

Radiation-generating Equipment Committee (REC)

July 21, 2011

Approved Minutes

MEMBERS PRESENT

Lawrence Osher, Chair
Jill Paessun
Brenda Johnson
Kathryn Gardner
Nina Kowalczyk
Chuck Wissuchek
Ruth Hackworth

MEMBERS ABSENT

Kerry Krugh, Vice Chair
Nina Mayr
Teresa Yates
Thomas Hangartner
Jack Dukes

GUESTS

ODH ATTENDEES

Margie Wanchick
James Castle
David Lipp

Paul Geis, Summa Health System
Susan Suchan, Mt. Carmel Health System
Heather Moore, Ohio Society of Radiologic Technologists
Linda Rizzo, Ohio Society of Radiologic Technologists
Rick Sites, Ohio Hospital Association
Billie Fiore, Ohio State Radiological Society

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The Radiation-generating Equipment Committee (REC) meeting was called to order by chairperson, Larry Osher at 10:10 a.m. The meeting was held at the Ohio Department of Health (ODH) in the Basement Training Room A at 35 Chestnut Street, Columbus, Ohio. The Sign-in Sheet serves as the official record of attendance.

Approval of Agenda: Two items were requested to be added to the agenda: Kathryn Gardner asked to add “contrast media injection” as related to the definition of “radiographer” from rule 3701-72-01, and Chuck Wissuchek asked to have a discussion of the therapy rules in Chapter 3701:1-67. Both items were added under the order of “Old Business.”

Past Minutes: The committee reviewed the June 24, 2011 minutes. Nina Kowalczyk made a motion to accept the minutes. Larry Osher seconded the motion; the members present unanimously approved the minutes as written.

Old Business:

Status of X-ray Rules - Margie Wanchick provided handouts of the latest status of the Chapter 66 & related Chapter 38 rules and the proposed new Chapter 68 industrial rules explaining that two rules have been approved by Public Health Council: 66-03 Certified Radiation Experts and 66-13 Industrial Analytical which will become effective on August 1, 2011. The Industrial Particle Accelerator rule 66-17 is expected to become effective following the August 18, 2011 PHC meeting. As soon as the Industrial Particle Accelerator rule 66-17 is adopted, the proposed renumbering of the Industrial Radiography & Irradiators, Analytical, and Particle Accelerator rules will be put out for public comments, even though there were no language changes made to them. Also, the new Chapter 68 will include a new Definitions rule (68-01) and Quality Assurance (QA) rule (68-02). These two rules include language extracted from the existing rule requirements found in Chapter 66. Margie urged the committee to review these rules carefully to assure that all definitions and QA requirements were correctly included. Margie informed the committee that Michael Snee is initiating a change to the registration rule 3701:1-38-03, specifically to address the enforcement process for unregistered handlers which she will present at the September REC meeting.

Contrast Media Injection - There was a long discussion centered on clarifying the difference between ‘prescribing’ versus ‘administering’ contrast media for a radiologic procedure. Kathryn Gardner told the

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members that recommending the deletion of “administering contrast media” from the definition of “radiographer” has become a big issue because this task has been performed by radiographers since the 1920’s. She urged the members to recommend putting the language back in and to add “as prescribed or directed by a physician.” Rick Sites raised questions about the authority of the Board of Pharmacy (BOP) and of their email to the Department. A copy of the May 4, 2010 email from the BOP to ODH, explaining their position on radiographers administering contrast media issue was distributed. Nina Kowalczyk said that these rules need to include “practice standards” acknowledging that there is no licensing board for the radiological sciences to specify the scope of practice for this professional group. Nina suggested language to address this which will be discussed in further detail at the upcoming August 12 REC meeting when the public comments will be reviewed. There was some discussion on the language modification of who is authorized to operate CT units for therapy simulation and whether cardiovascular technologists and nurses should be permitted to perform some radiologic-related tasks in the cardiac catheterization laboratories. These and other issues will be discussed further during the August 12, 2011 REC meeting.

Review Public Comments for Radiographic Equipment rule 3701:1-66-05 - The following comments were submitted; the REC’s response is noted below each paragraph cited.

(A)(2)(a), change "adjustment of at least two dimensions" to "adjustment of both the length and width"
REC decision: Accepted.

(A)(4)(a)(ii), delete the "or" at the end
REC decision: Accepted.

(A)(5)(a), start the sentence with "The PBL" instead of "PBL"
REC decision: Accepted.

(B)(3)(a), change "A device on the control" to "The control"
REC decision: Accepted.

(B)(6)(c) - "The switch shall be permanently mounted so that it cannot be operated outside of a protected area when shielding of the operator is needed to maintain the dose to the operator below design goals, except ..."
REC decision: Not accepted.

(D)(2) - Is timer COV expected to be measured if the unit only permits mAs settings? **Answer: No**
Some portable/mobile units do not have specific timer settings. Perhaps we need to add a caveat about making this rule not applicable if the time interval cannot be specified.
REC decision: Not accepted.

In (G), your formula is incorrect. The numeric limit should be 0.10, not 0.01.
REC decision: Accepted.

Therapy Rules – Chuck Wissuchek said that he wants the REC to review the new therapy rules to address problems identified from recent therapy inspections, specifically, the rules relating to quality assurance checks and the inconsistency of violations cited against those requirements. Chuck reported that he and Jim Castle have been having discussions regarding these problems, and therefore, Chuck had previously requested that ODH not inspect against the new rules. Due to these issues, the Penn-Ohio AAPM Chapter discussed the new therapy rules at their spring meeting, specifically, the increased number of violations

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cited after the Chapter 67 rules became effective. The northern Chapter is asking the southern Chapter (i.e., Ohio RiverValley) to collaborate on establishing some minimal standards and guidelines relating to using the AAPM reports. Paul Geis said that Jim Castle asked the Ohio AAPM chapters to provide input/guidance regarding what the minimum standards should be for future rule changes. Nina Kowalczyk asked for clarification about the guidance that Chuck has provided Jim regarding the quality assurance checks. Jim clarified that he has issued inspector guidance to address the concerns and requirements, including tolerance and action levels set by ODH, until new regulations can be developed. Larry Osher asked that the medical physicists provide Margie Wanchick with those recommendations also because that information should be presented to and addressed by REC. Margie also asked Chuck to have the Ohio Chapters' working group submit their recommendations for rule changes to her so the Department has an opportunity to review them and to include them on a future REC agenda. When asked how soon the therapy rules could be reviewed by REC, Margie and Larry indicated that it could be put on an agenda as soon as the REC completes their review of the public comments from the proposed changes to the Chapter 3701-72 rules and addresses the ODH recommendations for amending the Registration rule 3701:1-38-03.

New Business: There was no new business.

Future Meeting Dates: Friday, August 12, 2011
 Friday, September 16, 2011

Adjourn: The meeting was adjourned at 3:00pm.