October 3, 2000

Mr. Charles H. Rose
Executive Director
American Association of Nuclear Cardiology, Inc.
5660 Airport Boulevard, Suite 101
Boulder, Colorado 80301

I am responding to your August 14, 2000, letter to me requesting clarification of NRC acceptance of "cases where an individual is pregnant, where the individual's monthly exposure may exceed 200m rem (sic), or when monitoring minors who are occupationally exposed, two month dosimeter measurement."

The requirements of 10 CFR Part 20 stipulate that the 0.5 rem deep dose equivalent limit be applied for the entire gestation period, from the point of conception for the declared pregnant worker, and for the year in the case of a minor. There is no specific prohibition on using two-month dosimeter measurements for pregnant workers or minors. However, the hypothetical scenario you describe appears to be unrealistic; that is, you seem to be postulating that a licensee would knowingly assign a pregnant worker or minor to conditions where exposures may exceed 200 millirem monthly, and then rely on dosimetry which was evaluated after-the-fact to determine whether the applicable limits were met. Licensees normally would limit exposures such that the total anticipated dose received by the pregnant worker or minor would be well below the applicable limit, and as low as reasonably achievable. The dosimetry, whether it is read monthly, bimonthly, or quarterly, would serve primarily to confirm that projected doses had not been exceeded.

I hope this reply responds to your concerns.

Sincerely,

/RA/

John W. N. Hickey, Chief
Materials Safety and Inspection Branch
Division of Industrial and
Medical Nuclear Safety
Office of Nuclear Material Safety
and Safeguards

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