

October 19, 2006

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SUBJECT: BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2; CRYSTAL RIVER UNIT 3 NUCLEAR GENERATING PLANT; SHEARON HARRIS NUCLEAR POWER PLANT, UNIT NO. 1; AND H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2 - AUTHORIZATION FOR USE OF DELTA PROTECTION MURUROA SINGLE-USE, SUPPLIED-AIR SUITS, MODELS V4 F1 AND V4 MTH2 (TAC NOS. MD1384, MD1385, MD1386, MD1387, AND MD1388)

Dear Mr. Burton:

By letter dated May 1, 2006, Carolina Power & Light Company and Florida Power Corporation (CP&L and FPC, the licensees) submitted a request, pursuant to Part 20 of Title 10 of the *Code of Federal Regulations* (10 CFR 20) Section 1703(b) and Section 1705 for authorization to (1) use French designed respiratory protection equipment that has not been tested and certified by the National Institute for Occupational Safety and Health, (2) not provide standby rescue persons whenever this equipment is used, and (3) take credit for an assigned protection factor of 5000 for this equipment.

The U.S. Nuclear Regulatory Commission staff concludes in the enclosed safety evaluation that the CP&L and FPC request is acceptable and within the provisions of 10 CFR Part 20.

If you or your staff have any questions concerning the resolution of this matter, please contact me at 301-415-2020.

Sincerely,

/RA by L. Raghavan for/

Brenda Mozafari, Senior Project Manager
Plant Licensing Branch II-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-325, 50-324, 50-302, 50-400, 50-261

Enclosure: Safety Evaluation

cc w/encl: See next page

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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO THE USE OF DELTA PROTECTION MURUROA
V4 F1 AND V4 MTH2 SUPPLIED AIR SUITS
AND ASSIGNMENT OF A PROTECTION FACTOR OF 5000
CAROLINA POWER AND LIGHT COMPANY AND FLORIDA POWER CORPORATION
BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2
CRYSTAL RIVER UNIT 3 NUCLEAR GENERATING PLANT
SHEARON HARRIS NUCLEAR POWER PLANT, UNIT 1
H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT 2
DOCKET NUMBERS 50-325, 50-324, 50-302, 50-400, 50-261

1.0 INTRODUCTION

By letter dated May 1, 2006, Carolina Power & Light and Florida Power Corporation (the licensees) submitted a request to use certain air-supplied, continuous flow suits that provide respiratory protection for persons working in areas with airborne radioactivity. Under Title 10 of the *Code of Federal Regulations* (10 CFR) Part 20, Section 1703(b) and Section 1705, the licensees requested authorization (1) to use French designed respiratory protection equipment that has not been tested and certified by the National Institute for Occupational Safety and Health (NIOSH), (2) to not provide standby rescue persons whenever this equipment is used, and (3) to take credit for an assigned protection factor (APF) of 5000 for this equipment.

Specifically, the licensees requested authorization to use the French-made Mururoa single-use, V4 F1 and V4 MTH2 Supplied-Air Suits, manufactured by Delta Protection and to use an APF of 5000. As defined in 10 CFR 20.1003, an APF denotes the expected level of protection that would be provided to a trained respirator user by a properly fitted and functioning respirator. These suits would be used for the Brunswick Steam Electric Plant, Units 1 and 2, Crystal River Unit 3 Nuclear Generating Plant, Shearon Harris Nuclear Power Plant, Unit 1, and H. B. Robinson Steam Electric Plant, Unit 2.

2.0 REGULATORY EVALUATION

The use of respiratory protection equipment (respirators) for protection against airborne radioactive materials is addressed in 10 CFR Part 20, "Standards for Protection Against Radiation," Subpart H, "Respiratory Protection and Controls to Restrict Internal Exposure in

Enclosure

Restricted Areas.” Section 1703(a) of 10 CFR Part 20 requires the use of respiratory equipment certified by NIOSH when used to limit worker intake of radioactive materials. However, NIOSH currently has no testing and certification schedules for air-supplied suits. Authorization by the U.S. Nuclear Regulatory Commission (NRC) to use respiratory equipment that has not been tested and certified by NIOSH is provided for in 10 CFR 20.1703(b). Section 1703(b) requires the licensees to demonstrate by appropriate testing that a respirator is capable of safely providing the necessary level of user protection under the anticipated conditions of use.

Additionally, when an air-supplied respirator (such as a full suit or hood) that could be difficult for a user to remove without assistance is used, 10 CFR 20.1703(f) requires that standby rescuers be present to render suit egress assistance to the user in the case of a sudden, unexpected loss of air supply (or other emergencies). Without this prompt assistance, a user could be asphyxiated in a short period of time.

Based on the special design escape features of the two suits discussed below, the licensees have requested authorization to not use a rescuer. The NRC staff notes that these suits will not be used in areas immediately dangerous to life or health (IDLH); IDLH areas pose immediate hazards to life or irreversible debilitating effects on health. For example, air-supplied respirators (without auxiliary self-contained breathing air capability) may not be used to enter areas where unknown airborne hazards may be present during emergencies.

