

**Response to Attachment 4, Part 1 Comments on Energy Fuels Resources Piñon Ridge Mill
Health And Safety Plan (Vol. 11; Exhibit J1)**

Comment #	Section	Response
1.		Refer to redline changes in TOC, Section 1.0 and slip sheets
2.	3.0	Refer to redline changes in applicable section of the plan
3.	4.0	Refer to redline changes in applicable section of the plan
Comments on Appendix A of the Mill H&S Plan - “Hazard Communication Program”		
4.	1.1	Refer to redline changes in applicable section of the plan
5.	3.0	Refer to redline changes in applicable section of the plan
6.	6.0	Refer to redline changes in applicable section of the plan
Comments on Appendix B of the Mill H&S Plan - “Administrative Procedures”		
AD-020 Preparation, Control, and Distribution of Procedures Procedure		
7.	2.0	Refer to redline changes in applicable section of the procedure
8.	3.1	Refer to redline changes in applicable section of the procedure
9.	4.2	Refer to redline changes in applicable section of the procedure
10.	6.14	Refer to redline changes in applicable section of the procedure
AD-030 Organization Procedure		
11.	5.3	Refer to redline changes throughout the H&S Plan and all procedures
AD-040 Radiation Protection Program Performance Review Procedure		
12.	5.2.1	Refer to redline changes in applicable section of the procedure
AD-060 Training Records Documentation and Tracking Procedure		
13.		Refer to redline changes in Form AD-060A in Appendix A of the procedure
AD-080 As Low As Reasonably Achievable (ALARA) Procedure		
14.	2.0	Refer to redline changes in Sections 2.0, 4.0 and 5.0 of the procedure
15.	4.2	Refer to redline changes in Section 6.2 of the procedure
16.	4.2	Refer to redline changes in Section 6.1 of the procedure
17.	4.4.2.4	Refer to redline changes in Section 6.4.2.4 of the procedure
AD-090 Accident Investigation Procedure		
18.		Root-cause analysis training will be conducted internally at the Mill. See Exhibit 4, “M/NM (Metal/Non-metal) Accident Analysis and Problem Identification Course”, MSHA Instruction Guide Series IG 68a, rev. 2002
19.	4.6	Refer to redline changes in Section 4.7 of the procedure
20.	Various	Refer to redline changes throughout the procedure
21.	7.46	Refer to redline changes in Section 7.4.6 of the procedure
22.		Refer to redline changes in Section 6.1 of the procedure
23.	Appendix A Form AD-090A	Refer to redline changes in Appendix A of the procedure
24.	Appendix A Form AD-090A	Refer to redline changes in Appendix A of the procedure
AD-100 Job Safety Analysis Procedure		
25.		Refer to redline changes throughout the procedure

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AD-110 Contractor Requirements Procedure		
26.		Refer to redline changes in Section 5.1 of the procedure
27.	4.1.3	Refer to redline changes in Section 5.2.2.4 of the procedure
28.	4.2.1	Refer to redline changes in Section 5.3.3 of the procedure
29.	4.5.2.1	Refer to redline changes in Section 5.6.2 of the procedure
30.	4.5	Refer to redline changes in Section 5.1.4 of the procedure
31.	4.6.1	Refer to redline changes in Section 5.7.2 of the procedure and Section 3.0 of the H&S Plan
32.	4.5.8.1	Refer to redline changes in Section 5.6.8 of the procedure
33.	4.6.5.1	Refer to redline changes in Section 5.7.9 of the procedure
AD-120 Drug Policy Procedure		
34.	3.4.1	Refer to redline changes in applicable section of the procedure
Comments on Appendix C of the Mill H&S Plan “General Health and Safety Procedures”		
HS-010 Safety Meetings Procedure		
35.	2.0	Refer to redline changes in Sections 2.0 and 5.3 of the procedure
HS-020 Bloodborne Pathogen Exposure Procedure		
36.	3.2.1	Refer to redline changes in Sections 5.6.1 and 5.6.2 of the procedure
37.	3.2.2	Refer to redline changes in applicable section of the procedure
HS-030 Hearing Conservation Procedure		
38.	5.4.1	Refer to redline changes in Section 6.4.1 of the procedure
39.	5.6	Refer to redline changes in Section 6.6.1.3 of the procedure
40.	6.2	Refer to redline changes in Section 7.2 of the procedure
HS-040 Vehicles and Mobile Equipment Procedure		
41.		Refer to redline changes in Section 2.0 of the procedure
42.		Refer to redline changes in Section 5.3 of the procedure
43.	3.0	Refer to redline changes in Section 5.2.1 of the procedure
HS-050 Confined Space Entry Procedure		
44.		Refer to redline changes in Section 6.4 of the procedure
45.		Refer to redline changes in Section 3.2 of the procedure. MSHA was referenced in the procedure; however, OSHA was not because the OSHA regulations will not apply to the Mill. However, this procedure does mirror OSHA regulations regarding confined spaces.
