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June 26, 2017

Environmental Quality Board  
Pennsylvania Department of Environmental Protection  
PO Box 8477  
Harrisburg, PA 17105-8477

Re: Comments on Proposed Rulemaking: Radiological Health  
25 PA Code Chapter 223, May 13, 2017

Avid Radiopharmaceuticals appreciates the opportunity to comment on the 25 PA. Code Chapter 223 proposed rulemaking published on May 13, 2017.

The proposed change to Chapter 223.1 Purpose and Scope, adds "research on animals" to the Veterinary Medicine section. We agree with this clarification to the rules and would like to comment on what we hope was an unintended consequence of this change. We currently use a Siemens Inveon Multimodal PET/CT unit in our facility that is under registration with the PA DEP. This PET/CT unit is manufactured as a cabinet x-ray system and is located and used in a room not dedicated entirely to the use of the PET/CT unit. Since this unit is used for research and would now be subject to the rule, per section 223.31(d), we would be required to have any personnel not directly associated with use of the x-ray to vacate the room during use of the x-ray. We have conducted exposure measurements around the cabinet x-ray unit and currently allow personnel not directly associated with the use of the PET/CT to be in the room during x-ray use without using any additional personnel shielding. Access to the room is already restricted based on the use of unsealed sources of radioactive materials in the room.

We propose that 223.31(d) be revised as follows to allow other personnel to be in the room if the x-ray is a cabinet x-ray or enclosed x-ray system and that 223.31(d)(3) would not apply to use of such cabinet or enclosed x-ray systems.

(d) Only the staff, ancillary facility personnel or other persons required for the medical procedure or training may be in the room during the radiographic exposure, **unless the radiographic equipment is a cabinet or enclosed x-ray system**. All of the following requirement apply to persons involved in the examination:

...

3) **Unless the radiographic equipment is a cabinet or enclosed x-ray system**, each person shall be protected ...

If you need further information please contact Stan Hampton, Corporate Radiation Safety Officer, Eli Lilly and Company, 317-276-7862 or [shampton@lilly.com](mailto:shampton@lilly.com).

**Nathaniel Lim, Ph.D.**

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