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Level 2 Program Description Document (PDD)

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4	Minor Revision/Periodic Review; Updated procedure template and formatting. Added Appendix A, <i>Regulatory Requirements Flow Down</i> , and associated step in Purpose, Added Appendix B, <i>Pregnant Worker-Reporting Flow Chart</i> .	All

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1.0 PURPOSE

- 1.1 This program description provides instructions for the overall program to protect the reproductive health and fertility of personnel and embryo/fetal health from chemical, biological, and radiological (ionizing and non-ionizing radiation) overexposure.
- **1.2** This document implements applicable regulatory requirements. They are listed in Appendix A, *Regulatory Requirements Flow Down*.

2.0 SCOPE AND APPLICABLITY

- 2.1 The scope of this Level 2 program description is of the programmatic controls associated with reproductive health protection of personnel and embryo/fetal health from exposure to chemical, biological, radiological and physical stress hazards.
- 2.2 This program description applies to Fluor-BWXT Portsmouth LLC (FBP) and contracted labor resources performing activities at Portsmouth Gaseous Diffusion Plant (PORTS) that involve exposure to radiological and non-radiological hazards and to those who are planning a family and/or females who suspect or have confirmed that they are pregnant.

3.0 PROGRAM DOCUMENTS

3.1 Implementing Procedure

- **3.1.1** FBP-IH-PRO-00010, Reproductive Health Protection (Non-Radiological)
- **3.1.2** FBP-RP-PRO-00031, *Pregnancy Declaration*

4.0 PROGRAM RESPONSIBILITES

4.1 Radiation Protection Professional

Provides oversight of the reproductive health program regarding counseling, work area assessments, temporary work area reassignments, pregnancy declarations, and pregnancy withdrawals related to control of radiation exposure to workers.

4.2 Occupational Safety and Health (OS&H) Professional

Provides oversight of the reproductive health program regarding counseling, work area assessments, temporary work area reassignments, pregnancy declarations, and pregnancy withdrawals related to control of chemical, biological, and physical stress exposure to workers.

4.3 Occupational Physician

Provides medical counseling and recommendations to employees, OS&H, and Radiation Protection related to reproductive health exposure, follow-up workplace evaluations, and follow-up medical evaluations.

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4.4 Supervisor

- **4.4.1** Arranges for reproductive risk counseling with workers, as needed.
- **4.4.2** Supports evaluations of work areas with possible workplace exposure hazards, as needed.
- 4.4.3 Assists in implementing OS&H, Radiation Protection, and Occupational Physician recommendations for maintaining potential exposures to the embryo/fetus as low as reasonably achievable and within the required limits.

4.5 Worker

- **4.5.1** Reports any concerns or potential workplace exposure hazards to their Supervisor.
- **4.5.2** Voluntarily declares pregnancy and initiates pregnancy declaration withdrawal for radiological hazards.
- **4.5.3** Voluntarily requests non-radiological reproductive counseling.
- **4.5.4** Follows recommendations of OS&H, Radiation Protection, and Supervisor to control exposure to reproductive hazards.

5.0 PROGRAM DESCRIPTION

5.1 Reproductive Health Program

- 5.1.1 It is the practice of FBP that every reasonable effort will be made to protect workers, both male and female, from excessive exposure to reproductive hazards. Due to the sensitivity of the human reproductive system to the effects of chemical, biological, and radiological agents, special precautions such as engineering controls, product substitution, personal protective equipment (PPE), and administrative controls, may be necessary to reduce employee exposure.
- **5.1.2** The embryo/fetus is most susceptible to adverse health effects from chemical and radiological exposure and other reproductive hazards during the first trimester.
- 5.1.3 It is recommended that individuals who may be exposed to workplace hazards that affect reproductive health promptly report suspected or confirmed pregnancies to their supervision and/or the Occupational Physician. Reporting at the earliest possible time is important so that the work environment of pregnant workers can be evaluated for reproductive hazards.
- **5.1.4** Reporting a pregnancy or concerns about possible workplace exposures that pose reproductive hazards is a voluntary choice made by the employee so that a workplace evaluation can be made to minimize potential exposures.
- **5.1.5** Exposure control to radiological reproductive health hazards is implemented according to FBP-RP-PRO-00031, *Pregnancy Declaration*.

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- **5.1.6** Exposure control to non-radiological chemical, biological, and physical stress hazards is implemented according to FBP-IH-PRO-00010, *Reproductive Health Protection (Non-Radiological)*.
- **5.1.7** Appendix B, *Pregnant Worker-Reporting Flow Chart*, provides guidance to a pregnant worker as the decision to report a pregnancy is made.

5.2 General Program Controls

Occupational Safety and Health Professional/Radiation Protection Professional

5.2.1 Assist line management by performing worksite investigations and providing recommendations to supervision to protect the individual from exposure to reproductive hazards.

Radiation Protection Professional

5.2.2 Investigate the worksite for potential exposure of personnel to ionizing radiation, provide recommendations to supervision, and implement restrictions, as necessary, according to FBP-RP-PRO-00031.

