

Saint Louis University  
RADIATION SAFETY MANUAL

## **SECTION 13**

### **POLICY & PROCEDURES** **FOR** **PREGNANT WORKERS**

*(Applicable to: Radioactive Materials Use & X-Ray/Fluoroscopy Use)*

#### **INTRODUCTION**

If you are pregnant, you have the option to require dose limits for your fetus that are 10% of your dose limits as a radiation worker by notifying the Radiation Safety Office, in writing, that you are pregnant. This section of the Radiation Safety Manual is intended to provide you with basic information that will be helpful to you in deciding whether you want to declare pregnancy and how to do so. Although the guidance in this section is largely based upon NRC guidance and regulations, the Saint Louis University Radiation Safety Committee and the Saint Louis University Hospital Diagnostic Imaging Safety Committee extend this program to all categories of radiation workers, whether working with NRC licensed materials, OSHA/State of Missouri regulated materials, x-ray units, fluoroscopy units, accelerators, etc.

If after reading this section of the manual, including the appendices, you have any questions or need additional information, please contact the Radiation Safety Officer. He will be glad to assist you with your questions or concerns.

(Updated June 2001)

# SECTION 13

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## **I. KEY WORDS & TERMS**

**accelerator produced radionuclides, ALARA, badge, by-product material, declared pregnant worker, diagnostic imaging safety committee, dosimeter, isotope, NRC, nuclide, OSHA, pregnant worker, radiation dosimeter, radiation worker (RMU), radiation worker (XFU), radioisotopes, radionuclide, whole body dosimeter.**

A comprehensive set of terms and definitions is contained in Section 23 of this manual. It may be helpful to refer to Section 23 if you are unfamiliar with a given term or are uncertain as to the specific applications of the term at Saint Louis University.

## **II. DECLARING PREGNANCY**

### **(A) INTRODUCTION**

The decision on whether to declare pregnancy or not is a personal decision. By declaring pregnancy, you are taking steps to help assure that your fetus will not be exposed to dose limits in excess of 500 mrem during the 9 month gestation period. However, if your radiation doses are routinely reported to be quite low, e.g. less than 500 mrem per year, or less than 125 mrem per quarter, then it is unlikely that declaration of pregnancy will result in any formal change to your job duties, since the dose to your fetus during the 9 month gestation period is not likely to exceed these values. The paragraphs below, and NRC's Regulatory Guide 8.13 (Revision 3; June 1999) which is included as an appendix to this section, will provide you with some basic information that will help you in making your decision to declare or not declare pregnancy.

### **(B) THE "DECLARATION OF PREGNANCY"**

The declaration of pregnancy is a simple document whereby the pregnant worker states in writing the following information:

- (1) Your name.
- (2) A statement that you are declaring that you are pregnant.
- (3) The date (month and year only) that you believe you became pregnant.
- (4) The date that you are giving the letter (i.e., Declaration of Pregnancy) to the Radiation Safety Office.

A form letter is included as Appendix A to this section of the Radiation Safety Manual. Copies of the letter can be made and used for declaring pregnancy.

### **(C) SAINT LOUIS UNIVERSITY POLICY/RADIATION SAFETY OFFICE RESPONSIBILITIES**

The Radiation Safety Office will maintain all declarations of pregnancy under strict confidence. Upon receipt of the declaration of pregnancy, the Radiation Safety Officer, or his designee, will review the declared pregnant worker's radiation dose history and the type of radiation work being performed, and make recommendations on work practices or job functions if warranted.

#### **(1) DOSE HISTORY REVIEW & EVALUATION:**

- (a) **POTENTIAL FOR SIGNIFICANT RADIATION DOSE TO FETUS:** In the event that the worker has a dose history that indicates potential for the fetus to incur 500 mrem or more during the 9 month gestation period, the worker will be contacted to discuss methods of reducing radiation dose. If deemed necessary, and agreed to by the declared pregnant worker, the need to reduce radiation dose will be discussed with the declared pregnant worker's supervisor, and an action plan devised, which may include reassignment of some or all job duties. The declared pregnant worker will also be provided a fetal dose monitor

if, after resolution of job duty assignments, it appears likely that the declared pregnant woman will receive, from external sources, a deep dose equivalent of 50 mrem in 1 year. The worker will be notified to follow practices that are consistent with the ALARA philosophy. The fetal doses will be reviewed at least quarterly. For declared pregnant workers who are issued dosimeters more frequently than quarterly, the fetal doses will be reviewed monthly. Elevated doses will be promptly discussed with the declared pregnant worker and recommendations for modifications to job duties and/or work practices will be made as necessary.