Appendix A “Assigned Protection Factors for Respirators” to 10 CFR Part 20, does not provide an APF for atmosphere supplying respirator (air-line respirator) suits in a continuous-flow operating mode. Instead, it references footnote (g), which states:

No NIOSH approval schedule is currently available for atmosphere supplying suits. This equipment may be used in an acceptable respiratory protection program as long as all the other minimum program requirements, with the exception of fit testing, are met (i.e., § 20.1703).

Section 1705, “Application for use of higher assigned protection factors,” states that licensees shall obtain NRC authorization before using assigned protection factors in excess of those specified in Appendix A to 10 CFR Part 20. Since Appendix A does not provide an APF for atmosphere supplying respirator suits in a continuous-flow operating mode, the licensees must obtain NRC approval to take credit for an APF for the French-designed respiratory protection equipment.

Criteria and background information used for the NRC staff’s evaluation include 10 CFR Part 20, Subpart H; 10 CFR Part 19, Paragraph 19.12, “Instruction to Workers”; Regulatory Guide 8.15, Revision 1, “Acceptable Programs for Respiratory Protection”; NUREG/CR-0041, Revision 1, “Manual of Respiratory Protection Against Airborne Radioactive Materials”; 30 CFR Part 11, “NIOSH testing and certification regulations”; Los Alamos National Laboratory Report LA-10156-MS, “Acceptance-Testing Procedures for Air-Line Supplied-Air Suits”; and American National Standards Institute standard (ANSI) Z88.2-1992, “American National Standard Practices for Respiratory Protection.”

NRC guidance provided in NUREG/CR-0041 encourages the use of suits, noting that, in certain work environments, air-supplied suits may be the best respiratory application when factoring in

heat stress, minimizing skin contamination, and maintaining worker doses as low as is reasonably achievable (ALARA). Additionally, Appendix A, Footnote (g) to 10 CFR Part 20 allows the use of air-supplied suits, but allows no credit to be taken for protection provided by the non-NIOSH approved units (unless approval is granted under 10 CFR 20.1703(b)).

3.0 TECHNICAL EVALUATION

The licensees requested authorization to use and take credit for the protection provided by two models of air-supplied suits made by the same manufacturer and identified as MURUROA V4 F1 (Certificate No. 0073/197/162/12/97/0028) and MURUROA V4 MTH2 (Certificate No. 0073/197/162/01/96/0001). Both models are approved as single-use suits (a suit is disposed of after one use), and the licensees will use the suits in the approved configurations, relative to their form, fit and function.

Testing conducted by the Institute for Nuclear Protection and Security (INPS), the European certifying agency (comparable to NIOSH), and over 20 years of successful use of similar certified suits in European power plants, form the basis for the licensees' request for authorization to use and take credit for the protection provided by the two suits during normal operations (non-emergencies). The European Standard CEN/TC 162 N 738 "Protective Clothing Against Radioactive Contamination", November 1995 and July 1997 for Model V4 MTH2 and V4 F1, respectively, provided testing and acceptance criteria used for certification of the suits. This standard is generally consistent with the pertinent acceptance criteria provided in the Los Alamos National Laboratory Report, LA-10156-MS (used to test and authorize the use of air-supplied suits at Department of Energy sites).

The INPS certification testing regime was broadly based and included a range of various functional areas, including suit material strength, tear and puncture resistance, material flammability, wearer comfort, noise level, wearer visibility, air flow, carbon dioxide concentrations, and degree of contaminate in-leakage during a series of varied simulated work practices and exercises. Both models passed all required tests and both provided a measured average protection level (fit factor) of 50,000. Developed in a simulated work environment, a fit factor is the ratio of contaminate concentration outside the suit to the contaminate concentration inside the suit. Given an overall measured fit factor of 50,000 (averaged over all exercise activities), allowing an APF of 5000 provides a conservative safety factor for estimating the actual protection provided to the user by the suit in the actual working environment. APFs are generally lower than fit factors for all types of respirators, because workplace demands are typically greater on the respirator user than laboratory conditions and simulated work activities (e.g., higher heat and humidity, longer work durations, greater worker fatigue, etc.).

In general, when compared with other air-fed respirators, both the MURUROA V4 F1 suit and the MURUROA V4 MTH2 suit provide the following advantages for the user: (1) Dual zippers (metal zipper inside and plastic zipper outside); (2) welded sleeve to insert communication cable; (3) a removable strip near the mouth that could be used for emergency breathing in case of loss of supplied air; (4) an egress strip stretching from left arm, over the head, to the right arm that is used for undressing and for self-rescue in an emergency, such as loss of supplied air; (5) air intake located at the waist with a built-in regulator that can adjust but not block air flow; (6) dual magnetic exhaust valves that provide ventilation, and relief of excess pressure in case the suit is squeezed/pinched unexpectedly; (7) very low noise level at maximum air flow; and (8) air flow to hands, feet, face and chest.

