



RADIATION SAFETY COMMITTEE POLICY

Policy Number: 13-1

Declaring a Pregnancy

Adopted: 05/2013

Revised: 05/2015

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UNIVERSITY OF CINCINNATI

13-1

Policy Concern: This policy covers pregnant women and their option to declare their pregnancy.

Policy Implementation: The Radiation Safety Officer (RSO) is directed to implement this policy upon approval by the Radiation Safety Committee (RSC).

Discussion: Working with radiation can be a concern for pregnant women. Under the University of Cincinnati Radiation Control and Safety Program (RCSP) the radiation dose received by pregnant and possibly pregnant workers is very low and well under the dose limit for a declared pregnant worker. By regulation, a licensee or registrant cannot force an individual to declare their pregnancy. By regulation, risks to the embryo/fetus, the option to declare a pregnancy and how to declare a pregnancy are expected to be reviewed with all radiation workers. The information is discussed with all new radiation workers who will be handling radioactive material. It is discussed during the initial site specific training presented by the Radiation Safety Office (RSO). Contact persons (CP) for radiation generating equipment (RGE) are expected to assure the information is reviewed with all RGE operators under their supervision. The RCSP declaration of pregnancy requirements are listed in both the Quality Assurance and Radiation Protection Manual for Human-Use Radiation Generating Equipment, and the Quality Assurance and Radiation Protection Manual for Non-Human Use Radiation Generating Equipment.

During an inspection performed by the Ohio Department of Health (ODH) for RGE, the ODH inspector determined that a professor overseeing students in a program that used RGE did not adequately know the RCSP policy for declaring a pregnancy. As follow-up the RSO provided information to the individual, and all contacts for programs where radiation is used by students. While drafting the follow-up, the RSO noted that the Radiation Protection Procedures Manual (Authorized User Manual), aka the AU Manual did not include the RCSP declared pregnancy policy. The AU Manual is the primary guidance for individuals using radioactive material under the RCSP. As corrective action, the RSO drafted this formal RCSP-wide policy and updated the AU Manual accordingly.

All personnel must respect the PRIVACY of others regarding medical information including pregnancy declaration. Discussion of any personal medical information is a violation of the HIPAA Privacy Rule.

Policy Definitions:

Ancillary Worker - An individual who is not a radiation worker but who may be exposed to radiation from a licensed or registered radiation source under the University of Cincinnati Radiation Control and Safety Program (RCSP) while performing a duty as part of their "job"

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(e.g., employee, student, volunteer).

Declared pregnant individual - An individual who has declared their pregnancy in writing to the Radiation Safety Office (RSOf).

Radiation Worker – An individual engaged in activities licensed or registered to be performed under the University of Cincinnati Radiation Control and Safety Program (RCSP). Licensed activities are those involving radioactive material. Registered activities are those involving radiation generating equipment, e.g., x-ray machines.

Policy:

1. Any individual exposed to radiation under the Radiation Control and Safety Program (RCSP) has the option to declare their pregnancy. This includes, but is not limited to radiation workers and ancillary workers.
2. Individuals are not considered declared pregnant workers until they declare the pregnancy in writing to the Radiation Safety Office (RSOf).
3. The declaration must include the following information. The Radiation Safety Committee (RSC) approved form “Declaration of Pregnancy” (RS Form 33) is available on the Radiation Safety website (www.uc.edu/radsafety) and may be used to declare a pregnancy.
 - a. the name of the individual
 - b. the date of declaration
 - c. the type of radiation exposed under the Radiation Control and Safety Committee (and)
 - d. the estimated date of conception
4. The radiation dose limit to the embryo/fetus of a declared pregnant worker is 500 millirem total effective dose equivalent over the term of the pregnancy.
5. Declared pregnant workers may request a meeting with the Radiation Safety Officer (RSO). During this meeting the RSO will review the following, along with answering any questions the individual may have.
 - a. The individual's exposure record. If the record indicates an exposure to the embryo/fetus greater than 500 millirem may occur, the RSO will initiate steps to move the individual to a position of lower radiation exposure and one that the exposure can be maintained less than 500 millirem.
 - b. Procedures to minimize exposure to the embryo/fetus.
6. Whether a pregnancy is declared or not, pregnant workers are expected to apply good radiation safety practices and keep their dose and the dose to their embryo/fetus as low as reasonably achievable (ALARA).
 - a. For radioactive material this means.
 - i. The individual may continue to work with and around radioactive material, unless



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deemed otherwise by the RSO.

- ii. The individual should use appropriate shielding for the radionuclide and activity used.
 - iii. The individual should wear appropriate personnel protective equipment. This includes but is not limited to gloves and laboratory coat.
 - iv. The individual should not eat, drink, smoke or apply cosmetics in an area approved for radioactive material. This includes not storing food or drink in an area where radioactive material is used, whether it will later be consumed in an area where radioactive material is approved for use or not.
- b. For radiation generating equipment (RGE) this means.
- i. The individual may continue to operate and work around RGE, unless deemed otherwise by the RSO.
 - ii. The pregnant individual should not enter or be in a RGE restricted area unless they are wearing a lead protective apron. The pregnant individual should consider wearing the wrap-around type apron whenever possible as wrap-around aprons provide the best protection.
7. Pregnant workers or individuals who are considering becoming pregnant should review Nuclear Regulatory Commission (NRC) regulatory guide 8.13; this guide covers the effects of radiation to the embryo and fetus and is available on the NRC website (www.nrc.gov) or from the RSO.

Approval:

Approved by the Radiation Safety Committee on 5/13/15

Signature of the RSC Administrative Representative _____ on file _____

Adoption Date:	Created by:	Date of Revision:	Revised By:	Summary of Revision:
5/15/13	Morris			
		5/13/15	Konate	Revised to include respecting privacy of medical information including pregnancy