

**DRAFT Minutes of the Radiation Protection Advisory Committee (RPAC) Meeting
Room 105
Rachel Carson State Office Building, Harrisburg, PA
October 16, 2014**

Call to order – 9:05 a.m.

Members in Attendance:

John Keklak	Joseph Och
Margaret Blackwood	Paul Houle
Tiffany Whitcomb	Kent Lambert
Anthony Montagnese	Shawn McNeely
Michael Sheetz	John Pammer
Vincent Roding	Eric Boeldt
Jean Gresick-Schugsta	Michele Tate

Members Absent:

Douglas Eggli	William Thorne
Charles Chambers	Peter Smith
Charles Stoup	Janice Wirth
Richard Purse	

DEP Staff in Attendance:

David Allard	Sharon Trostle
Joseph Melnic	Laura Henry
Robert Lewis	Kristina Hoffman
Terry Derstine	Dyran Altenburg
Robert Zaccano	Denise Bleiler
Dwight Shearer	John Winston
Ben Seiber	Jennifer Noll
John Chipppo	Christopher Heckert
Keith Salador	Joseph Koshy

Members of the General Public in Attendance:

Karen Colucci	Kendall Berry
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Introduction of Members and Staff:

Mr. Allard welcomed everyone and noted our newest member, Dr. Tiffany Whitcomb, DVM, representing veterinarians. Also introduced was Mr. Keith Salador as the new Bureau Counsel.

Adoption of Agenda:

Today's agenda was approved unanimously.

Approval of Minutes:

Meeting minutes from June 12, 2014, were approved unanimously.

Open Floor:

An additional meeting tentatively set for December 11, 2014, was confirmed.

The 2015 meeting dates were confirmed for April 2, June 4, and September 24, 2015.

Radiation Protection Program Update:

Nuclear Safety

The nuclear power plants hostile action-based (HAB) exercises are continuing. Next week is the Susquehanna Steam Electric Station exercise.

The Low-Level Radioactive Waste Advisory Committee meeting was held last week.

Decommissioning/Environmental Surveillance

- Safety Light buildings are planned for demolition this year.
- Other cleanup sites continue to be monitored.

Radon

Work continues on revising the regulations.

TENORM Study

The draft final report is being written and soon to be released for peer review. The report should be out before the end of the year.

Radiation Control

The Department continues to reach out to the Department of Health regarding a position relating to low-dose lung cancer screening. Currently facilities offering this screening do so with a physician's script, which then falls outside *healing arts screening*. Concerns whether low-dose CT will give a definitive diagnosis are also being debated.

The Bureau concurs with the Image Gently campaign, which raises awareness about methods to reduce radiation dose during pediatric medical imaging exams. The movement has expanded into Image Wisely, primarily to address adults. Now Image Gently has expanded even more by releasing information for the dental industry.

<http://www.imagegently.org/WhatcanIloasa/Parent/Dentist.aspx#35741068-dental-procedures>

Committee members expressed a concern that some individuals will forego an appropriate and necessary scan out of fear of radiation, regardless that a dental dose gives negligible exposure.

The Department will be presenting to the Environmental Quality Board next week the proposed security rule, which will incorporate Part 37 by reference. In preparation for this regulatory change the bureau hosted three information workshops throughout the Commonwealth. A number of presentations were offered, including the following:

- A comparison of the Increased Control (IC) Orders and the new Part 37 regulations;
- NRC lessons learned from their licensees who are required to abide by the regulation;
- Security enhancements from the National Nuclear Security Agency; and
- A discussion with the FBI and other local law enforcement agencies.

The Department is recommending that all IC licensees begin implementing the regulations now.

Licensees who are compliant with the regulations now will automatically be compliant with the orders. Title changes, such as T & R Official becoming Reviewing Official, would not result in non-compliance.

