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Kathy Cooper

From: ecomment@pa.gov
Sent: Wednesday, June 21, 2017 1:49 PM
To: Environment-Committee@pasenate.com; IIRC; eregop@pahousegop.com; environmentalcommittee@pahouse.net; gvitali@pahouse.net; regcomments@pa.gov; apankake@pasen.gov
Cc: ra-epmsdevelopment@pa.gov
Subject: Comment received - Proposed Rulemaking: Radiological Health

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Re: eComment System

The Department of Environmental Protection has received the following comments on Proposed Rulemaking: Radiological Health.

Commenter Information:

John Keklak
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Comments entered:

1. Re § 219.3. Definitions. "Medical reportable event for radiation-producing diagnostic or interventional X-ray procedures ". Subsection (iii) currently reads "(iii) A dose to the wrong patient or wrong site for the entire procedure and exceeding 0.5 Gy (50 rad) to any organ." As worded, a 'wrong patient' dose would have to be delivered over an entire procedure AND exceed 0.5 Gy to an organ in order to meet the criteria. I do not believe the intent was to necessitate that a wrong patient dose would have to be delivered over the entire procedure. Also, the dose criteria would seem to make the phrase "over an entire procedure" unnecessary. I suggest the following wording (in its entirety): "A dose to the wrong patient or unintended site and exceeding 0.5 Gy (50 rad) to any organ." (At the very least, a comma should follow "patient" and a second comma should follow "procedure".)
2. Re § 219.229. "Other medical reports". Subsection "(b)" reads: "Upon discovery of a medical event, the registrant or licensee shall:...". I believe that the word "reportable" needs to be inserted between "medical" and "event", since "medical event" is not defined relevant to the type of event intended to be reported.
3. Re § 221.35a. "Fluoroscopic X-ray systems." Subsection (b)(4) allows for operation of a fluoroscopic system by "A medical resident, radiologist assistant or radiologic technology student in training who is under the personal supervision of a licensed practitioner working within his scope of practice." I believe that this provision for individuals in clinical training needs to be made applicable to individuals in clinical training for any modality (CT, general radiography, etc.) and should therefore be moved to a location within the regulations that applies to all, or should be added individually to each appropriate section of the regulations.