (e.g., dizziness, shortness of breath, cramps) in subatmospheric areas, the open-circuit SCBA must supply the wearer with enriched oxygen. However, aside from negating the NIOSH certification, the use of 35% oxygen enriched breathing air does present an increased risk of certain types of SCBA material failure and flammability problems under extreme conditions of use.

The licensee requested authorization to use several types of MSA SCBAs as CUO devices: 1) Model 401, with either brass or aluminum parts, 2) Ultralite, and 3) Custom 4500 Dual-Purpose SCBA (the latter two types have only aluminum parts). The licensee designates CUO

devices as such and segregates and controls these devices to ensure no exchange with other SCBAs using normal compressed air. The Custom 4500 SCBA operates at pressures up to 4500 psia and uses aluminum components, while the other models' operating pressures are less than 2100 psia. Given that the material failure problems with compressed air systems are heightened with increased operating pressures and aluminum parts are more prone to failure than brass parts, the Custom 4500 SCBA was used in the testing program to envelope the lower pressure applications of the Model 401 and Ultralite units. As discussed below, the results of the testing program demonstrated that, given certain conditions, these MSA SCBA units will perform safely under adverse conditions.

The licensee contracted with the National Aeronautics and Space Administration (NASA) and Lawrence Livermore National Laboratory (LLNL) to conduct controlled testing. NASA's White Sands Test Facility (WSTF) examined ignition and combustion within the SCBA regulator, and compressive heating of hoses and regulator softgoods (e.g., O-rings). The test results showed that the Custom 4500 materials did not promote ignition under conditions up to 51% oxygen at 4500 psig. However, with hydrocarbon contamination present, combustion testing showed ignition and failure of nonmetal regulator parts, and some metal parts did melt. The compressive heating tests were conducted under worst-case conditions -- during rapid pressurization during start up. The test results showed that only at ambient temperatures greater than 135°F did some non-catastrophic regulator O-ring failures occur. As a result of the WSTF testing, the licensee committed to follow procedures in place which address the following actions and conditions of use for the CUO units. All maintenance and repair activities and environments will be free of hydrocarbon contamination - the CUO units are maintained to preclude introduction of hydrocarbon contamination (e.g., oil). This is normal maintenance practice with compressed, high pressure, supplied-air systems, and is consistent with MSA normal maintenance and repair recommendations and procedures. To prevent compressive heating problems, the CUO units will not be started up in environments with temperatures greater than 135°F (users will start up the CUO units before entry into elevated temperature areas).

As recommended by NASA's WSTF, LLNL conducted testing to address the use of the CUO units in firefighting applications. The concern focused on the potential effects of exhalation and leakage of enriched oxygen mixture from the SCBA facepiece into a fire-charged environment. All three types of MSA SCBAs can use the same types of facepieces. LLNL tested two types of interchangeable facepieces against the National Fire Protection Association (NFPA) heat and flame requirements, which simulate typical fire conditions. The HighCarb facepiece failed the test due to sustained burning at the back of the exhalation valve; this was the only failure point on the mask. As a result, the testing continued with a silicone facepiece, and these tests were successful. LLNL concluded that a SCBA equipped with a silicone facepiece meets the NFPA Flame and Heat Test. The licensee implementing procedures will require that CUO SCBAs be equipped only with silicone facepieces.

RESPIRATORY PROTECTION PROGRAM REQUIREMENTS

Subpart H of 10 CFR Part 20, Respiratory Protection and Controls to Restrict Internal Exposure in Restricted Areas, establishes the requirements for implementing a respiratory protection program. These programmatic requirements ensure that worker doses from airborne radioactive materials are maintained as low as reasonably achievable (ALARA). The licensee intends to integrate the use of the enriched-oxygen SCBAs into the existing respiratory programs that satisfy Part 20 requirements and support fire brigade activities in primary containment.

Certain 10 CFR Part 20 requirements, pertinent to the use of enriched-oxygen CUO SCBAs, and the licensee's programs to meet the requirements are discussed below:

1. Fit testing individual users

The licensee follows the latest consensus industry guidance provided in ANSI Z88.2-1992, and worker fit testing procedures employ a minimum fit factor of 1000, greater than the minimum industry standard of 100. The licensee's program includes fit testing workers prior to initial use and periodically afterward. Providing an adequate fit of the facepiece to a worker's face ensures that face-seal leakage will not be excessive and will not lead to significant shortening of the SCBA-rated air supply. Since the licensee provides a wide selection of different sizes, the licensee can provide acceptable fits to essentially 100% of the qualified workers.