Regulatory Revisions

Fee Revision Request

The bureau recently submitted to the Environmental Quality Board (EQB) an analysis of our fee schedule and concluded that an increase in certain areas is required. The Nuclear Safety Division has proposed an increase that is currently in the legislature. RAM and Radon fees need to be increased. The bureau is proposing a 50% increase to the current fee schedule and a new remediation fee of \$50. Members suggested that fees should be based on workload. For example, a broad scope license requires little oversight by BRP licensing staff because all conditions are the responsibility of the facility's Radiation Safety Committee. Some committee members stated that these types of fees should be decreased rather than increased. Bureau staff noted that fee increases are necessary to continue to operate the program and, compared to current NRC fees, Pennsylvania's fees are substantially lower.

RPAC supported moving the fee revision package forward to the EQB, but wants to ensure their concerns are documented and will be considered before the proposal is finalized. Sharon Trostle encouraged the committee to include their specific concerns in the RPAC's position letter to DEP, which will accompany the regulatory package to the EQB. She also suggested that interested RPAC members submit comments to the EQB either individually or on behalf of their respective appointing organization during the public comment period. Eric Boeldt moved to support the proposal, and it was seconded by Jean Gresick-Schugsta. All members approved; no members were opposed.

Radiological Health Revisions

Chapter 240 - Radon Summary:

Dr. Paul Houle informed the committee that all comments received were addressed and final revisions made to the chapter. He recommended approval of Chapter 240. This chapter will remain with the entire Radiological Health revisions as they move forward to the EQB.

Chapters 215-219 - The following sections were discussed and comments were offered:

- Section 219.3 definition relating to medical reportable events for radiation-producing diagnostic or interventional machines:
 - The committee recommended revising "interventional machines" to "interventional X-ray procedures."
 - In subparagraph (i), the committee recommended using 5 Gy, not 2 Gy, for peak skin dose limit because it is difficult and unnecessary to determine a low peak skin dose of 2 Gy.
 - Subparagraph (ii) should be deleted or, at a minimum, "effective dose" should be deleted.
 - Subparagraph (iii) – "effective dose" should be deleted.

- Section 219.3 definition for “medical reportable event for radiation-producing machine therapy”:
 - In subparagraph (i), the committee recommended revising “wrong treatment modality or plan...” to “using a treatment delivery intended for another patient.”
- Section 219.229 – Revise “interventional radiation” to “interventional procedure.”

Chapter 221 – The following revisions were suggested:

- Section 221.2 relating to definitions – delete “universal dose index” from the alert value definition.
- Section 221.2 relating to definitions – delete “consensus” from the diagnostic reference level definition.
- Section 221.2 relating to definitions – delete “intraoperative” from the electronic brachytherapy definition.
- Section 221.2 relating to definitions – use NCRP’s definition for kerma.
- Section 221.2 relating to definitions – Qualified medical physicist should be expanded from the current AAPM definition.
- Section 221.11(b)(1) – include registration along with certification.

Other Business:

Mr. Sheetz provided a PowerPoint presentation addressing Radioactive Seed Localization (RSL). The Department uses NRC licensing guidance to approve an Authorized User for this procedure; however, NRC is now allowing partial approvals, that is, a radiologist may be approved for implanting seeds without the opportunity to explant seeds, which is a surgical procedure.

The issue regarding personnel monitoring was also discussed. The Department reiterated its position that, at a minimum, all monitoring issues should be addressed by the radiation safety committee. Discussion ensued regarding whether a regulatory provision is needed to have an individual legally responsible for sharing monitoring results with all facilities offering employment. This proposal is ongoing.

The members asked again for an explanation of the regulatory process. A few hardcopy handouts of the “Citizen’s Guide to DEP Regulations” were provided. Attached is a link to the guide: <http://www.elibrary.dep.state.pa.us/dsweb/Get/Document-97341/Citizens%20Guide%20combined.pdf>

The next RPAC meeting is scheduled for December 11, 2014.

Adjournment – 3:09 p.m.