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**Safety Products**

45 Great Valley Parkway  
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January 15, 1982

Ms. Lynnette Hendricks  
Office of Nuclear Regulatory Research  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Reference Proposed Rules: Federal Register Vol. 46, No. 212  
Monday, November 8, 1981 10CFR Part 20  
Replacement of Provisions Regulatory Guide 8.15  
Incorporated by Reference in 20.103

Dear Lynnette,

Thank you for the consideration to comment after the deadline of January 4. We requested an extension to that date in writing prior to that time, and were verbally denied the request citing a deadline the Federal Register had given NRC. Consideration was given to allow our late submission of comments if they could arrive during the middle of January. We hope these comments are properly presented in our limited preparation time.

Rexnord Electronic Products Division wishes to comment on four (4) areas:

1. General: the permissible concentration of radioactive substances is much lower than the TLV (Life Hazard) of gases/vapors, therefore the closed circuit positive pressure breathing apparatus (RP) should have language stating this apparatus is acceptable in IDLH - immediately dangerous to life and health - conditions. Probable reference should be in footnote k of appendix A.
2. F.R. Page 55272, Section 5, states that a company (licensee) could gain higher protection factors should they wish by applying to the commission and demonstrating them. We interpret this section to expand IN-81-26 notice that a company (licensee) has a good opportunity to have a higher protection factor (PF) assigned concerning an "RP" for whatever reason should they wish to apply to the commission. We further interpret that:  
1. Passage of fit test requirements in IN-81-26 which demonstrate this higher protection factor will be the basis for approval of the application and  
2. the application process is not such a complicated time consuming process as to substantially reduce the desirability of the application for higher protection factor.

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PDR PR  
20 438755271 PDR

**BioMarine** ||| instruments

**BioPak** ||| self-contained breathing apparatus

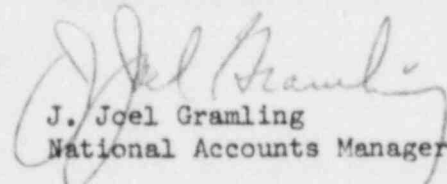
3. F.R. Page 55272. We request that you change the description in appendix A for RP to "Positive Pressure - recirculating (closed circuit)" device rather than "pressure demand device". Designation RD should be NPR - Non Positive Pressure - recirculating. The positive pressure BioPaks operate on a constant flow to a breathing chamber rather than a demand from a regulator. A "demand" designation would be technically incorrect. The Positive Pressure wording for all breathing apparatus is more technically correct as to what the device does rather than how it works. This language is consistent with industry wording, the OSHA 1910 Sub. Part. L. fire brigade wording and other recognized authorities working with respirators. We would suggest that other SCBA should use the Positive Pressure and Negative Pressure designations also. The D might be: D = Demand (negative pressure in part of the respiration cycle) and PD should be: PD = Positive Pressure (i.e.: pressure demand).
4. F.R. Page 55273 Footnote 1 should be changed to read "Quantitative fit testing must be performed on each individual to achieve a minimum protection factor of 5,000 (0.02% leakage). Perceptible outward leakage of gas from this or any self contained breathing apparatus is unacceptable because service life will be reduced substantially. Special training in the use of this type of apparatus must be provided to the wearer. (See footnote k.) We request that footnote k be noted with footnote 1 for "RP" units.

This language noted in the four areas is more consistent with the intent and substance of the IN-81-26. In item 4, the wording presently written confuses duration with protection factors. The suggested wording is more appropriate.

We hope that you will favorably receive these suggestions and incorporate them in the final rule. If you differ with these comments or you have any questions, please let me know immediately.

Sincerely,

REXNORD ELECTRONIC PRODUCTS DIVISION

  
J. Joel Gramling  
National Accounts Manager

JJG/lcd



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FROM: *Suzanne Werdnick*

Please place the attached document in the PDR using the following file and file points:

PDR File  
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(Enter if appropriate)

*RR 20*  
Proposed Rule (PR) *X 46 FR 55271*  
Reg. Guide \_\_\_\_\_  
Draft Reg. Guide \_\_\_\_\_  
Petition (PRM) \_\_\_\_\_  
Effective Rule (RM) \_\_\_\_\_

ACRS Minutes No. \_\_\_\_\_  
Proposed Rule (PR) \_\_\_\_\_  
Draft Reg. Guide \_\_\_\_\_  
Reg. Guide *8.15* \_\_\_\_\_  
Petition (PRM) \_\_\_\_\_  
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SD Task No. \_\_\_\_\_  
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Subject: *Disincorporation of*  
*R.G. 8.15 from*  
*20.103*