- (b) **INSIGNIFICANT RADIATION DOSE TO FETUS:** In the event that the declared pregnant worker has a dose history that indicates that is likely that the declared pregnant woman will receive, from external sources, a deep dose equivalent of less than 50 mrem in 1 year, no recommendations regarding worker job functions or reassignment will be made. The worker will be notified that no additional actions are necessary and reminded to continue to follow practices that are consistent with the ALARA philosophy. The declared pregnant worker's doses will be reviewed at least quarterly. For declared pregnant workers who are issued dosimeters more frequently than quarterly, their doses will be reviewed monthly. Elevated doses will be promptly discussed with the declared pregnant worker and recommendations for modifications to job duties and/or work practices will be made as necessary.

### **III. ADDITIONAL INFORMATION**

- (A) **NRC REGULATORY GUIDE 8.13:** There is additional information in this section included as Appendix 13 - 2. This appendix contains an NRC Regulatory Guide (No. 8.13, Revision 3, June 1999), titled: Instruction Concerning Prenatal Radiation Exposure, which provides detailed instruction concerning prenatal radiation exposure. Included with the Guide is an Appendix, "Questions and Answers Concerning Prenatal Radiation Exposure". This information should be read by all pregnant workers prior to making a decision on whether to declare pregnancy or not.
- (B) **RADIATION SAFETY OFFICE:** If after reading NRC Regulatory Guide 8.13 and its appendix you have questions regarding declaration of pregnancy, fetal dose limits, your dose history, etc., please contact the Radiation Safety Office.

**APPENDIX 13-A**  
**DECLARATION OF PREGNANCY FORM LETTER**

(See following insert)

**Saint Louis University - Radiation Safety Office**  
**FORM LETTER for DECLARING PREGNANCY**

*(Please print legibly all entries)*

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**DATE:** \_\_\_\_\_  
(Specify Date)

**TO:** Mark Haenchen  
Radiation Safety Officer  
Office of Environmental Safety  
Doisy Hall - Room RB5

**FROM:** \_\_\_\_\_  
(Your Name)

\_\_\_\_\_  
(Your Department)

\_\_\_\_\_  
(Your Inter-Office Mailing Address)

\_\_\_\_\_  
(Your Work Phone No.)

**SUBJECT: Declaration of Pregnancy**

In accordance with the NRC's regulations at 10 CFR 20.1208, "Dose to an Embryo/Fetus", and/or in accordance with other institutional policies for pregnant workers outlined in the Saint Louis University Radiation Safety Manual, I am declaring that I am pregnant.

I believe that I became pregnant in the month of \_\_\_\_\_ of \_\_\_\_\_.  
(specify month) (specify year)

I have read NRC Regulatory Guide 8.13 (Revision 3; June 1999) titled : "***Instruction Concerning Prenatal Radiation Exposure***", and its appendix titled: "***Questions And Answers Concerning Prenatal Radiation Exposure***".

I understand that the radiation dose to my embryo/fetus during my entire pregnancy will not be allowed to exceed 500 millirems (unless that dose has already been exceeded between the time of conception and the submission of this letter). I understand that meeting the lower dose limit may require a change in job or job responsibilities during my pregnancy. I also understand that this declaration and my dose history will be reviewed by the Radiation Safety Officer and/or his staff and that the recommended or required changes in my job or job responsibilities during my pregnancy may result from that review.

\_\_\_\_\_  
(Your signature)

\_\_\_\_\_  
(Your printed name)

\_\_\_\_\_  
(Date)

**APPENDIX 13-B**

NRC REGULATORY GUIDE 8.13

Revision 3; June 1999

**INSTRUCTION CONCERNING PRENATAL RADIATION EXPOSURE**

(See following insert)



U.S. Nuclear Regulatory Commission  
**REGULATORY GUIDE**  
Office of Nuclear Regulatory Research

**REGULATORY GUIDE 8.13**  
(Draft was issued as DG-8014)

**INSTRUCTION CONCERNING PRENATAL RADIATION EXPOSURE**

**A. INTRODUCTION**

The Code of Federal Regulations in 10 CFR Part 19, "Notices, Instructions and Reports to Workers: Inspection and Investigations," in Section 19.12, "Instructions to Workers," requires instruction in "the health protection problems associated with exposure to radiation and/or radioactive material, in precautions or procedures to minimize exposure, and in the purposes and functions of protective devices employed." The instructions must be "commensurate with potential radiological health protection problems present in the work place."