46.	5.1.1	Refer to redline changes in applicable section of the procedure
47.	6.2.1	Refer to redline changes in applicable section of the procedure
48.	Appendix A Form HS-050A	Refer to redline changes in Appendix A of the procedure
49.	Appendix A HS-050 Form	Refer to redline changes in Appendix A of the procedure
HS-060 Electrical Safety Procedure		
50.		Refer to redline changes in Section 5.1 of the procedure
51.	4.0	Refer to redline changes in Section 5.1.2 of the procedure

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Comment #	Section	Response
HS-070 Excavation and Trenching Procedure		
52.	4.0	Refer to redline changes in Section 5.1 of the procedure
HS-080 Fall Protection Procedure		
53.	5.1.1	Refer to redline changes in Section 6.1 of the procedure
HS-090 Flammable Materials Storage Procedure		
54.		Refer to redline changes in Table 1 of the procedure
HS-100 Ladders and Scaffolding Procedure		
55.		Refer to redline changes in Section 6.1 of the procedure
HS-110 Lockout/Tagout Procedure		
56.		Refer to redline changes in Section 2.0 of the procedure
HS-120 Hand and Power Tools Procedure		
57.		Refer to redline changes in Section 6.1.1 of the procedure
HS-130 Respiratory Protection - Use and Fit Test Procedure		
58.	3.1.1.1	Refer to redline changes in Section 3.1.1 of the procedure
59.	3.1.2.4	References to ANSI Z88.2-1969 have been removed, but not replaced with ANIS Z88.2-1992 as that standard has been withdrawn. Sufficient information is available in the other references (Reg Guide 8.15, 10 CFR 20, and 6 CCR 1007-1) presented in the procedure to support the procedure.
60.	6.2.1, 6.2.2	Refer to redline changes in applicable sections of the procedure
61.	7.7.4	Refer to redline changes in applicable section of the procedure
62.	7.8.2	Refer to redline changes in Section 7.8.3 of the procedure
63.	7.8	Refer to redline changes in Section 7.8.1 of the procedure
64.	7.8.4	Refer to redline changes in applicable section of the procedure
65.	7.8	Refer to redline changes in applicable section of the procedure
66.	7.17.1	Refer to redline changes in Section 7.18.1 of the procedure
67.	7.17.1	Refer to redline changes in Section 7.18.1 of the procedure
68.	Exhibit 2	This Exhibit was changed to “Respirator Protection Equipment Selection”, redundant information was removed and non-redundant information was incorporated into the procedure in various sections. Refer to redline changes throughout the procedure.
69.		Refer to redline changes in Section 6.1.3 of the procedure
70.		Refer to redline changes in Section 3.2 of the procedure
71.		Refer to redline changes in Section 5.3 of the procedure
HS-131 Respirator Maintenance, Inspection, Cleaning, and Storing Procedure		
72.	1	Refer to redline changes in applicable section of the procedure
73.	3.1.2.3	References to ANSI Z88.2-1969 have been removed. See response to comment #59 above.
74.	7.1	This information was removed and non-redundant info was incorporated into Procedure HS-130, Section 7.3.1.
