DSSA Release

From: Eric Weiss NRR
To: Phil Qualls
Date: Tue, Apr 29, 2003 3:19 PM
Subject: Re: OSHA

Phil-

Before we handed the rule over to the other branch, I drafted what I thought the manaual actions rule should say. I specifically included a requrement that the environment meet OSHA standards. Someone, (I forget who but I think you told me that it was the Human Factors folks), took that out because they said there were no OSHA standards on the issue. I think you need to work this out with the Human Factors folks. Seems unfair to me that my ideas are discounted and then resurrected later as new ideas.

-Eric

P.S. make the Salem SE your first priority because it is overdue.

>>> Phil Qualls 04/29/03 02:38PM >>> NRR
Eric, during recent discussions of habitability for the manual action rulemaking, I was looking at OSHA standards. I could find nothing specific on temperature/humidity acceptance criteria as relates to heat stress. I also looked at the standard for employee CO2 exposure from fire suppression effects for the rule background.

I did find that there is an OSHA standard on gaseous suppression systems, 29 CFR 1910.162. I wanted to ensure that any information in the rulemaking supporting information meets the OSHA standards.

The standard does say:

"1910.162(b)(2)

Except during overhaul, the employer shall assure that the designed concentration of gaseous agents is maintained until the fire has been extinguished or is under control.

..1910.162(b)(3)

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The employer shall assure that employees are not exposed to toxic levels of gaseous agent or its decomposition products."

I know that we have some kind of memorandum of understanding with OSHA as regards the notification of OSHA violations at NPPs. When we get information about such places as St. Lucie, where the inadequate Halon system will not suppress a fire and may produce toxins due to combustion of the halon or at Millstone where the CO2 system leaks into the CR, are we under obligation to notify the OSHA?

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