The Nuclear Regulatory Commission's (NRC's) regulations on radiation protection are specified in 10 CFR Part 20, "Standards for Protection Against Radiation"; and 10 CFR 20.1208, "Dose to an Embryo/Fetus," requires licensees to "ensure that the dose to an embryo/fetus during the entire pregnancy, due to occupational exposure of a declared pregnant woman, does not exceed 0.5 rem (5 mSv)." Section 20.1208 also requires licensees to "make efforts to avoid substantial variation above a uniform monthly exposure rate to a declared pregnant woman." A declared pregnant woman is defined in 10 CFR 20.1003 as a woman who has voluntarily informed her employer, in writing, of her pregnancy and the estimated date of conception.

This regulatory guide is intended to provide information to pregnant women, and other personnel, to help them make decisions regarding radiation exposure during pregnancy. This Regulatory Guide 8.13 supplements Regulatory Guide 8.29, "Instruction Concerning Risks from Occupational Radiation Exposure" (Ref. 1), which contains a broad discussion of the risks from exposure to ionizing radiation.

Other sections of the NRC's regulations also specify requirements for monitoring external and internal occupational dose to a declared pregnant woman. In 10 CFR 20.1502, "Conditions Requiring Individual Monitoring of External and Internal Occupational Dose," licensees are required to monitor the occupational dose to a declared pregnant woman, using an individual monitoring device, if it is likely that the declared pregnant woman will receive, from external sources, a deep dose equivalent in excess of 0.1 rem (1 mSv). According to Paragraph (e) of 10 CFR 20.2106, "Records of Individual Monitoring Results," the licensee must maintain



records of dose to an embryo/fetus if monitoring was required, and the records of dose to the embryo/fetus must be kept with the records of dose to the declared pregnant woman. The declaration of pregnancy must be kept on file, but may be maintained separately from the dose records. The licensee must retain the required form or record until the Commission terminates each pertinent license requiring the record.

The information collections in this regulatory guide are covered by the requirements of 10 CFR Parts 19 or 20, which were approved by the Office of Management and Budget, approval numbers 3150-0044 and 3150-0014, respectively. The NRC may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

## **B. DISCUSSION**

As discussed in Regulatory Guide 8.29 (Ref. 1), exposure to any level of radiation is assumed to carry with it a certain amount of risk. In the absence of scientific certainty regarding the relationship between low dose exposure and health effects, and as a conservative assumption for radiation protection purposes, the scientific community generally assumes that any exposure to ionizing radiation may cause undesirable biological effects and that the likelihood of these effects increases as the dose increases. At the occupational dose limit for the whole body of 5 rem (50 mSv) per year, the risk is believed to be very low.

The magnitude of risk of childhood cancer following in utero exposure is uncertain in that both negative and positive studies have been reported. The data from these studies “are consistent with a lifetime cancer risk resulting from exposure during gestation which is two to three times that for the adult” (NCRP Report No. 116, Ref. 2). The NRC has reviewed the available scientific literature and has concluded that the 0.5 rem (5 mSv) limit specified in 10 CFR 20.1208 provides an adequate margin of protection for the embryo/fetus. This dose limit reflects the desire to limit the total lifetime risk of leukemia and other cancers associated with radiation exposure during pregnancy.

In order for a pregnant worker to take advantage of the lower exposure limit and dose monitoring provisions specified in 10 CFR Part 20, the woman must declare her pregnancy in writing to the licensee. A form letter for declaring pregnancy is provided in this guide or the licensee may use its own form letter for declaring pregnancy. A separate written declaration should be submitted for each pregnancy.

## **C. REGULATORY POSITION**

### **1. Who Should Receive Instruction**

Female workers who require training under 10 CFR 19.12 should be provided with the information contained in this guide. In addition to the information contained in Regulatory Guide 8.29 (Ref. 1), this information may be included as part of the training required under 10 CFR 19.12.