75.	4.1.1, 4.1.2, 4.1.3	Refer to redline changes in applicable section of the procedure

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76.	7.2.6	Storing a respirator at the bottom of a tool box was intended to be an example of an inappropriate place to store a respirator. This was removed as the wording was confusing. Refer to redline changes in Section 7.1.3.5 of the procedure.
77.	7.2	Refer to redline changes in Section 7.1 and Appendix A of the procedure
78.	7.2	Refer to redline changes in Section 7.1.3.7 of the procedure
79.	7.5	Refer to redline changes in Section 7.4.2 of the procedure
80.	All	Refer to redline changes in Section 7.5.1 of the procedure
81.	7.6.2	Refer to redline changes in Section 7.5.2.7 of the procedure
82.	7.6.3	Refer to Form HS-131C, Appendix C of the procedure
HS-132 Medical Evaluation for Respirator Use Procedure		
83.	3.1.1	Refer to redline changes in applicable section of the procedure
84.	5.1.2, 6.2.4	Refer to redline changes in applicable section of the procedure
85.	All	Refer to redline changes in Section 6.1 of the procedure
86.	6.3	Refer to redline changes in Section 6.3.2 of the procedure
HS-140 Air Quality Surveys – Non-Radiological Procedure		
87.		No Comments
Comments on Appendix D of the Mill H&S Plan “Radiological Health and Safety Procedures”		
RH-010 Radiological Health and Safety Training Procedure		
88.		Refer to redline changes in Sections 3.2 and 7.2 and Appendix A of the procedure
89.	7.1.2	Refer to redline changes in Section 7.3 of the procedure
90.	3.1.4, 7.3.1	This comment actually applies to RH-020. Refer to redline changes in applicable sections of Procedure RH-020.
91.	Appendix C	Refer to redline changes in applicable section of the procedure
RH-020 Decontamination Procedure		
92.	7.4	Refer to redline changes in Section 7.4.1 of the procedure
93.	Table 1	References to Table 1 changed to Procedure RH-070, Table A1. Refer to redline changes in Section 7.4.2.2 and 7.5.2 of the procedure.
94.	Appendix B	Form RH-020A was changed to the “Personnel Contamination Form” and surveys portions refer to Procedure RH-200, Form RH-200A. Refer to redline changes in Appendix B and throughout the procedure.
95.	Appendix C	This form was removed as it was duplicative of Form RH-070A
RH-030 Posting Procedure		
96.	3.1	Refer to redline changes in applicable section of the procedure
97.	4.1.3	Refer to redline changes in applicable section of the procedure
98.	6.1	Refer to redline changes in Section 6.1.1.2 of the procedure
99.	6.1	Refer to redline changes in Section 6.1.3 of the procedure
100.	6.3	Refer to redline changes in Sections 5.1.2 and 6.2.2 of the procedure
101.	7.1.3	Refer to redline changes in Section 7.1.1.3 of the procedure

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Comment #	Section	Response
102.		Refer to redline changes in Section 7.1.2 of the procedure
RH-040 Radiation Exposure Action Levels Procedure		
103.		Refer to redline changes in Section 6.12 of the procedure as well as redline changes in Procedures RH-120 (area surveys) and RH-200 (personnel surveys)
104.	3.1	Refer to redline changes in Section 3.1.7 of the procedure
105.	6.1, 6.2	Refer to redline changes in applicable sections of the procedure
106.	6.10	Refer to redline changes in applicable section of the procedure
107.	6.10	Refer to redline changes in applicable section of the procedure
108.	6.6, 6.7	Refer to redline changes in applicable sections of the procedure
RH-050 Uranium Bioassay Procedure		
109.	6.0	After review, EFR has concluded there currently is no basis for Mill personnel to receive hepatitis vaccinations, this section of the procedure was removed.
110.	8.1.4	Refer to redline changes in Section 7.1.4 of the procedure
111.	8.1.7	Refer to redline changes in Sections 7.1.7 and 7.1.8 of the procedure
112.	8.3.4	Refer to redline changes in Section 7.3.5 of the procedure
113.	Appendix A Form RH-050A	Analyst signature boxes were removed. Refer to redline changes in Appendix A of the procedure.