2. Maintenance and testing of respirators

The licensee conducts a CUO SCBA maintenance program that is implemented by station personnel trained and certified by the respirator vendor, MSA. The SCBAs are maintained in accordance with MSA recommendations for preventative maintenance and repair, and this maintenance is governed by management-approved station procedures. These procedures take into account and implement the special needs and techniques required as a result of the use of the enriched oxygen (e.g., oil-free maintenance area). Additionally, these procedures specify the type and frequency of each required maintenance/surveillance item, e.g., regulator inspection and O-ring replacement.

3. Respirable breathing air provided to respirator users

Breathing gas quality and composition are ensured by strict controls used by the authorized vendor, in accordance with the latest revision of the United States Pharmacopeia (USP)-The National Formulary (NF). The cryogenic process for producing the breathing gas mixtures ensures that no detectable contaminants (e.g., oil) can be present. The onsite gas handling systems (cascades) are dedicated solely for the enriched oxygen/nitrogen mixtures. The appropriate CUO SCBA air cylinders have been

qualified for handling the gas mixtures in accordance with the Compressed Gas Association's Pamphlet C-10, Recommended Procedures for Changes of Gas Service for Compressed Gas Cylinders.

4. Training of workers

The worker training and retraining program includes appropriate hands-on and classroom instruction. Specific training is provided on proper operation and use of the CUO units and actions to be taken in the event of equipment malfunction. The industrial hygiene hazards of the subatmospheric containment and appropriate emergency actions are included in the training program.

5. Initial and periodic medical evaluations

As required by 10 CFR 20.1703(a)(3)(v), under the direction of licensed physicians, periodic physicals (medical evaluations) are performed on workers who may enter the subatmospheric containment using CUO SCBAs. This program is effective in screening and identifying certain workers with existing medical conditions that could hamper their performance while working in the elevated temperatures and humidity of containment. These workers are not authorized to enter the subatmospheric containment. Since the subatmospheric containment does present elevated temperatures and high humidity, to reduce worker stresses, the licensee maintains a heat stress management program. This program includes the use of cooling garments, limiting stay-times, and other techniques.

FIRE BRIGADE RESPIRATORY NEEDS

The testing described above performed by the National Laboratories demonstrates that the three types of MSA units do not present undue hazards to the workers using these devices during adverse conditions, such as firefighting. Manufacturer documentation and NIOSH certification clearly show that these SCBAs are full-face, positive-pressure units that are rated to provide a minimum 30-minute supply of air (at a nominal ambient 14.7 psia). Use of SCBAs at subatmospheric pressures will not reduce this supply duration. Additionally, upon approval of its exemption request, the licensee will not allow use of the older design CUO Model 401 for in-containment firefighting. With a rated flowrate of 40 L/min (regulator output), the Model 401 does not meet the current NFPA requirements of 100 L/min to the user. Higher breathing air flowrates to the users provide greater safety margins against hazardous facepiece in-leakage (e.g., over breathing at high work rates) and enhance worker safety during responses to emergencies. The licensee commitment to use only high-flow SCBA improves worker safety and enhances firefighting capability within primary containment.

CONCLUSIONS

Pursuant to 10 CFR 20.1703(a)(2), VEPCO has requested authorization to use certain respirators that have not been tested and qualified by NIOSH/MSHA for use with an enriched oxygen-nitrogen mixture for worker protection inside the containment. VEPCO has also requested exemption from certain requirements of 10 CFR 20.1703(a)(1), 10 CFR 20.1703(c) and 10 CFR Part 20 Appendix A, Footnote d.2.(d).

Based on the staff's review of the referenced licensee submittals and commitments therein, the staff concludes that the request to use oxygen-enriched breathing air for certain designated SCBAs is in accordance with the intent of the requirements of 10 CFR Part 20 and should be authorized as requested. Granting an exemption from Part 20, related to the use of CUO SCBA, improves worker safety while working in an oxygen-deficient environment. Additionally, by providing an exemption to Part 20 requirements pertinent to the use of NIOSH-certified respiratory equipment, the modified CUO SCBA program improves worker and plant safety by improving protection provided to the fire brigade during in-containment activities and is, therefore, acceptable. Accordingly, the requested exemption is authorized by law and would not result in undue hazard to life or property, and should be granted.

Principal Contributor: J. E. Wigginton

Date: September 3, 1998