### **2. Providing Instruction**

The occupational worker may be given a copy of this guide with its Appendix, an explanation of the

contents of the guide, and an opportunity to ask questions and request additional information. The information in this guide and Appendix should also be provided to any worker or supervisor who may be affected by a declaration of pregnancy or who may have to take some action in response to such a declaration.

Classroom instruction may supplement the written information. If the licensee provides classroom instruction, the instructor should have some knowledge of the biological effects of radiation to be able to answer questions that may go beyond the information provided in this guide. Videotaped presentations may be used for classroom instruction. Regardless of whether the licensee provides classroom training, the licensee should give workers the opportunity to ask questions about information contained in this Regulatory Guide 8.13. The licensee may take credit for instruction that the worker has received within the past year at other licensed facilities or in other courses or training.

### **3. Licensee's Policy on Declared Pregnant Women**

The instruction provided should describe the licensee's specific policy on declared pregnant women, including how those policies may affect a woman's work situation. In particular, the instruction should include a description of the licensee's policies, if any, that may affect the declared pregnant woman's work situation after she has filed a written declaration of pregnancy consistent with 10 CFR 20.1208.

The instruction should also identify who to contact for additional information as well as identify who should receive the written declaration of pregnancy. The recipient of the woman's declaration may be identified by name (e.g., John Smith), position (e.g., immediate supervisor, the radiation safety officer), or department (e.g., the personnel department).

### **4. Duration of Lower Dose Limits for the Embryo/Fetus**

The lower dose limit for the embryo/fetus should remain in effect until the woman withdraws the declaration in writing or the woman is no longer pregnant. If a declaration of pregnancy is withdrawn, the dose limit for the embryo/fetus would apply only to the time from the estimated date of conception until the time the declaration is withdrawn. If the declaration is not withdrawn, the written declaration may be considered expired one year after submission.

### **5. Substantial Variations Above a Uniform Monthly Dose Rate**

According to 10 CFR 20.1208(b), "The licensee shall make efforts to avoid substantial variation above a uniform monthly exposure rate to a declared pregnant woman so as to satisfy the limit in paragraph (a) of this section," that is, 0.5 rem (5 mSv) to the embryo/fetus. The National Council on Radiation Protection and Measurements (NCRP) recommends a monthly equivalent dose limit of 0.05 rem (0.5 mSv) to the embryo/fetus once the pregnancy is known (Ref. 2). In view of the NCRP recommendation, any monthly dose of less than 0.1 rem (1 mSv) may be considered as not a substantial variation above a uniform monthly dose rate and as such will not require licensee justification. However, a monthly dose greater than 0.1 rem (1 mSv) should be justified by the licensee.

## **D. IMPLEMENTATION**

The purpose of this section is to provide information to licensees and applicants regarding the NRC staff's plans for using this regulatory guide.

Unless a licensee or an applicant proposes an acceptable alternative method for complying with the specified portions of the NRC's regulations, the methods described in this guide will be used by the NRC staff in the evaluation of instructions to workers on the radiation exposure of pregnant women.

### **REFERENCES**

1. USNRC, "Instruction Concerning Risks from Occupational Radiation Exposure," Regulatory Guide 8.29, Revision 1, February 1996.
2. National Council on Radiation Protection and Measurements, *Limitation of Exposure to Ionizing Radiation*, NCRP Report No. 116, Bethesda, MD, 1993.

## APPENDIX

### QUESTIONS AND ANSWERS CONCERNING PRENATAL RADIATION EXPOSURE

#### **1. Why am I receiving this information?**

The NRC's regulations (in 10 CFR 19.12, "Instructions to Workers") require that licensees instruct individuals working with licensed radioactive materials in radiation protection as appropriate for the situation. The instruction below describes information that occupational workers and their supervisors should know about the radiation exposure of the embryo/fetus of pregnant women.

The regulations allow a pregnant woman to decide whether she wants to formally declare her pregnancy to take advantage of lower dose limits for the embryo/fetus. This instruction provides information to help women make an informed decision whether to declare a pregnancy.

#### **2. If I become pregnant, am I required to declare my pregnancy?**

No. The choice whether to declare your pregnancy is completely voluntary. If you choose to declare your pregnancy, you must do so in writing and a lower radiation dose limit will apply to your embryo/fetus. If you choose not to declare your pregnancy, you and your embryo/fetus will continue to be subject to the same radiation dose limits that apply to other occupational workers.