RH-060 Radiation Work Permits Procedure		
114.	2.0	Refer to redline changes in Section 2.4 of the procedure
115.	2.0	Refer to redline changes in Section 2.5 of the procedure
116.	3.0	Refer to redline changes in Section 3.1.2 of the procedure
117.	4.1.7	Refer to redline changes in applicable section of the procedure
118.	Appendix A Form RWP-1	Refer to redline changes in Appendix A of the procedure
RH-070 Release of Equipment to Unrestricted Areas Procedure		
119.		Refer to redline changes in Section 6.4 of the procedure. Survey procedures were consolidated in Procedure RH-120 for consistency.
120.	6.1.1	Refer to redline changes in Section 5.1.1 of the procedure
121.	7.6.1	After review of the comment it was determined that beta and gamma exposure rate surveys are not required per NRC Reg Guides 1.86 and 8.30. This section was removed from the procedure.
122.	7.9.2	Refer to redline changes in Sections 6.6.3 and 6.6.4 of the procedure
123.	Appendix B RH-070A	Refer to redline changes in Appendix B of the procedure. Conversion Factor and Correction Factor are the same; Conversion Factor reference was removed. No alternate release limits have been established at this time for the Mill. This row was removed from the table. If alternate limits are established in the future, changes will be made to the form in a future amendment to the procedure.
RH-100 Shipment of Yellowcake, Ore, or Contaminated Equipment by Truck Procedure		
124.		Refer to redline changes in Section 8.0 of the procedure
125.	3.0	Refer to redline changes in Section 3.1.2 of the procedure
126.	1 st Table	Refer to redline changes in Section 7.1.1, row 2 of the procedure

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127.	1 st Table	Refer to redline changes in Section 7.1.1, row 2 of the procedure
128.	Line 6 in 1 st Table	Refer to redline changes in Section 7.1.1, row 7 of the procedure
129.	Lines 7-8 in 1 st Table	Refer to redline changes in Section 7.1.1, rows 8 and 9 of the procedure
130.	Lines 9-11 in 1 st Table	Refer to redline changes in Section 7.1.1, rows 10 and 11 of the procedure. Rows 9 and 10 were combined into 1 row.
131.	Line 12-13 in 1 st Table	Refer to redline changes in Section 7.1.1, rows 12 and 13 of the procedure
132.		Refer to redline changes in Section 7.1.1 of the procedure. All references to 49 CFR were reviewed and corrected where appropriate.
133.	7.1.2.1	Refer to redline changes in Section 7.1.2 of the procedure. All references to 49 CFR were reviewed and corrected where appropriate.
134.	7.1.3.1	Refer to redline changes in Section 7.1.3, row 1 of the procedure. All references to 49 CFR were reviewed and corrected where appropriate.
135.	Line 4 of Table	Refer to redline changes in Section 7.1.3, row 4 of the procedure
RH-110 Beta and/or Gamma Exposure Rate Surveys Procedure		
136.	3.1	Refer to redline changes in Section 3.1.2 of the procedure
137.	6.3	Refer to redline changes in applicable section of the procedure
138.	7.1.6	Refer to redline changes in Sections 6.3, 7.1.6, and 7.2.6 of the procedure
139.	7.1.7	Refer to redline changes in applicable section of the procedure
140.	7.2	Refer to redline changes in Sections 7.2.11 through 7.2.12 of the procedure
141.		Refer to redline changes in Section 7.3 of the procedure
142.	Appendix B Form RH-110A	Refer to redline changes in Appendix B of the procedure
RH-120 Alpha and Beta-Gamma Contamination Surveys Procedure		
This Procedure includes consolidated survey procedures from Procedures RH-070, RH-120 and RH-200. These procedures were consolidated for conciseness and consistency. Refer to redline changes in Sections 7.0 for the consolidated survey procedures which closely mirror those previously submitted in the above referenced procedures.		
