Regulatory Guide Periodic Review

Regulatory Guide Number: 8.15, Revision 1

Title: Acceptable Programs for Respiratory Protection

Office/division/branch: NRR/DRA/ARCB Technical Lead: David Garmon

Staff Action Decided: Reviewed with issues identified for future

consideration

1. What are the known technical or regulatory issues with the current version of the Regulatory Guide (RG)?

RG 8.15, Revision 1 was issued in 1999 to provide guidance on the use of respiratory protection equipment to limit the intake of radioactive material and implement and maintain a respiratory protection program that meets the requirements of 10 CFR Part 20.1703(c), "Use of individual respiratory protection equipment."

Revision 1 to RG 8.15 endorses American National Standards Institute (ANSI) standard Z88.2-1992, "American National Standard for Respiratory Protection," with certain exceptions and amplifications. Since 1992, ANSI Z88.2 has been updated multiple times. However, these changes have not significantly impacted the staff's positions regarding what constitutes an acceptable respiratory protection program. Therefore, Revision 1 to RG 8.15 continues to provide an adequate description of an acceptable respiratory protection program. In addition, Revision 1 to NUREG/CR-0041, "Manual of Respiratory Protection Against Airborne Radioactive Material," provides additional information on the implementation and maintenance of a respiratory protection program. Although the information in the NUREG/CR-0041 does not constitute a staff position, it could be valuable information for applicable licensees.

This RG includes references and formatting changes that could be updated. However, there are no technical or regulatory issues with Revision 1 to RG 8.15 that necessitate updating in the near-term. In the future, the staff will consider endorsing the most up-to-date ANSI Z88.2 and other applicable standards.

2. What is the impact on internal and external stakeholders of <u>not</u> updating the RG for the known issues, in terms of anticipated numbers of licensing and inspection activities over the next several years?

Since there are no significant technical or regulatory issues, there is no impact on licensing and inspection activities.

3. What is an estimate of the level of effort needed to address identified issues in terms of full-time equivalent (FTE) and contractor resources?

Not applicable.

4. Based on the answers to the questions above, what is the staff action for this guide (Reviewed with no issues identified, Reviewed with issues identified for future consideration, Revise, or Withdraw)?

Reviewed with issues identified for future consideration.

5. Provide a conceptual plan and timeframe to address the issues identified during the review.

The staff will consider revising Revision 1 to RG 8.15 if more substantive changes to applicable standards are published, or if the staff finds that further guidance is needed in the implementation of respiratory protection programs.

NOTE: This review was conducted in October 2017 and reflects the staff's plans as of that date. These plans are tentative and are subject to change.