

**DATE:** August 3, 2004  
**TO:** State Licensed Private Inspectors  
**FROM:** Renee L. Fizer, Chief, Radiation Machine Division  
**SUBJECT:** Information and Regulatory Interpretation Memos (IRI) 04-02 August 2004

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**Meeting Location at Maryland Department of the Environment (MDE)**

The next meeting of the licensed private inspectors will be held on September 21, 2004 at 10:00 a.m. in the Aqua and Aeris Conference Room on the 1<sup>st</sup> Floor at 1800 Washington Boulevard. Please park in the visitor lot (marked Red Lot) and come to the lobby area where someone will escort you to the meeting. A tentative agenda and directions will be mailed two weeks prior to the meeting.

**Radiological Health Program Announcements**

The RHP is proud to announce the filling of the two supervisory positions effective June/July 2004:

Ms. Barbara Park –Section Head of Licensing, Radioactive Materials Division (RAM)

The RHP is also filling a Health Physicist II Contractual Position in the RMD.

**Bone Density Exemption**

The Department of Health and Mental Hygiene maintains no restrictions for who may operate human-use bone density radiation machines. In addition, manufacturers of bone density units were not historically providing training to operators using this type of radiation machine. The RMD determined the necessity to require registrants to provide all bone density machine operators with personnel monitoring. Since most of the manufacturers now provide comprehensive training and manuals for the operators, the RMD recognizes the need to review the personnel monitoring requirement and is soliciting comments. One proposed option is to offer a conditional exemption for facilities that solely operate bone density units. The conditional exemption would mirror the current podiatric exemption program. The registrant would submit a letter requesting exemption from personnel monitoring and attach six consecutive months or four consecutive quarters of film badge dosimetry reports to the RMD. Upon review of the dosimetry records, the RMD may grant an exemption. A bone density facility will be required to maintain either an exemption approval letter or continuous monitoring records **on site** during the State certification. The exemption would remain valid **unless** any of the following occur:

1. The radiation machine facility changes ownership or the Federal Tax ID number changes;
2. The radiation machine facility relocates from its current location;
3. More radiation machines are added to the facility;
4. The facility exhibits a behavior of non-compliance such that monitoring is again required.

### **Certification/Registration Renewal**

Upon completion of the 2003 registration renewal cycle and for all certification facilities (Groups 1 through 5) which excludes dental, veterinary, and mammography facilities (Groups 6, 7, & 8), the facility's registration expiration and certification due date are the same. The dual expiration date is reflected on the posted Radiation Machine Facility Registration and Certification certificate provided to each facility. Effective mid year of 2004, the RMD will issue Notices of Violation to certification facilities that fail to pay their radiation machine facility fee. A registrant will receive an updated certificate only when it pays its registration fees and undergo a certification inspection with all violation resolved.

### **Draft Fluoroscopic Regulations**

By mid-August 2004, the draft fluoroscopic regulations pertaining to in-house privileging will be mailed to all fluoroscopic stakeholders for final comments. Comments will be due back by September 15, 2004.

The rest of section F.5 is also under revision and has been forwarded to all private inspectors for review. Forward all comments to Renee Fizer by September 15, 2004. At that point, the promulgation process will begin with a proposed effective date of early Spring 2005.

### **CDC Video**

On September 30, 2004 at 10 a.m., the RHP will be showing a video from the Center of Disease Control (CDC) entitled "Medical Response to Nuclear and Radiological Terrorism" to all interested Maryland hospitals. This video discusses basic radiation information for clinicians, medical management of radiological injuries, decontamination procedures and staff protective measures. If you are interested in attending, contact Ms. Renee Fizer or Ms. Eva Nair.

### **Peachbex 2004 Emergency Response Exercise**

On June 22, 2004, the MDE's Emergency Radiation Response Team performed with an exceptionally high level of success during the Peachbex 2004 mock nuclear power plant accident exercise. The Federal Emergency Management Agency (FEMA) evaluated and graded how well the staff maintained communication, logged all events that occurred, performed possible dose calculations, and the field team who traveled to Cecil and Hartford counties and performed radiation readings. According to FEMA, there were no issues and they commended us on being able to coordinate first responders through this radiological event.

### **Mid Atlantic States Radiation Program Meeting**

On October 20 and 21, 2004 the RHP will be host the 3<sup>rd</sup> Meeting of the Mid-Atlantic States Radiation Control Programs at Donaldson Brown Conference Center in Port Deposit, MD. The FDA has approved 6.5 continuing education credits for the day of mammography training on October 20, 2004. The second day will focus on issues involving radioactive material and radiation machines. If you are interested in attending this meeting, please call Ms. Renee Fizer for more details. Attached is the registration information and registration form. Space is limited.

Attachments (2):        2004 Mid-Atlantic States Radiation Programs meeting notice, and  
                                 Registration Form