

X-ray Industrial Focus Group Meeting

MEETING MINUTES

Date: March 1, 2018

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

Attendees: Brad Hoium (Medtronic), Brett Muehlhauser (North Star Imaging, Service Provider), David Paulu (University of Minnesota), Michael Lewandowski (3M).
Conference Call: Wade Padrnos (Ridgewater University).
MDH: Bevin Beaver, Craig Verke, Jacquie Cavanagh, Kelly Medellin, Mary Navara, Teresa Purrington.

Acronyms and Terms

21 CFR – Title 21 of the Code of Federal Regulations

IFGM – Industrial Focus Group member

MDH – Minnesota Department of Health

Revisor – Office of the Revisor of Statutes

SSRCR – State Suggested Regulations for Control of Radiation

Welcome and Introductions

Teresa Purrington, X-ray Program Supervisor

Purrington welcomed everyone. Let the public know how they can submit their request for comments. She stated if there are additional comments on suggested language for timeframes, they should be sent to the request for comments email box, and will not be further discussed at this meeting.

Stated this is the last Industrial Focus Group meeting. MDH will be meeting with the Advisory Committee next. Industrial Radiography will be discussed at the first Advisory Committee meeting, and Brett Muehlhauser will be a guest on the committee for these discussions.

Review of Non-Medical Industrial Radiography Rules

Jacquie Cavanagh, Section Policy and Rules Analyst

Teresa Purrington, X-ray Unit Supervisor

Began review of Non-Medical Industrial Radiography Rules, v1.0.

Subp. 2

Brett Muehlhauser (IFGM) asked if there is an example of item C and questioned if this refers to a positional sensor. David Paulu (IFGM) agreed that this needs to be clarified.

Subp. 3

Muehlhauser questioned A(1), and suggested using the word visible. Need to be able to see it. Sometimes there is a light on the x-ray tube, and suggests adding that if possible. Not sure all the manufacturers have this. Bevin Beaver (MDH) stated there might be suggested language in Texas rules. Paulu questioned B, and the wording regarding "two visible signals". Suggested simplifying this language.

Subp. 5

Muehlhauser asked for clarification on the word "coupling". Beaver stated MDH would research that.

Subp. 8

Muehlhauser stated that the majority of industrial x-ray tubes would not meet this requirement. Craig Verke (MDH) stated that MDH wondered if there were shutters at all on this equipment. Muehlhauser stated this makes sense for isotopes only. Beaver stated that MDH will do more research. Michael Lewandowski (IFGM) stated this language is applicable for x-ray tubes housing, but not necessarily radiography. Muehlhauser stated the definition for x-ray tube housing needs to be better defined.

Subp. 10

Muehlhauser suggested adding language that has something to do with the impact or product being x-rayed, and accepting like surveys instead of having to repeat them.

Subp. 11

Lewandowski questioned how a radiation survey is separate from an area survey. Verke responded that the area survey is for temporary use.

Subp. 12

Purrington stated this is consistent with other states and SSRCR. Muehlhauser stated there should be an assignment of an RSO. Purrington stated that will be added with the entire chapter. Purrington asked if the 40 hours training is correct. Muehlhauser stated that this seems to be the case. Purrington stated MDH will review with Radioactive Materials rules to be sure these rules are consistent. Muehlhauser stated he would like to add an acceptable equivalent exam, because the exam needs to be changed. Wade Padrnos (IFGM) agrees with Muehlhauser that the exam needs to be edited.

Subp. 13

Purrington stated MDH referenced 4731, Radioactive Materials rule part.

Subp. 15 and 16

Paulu stated the language should be consistent between these two subparts, and 16's language is better. Purrington stated that MDH needs to review this. Lewandowski stated that the differentiation between radiographer and assistant should be defined at the appropriate level. Lewandowski stated this is an opportunity to look at these rules that may be incorrect in Radioactive Materials rules. Purrington stated MDH will review this.

Subp. 17

Muehlhauser asked if it is valuable to include topics and hours. Purrington stated MDH can reference the definition in this subpart. Lewandowski questioned if this should be in the rule, rather than the definition. Purrington stated this is an opportunity for MDH to include this in the rule part, because it is referred to only once in the rule.

Subp. 18

Lewandowski stated the reference to the subparts need to be updated in B(1) and B(2). He also stated that the reference for subpart C is exactly the same as RAM. Purrington stated MDH is aware of this.

Subp. 19

Lewandowski questioned item C, and items one and two do not belong under this item. Muehlhauser stated there should be some reference to ALARA in this subpart.

Subp. 20

Purrington stated this references SSRCR. Muehlhauser questioned if MDH is differentiating between a piece that is not a certified cabinet that has a permanent enclosure, and those that are certified cabinets. These pieces are the same, so training and other requirements should be the same in the rule.

Subp. 21

Muehlhauser stated he did not see anything regarding the number of exposures in open-air radiography to calculate dose. He stated this should be added. Muehlhauser asked Padrnos about the value of keeping track of exposures. Padrnos stated they do train their students to record the exposures.

Subp. 22

Paulu questioned B(2) and the visual check. Purrington stated this should say visual and operability. Padrnos questioned the posting and if this is referring to a warning label. Purrington stated this will be further defined. Muehlhauser asked if there should be a record of the visual checks. Beaver stated MDH discussed this, and it will be added in.

Subp. 24

Muehlhauser stated that interlocks and certified versus non-certified enclosed cabinets could be addressed here. He stated MDH could reference cabinet rules in this part, or the outlined requirements.

Subp. 25

Lewandowski questioned item C and the restricted area, and stated this is inconsistent with subpart 11 and 23.

Muehlhauser questioned item B, and if it would be acceptable for the radiographer and the assistant to be on the same job site, running different pieces of equipment. Purrington stated that this is the case. Verke stated that the wording states “personal supervision”. If the radiographer is not supervisor the assistant, then that could be an issue. Muehlhauser questioned the wording direct observation, and stated it needs to be further defined.

Paulu questioned items C(3) and D, and stated they are repetitive. Paulu questioned the word direct before visual surveillance and direct observation in B(3). Purrington stated that MDH will research this further and discuss this with Radioactive Materials.

Subp. 26

Muehlhauser stated there are strict regulations on how radioactive materials are stored and locked, and questioned whether this is further defined in another rule part. Purrington stated it is further defined in Radioactive Materials rules.

Lewandowski questioned whether A(1) and A(2) are needed. Muehlhauser stated we should look at the wording for cabinets, and use that language. Purrington stated MDH will look at that. Paulu stated A(1) and A(2) would be differentiated between a permanent facility and a portable. Lewandowski stated this should be clarified if it is not clear. Purrington stated she values these comments.

Public Comments

- Don McGruder: Questioned subpart 26 and asked if lock-out/tag-out satisfies for securing this equipment? Verke stated that it could not be used, but it could be taken.
- Linda Laman: Questioned subpart 12 and asked if this is applicable for all RSOs? Purrington stated this is specific only for this rule part.
- Sue McClanahan: Questioned if this rule part is for both open fields and vaults? Purrington stated yes.

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03/01/2018

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