

X-ray Advisory Committee Meeting

MEETING MINUTES

Date: April 23, 2018

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

Attendees: Beth Schueler (Medical Physicist), Brian Hall (Service Provider), Dan Lind (Service Provider), Frank Zink (Medical Physicist), Julie Sabo (MN Nursing Board), Richard Giese (Medical Physicist/PhD), Ronnell Hanson (MN Radiological Society), Tony Murphy (Medical Physicist), Vinton Albers (Chiropractic Association).

Guest: Sergeant Jeff Keller (St. Paul Bomb Squad).

Absent: Bridgett Anderson (MN Dental Board), Jon Wohlhuter (MN Association of Nurse Anesthetists), Louis Saeger (MN Medical Association), Michael Lewandowski (Health Physicist/CHP), William Duppler (Medical Physicist).

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

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

Purrington welcomed the Advisory Committee. Service Provider Focus Group will start May 1, 2018, and MDH anticipates two meetings to cover the material. The schedule for committee meetings for the year are as follows: July and August, the committee will discuss the service provider rules; September, the committee will discuss fluoroscopy rules; and the remainder of the year committee will meet to finalize the rules. No more focus group meetings are scheduled. Jacquie Cavanagh is not facilitating the meeting today. Bevin Beaver is facilitating in her absence.

Review of Suspected Hazards Rule Draft

Teresa Purrington, X-ray Program Supervisor
Bevin Beaver, X-ray Unit Inspector

Frank Zink (Advisory Committee Group – ACG) asked for clarification on the system referred to in this rule part. Sergeant Jeff Keller (St. Paul Bomb Squad) stated that this is the device the bomb squad uses (XR 300) and most of what is in the rule is in the manufacturer specifications. Craig Verke (MDH) stated that most of the bomb squad's devices are similar to Industrial Radiography equipment and are not regulated by FDA, and do have ANSI standards. Purrington stated because the nature of the bomb squad work, they needed separate rules.

Subp. 10(B). Safety procedures.

Richard Giese (ACG) questioned the definition of "accident". Purrington stated MDH will revise this to "radiation accident". Julie Sabo stated that subpart 10(B), item 5 should also be revised/clarified. Tony Murphy (ACG) stated that the word "accident" is not appropriate, and suggested changing to "malfunction of the device".

Subp. 12. Additional requirements for a handheld x-ray system for suspected hazards for training purposes.

Purrington stated this provision takes into consideration hand-held equipment that is currently available and may be used in the future for suspected hazard testing. Zink questioned the wording "solely in training capacity", and suggested omitting the word "solely". Giese questioned "lead aprons" in this part. Sergeant Keller stated they do not use lead aprons. Giese also questioned item D and stated training rules for this device should be similar to other industrial equipment. Purrington stated all registrants will have training requirements and will be placed at the beginning of the rule. The training requirements have not been reviewed. Zink questioned why MDH needs subpart 12 if this will be discussed in a training rule part. Purrington stated she will consider the comment, but would like to keep this part in as a placeholder for training. Verke stated that the word training is confusing here, because it's not training on the equipment, but the bomb squad's training. Hanson suggested changing the wording to "practice scenarios" instead of training. Sergeant Keller suggested "suspected hazards in a training environment". Julie Sabo (ACG) suggested the wording "training

simulation”. Vinton Albers (ACG) asked why MDH has this section pulled out when there is a non-medical hand-held device rule part. Murphy stated that it does not make sense to exempt anyone from the rules, regardless of the hazards involved. Purrington asked Sergeant Keller to explain bomb detection training they receive from the Federal Bureau of Investigation. He stated they have specific training on using the device, and it is in plain language for anyone to understand. Purrington stated this is consistent with what other states have in place. Purrington displayed California’s rules on the internet to illustrate bomb detection exemptions. Zink suggested including wording regarding their certification as a bomb technician by the Federal Bureau of Investigation. Purrington agreed with Zink, and stated MDH will revise the Applicability part to incorporate that suggestion.

Zink stated that “suspected hazards” is not defined in this part or in the definitions part. He questioned whether subpart 1 is an adequate definition. Sergeant Keller stated that this is left vague because the suspected hazard could be anything. Zink stated the wording suspected hazards should be defined.