#### **3. If I declare my pregnancy in writing, what happens?**

If you choose to declare your pregnancy in writing, the licensee must take measures to limit the dose to your embryo/fetus to 0.5 rem (5 millisievert) during the entire pregnancy. This is one-tenth of the dose that an occupational worker may receive in a year. If you have already received a dose exceeding 0.5 rem (5 mSv) in the period between conception and the declaration of your pregnancy, an additional dose of 0.05 rem (0.5 mSv) is allowed during the remainder of the pregnancy. In addition, 10 CFR 20.1208, "Dose to an Embryo/Fetus," requires licensees to make efforts to avoid substantial variation above a uniform monthly dose rate so that all the 0.5 rem (5 mSv) allowed dose does not occur in a short period during the pregnancy.

This may mean that, if you declare your pregnancy, the licensee may not permit you to do some of your normal job functions if those functions would have allowed you to receive more than 0.5 rem, and you may not be able to have some emergency response responsibilities.

#### **4. Why do the regulations have a lower dose limit for the embryo/fetus of a declared pregnant woman than for a pregnant worker who has not declared?**

A lower dose limit for the embryo/fetus of a declared pregnant woman is based on a consideration of greater sensitivity to radiation of the embryo/fetus and the involuntary nature of the exposure. Several scientific advisory groups have recommended (References 1 and 2) that the dose to the embryo/fetus be limited to a fraction of the occupational dose limit.

## **5. What are the potentially harmful effects of radiation exposure to my embryo/fetus?**

The occurrence and severity of health effects caused by ionizing radiation are dependent upon the type and total dose of radiation received, as well as the time period over which the exposure was received. See Regulatory Guide 8.29, "Instruction Concerning Risks from Occupational Exposure" (Ref. 3), for more information. The main concern is embryo/fetal susceptibility to the harmful effects of radiation such as cancer.

## **6. Are there any risks of genetic defects?**

Although radiation injury has been induced experimentally in rodents and insects, and in the experiments was transmitted and became manifest as hereditary disorders in their offspring, radiation has not been identified as a cause of such effect in humans. Therefore, the risk of genetic effects attributable to radiation exposure is speculative. For example, no genetic effects have been documented in any of the Japanese atomic bomb survivors, their children, or their grandchildren.

## **7. What if I decide that I do not want any radiation exposure at all during my pregnancy?**

You may ask your employer for a job that does not involve any exposure at all to occupational radiation dose, but your employer is not obligated to provide you with a job involving no radiation exposure. Even if you receive no occupational exposure at all, your embryo/fetus will receive some radiation dose (on average 75 mrem (0.75 mSv)) during your pregnancy from natural background radiation.

The NRC has reviewed the available scientific literature and concluded that the 0.5 rem (5 mSv) limit provides an adequate margin of protection for the embryo/fetus. This dose limit reflects the desire to limit the total lifetime risk of leukemia and other cancers. If this dose limit is exceeded, the total lifetime risk of cancer to the embryo/fetus may increase incrementally. However, the decision on what level of risk to accept is yours. More detailed information on potential risk to the embryo/fetus from radiation exposure can be found in References 2-10.

## **8. What effect will formally declaring my pregnancy have on my job status?**

Only the licensee can tell you what effect a written declaration of pregnancy will have on your job status. As part of your radiation safety training, the licensee should tell you the company's policies with respect to the job status of declared pregnant women. In addition, before you declare your pregnancy, you may want to talk to your supervisor or your radiation safety officer and ask what a declaration of pregnancy would mean specifically for you and your job status.

In many cases you can continue in your present job with no change and still meet the dose limit for the embryo/fetus. For example, most commercial power reactor workers (approximately 93%) receive, in 12 months, occupational radiation doses that are less than 0.5 rem (5 mSv) (Ref. 11). The licensee may also consider the likelihood of increased radiation exposures from accidents and abnormal events before making a decision to allow you to continue in your present job.

If your current work might cause the dose to your embryo/fetus to exceed 0.5 rem (5 mSv), the licensee has various options. It is possible that the licensee can and will make a reasonable accommodation that will allow you to continue performing your current job, for example, by having another qualified employee do a small part of the job that accounts for some of your radiation exposure.

