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October 21, 1984

MEMORANDUM FOR: S. Guthrie, Sr. Resident Inspector
Big Rock Point Nuclear Station

FROM: L. R. Greger, Chief
Emergency Preparedness and
Radiological Protection Branch

SUBJECT: FACIAL HAIR RESTRICTION ON RESPIRATOR USE

This memorandum is in response to your October 2, 1984 memorandum to James G. Keppler.

I have attached a clarification of OSHA regulations concerning respirator usage and facial hair (29 CFR 1910.134(e)(5)(1)). This clarification, which was provided by J. E. Wigginton, EGCB, IE, who has been coordinating IE's resolution of this matter, states that "any hair growth in the face sealing area is unacceptable." It appears clear that workers wearing tight-fitting facepiece respirators must be clean shaven when wearing such a respirator. It is obvious that if workers' duties involve emergency response activities, where respirator usage may be required, they must remain clean shaven if they are to respond quickly to emergencies.

Mr. Wigginton also advised me that a memorandum will be issued soon by R. L. Baer, Chief, EGCB, IE, to all five Regions concerning regulatory prohibitions against the use of tight-fitting respirators if facial hair intrudes into the facepiece seal against the skin. I assume that if they are not already doing so, all Regions will enforce these regulatory requirements subsequent to their receipt of Mr. Baer's memorandum. I will provide a copy of that memorandum to you when I receive it.

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OFFICE

URNAME

S. Guthrie

-2-

October 31, 1984

Subsequent to receipt of your October 2, 1984 memorandum, Consumers Power Company was released from their commitment to this office to implement a facial hair policy by October 19, 1984, while I reviewed the matter. Upon receipt of the above referenced memorandum from R. L. Baer, I expect to reestablish a commitment date with Consumers Power Company.

L. R. Greger, Chief
Emergency Preparedness and
Radiological Protection Branch

Attachment: As stated

cc w/attach.:

Ron Siwarga, Chief Steward

Local 346, UWUA

Jeff Bakker, Sec-Treas.,

Local 346, UWUA

Mr. Dave Hoffman, Plant

Superintendent, Big Rock Point

J. G. Keppler, Regional

Administrator, RIII

J. E. Wigginton, IE

OFFICE	RIII/DRSS	RIII	RIII	RIII		
JRNAME	Greger/mf	Greger	Hick	Davis	540342	
DATE	10/29/84	WARNICK	10/30/84	10/30		

U.S. Department of Labor

Occupational Safety and Health Administration
Washington, D.C. 20340

Reply to the Attention of



JUL 13 1983

Harry C. Russell, Col., USAF, BSC
Command Bioenvironmental Engineer
Office of the Surgeon
Department of the Air Force
Headquarters Air Force Logistics Command
Wright-Patterson Air Force Base, Ohio 45433

Dear Colonel Russell:

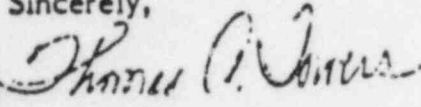
We are providing answers to the questions on beards and respirator wear which you asked in your letter of June 20, 1983.

- a. Yes, any facial hair growth between the facepiece sealing surface and the skin that prevents a good sealing surface is a violation of 29 CFR 1910.134(e)(5)(i).
- b. The OSHA standard is a minimum standard. Any employer can set more stringent requirements than OSHA's. If the bearded employee is exposed to a toxic material in excess of the Air Force standard but within the OSHA standard, the respirator should not be worn until the interfering hair is removed because the Air Force standard would have been violated even if the OSHA standard were not.
- c. Yes, the situation described in your section C is still a violation of 1910.134(e)(5)(i). The question is not whether the bearded person can pass the fit test on a given day, but whether he can pass the test everyday. Since the density and texture of the beard is not uniform around the face, and because the density and bulk of beard is not the same over time, consistent fit test results cannot be obtained. Quantitative fit testing (QNFT) is the only available method which can accurately measure the fit testing result of a respirator. It is a time consuming process. The equipment is rather expensive and needs trained personnel to operate it. For these reasons, the QNFT is generally conducted only annually. It is unreasonable to require the employer to conduct QNFT everyday to determine whether a satisfactory fit can be obtained from a bearded individual. Qualitative fit testing would yield less reliable results.
- d. OSHA's position is that any hair growth in the face sealing area is unacceptable. Depending on the growth, density and texture of beard, some bearded individuals cannot achieve a satisfactory seal even at the end of the shift.

- e. The language on beards and respirator wearing is adequate in 1910.134(e)(5)(i). The third sentence in this paragraph only provides a partial list of the conditions that prevent a good face seal. The second sentence clearly prohibits respirator use when any such condition is present. Since the Air Force can adopt a standard which is more stringent than ours, you may consider adopting the current American National Standard Practices for Respiratory Protection, ANSI Z88.2, 1980 (enclosed).

We are also enclosing two research papers on facial hair and a publication from the Fire Fighters Union which includes two U.S. Supreme Court decisions on the facial hair issue for your reference.

Sincerely,



Edward J. Baier
Director
Technical Support

Enclosures