143.	4.1	Refer to redline changes in Section 7.1.1 of the procedure
144.	6.2.2	Refer to redline changes in Section 6.1.4 of the procedure
145.	7.4	Refer to redline changes in Section 7.9 of the procedure
146.	Appendix A Form RH-120A	Refer to redline changes in Appendix A of the procedure
147.	Appendix A Form RH-120A	Refer to redline changes in Appendix A of the procedure
148.	Appendix B Table 1	Appendix B was removed from this procedure. References within the procedure were directed to Procedure RH-070, Table A1.
RH-130 Occupational General Air Particulate Survey		
149.	3.1	Refer to redline changes in Section 3.1.3 of the procedure
150.	3.1.3	Refer to redline changes in Section 3.1.4 of the procedure
151.	6.2	Refer to redline changes in Section 6.2.2 of the procedure
152.	6.3	Refer to redline changes in Section 6.3.3.1 of the procedure
153.	6.3, Table 1	Refer to redline changes in Section 6.3, Table 1 of the procedure

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154.	7.7	SSTF numbers will not be used at the Mill, just Sample ID No's and Location ID No's. This section was removed from the procedure.
155.	7.11	Refer to redline changes in Section 7.11.4 of the procedure
156.	Appendix A Form RH-130A	Refer to redline changes in Appendix A of the procedure
157.		Refer to redline changes in Section 7.7.3 and Appendix A of the procedure
RH-140 Radon-222 Decay Product Surveys Procedure		
158.		Refer to redline changes in Section 7.4 of the procedure
159.		After reviewing this comment, it was determined that Rn-220 would not need to be included in this procedure for ore expected to be processed at the Mill; references to Rn-220 were removed. Refer to redline changes in throughout the procedure.
160.	4.2.1	Refer to redline changes in Section 4.2.1 and Appendix B, Form RH-140A of the procedure
161.	5.2.4	See response to comment #160, above.
RH-150 Occupational Breathing Zone Monitoring Procedure		
162.	1.0, 6.3	Refer to redline changes in Section 1.0, 2.0 and 6.3 of the procedure
163.		Refer to redline changes in Section 8.0 of the procedure
164.	Appendix A Form RH-300A	Refer to redline changes in Appendix A of the procedure
RH-151 Calibration of Air Samplers Using the Bubble Method Procedure		
165.	6.1.1	The term PAS was removed. Refer to redline changes in Section 6.1 and throughout the procedure.
166.		Refer to redline changes in Section 7.1 of the procedure
167.	Appendix A Form RH-151A	Refer to redline changes in Appendix A of the procedure
RH-160 Source Leak Test, Shutter Test, and Inventory Procedure		
168.		Refer to redline changes in Section 6.2 of the procedure
169.		Refer to redline changes in Section 3.2 and Appendix A of the procedure
170.		Refer to redline changes in Section 7.2 of the procedure
171.		Refer to redline changes in Section 5.1.3, 6.1.2, 6.1.3, and 7.1 of the procedure
172.	2.0	Currently there are no other anticipated non-exempt sources at the Mill that would require leak testing. If such sources are acquired at the Mill in the future, the radioactive material license will be amended and procedures revised to incorporate those sources.
173.	3.1	Refer to redline changes in Section 3.1.4 of the procedure
174.	5.2.4	Refer to redline changes in applicable section of the procedure
175.	6.2	Refer to redline changes in Section 6.2.1 of the procedure
176.	6.2.2	Refer to redline changes in applicable section of the procedure
177.	Appendix A Form RH-160A	The "1465 (bnet) cpm" reference does not have any basis for the Mill and was removed. Refer to redline changes in Appendix A of the procedure.
RH-170 Nuclear Density Gauges Procedure		
178.		Refer to redline changes throughout the procedure
179.	3.1	Refer to redline changes in Section 3.1.2 of the procedure

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RH-200 Personnel Release Surveys Procedure		
180.		Survey procedures were consolidated into Procedure RH-120. Refer to redline changes in Section 7.0 of the procedure.
