

July 15, 2015

Mr. Andrew L Coats
President & CEO
OHD, Inc.
2687 John Hawkins Parkway
Hoover, AL 35244

SUBJECT: APPLICABILITY OF NUCLEAR REGULATORY COMMISSION HEALTH PHYSICS
POSITION NO.175 TO THE QUANTIFIT ® RESPIRATOR FIT TESTING SYSTEM

Dear Mr. Coats,

This letter is in response to your letter dated July 2, 2015, requesting that the U. S. Nuclear Regulatory Commission (NRC) clarify certain statements included in Health Physics Position (HPPOS 175) and their applicability to the controlled negative pressure (CNP) technology for fit testing of respirators at NRC licensed facilities.

As you point out in your letter, HPPOS 175 (issued in 1989) addressed the acceptability of the Quantafit ® respirator fit testing device which employed a negative pressure decay principle to quantify the goodness of the respirator fit. The negative pressure decay technology measured how long the face piece could hold a negative pressure when mounted on the test subject. HPPOS 175 notes that this fit test technology required the subject to be completely still with no face movement during the test. Since this limitation precluded the subject from performing any exercises, to simulate the working environment, the staff concluded that it was not an adequate fit test methodology.

Again, as you point out in your letter, the Quantafit ® system is not the same as the Quantifit ® system which employs the controlled negative pressure (CNP) technology. OSHA regulations at 29 CFR 1910.134, Appendix A, section B 4. includes exercises to be performed by the test subject during fit testing using CNP protocols.

In conclusion, the statements in HPPOS 175 concerning the acceptability of the Quantafit ® technically are not applicable to the CNP method of respirator fit testing. More specifically, since the Quantifit ® fit test system employs the CNP technology they would not apply to your product.

The NRC does not endorse specific commercial products. However, fit testing protocols accepted by OSHA, as listed in Appendix A to 29 CFR 1910.134, are adequate to meet NRC requirements in 10 CFR 20.

Sincerely,

/RA/

Roger Pedersen,
Senior Health Physicist
Nuclear regulatory Commission
Office of Nuclear Reactor Regulation

A.Coates

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Sincerely,

/RA/

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Senior Health Physicist
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Office of Nuclear Reactor Regulation

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