

RSP-54**PREGNANCY POLICY FOR WORKERS****I. Introduction:**

This procedure describes policies and procedures for administering a safe work environment and assuring compliance with regulations that protect female radiation workers who are pregnant. This includes issuing a fetal monitor (dosimeter) to a **“Declared Pregnant Worker” (DPW)**, defined as a worker who has voluntarily informed her employer in writing of a confirmed pregnancy, with the estimated date of conception.

Based on scientific evidence that health effects may occur in the embryo / fetus as a result of in-utero radiation doses above established levels, the Nuclear Regulatory Commission (“NRC”) and Agreement States have established maximum occupational dose limits to the embryo / fetus of a DPW. The fetal dose limits are **500 mrem** for the entire gestation period, with effort made to avoid substantial variation above a uniform monthly exposure rate (ie. **50 mrem/month**). These limits apply to occupational exposures only, and specifically exclude radiation exposure received for medical or other purposes.

The term of pregnancy considered most sensitive to radiation is the first trimester, specifically week’s eight through fifteen (8-15). Special care to minimize exposure to radiation is advisable during this time period. DPW’s shall comply with the following radiation safety rules:

- Be familiar with operating policies and procedures.
- Wear the assigned film badge(s) while working.
- Attend radiation safety training at least annually.
- Use structural and personal shields as appropriate.
- Use established methods and controls to keep radiation exposure ALARA.

II. Procedure:

1. Upon confirmation of pregnancy, the employee is responsible to notify her supervisor and the RSO in writing, if she desires to declare her pregnancy. The RSO shall provide a packet of information to the employee that contains NRC Regulatory Guide 8.13, "Instruction Concerning Prenatal Radiation Exposure", the Pregnancy Policy for Radiation Workers, and the Pregnancy Declaration Form. The employee may consult privately with the RSO to assist with making the decision to declare.
2. The RSO or designee will counsel the employee as needed. The employee should review the information contained in the packet, and seek out additional information from her medical care provider as desired. Counseling will include a review of radiation exposure history, methods to maintain low exposure, discussion of restrictions for a DPW, applicable regulations, instruction on fetal monitoring, and review of records interpretation. The employee will document attendance by signature and records shall be maintained.
3. **If the employee voluntarily chooses to declare pregnancy**, the Pregnancy Declaration Form (RSF-54-1) shall be completed and the following actions shall occur:
 - a. A monthly fetal badge shall be issued, in addition to the whole body badge, which is exchanged at the normal frequency. The fetal badge shall be worn each business day and stored in a radiation-free area in the department (along with the whole body badge) while not working. The fetal badge is labeled with an “F” to clearly distinguish it from the whole body badge.
 - b. The RSO shall review fetal reports monthly and inform the employee of any unusual exposure.
 - c. The employee shall comply with the written restrictions issued by the RSO. These restrictions will be based on the radiation risk in the employee’s department, past dosimetry data, and the ability to institute controls to maintain exposure ALARA.
 - d. A DPW may un-declare the pregnancy at any time by written notice to the RSO. Verbal notice must also be provided if a pregnancy terminates or when the pregnancy is brought to term, so the fetal badge service can be inactivated. The DPW status will automatically terminate ten months after

inception.

- e. During the time of fetal monitoring, if the fetal badge accumulates a radiation dose in excess of 400 mrem, the RSO will advise Department Leadership to temporarily reassign the worker to jobs that have a lower radiation exposure risk.
 - f. When a DPW is required to wear a lead apron to safely perform their job, the apron will be checked by the RSO or designee upon declaration, and periodically thereafter.
4. **If the employee voluntarily chooses not to declare pregnancy**, as defined in this policy, then no restrictions to duties shall occur, and the exposure limits shall be the same as for a non-pregnant adult radiation worker. A fetal monitor will not be issued in most cases. The Pregnancy Declaration Form shall be signed by the worker to decline participation in the DPW program.
 5. An employee may seek to refrain from working during pregnancy in lieu of complying with this policy. In this case, a personal leave of absence may be requested by consultation with the department supervisor and with Human Resources.
 6. When an individual's medical condition precludes compliance with this policy, a leave of absence may be requested. After consulting with her physician, the employee should consult with the department supervisor and Human Resources.

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