



MARYLAND DEPARTMENT OF THE ENVIRONMENT

1800 Washington Boulevard • Baltimore MD 21230

410-537-3000 • 1-800-633-6101

Robert L. Ehrlich, Jr.
Governor

Kendl P. Philbrick
Acting Secretary

Michael S. Steele
Lt. Governor

DATE: February 23, 2004
TO: State Licensed Private Inspectors
FROM: Roland G. Fletcher, Manager III, Radiological Health Program (RHP)
SUBJECT: Information and Regulatory Interpretation Memos (IRI) 04-00 February 2004

Meeting Location at Maryland Department of the Environment (MDE)

The next meeting of the licensed private inspectors will be held on March 23, 2004 at 10:00 a.m. in the Terra Conference Room on the 1st 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 three positions effective January 16, 2004:

Ms. Renee Fizer – Chief, Radiation Machines Division (RMD)

Mr. Ray Manley – Chief, Radioactive Materials Division (RAM)

Ms. Eva Nair – Section Head of Registration and Certification, Radiation Machines Division

The RHP is currently internally filling Section Head positions for both the Inspector Section in the Radiation Machines Division and the Licensing Section in Radioactive Materials Division.

Website Update

The RMD has updated the Maryland Department of the Environment's Radiological Health Program website. The website now contains most of the State certification forms, including RX1, RX3, RX4, RX5, RX6, RX7, RX8, RX10, RX11a, RX14, RX21, and RX22. The MDE RX-2, Inspection Summary Form and Notice of Violation, is currently under revision for printing to include current MDE location information and will also be posted on the website when done. Let Ms. Eva Nair know if there have been any changes to the inspector list that is posted on the website.



Private License Inspector Renewal

Please ensure that your inspector license is current and all information is updated. The RHP cancels licenses not renewed in a timely manner. State certifications performed without a license are not reviewed.

Interpretation of COMAR 26.12.01.01I.11(e)

COMAR 26.12.01.01I.11(e) states that all area monitors in a cancer center shall be calibrated at intervals not to exceed 1 year and after each servicing and repair. In response to questions regarding “calibrated,” the definition of calibration means the process of comparing an instrument’s output signal with a standard. The area monitor in the vault detects radiation at all times and not only when the accelerator is energized. Therefore, area monitors should be calibrated to ensure that they alarm at the limits (threshold) by using a check source. If you are using another method, please let us know the type of method.

Draft Fluoroscopic Regulations

The RHP is still soliciting comments from all fluoroscopic stakeholders with regards to the draft regulations for the in-house privileging of fluoroscopic radiation machine users. Open meetings for stakeholder comment are scheduled here at MDE for April 6, 2004 from 1 pm until 3 pm and July 13, 2004 from 10 am to 12 pm. Attached is the most recent draft regulations for the in-house privileging of fluoroscopic users. In addition, the RHP is revising Section F.5 of COMAR 26.12.01.01. Promulgation of the new Section F.5 is anticipated to occur simultaneously. For more information, please contact Ms. Renee Fizer.

Regulations

Supplement 8 and Supplement 9 to COMAR 26.12.01.01 are posted on the website for downloading unofficial copies. Information for purchasing official copies of these supplements through the Department of State Documents is also available on the website, www.mde.state.md.us.

Supplement 10 of COMAR 26.12.01.01 is scheduled to become effective by mid-April 2004 and posted on the website. This includes changes to COMAR 26.12.01.01 Section A and B, which describes the responsibility of the regulated community for registering a radiation machine facility or service provider, renewing a facility’s registration, and making changes to an existing facility registration. The regulated community will be informed of the changes via a letter mailed with their annual invoice.

A rewrite of COMAR 26.12.02 “Inspection and Certification of Radiation Machines” is scheduled to become effective by mid-April 2004 and posted on the website. Among minor updates, this outlines the procedure for evaluating a private inspector application and issuing conditions on new and renewal licenses. In addition, it also addresses Agency evaluation of applicants’ credentials to perform mammography facility medical physics support services.

Changes to COMAR 26.12.03 “Radiation Control Fund” will also become effective by mid-April 2004 and posted on the website. This incorporates a new fee structure for dental facilities that was included in House Bill 466 passed by the General Assembly in 2002.

Supplement 11 to COMAR 26.12.01.01 is proposed to become in effect in December 2004 which includes five radioactive material changes: clarification of contamination limits for leak testing industrial radiography exposure devices; minor corrections and clarifying changes in Sections D, E, and W; minor changes for transferring for disposal and manifests; respiratory protection and controls to restrict internal exposure; and energy compensation sources for well logging and other regulatory clarifications in Section W.

Kvp and Timer Accuracy Project

The RMD has worked closely with the registered service providers to obtain kVp and timer accuracy manufacturer specifications for certified medical radiation machines, including dental. It is necessary to know manufactures specifications for kVp and timer accuracy in order to State certify the machines. The RMD is compiling all the information to make it available. For further information, please contact Ms. Eva Nair.

Mammography Outreach

Beginning January 2004, Mr. Yun Chong, an MQSA-certified inspector and Health Physicist III Advanced, is offering outreach services to Maryland mammography facilities. He provides a 15-20 minute interactive presentation on imaging evaluation which includes discussion on the weekly scoring of the phantom image. One observation at this early point has been that some facilities are not evaluating their phantom image properly. Feedback received up to this point from the regulated community has been positive.

Mid Atlantic States Radiation Program Meeting

The RHP will be hosting the 2004 meeting of the regional state radiation control programs. The date and location will be announced at a later date. Current preliminary agendas include a day of training for mammography continuing education credits. If you are interested in attending or presenting at this meeting, please call Ms. Renee Fizer for more details.

Attachments (1): Draft regulations for in-house privileging of fluoroscopic users