Current State Regulatory Issues for Medical Physicists Part 1
Debbie Gilley, Liaison to AAPM Conference of Radiation Control Program Directors
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CRCPD Mission
To “promote consistency” in addressing and resolving radiation protection issues

CRCPD Organization Chart

Membership
- Board of Directors
  - RPAC
  - Healing Arts
  - General
  - Environmental
  - Homeland Security
- Suggested State Regulations
- OED

Objectives
- Update AAPM membership on the CRCPD issues concerning security requirements for category 1 and 2 sources
- Update AAPM membership on status of suggested state regulations
  - Use of Radionuclides in the Healing Arts
  - Therapeutic Radiation Machines
  - Security of Radioactive Materials
- Questions
Security Inspections

- Impacts 36 Agreement States
- 80 percent of licensees in Agreement States
- IAEA Category 1 and 2 sources
  - Blood Irradiators
  - Gamma Stereotactic Radiosurgery Units
  - Research Irradiators

Security of Sources

- Increased Control and Security Regulatory Requirements
  - Implementation
  - Completion of Inspections
  - Increased Inspection Frequencies
  - Annual Inspections
- Federal Assistance is Available
  - National Nuclear Security Administration (NNSA) Irradiation Enhancements
  - NNSA Security Assessments and Upgrades
  - NNSA Off-Site Source Recovery Program
  - Federal Bureau of Investigation (FBI) performing site visits

Fingerprinting

- IAEA Category 1 and 2 licensed sources
- Required for those who have authorized access to material
- Verification during the inspection process
- Documentation of compliance with fingerprinting
- Security of Records
- New inspection procedures for verification of compliance

National Source Tracking System

- Impacts all category 1 and 2 sources
- System improvements in process
- NRC available to help with credentialing process
- Licensees will be expected to be compliant
  - Have documentation
  - State will verify compliance and inventory accuracy
- Encourage electronic participation in tracking
Suggested State Regulations
The Complex Version

Start
- Compiled Needs

Development by Committee
- Part by Part

OCD
- Task Review & Formatting
- Document Design

Peer Review

Comments
- Federal Review

NO

Part, rationale, remaining comments

CRCPD Board Review

Adopted

Federal Review

Board

Comments

OED
- Tech Review
& Formatting

Document Ready?

Published

Revised

Document

Close out Report

Regulations
Important Facts

- Nuclear Regulatory Commission Agreement State Compatibility Requirements
  - Compatibility A Identical to NRC regulations
    - Public dose limits
  - Compatibility B essentially equivalent to NRC
    - Training and education of authorized users, authorized medical physicists, radiation safety officer, etc.

More Facts

- Compatibility C at least equivalent to NRC, but can be more restrictive
  - Dose calibrator requirements
  - Record keeping
- Compatibility D not required for agreement state adoptions
- Health and Safety not required for compatibility
  - Safety checks
Suggested State Regulations
Part V
Security or Radioactive Materials

- Compatibility B
- Many states required by law to adopt SSRs
- Completes the SSRs
- Codification of state orders and license conditions

Suggested State Regulations
Part G
Use of Radionuclides in the Healing Arts

- Current focus, adopt new language for Part G to be compatible with NRC
- Training and Education for Medical Physicists
- Added references to positron emission tomography isotopes
- Allows multiple RSOs (AAPM/CRCPD initiative)

Suggested State Regulations
Part G
Use of Radionuclides in the Healing Arts

- Separated out safety precautions for remote afterloader units and gamma stereotactic radio surgery units
- Regulations to allow for Perfexion units (helmets)
- Regulations that allow for electronic detection of entry into the room during HDR treatments
- Removed reference to radiation professionals credentials moved to SSR Z

Suggested State Regulations
Part G
Use of Radionuclides in the Healing Arts

Timeline and Review Process
- Currently being formatted to send out for peer review
- Board review
- AAPM, ACR and ASTRO (RPAC)
- Comments will reviewed
- Board approved
- Send to federal partners for concurrency
Suggested State Regulations

Part X

Therapeutic Radiation Machines

Electronic Brachytherapy
- Coordinated effort with AAPM, ASTRO and state regulators
- Went through the same process as described in adoption of suggested state regulations
- On our web site: www.CRCPD.org

Suggested State Regulations

Part X

Therapeutic Radiation Machines

- Electronic Brachytherapy
  - Definitions
  - Facility Design
  - Electrical Safety
  - Qualified Medical Physicist
  - Training and Education
  - Operating Procedures

Suggested State Regulations

Cooperative effort with federal partners and stakeholders
- Actively engaged with professionals with knowledge, skills and abilities with the applications
- Consensus building early in the process
- No regulatory procedure required for development of regulations