Radiation Work – Declared Pregnancy Policy

As part of a revision of regulations in January, 1994, the Nuclear Regulatory Commission (NRC) issued a rule limiting fetal radiation dose received as a result of a pregnant worker’s occupational exposure to 500 mrem in the gestation period\(^1\). For this limit to apply, the regulation requires the woman to declare pregnancy in writing and give the estimated date of conception. If a woman chooses not to declare her pregnancy, the normal occupational dose limit of 5,000 mrem per year would be in effect with the provision to maintain occupational radiation exposure "as low as reasonably achievable" (ALARA)\(^2\).

A radiation worker who decides to declare a pregnancy would do so by informing the EH&S Radiation Protection Office and, at the woman’s discretion, her supervisor. As required by law\(^3\), the University maintains this declaration and any dose records to the embryo/fetus with those of the declared pregnant worker which are protected from public disclosure. This notification will initiate a process by which the RPO will assess potential doses, evaluate potential exposures from ionizing radiation, and review the individual’s radiation exposure history. If this process identifies exposure potential to the embryo/fetus that is not in concert with the ALARA Plan, the individual will be contacted (even if the Declaration Form did not request consultation with a Health Physicist). Recommendations on minimizing radiation exposure may be made on an individual basis after this review.

It has always been Harvard University’s Policy to keep radiation doses to potentially exposed individuals ALARA. While the radiation dose limit for occupationally exposed individuals is 5,000 mrem per year, greater than ninety percent of all users of all radioactive material at Harvard have had an annual dose less than 100 mrem.

Anyone with questions relating to radiation protection measures for the embryo/fetus, the Radiation Protection Program or procedures on the declaration of a pregnancy is encouraged to contact the Radiation Protection Office (496-3797) or the local safety office for information.

\(^1\) - The Code of Federal Regulations, Standard for Protection Against Radiation 10 CFR 20.1208

\(^2\) - ibid 10 CFR 20.1003

\(^3\) - ibid 10 CFR 20.2106

Email radiation_protection@harvard.edu to send comments and suggestions to the Radiation Protection Office.
Pregnancy Declaration Form

Date: _______________________

To: Joseph P. Ring, Ph.D., Radiation Protection Officer

From: _______________________

Signature: ______________________________________

University Telephone: ____________________________

Harvard ID#: __________________________________

Working Under Permit Holder: ______________________

University Address: ______________________________

With this notice I inform you that I am pregnant or trying to become pregnant with an estimated conception date of ______________ and an expected delivery date of _______________. I understand the radiation exposure limit set by the Nuclear Regulatory Commission for embryo/fetus of the declared pregnant worker* is 500 mrem for the entire gestation period. In line with Harvard's policy of minimizing radiation exposure, I will continue to minimize my exposure and participate in a monitoring program for pregnant workers.

Please check the following as appropriate:

☐ I have questions related to the radiation protection of the embryo/fetus and would like to have a health physicist from the Radiation Protection Office contact me at ______________.

☐ I do not wish to inform the Principal Investigator at this time.

☐ I have informed or will inform the Principle Investigator.

☐ I have questions related to the radiation protection of the embryo/fetus and will contact the Radiation Protection Office at 496-3797.

☐ I do not have questions related to the radiation protection at this time. I understand that I may contact the Radiation Protection Office if I have any questions in the future concerning this pregnancy.

* The NRC defines a declared pregnant woman as "a woman who has voluntarily informed her employer in writing of her pregnancy and estimated date of conception."