181.	7.1, 7.2	Refer to redline changes in Section 7.1.2 of the procedure
182.	7.1.4	Refer to redline changes in Procedure RH-120, Section 7.1.3.3
183.	7.1.7.1, 7.2.6.1, 7.3.6.1, 7.4.6	Refer to redline changes in Section 7.1.2 of the procedure
184.	Appendix A Form RH-200A	Refer to redline changes in Appendix A of the procedure
185.	Appendix B Form RH-200B	The limits have no basis for the Mill and were removed from this form.
186.	ALL	Form RH-200C "Personnel Contamination Form" was moved to Procedure RH-020, Appendix B and relabeled Form RH-020A. Refer to redline changes throughout the procedure.
RH-210 Personal Radiation Dosimeters Procedure		
187.		Refer to redline changes throughout the procedure
188.		Refer to redline changes in Section 7.5 of the procedure
189.		Refer to redline changes in Section 7.4 of the procedure
190.		Refer to redline changes in Section 7.3 of the procedure
191.	1.0	Refer to redline changes in applicable section of the procedure
192.	3.1	Refer to redline changes in Section 3.1.3 of the procedure
193.	5.4.2	Refer to redline changes in Section 5.2.8 of the procedure
194.	6.2.2	Refer to redline changes in Section 6.2 of the procedure
195.	7.1	Refer to redline changes in Section 7.1.1 of the procedure
196.	7.1.1	Refer to redline changes in Section 7.1.2 of the procedure
197.	7.2.5	Refer to redline changes in applicable section of the procedure
198.	5.1.3, 7.2.3	Refer to redline changes in applicable sections of the procedure
199.	7.2.4	Refer to redline changes in Sections 7.2.3.3 and 7.2.4 of the procedure
200.	Appendix A Form RH-210A	Refer to redline changes in Appendix A of the procedure
RH-300 Radiation Dose Calculations Procedure		
201.	1.0	Refer to redline changes in applicable section of the procedure
202.	2.0	Refer to redline changes in applicable section of the procedure
203.		Refer to redline changes in Sections 6.2 through 6.3 of the procedure
RH-301 Worker Exposure to Ling-Lived Radionuclides in Airborne Particulate Matter		
204.	6.0	Refer to redline changes in applicable section of the procedure
205.	2.1	Form RH-301B was determined to be redundant with Form RH-150A. Refer to redline changes in procedure RH-150, Appendix A that incorporated information from Form RH-301B.
206.	Appendix A Form RH-301B	This form was removed from the procedure. See response to comment #205, above.

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RH-302 Radionuclide Concentrations in Air Samples Procedure		
207.		The Mill Safety Department will use ICRP 30 dosimetry models unless and until CDPHE approves use of the more recent ICRP 68 models via a formal amendment to the radioactive material license. Refer to redline changes throughout the procedure.
208.	4.1-4.7	The methods (as revised) reflect anticipated apportionment of radionuclides in the air samples based on three different process area related conditions of natural uranium in association with its progeny. As indicated in the redline changes to Section 1.0 of the procedure, during initial plant operations, radionuclide characterization of air particulate filters will be performed to determine if these assumptions can be validated. At that time, when the data from those samples is available, a technical basis document can be submitted that justifies the methods as they are written or revised methods that are based on the data collected.
209.	2.1	References to caldasite ore have been removed. Refer to redline changes throughout the procedure.
210.	2.2.5	Reference to stack sampling was removed from the procedure. Refer to redline changes in applicable section of the procedure.
211.	Table 3	Table 2 (formerly Table 3) has been revised to reflect Table 4B1 of the Colorado Regulations (6 CCR 1007-1). Refer to redline changes in Table 2 of the procedure.
RH-303 Dose Calculation Spreadsheets Procedure		
212.		The Mill Safety Department will use ICRP 30 dosimetry models unless and until CDPHE approves use of the more recent ICRP 68 models via a formal amendment to the radioactive material license. Refer to redline changes throughout the procedure.
213.	3.2	Calculations are now referred to as example calculations only. Refer to redline changes in Section 3.2 and Appendices A and B of the procedure.
RH-310 Declared Pregnant Worker Procedure		
214.		Refer to redline changes in the title of the procedure.