CRCPD’s Suggested State Regulations for Control of Radiation SSRCR

AAPM 48th Annual Meeting
August 1, 2006
Orlando, FL

John P Winston, Healing Arts Council Chair
Conference of Radiation Control Program Directors
Pennsylvania Bureau of Radiation Protection

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http://www.crcpd.org/publications.asp

CRCPD’s Suggested State Regulations

Part A  General Provisions (Published Mar03)
Part B  Registration of Machines (Dec95)
Part C  Licensing of Radioactive Material (Jan91)
Part D  Standards for Protection vs. Radiation (Mar03)
Part E  Industrial Radiography (Feb99)
Part F  X-Ray in Healing Arts (Dec01)

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SR - Emerging Issues Committee

Cindy Cardwell (TX), Chairperson

- Recommends that the Chairs of SR – A, D, and C, at the very least be brought together to discuss the upcoming changes to rules that will be required due to the EPAct and other NRC initiatives such as increased security controls and national source tracking rules.

CRCPD’s Suggested State Regulations

Keeping Pace…

A Working Group may have access to pre-decisional NRC rulemaking and guidance documents.

CRCPD’s Suggested State Regulations

Bracketed Language

- Language that is optional for state regulators.
- Committee felt it useful enough to suggest as a possible approach.
- Also used for language that may not apply to all states.
- Everything else has met full federal concurrence through our process, and may even be required by federal rules.

CRCPD’s Part G: RAM in Healing Arts

Members:
- Pamela Bishop (OK), Chairperson
- Bob Gallghar (MA)
- Debbie Gilley (FL)
- James Jarvis (CO)

AAPM Resource Individual:
- Lynne Fairobent

Last revised: March 2003
Minimum education and training requirements provided in 10CFR35.

- Identified as an authorized medical physicist on a specific medical use license or equivalent issued by Agency, NRC, AS, or Licensing State, or
- Identified as an authorized medical physicist on a permit issued by Agency, NRC, AS or LS specific medical use license of broad scope that is authorized to permit the use of RAM.

Examples of Bracketed Language

- G.18.g: Radiation Safety Committee
- G.21.c: Authorized User Supervision
- G.28.a: Training and Technical Requirements for Nuclear Medicine Technologists and Radiation Therapists
- G.31: Quality Control of Diagnostic Equipment

- G.32.c: Dose calibrator quality control
- G.33.d: Survey instrument check
- G.34.a: Determination of Doses
- G.38: Using vial shields
- G.39.b: Surveying storage areas

- G.40.f: Release of Individuals Containing Radioactive Drugs or Implants
- G.104: Records of training
CRCPD’s Part G: RAM in Healing Arts

- G.40.f: Release of Individuals Containing Radioactive Drugs or Implants
- G.104: Records of training

CRCPD’s Part C: Licensing of RAM

Members:
- Monica Perez (TX), Chairperson
- Cynthia Becker (FL)
- Johnny Graves (TN)
- Trudy Hill (NE)

Last revised: 1991


Draft and Rationale expected to be submitted to peer review August 2006.
CRCPD's Part C: Licensing of RAM

- Primarily worked on bringing compatibility items up-to-date with current NRC regulations.
- Streamlined the Part by removing some sections and making them separate chapters (e.g., financial assurance, decommissioning).
- Need to add standards for increased control and tracking, as well as compatibility with Energy Act.

CRCPD's Part D: Radiation Protection

Members:
- Shawn Seeley (ME), Chairperson
- Robert Greger (CA)
- Mike Snee (OH)

Last revised: March 2003

CRCPD's Part D: Radiation Protection

D.1201.c: Occupational Dose from Fluoroscopic Equipment

- Webster Calculation

D.1301: Dose Limits for the Public

- 1 millisievert (0.1 rem) in a year
- Retrofit shall not be required for locations where only radiation-producing machines existed prior to [the effective date of these regulations] and met the previous requirements of 5 mSv per year.

CRCPD's Part D: Radiation Protection

D.1502: Location of Personal Monitoring Devices

- When Pb apron is worn, at the collar (outside apron)
- When monitoring dose to embryo/fetus of declared pregnant worker, at waist under any apron
- When monitoring lens dose, at collar or an unshielded location closer to the eye
- When monitoring extremity dose, at the extremity likely to receive the highest exposure, and oriented to measure the highest dose.
D.1903: Exceptions to Posting Requirements

- Diagnostic X-ray Rooms
- Teletherapy Rooms
  - If access to room is controlled, and personnel in attendance take necessary precautions to prevent inadvertent exposure of workers, other patients, and members of the public in excess of limits.
CRCPD’s
Part X: Medical Therapy

[Examples of Bracketed Language]

- Sec. X.3.e: Qualifications of Operators
  – Shall be ARRT Registered Radiation Therapy Technologists, or
  – shall submit evidence of satisfactorily completing a radiation therapy technologist training program that complies with the requirements of the Joint Review Committee on Education in Radiologic Technology.

Sec. X.7.u: Periodic Quality Assurance Checks

- At intervals not to exceed those specified in “Comprehensive QA for Radiation Oncology: AAPM Report No. 46,” prepared by AAPM Radiation Therapy Committee Task Group 40.

CRCPD’s
Part F: X-ray in Healing Arts

Members:
- Russell Takata (HI), Chairperson
- Herman Gaines (MS)
- Brad Grinstead (AL)
- Catherine Fontaine (TX)

AAPM Resource Individual:
- Keith Strauss

Last revised: December 2001
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**CRCPD’s Part F: X-ray in Healing Arts**

Currently under revision to include:

- Hand-held dental x-ray equipment.

**CRCPD’s Part F: X-ray in Healing Arts**

F.3.a.ix: Procedures and auxiliary equipment
F.3.a.xiii: Patient Log
F.3.b: Film processing and practices
F.5.l.v: Cumulative Fluoroscopic Exposure Time

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**CRCPD’s Part F: X-ray in Healing Arts**

- Information Exchange
- Cooperative Efforts
- Training

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**CRCPD’s Part F: X-ray in Healing Arts**

F.14: Mammography – pages F42 – F75
F.15: Bone Densitometry
Appendix C: Exemptions from Shielding for Certain Fluoroscopic Procedures
Appendix D: Focal Spot Tolerance Limit
Appendix E: Minimum HVL for 20, 25, 30 kV

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Thank You

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