

ROBERT E. DENTON
Vice President
Nuclear Energy

DOCKETED
USING

Baltimore Gas and Electric Company
Calvert Cliffs Nuclear Power Plant
1650 Calvert Cliffs Parkway
Lusby, Maryland 20657
410 586-2200 Ext. 4455 Local
410 260-4455 Baltimore

'94 NOV 14 P3:22

OFFICE OF SECRETARY
DOCKETING & SERVICES
BRANCH

DOCKET NUMBER
PROPOSED RULE **PR 20**
(59FR47565)

(2)



November 11, 1994

U. S. Nuclear Regulatory Commission
Washington, DC 20555

ATTENTION: Secretary of the Commission
Docketing and Services Branch

SUBJECT: Frequency of Medical Examinations for Use of Respiratory Protection Equipment
(59FR47565)

We welcome the opportunity to comment on the Nuclear Regulatory Commission (NRC) proposal to amend the regulations concerning the frequency at which medical examinations are required to ensure the safe use of respiratory protection equipment. Section 10 CFR 20.1703(a)(3)(v) currently requires the determination by a physician prior to initial fitting of respirators, and at least every 12 months thereafter, that the individual user is physically able to use the respiratory protection equipment. The proposed revision would require determination by a physician prior to initial fitting of respirators and either every 12 months thereafter, or periodically at a frequency determined by a physician, that the individual user is medically fit to use the respiratory protection equipment.

We were pleased with the NRC's move to increase self-regulation in the area of respirator physicals. The industry has gained significant experience over the years in this area. We welcome the increased flexibility the proposed rule would allow.

Should you have any questions regarding this matter, we will be pleased to discuss them with you.

Very truly yours,

RED/JMO/dlm

9411180012 941111
PDR PR
20 59FR47565 PDR

DS10

Secretary of the Commission

November 11, 1994

Page 2

cc: D. A. Brune, Esquire
J. E. Silberg, Esquire
L. B. Marsh, NRC
D. G. McDonald, Jr., NRC
T. T. Martin, NRC
P. R. Wilson, NRC
R. I. McLean, DNR
J. H. Walter, PSC