

# X-ray Advisory Committee Meeting

## MEETING MINUTES

**Date:** June 7, 2018

**Location:** Orville Freeman Building  
645 Robert St. N.  
Saint Paul, MN 55155

**Attendees:** Beth Schueler (Medical Physicist), Dan Lind (Service Provider), Jon Wohlhuter (MN Association of Nurse Anesthetists), Julie Sabo (MN Nursing Board), Michael Lewandowski (Health Physicist/CHP), Ronnell Hanson (MN Radiological Society), Tony Murphy (Medical Physicist), Vinton Albers (Chiropractic Association).

Via Conference Call: Bridgett Anderson (MN Dental Board), Richard Giese (Medical Physicist/PhD).

Absent: Brian Hall (Service Provider), Frank Zink (Medical Physicist), Louis Saeger (MN Medical Association), William Duppler (Medical Physicist).

MDH: Bevin Beaver, Jacquie Cavanagh, Kelly Medellin, Mary Navara, Stephanie Welvaert, Teresa Purrington. Absent: Craig Verke.

## Acronyms and Terms

ACM – Advisory committee member

CRCPD – Council of Radiation Control Program Directors

CBCT – Cone beam computed tomography

CT – Computed tomography

FDA – Federal Drug Administration

IAC - Intersocietal Accreditation Commission

MDH – Minnesota Department of Health

NCRP – National Council on Radiation Protection and Measurements

QMP – Qualified medical physicist

Revisor – Office of the Revisor of Statutes

SSRCR – State Suggested Regulations for Control of Radiation

## Welcome and Introductions

*Teresa Purrington, X-ray Program Supervisor*

*Jacquie Cavanagh, Section Policy and Rules Analyst*

Purrington welcomed the Advisory Committee. She expressed concern that not all registrants are aware of the rulemaking and not receiving email updates about the rule revision. She asked the committee to communicate the rule revision to their radiation staff. Linda Laman from the public offered to include the X-ray Unit's rulemaking flyer with their mailings. Bridgett Anderson (MN Board of Dentistry) suggested that affected boards could include the flyer to notify individual providers, and offered to do so in her board's email subscriber notices. Julie Sabo stated the information has been previously included in the nursing board's newsletter. Purrington announced that the committee would discuss Service Provider rule drafts at the next meeting. She also stated that industrial accelerators might be included in the proposed Radiation Therapy rules, chapter 4733. Cavanagh stated the Radiation Therapy stakeholder group will be meeting next week and this information will be shared with the committee at that time.

Cavanagh gave an update on legislation. She stated that security screening legislation that was part of the omnibus bill was vetoed, and that the cardiovascular technologist bill was not enacted.

## Review of Cabinet X-ray System Rule Draft

*Teresa Purrington, X-ray Program Supervisor*

*Jacquie Cavanagh, Section Policy and Rules Analyst*

### Subp. 1

Cavanagh referred to the MDH comment to possibly include other types of industrial equipment. Michael Lewandowski (Advisory Committee Group – ACG) noted that there are other uses for electron beam such as curing sterilization. Purrington stated MDH researched other states and did not see these other uses. Lewandowski stated other states refer to them as minimal threat. Cavanagh stated comparable systems could be included in this rule draft. Lewandowski asked about pieces that are closed beam, but not analytical. Purrington stated MDH trying to be clear in the rule draft and include areas that might be unclear. Lewandowski asked if this rule is intended to govern all enclosed systems and Purrington affirmed.

### Subp. 2

Lewandowski stated that the term "aperture" is not defined in the industrial definitions part nor in the main definitions part. Lewandowski noted that aperture and beam port have the same definition and suggested using the term "beam port" instead of "aperture".

### Subp. 5

Cavanagh stated that the industrial focus group discussed this subpart in length. Lewandowski stated it looks like MDH captured all the discussions from the focus group.

### Subp. 6

Lewandowski stated that item A(1) could be interpreted that only one interlock is needed. Suggested using the wording “at least one of the required interlocks”, as the software is not as reliable as a physical disconnection. He also questioned item A(2) using the word results, grammatically doesn't make sense.

### Subp. 12

Beth Schueler (ACM) asked if relocation of the equipment includes breast specimen imagers because these are always mobile. Purrington stated MDH would review this.

### Subp. 13

Lewandowski asked if item E(1) should refer to items C and D. Suggested using the word “control”, rather than “warning lights and signals”. Purrington stated MDH would review this. He also questioned G(1) and the intention of the words “tested and checked”. It is his understanding that the focus group did not intend there to be a special process for testing the equipment. Lewandowski suggested stating that it should be “checked daily during operation”.

