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RECORD #55

TITLE: IE Position - Unduly Restricted Access of Female NRC
Inspectors to Radiation Area

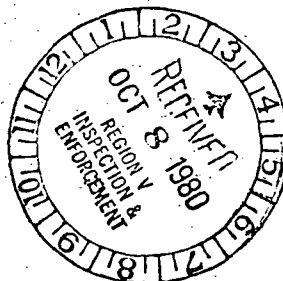
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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

0809/80

OCT 2 1980



MEMORANDUM FOR:

- B. H. Grier, Director, Region I
- J. P. O'Reilly, Director, Region II
- J. G. Keppler, Director, Region III
- K. V. Seyfrit, Director, Region IV
- R. H. Engelken, Director, Region V

FROM:

J. H. Sniezek, Director, Division of Fuel Facility
and Materials Safety Inspection, IE

SUBJECT:

IE POSITION - UNDULY RESTRICTED ACCESS OF FEMALE NRC
INSPECTORS TO RADIATION AREAS

The enclosed position paper is provided for the Regional Office's use as seen fit in discussing with licensees the subject of restricting access of female inspectors because of any interpretations of the requirements of 10 CFR Part 19.

The initial intent of this position was for issuance as an IE Information Notice. A draft was provided for comment on August 6, 1980. From comments received on the draft, it was determined that widespread distribution was not warranted. With the anticipated small occurrence of this type of restricted access, it was determined to best handle these occurrences individually. If, after initial discussion with any licensee further opposition is encountered, the matter should be referred to the Office of the Executive Legal Director (contact - J. Lieberman) with notification to the Director of this Division.

As stated in this position, all female NRC inspectors have read and are familiar with Regulatory Guide 8.13. This statement should be verified by each of the Regions. A frequency of refamiliarization should be established to assure that our inspectors remain informed of the risks associated with prenatal exposure.

J. H. Sniezek, Director
Division of Fuel Facility and Materials
Safety Inspection
Office of Inspection and Enforcement

Enclosure: As Stated

- cc: G. H. Smith, RI
- J. P. Stohr, RII
- A. B. Davis, RIII
- G. D. Brown, RIV
- H. E. Book, RV

CONTACT: J. S. Bland, IE
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UNDULY RESTRICTED ACCESS OF FEMALE NRC INSPECTORS TO RADIATION AREAS

During recent NRC onsite inspections, several licensees have imposed additional restrictions on the access of female NRC inspectors to radiation areas. These restrictions appeared to be honest attempts on the part of the licensees to comply with the requirements of 10 CFR 19.12 and the guidance of Regulatory Guide 8.13, "Instructions Concerning Prenatal Radiation Exposure." It is not believed that the licensees were attempting to impede or hinder the inspection effort but rather were being overly cautious in their interpretation of the requirements.

Regulatory Guide 8.13 sets forth information to be presented by NRC licensees to female employees and to their supervisors and coworkers. This information is part of the instruction that should be provided pursuant to 10 CFR 19.12. The intent of Regulatory Guide 8.13 is not only to assure that employees are aware of the risk associated with radiation exposure of an embryo or fetus but also to permit women to make an informed decision when considering employment in situations involving their potential exposure to radiation. The dose limits in 10 CFR 20 do not differentiate between females and males. Licensees should not interpret the requirements of 10 CFR 19.12 and the guidance of Regulatory Guide 8.13 as imposing any additional radiation dose limits or restrictions on females.

Each female NRC inspector has to read and is familiar with Regulatory Guide 8.13. Therefore, licensees shall not restrict the access of an NRC inspector to any part of a facility because of requirements that are considered to be imposed by 10 CFR 19.12 as related to instructions of workers on the risks of prenatal radiation exposure.