Review of Non-Medical Hand-Held Rule Draft

Teresa Purrington, X-ray Program Supervisor

Bevin Beaver, X-ray Unit Inspector

Subp. 3. Warning lights and devices.

Purrington asked the committee about A(1) and whether it should be consistent with industrial radiography wording for this part. Zink stated that either wording is fine. Giese stated that there are medical hand-held devices, suggested MDH look at the FDA language for those devices. Purrington stated MDH would look at the medical language. Purrington stated that some hand-held devices could be on a stand. Zink stated that if there is a blue tooth device, the operator should know it is on with the remote as well.

Subp. 7. Area survey.

Murphy asked how area is defined with hand-held devices, and wondered if it includes every area where the device is used. Purrington stated MDH would research that.

Hanson questioned “daily visual and operability checks” with a hand-held device in this rule draft to verify performed on days of use only. Zink also questioned how they would perform a survey on this type of device. Purrington stated that this perspective is helpful/insightful, as this was not an issue with focus group. She stated that MDH would consider these comments. Verke stated there could be defined areas where they use the device. Zink stated that the wording does not indicate if this has to be done before every exposure. Dan Lind (ACG) stated that the survey should include looking at the traffic around the device, and stated that doing a survey each time the device is used is not practical. Verke stated we would review the language in the industrial radiography rules.

Subp. 9. Temporary job site.

Murphy stated this is a good area to include Verke's suggestion of industrial radiography rules in subpart 7.

Subp. 12. Operator protection.

Giese stated that an operator is an individual, seems repetitive. Beth Schueler (MDH) stated that there could be an individual other than the operator involved. Murphy question item D and the 6 feet rule. Hanson suggested wording this subpart as 6 feet or internal safety procedures. Purrington stated the differences of exposure would be reviewed. Zink questioned item F. Bevin Beaver (MDH) stated this is taking into consideration those devices with no backscatter shield. Giese stated this should be clarified. Purrington stated MDH would review this, and that item G will be looked at, as it does not include the exemption of item F.

Review of Gauging X-ray Systems Rule Draft

Jacquie Cavanagh, Section Policy and Rules Analyst

Teresa Purrington, X-ray Unit Supervisor

Zink questioned the definition of a gauging x-ray system. Purrington stated that MDH is concerned about adding all the uses of the equipment to the definition or applicability. Purrington stated she does not want this rule part to limit future technologies. Giese stated he would like to look at an image of the system. Beaver displayed an image of the system from the internet, and Verke described how the equipment is used. Purrington stated it is not portable but a fixed system, and MDH may consider defining fixed or temporary for each equipment type in the rule. Giese suggested defining the use of a gauging x-ray system. Zink stated that the proposed language describes a fixed system, but our definition does not take that into consideration. Purrington stated that rather than including the uses in rule, MDH would develop guidance documents to address equipment use.

Subp. 6. Safety device evaluation.

Hanson asked who performs the safety device evaluation if not the registrant. Zink stated Regions has their own staff or a consultant. Beaver stated MDH would review the registrant wording.

Subp. 9. Area survey.

Zink questioned item B, and if area surveys really happen. Purrington stated this is the case.

Subp. 10. Safety procedures.

Hanson questioned the "daily visual and operability checks" in this rule draft to verify performed on days of use only.

Purrington stated that 3M and Medtronic invited MDH to an onsite visit and that it was helpful to review these drafts with the Industrial Focus Group. She asked the advisory committee to provide any additional comments.

Public Comments

- Kelly Daigle: Questioned suspected hazards and training. She stated that subparts 10 and 12 could be combined. She also asked what research has been conducted by MDH and what feedback MDH has received from other states. Beaver stated MDH has looked at several other regulations, and spoken to some states. Purrington stated that North Carolina recently adopted new rules. North Carolina's program has been a good resource for MDH.
- Kelly Daigle: Would like to see clearer definitions since the rules can be confusing. Also agrees there should be guidance documents.
- Kelly Daigle: Asked where a fluoroscopic hand-held device would be regulated under the rules. Purrington stated that would be in the hand-held x-ray system rule part as of now.
- Linda Laman: Questioned gauging x-ray systems, subpart 10. Using the word may is confusing. Purrington stated she would consult with Jacquie Cavanagh.

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