

ENCLOSURE 1
Reply to Request for Additional Information

Set forth below is information provided pursuant to the NRC Request for Additional Information (RAI) by letter dated March 6, 2012. The RAI Comments are repeated below. B&W NOG's responses are denoted as B&W Response.

NRC RAI Comments

The following questions are required to resolve your request for exemption from the requirements of 10 CFR 20.1703(c)(5).

NRC RAI -1

Is the respiratory protection program designed by and under the supervision of a physician?

B&W Response

The Respiratory Protection Program is designed by and under the supervision of the Radiation Protection Program Manager. RP-05, *Respiratory Protection*, (Radiation Protection Manual) documents the program. The program is administered via the following procedures:

- RP-05-001 - Respirator Issuance
- RP-05-002 - Quantitative Fit Testing
- RP-05-003 - Respirator Cleaning, Inspection & Maintenance
- RP-05-004 - Sampling of Air Used for Supplied Air Line Respirators
- RP-05-006 - Qualification of Personnel for the Use of Respiratory Protection Equipment
- RP-05-009 - Inspection of the Respiratory Protection Program
- RP-05-011 - Respiratory Protection Selection & ALARA Evaluation

RP-05-006, *Qualification of Personnel for the use of Respiratory Protection Equipment*, specifies that if an individual is to be respirator qualified, they must have a "current respirator physical as specified by the physician". The Medical Qualification aspect of the Respiratory Protection Program is designed by and under the supervision of a physician.

NRC RAI -2

Is a physician ultimately responsible for the fitness determination and supervision of personnel performing the tests?

B&W Response

A physician is ultimately responsible for the Medical Qualification aspect of the fitness determination and for supervision of personnel performing the Medical Qualification. The attached Practice Agreement, as shown in Enclosure 2, demonstrates the responsibilities of a Licensed Nurse Practitioner and the supervisory role of the Primary Supervising Physician. As stated in the above paragraph, other aspects of the Respiratory Protection Program are managed within the Radiation Protection Program.

NRC RAI -3

Does the physician review the overall results and individuals' cases that fall outside physician determined parameters?

B&W Response

Currently, yes. However, the exemption request (Letter dated September 17, 2010, Cole (B&W NOG) to Executive Director of Operations (NRC), Request for Exemption from 10 CFR 20.1703(c)(5)), directly applies to this aspect of the program. Upon receiving NRC approval of exemption request, B&W NOG will utilize Licensed Nurse Practitioners to review results and determine that an individual user is medically fit to use respiratory protection equipment. These decisions will be made within parameters established by a Physician. The Physician will continue to review any results that fall outside physician determined parameters.