### Subp. 14

Lewandowski questioned “industrial quality control”. Purrington stated this is specifically for food products. Lewandowski stated there is other uses for baggage systems that are designed to run without attendants. The requirement for attended operation in this situation could be erroneous. Purrington stated MDH did not get feedback from the focus group regarding this but MDH will review it. Beth was unsure what daily testing was trying to reference in this sup.

### Subp. 15

Beth was unsure what daily testing was trying to reference in subpart 15, item A(5). Purrington stated MDH would review this for clarity.

### Subp. 16

Lewandowski questioned “qualified personnel”. Purrington stated this would be discussed in definitions.

### Subp. 17

Lewandowski stated this subpart is inconsistent with subpart 16. Purrington stated this was discussed in the focus group and that there are certain cases where this is correct.

## Review of Industrial Definitions

*Teresa Purrington, X-ray Program Supervisor*

*Jacquie Cavanagh, Section Policy and Rules Analyst*

### Subp. 1

Purrington stated that the scope describes following these definitions, as well as other definitions. Stated that subparts 23 and 24 will be removed.

#### Subp. 4

Purrington stated the word “equipment” would be replaced with “system” throughout the draft.

#### Subp. 5

Lewandowski stated that gauging systems should not be included in the analytical x-ray system definition. Purrington stated it is in the definition to clarify gauging x-ray systems are not included in the analytical subpart, that gauging has its own subpart. Lewandowski suggested removing the last sentence of the definition. Purrington stated all of these should be removed, and that MDH would review this.

#### Subp. 6

Lewandowski questioned the wording “or during relocation”. Purrington stated the wording should be “*after* relocation”. Rich Geise (ACM) asked if “survey meter” should be defined. Purrington stated MDH would review this in the service provider rule drafts.

#### Subp. 9

Purrington noted that if closed beam were within several rule parts, MDH would make sure it is consistent throughout the rule.

#### Subp. 14

Lewandowski questioned if this subpart was the same as subpart 4. Purrington stated MDH would review this.

#### Subp. 29

Purrington stated MDH researched other states for this subpart. Lewandowski questioned the different roles and their responsibilities. Purrington explained each role’s responsibilities. Lewandowski questioned training and repair, and modification. Dan Lind (ACM) stated that the manufacturer provides a training course. Ronnell Hanson (ACM) stated there must be other sanctioned methods and suggested including other methods in this rule part. Lewandowski stated that the equipment manual specifies how to perform repairs. Purrington stated if something went wrong, the responsibility would fall on the RSO. Lewandowski stated that many repairs are performed in-house, and he suggested adding a provision to this part to describe (and sanction) this level of activity. Hanson stated that would be under manufacturer guidelines, and some repairs should be able to be performed in-house. Purrington stated MDH would research this, and asked Beaver to research other states. Lewandowski offered that the question that should be asked of manufacturers is “what type of maintenance and repair training is suggested?” Lind stated that registrants might incur warranty issues if equipment is not maintained as directed by the manufacturer. Hanson stated that the difference between qualified personnel and operators is unclear. Lewandowski responded that an operator (of the equipment) may or may not be qualified to repair the equipment. Purrington asked Lewandowski if a smaller facility would have an in-house individual. Lewandowski stated the individual who buys this equipment is usually a physicist or someone who is properly trained. Purrington stated it sounds like this would happen more in a larger research setting, and that MDH will discuss a possible solution for this situation.

### Subp. 31

Lewandowski recommended revising this definition to include “radiographic” within the phrase industrial x-ray system.

### Subp. 34

Hanson questioned the wording “storage area”, rather than “secure area”. Purrington stated this wording is consistent with Minnesota Rule, Chapter 4731. Lewandowski added that storage areas must be secured.

## Public Comments

- Sue McClanahan: Asked about updated service provider qualifications. Purrington stated MDH is working on this with the service provider rules.
- Kelly Daigle: Stated she has seen communication from the boards about the rule updates, but there are some biomedical groups that are not aware of the rule revision. Purrington stated MDH would look into reaching out to these groups.
- Kelly Daigle: Asked about subpart 18 and “nondestructive methods”. She suggested that the term should be expressed in the singular.
- Kelly Daigle: Asked about “practical examination” in subpart 28 and referenced who would review the demonstration. Purrington stated this would be an industrial radiographer overseeing their assistant.

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