**9. What information must I provide in my written declaration of pregnancy?**

You should provide, in writing, your name, a declaration that you are pregnant, the estimated date of conception (only the month and year need be given), and the date that you give the letter to the licensee. A form letter that you can use is included at the end of these questions and answers. You may use that letter, use a form letter the licensee has provided to you, or write your own letter.

**10. To declare my pregnancy, do I have to have documented medical proof that I am pregnant?**

NRC regulations do not require that you provide medical proof of your pregnancy. However, NRC regulations do not preclude the licensee from requesting medical documentation of your pregnancy, especially if a change in your duties is necessary in order to comply with the 0.5 rem (5 mSv) dose limit.

**11. Can I tell the licensee orally rather than in writing that I am pregnant?**

No. The regulations require that the declaration must be in writing.

**12. If I have not declared my pregnancy in writing, but the licensee suspects that I am pregnant, do the lower dose limits apply?**

No. The lower dose limits for pregnant women apply only if you have declared your pregnancy in writing. The United States Supreme Court has ruled (in *United Automobile Workers International Union v. Johnson Controls, Inc.*, 1991) that “Decisions about the welfare of future children must be left to the parents who conceive, bear, support, and raise them rather than to the employers who hire those parents” (Reference 7). The Supreme Court also ruled that your employer may not restrict you from a specific job “because of concerns about the next generation.” Thus, the lower limits apply only if you choose to declare your pregnancy in writing.

**13. If I am planning to become pregnant but am not yet pregnant and I inform the licensee of that in writing, do the lower dose limits apply?**

No. The requirement for lower limits applies only if you declare in writing that you are already pregnant.

**14. What if I have a miscarriage or find out that I am not pregnant?**

If you have declared your pregnancy in writing, you should promptly inform the licensee in writing that you are no longer pregnant. However, if you have not formally declared your pregnancy in writing, you need not inform the licensee of your nonpregnant status.

**15. How long is the lower dose limit in effect?**

The dose to the embryo/fetus must be limited until you withdraw your declaration in writing or you

inform the licensee in writing that you are no longer pregnant. If the declaration is not withdrawn, the written declaration may be considered expired one year after submission.

**16. If I have declared my pregnancy in writing, can I revoke my declaration of pregnancy even if I am still pregnant?**

Yes, you may. The choice is entirely yours. If you revoke your declaration of pregnancy, the lower dose limit for the embryo/fetus no longer applies.

**17. What if I work under contract at a licensed facility?**

The regulations state that you should formally declare your pregnancy to the licensee in writing. The licensee has the responsibility to limit the dose to the embryo/fetus.

**18. Where can I get additional information?**

The references to this Appendix contain helpful information, especially Reference 3, NRC's Regulatory Guide 8.29, "Instruction Concerning Risks from Occupational Radiation Exposure," for general information on radiation risks. The licensee should be able to give this document to you.

For information on legal aspects, see Reference 7, "The Rock and the Hard Place: Employer Liability to Fertile or Pregnant Employees and Their Unborn Children—What Can the Employer Do?" which is an article in the journal *Radiation Protection Management*.

You may telephone the NRC Headquarters at (301) 415-7000. Legal questions should be directed to the Office of the General Counsel, and technical questions should be directed to the Division of Industrial and Medical Nuclear Safety.

You may also telephone the NRC Regional Offices at the following numbers: Region I, (610) 337-5000; Region II, (404) 562-4400; Region III, (630) 829-9500; and Region IV, (817) 860-8100. Legal questions should be directed to the Regional Counsel, and technical questions should be directed to the Division of Nuclear Materials Safety.