Safety features also include light-weight (2.5 pounds) one-piece construction with welded gloves and booties with tie straps. Helmets are made with PVC material that provides distortion-free vision and are large enough for wearing a headset. Noise levels are less than 80 decibels at maximum air flow and air flow can be adjusted by the user for comfort but cannot be shut off below the required minimum air flow. The MURUROA V4 MTH2 model also provides two additional vents near the chin for cooling to the face. Both models are fireproof up to 65 °C and can be used in temperatures up to 60 °C. Suits are constructed with reinforced elbows, knees, and crotch areas.

Based on the licensees' evaluation, the MURUROA V4 F1 and V4 MTH2 air supplied suits were found to offer a safer and more efficient means to protect workers in areas of high radiological contamination and in areas where there is potential for airborne contamination. While these suits provide improved cooling over the entire body, the existing combination of rain suits and air-supplied, NIOSH-certified hoods available to the licensees provide cooling only to the head. As a result workers are forced to wear the ensemble in a manner that makes self-rescue nearly impossible, thus requiring a rescue worker to be stationed nearby. Ease of removal of the MURUROA suits provides for more desirable self-rescue features, and provides a means to undress that minimizes the potential for personnel contamination events.

Upon loss of supplied air to the suit, the wearer can easily extricate himself by pulling off the mouth strip and then opening the hood, or pulling the egress strip from the forearm to the head. Based on these designed safety features, the NRC staff finds that the suit design provides for easy and effective self-rescue, thus avoiding asphyxiation if the air supply is interrupted or lost. As a result of external radiation levels present in typical job sites, suit users are typically provided with radiological protection (RP) coverage such as closed-circuit television or on scene RP coverage, and continuous audio communication. This communication and coverage adds to the assistance available to the suit user, if needed. Due to these design features of the suit, coupled with required training of all suit users on escape methods, and limitations on the use of the suits to non-IDLH atmospheres, the requirement for standby rescue persons in accordance with 10 CFR 20.1703(f) is not necessary.

Subpart H of 10 CFR Part 20 establishes the requirements for implementing a respiratory protection program. These programmatic requirements ensure that worker doses from airborne radioactive materials are maintained ALARA. The licensees intend to integrate the use of the MURUROA suits into their existing, ongoing respiratory programs, which satisfy 10 CFR Part 20 requirements. The NRC staff finds this approach acceptable. The following summary of controls and program elements generally follow the specific 10 CFR Part 20 requirements pertinent to the use of supplied air-suits. Since the licensees have a viable, ongoing respiratory protection program, and have successfully used air-supplied hoods in the past, only items pertinent and specific to the use of suits are discussed below.

1. Section 1703(c) requires written procedures governing the training of respirator users (workers). The licensees have committed to develop new lesson plans to train workers on the suits' features; how to don, use, and remove the suit; and instructions on using the built-in escape strips for routine and emergency egress conditions. This training should include appropriate hands-on and classroom instruction. Specific training will be provided on actions to be taken by the user in the event of equipment malfunction. The RP personnel will be trained to ensure they are competent to issue, assist in helping the

user don and doff the suit, and set up and operate the unit (including the regulated air supply).

2. Communication channels will be established and maintained between the licensees, the manufacturer, and other licensees through the Operating Experience Program. The licensees have committed to use their Corrective Action Program to document and evaluate any unexpected problems with the Delta Suit and to report any suit defects in a timely manner to the United States nuclear industry and to the manufacturer through the licensees' Operating Experience processes.
3. Section 20.1703(c)(4)(vii) requires written procedures governing respirator storage and quality assurance. The licensees have committed to implement the provisions in the manufacturer's "MURUROA V4 MTH2 And F1, Instructions for Use," dated December 2000, with the minor clarification that the suits may be inspected and removed from their protective packaging outside of the plant's radiological controlled areas, in a way that maintains the integrity of the suit but does not lead to the unnecessary generation of solid radioactive waste.
4. Section 20.1703(c)(4)(vii) requires written procedures governing respirator storage and quality assurance. The suits have a 3-year shelf-life and must be stored in the original packing at temperatures specified by the manufacturer's "Instructions for Use." The suits are approved for single use only, therefore maintenance and repair requirements are not necessary.

4.0 CONCLUSIONS

Based on the testing data provided, and when used in accordance with the applicable manufacturer's instructions, licensees' commitments, and requirements of 10 CFR Part 20 Subpart H, the NRC staff concludes that the licensees' request to use the two suits, MURUROA V4 F1 and V4 MTH2, satisfies the 10 CFR Part 20 ALARA requirements and will provide the suit wearer with an adequate level of protection while working in high and potentially high airborne radioactivity areas. Therefore, the NRC staff finds that the request is acceptable. The NRC staff also concludes that the licensees can take credit for an APF of 5000 for both of these suits and that standby rescue persons, discussed in 10 CFR 20.1703(f), are not required when these suits are used.

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Date: October 19, 2006

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