Occupational Safety and Health Professional

5.2.3 Investigate the worksite for potential exposure of personnel to chemical, biological, and physical agents (excluding ionizing radiation) and provide recommendations to supervision.

Occupational Physician

5.2.4 Conduct interviews and examinations as necessary with personnel and notify OS&H and Radiation Protection with recommendations related to reproductive health exposure, follow-up workplace evaluations, and/or follow-up medical evaluations.

Supervisor

- 5.2.5 Ensure that a qualified representative from OS&H and Radiation Protection is contacted to initiate the proper level of reproductive risk counseling.
- 5.2.6 Follow the recommendations of OS&H, Radiation Protection, and the Occupational Physician and implement a course of action to minimize risks to the individual and the embryo/fetus.
- **5.2.7 IF** OS&H, Radiation Protection, and/or the Occupational Physician impose work restrictions for a declared pregnant worker, **THEN** provide the worker with the option of a mutually agreeable assignment of work for the duration of the pregnancy without loss of benefits, seniority, or promotional opportunity.
- **5.2.8 IF** a declared pregnant worker withdraws her declaration of pregnancy for any reason, **THEN** the work restrictions imposed by OS&H, Radiation Protection, and/or the Occupational Physician no longer apply and the assignment of work does not need to address embryo/fetus protection requirements.

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- **5.2.9** Maintain the privacy of the worker who declares a pregnancy, including all contacts with OS&H, Radiation Protection and/or the Occupational Physician.
- **5.2.10** Respect and maintain the rights and privacy of workers who have chosen not to declare their pregnancy or who have withdrawn their declaration of pregnancy.

Worker

- **5.2.11** Seek consultation with supervision for concerns and questions regarding potential exposure to reproductive or developmental hazards in the workplace.
- **5.2.12** Declare pregnancy and withdraw pregnancy declaration in accordance with FBP-RP-PRO-00031.
- **5.2.13** Follow OS&H, Radiation Protection, Supervisor, and Occupational Physician recommendations/directions.
- **5.2.14** Request non-radiological reproductive counseling in accordance with FBP-IH-PRO-00010.

6.0 **DEFINITIONS/ACRONYMS**

6.1 Definitions

- **A. Declared Pregnant Worker** A woman who has voluntarily declared to her employer, in writing, her pregnancy for the purpose of being subjected to the occupational exposure limits to the embryo/fetus. The declared pregnant worker may revoke this declaration, in writing, at any time.
- **B.** Embryo/Fetus A developing human organism from conception until birth (same as unborn child).
- C. Reproductive Hazard A hazardous agent as specified in the Material Safety Data Sheet (MSDS) System or Hazardous Material Control System that is known or may have the potential to cause reproductive impairment in adults (reproductive toxin) such as infertility, impotence, or menstrual irregularities, or agents that cause developmental impairment or death in the embryo/fetus or child (developmental toxin).
- **D. Overexposure** In excess of Occupational Safety and Health Administration (OSHA) permissible exposure limits (PELs), ACGIH threshold limit values (TLVs), or radiological limits specified in 10 CFR 835.

6.2 Acronyms

- A. ACGIH American Conference of Governmental Industrial Hygienists
- **B. FBP** Fluor-BWXT Portsmouth LLC
- C. PORTS Portsmouth Gaseous Diffusion Plant

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D. PPE – Personnel Protection Equipment

7.0 REFERENCES

- **A.** FBP-PM-PDD-00001, *Integrated Safety Management System*
- **B.** ICRP Publication 88, *Doses to the Embryo and Fetus from Intake of Radionuclides by the Mother, Pergamon Press, NY, 2002*
- C. National Institute for Occupational Safety and Health (NIOSH), *Registry of Toxic Effects of Chemical Substances (RTECS)*
- **D.** American Conference of Governmental Industrial Hygienists (ACGIH), *Threshold Limit Values (TLV) for Chemical and Physical Agents* (latest edition)
- E. Health Insurance Portability and Accountability Act of 1996
- **F.** DOE G 441.1-1C, Change 1, Radiation Protection Program Guide for use with 10 CFR 835, Occupational Radiation Protection, 2011
- **G.** USNRC Regulatory Guide 8.13, rev. 3, *Instructions Concerning Prenatal Radiation Exposure*, *June 1999*

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Appendix A REGULATORY REQUIREMENTS FLOW DOWN

- 1. 10 Code of Federal Regulations (CFR) 851, Worker Safety and Health Program
- 2. DOE-STD-1098-2017, DOE Standard Radiological Control 2017
- 3. DOE-STD-1121-2008, DOE Standard for Internal Dosimetry, October 2008
- 4. Occupational Safety and Health Administration (OSHA) 29 CFR 1910.1450, *Occupational Exposure to Hazardous Chemicals in Laboratories*
- 5. OSHA 29 CFR 1910.1200, Hazard Communication
- 6. OSHA 29 CFR 1910, Subpart Z, Toxic and Hazardous Substances
- 7. Title 10, Code of Federal Regulations (CFR), Part 835, Occupational Radiation Protection

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Appendix B PREGNANT WORKER-REPORTING FLOW CHART