## REFERENCES FOR APPENDIX

1. National Council on Radiation Protection and Measurements, *Limitation of Exposure to Ionizing Radiation*, NCRP Report No. 116, Bethesda, MD, 1993.
2. International Commission on Radiological Protection, *1990 Recommendations of the International Commission on Radiological Protection*, ICRP Publication 60, Ann. ICRP 21: No. 1-3, Pergamon Press, Oxford, UK, 1991.
3. USNRC, "Instruction Concerning Risks from Occupational Radiation Exposure," Regulatory Guide 8.29, Revision 1, February 1996.<sup>11</sup> (Electronically available at [www.nrc.gov/NRC/RG/index.html](http://www.nrc.gov/NRC/RG/index.html))
4. Committee on the Biological Effects of Ionizing Radiations, National Research Council, *Health Effects of Exposure to Low Levels of Ionizing Radiation* (BEIR V), National Academy Press, Washington, DC, 1990.
5. United Nations Scientific Committee on the Effects of Atomic Radiation, *Sources and Effects of Ionizing Radiation*, United Nations, New York, 1993.
6. R. Doll and R. Wakeford, "Risk of Childhood Cancer from Fetal Irradiation," *The British Journal of Radiology*, 70, 130-139, 1997.
7. David Wiedis, Donald E. Jose, and Timm O. Phoebe, "The Rock and the Hard Place: Employer Liability to Fertile or Pregnant Employees and Their Unborn Children—What Can the Employer Do?" *Radiation Protection Management*, 11, 41-49, January/February 1994.
8. National Council on Radiation Protection and Measurements, *Considerations Regarding the Unintended Radiation Exposure of the Embryo, Fetus, or Nursing Child*, NCRP Commentary No. 9, Bethesda, MD, 1994.
9. National Council on Radiation Protection and Measurements, *Risk Estimates for Radiation Protection*, NCRP Report No. 115, Bethesda, MD, 1993.

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<sup>11</sup>Single copies of regulatory guides, both active and draft, and draft NUREG documents may be obtained free of charge by writing the Reproduction and Distribution Services Section, OCIO, USNRC, Washington, DC 20555-0001, or by fax to (301)415-2289, or by email to <DISTRIBUTION@NRC.GOV>. Active guides may also be purchased from the National Technical Information Service on a standing order basis. Details on this service may be obtained by writing NTIS, 5285 Port Royal Road, Springfield, VA 22161. Copies of active and draft guides are available for inspection or copying for a fee from the NRC Public Document Room at 2120 L Street NW., Washington, DC; the PDR's mailing address is Mail Stop LL-6, Washington, DC 20555; telephone (202)634-3273; fax (202)634-3343.



10. National Radiological Protection Board, *Advice on Exposure to Ionising Radiation During Pregnancy*, National Radiological Protection Board, Chilton, Didcot, UK, 1998.
11. M.L. Thomas and D. Hagemeyer, "Occupational Radiation Exposure at Commercial Nuclear Power Reactors and Other Facilities, 1996," Twenty-Ninth Annual Report, NUREG-0713, Vol. 18, USNRC, 1998.<sup>22</sup>

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<sup>22</sup>Copies are available at current rates from the U.S. Government Printing Office, P.O. Box 37082, Washington, DC 20402-9328 (telephone (202)512-1800); or from the National Technical Information Service by writing NTIS at 5285 Port Royal Road, Springfield, VA 22161. Copies are available for inspection or copying for a fee from the NRC Public Document Room at 2120 L Street NW., Washington, DC; the PDR's mailing address is Mail Stop LL-6, Washington, DC 20555; telephone (202)634-3273; fax (202)634-3343.

## FORM LETTER FOR DECLARING PREGNANCY

This form letter is provided for your convenience. To make your written declaration of pregnancy, you may fill in the blanks in this form letter, you may use a form letter the licensee has provided to you, or you may write your own letter.

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### DECLARATION OF PREGNANCY

To: \_\_\_\_\_

In accordance with the NRC's regulations at 10 CFR 20.1208, "Dose to an Embryo/Fetus," I am declaring that I am pregnant. I believe I became pregnant in \_\_\_\_\_ (only the month and year need be provided).

I understand the radiation dose to my embryo/fetus during my entire pregnancy will not be allowed to exceed 0.5 rem (5 millisievert) (unless that dose has already been exceeded between the time of conception and submitting this letter). I also understand that meeting the lower dose limit may require a change in job or job responsibilities during my pregnancy.

\_\_\_\_\_  
(Your signature)

\_\_\_\_\_  
(Your name printed)

\_\_\_\_\_  
(Date)

## **REGULATORY ANALYSIS**

A separate regulatory analysis was not prepared for this regulatory guide. A regulatory analysis prepared for 10 CFR Part 20, “Standards for Protection Against Radiation” (56 FR 23360), provides the regulatory basis for this guide and examines the costs and benefits of the rule as implemented by the guide. A copy of the “Regulatory Analysis for the Revision of 10 CFR Part 20” (PNL-6712, November 1988) is available for inspection and copying for a fee at the NRC Public Document Room, 2120 L Street NW, Washington, DC, as an enclosure to Part 20 (56 FR 23360).