

3169

**Kathy Cooper**

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**From:** ecomment@pa.gov  
**Sent:** Monday, June 26, 2017 4:19 PM  
**To:** Environment-Committee@pasenate.com; IRRRC; eregop@pahousegop.com; environmentalcommittee@pahouse.net; regcomments@pa.gov; apankake@pasen.gov  
**Cc:** ra-epmsdevelopment@pa.gov  
**Subject:** Comment received - Proposed Rulemaking: Radiological Health



**Re: eComment System**

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

Commenter Information:

Xiaoqian (Carol) Wen, M.S., CHP  
Christiana Care Health System ([Xiaoqian.Wen@ChristianaCare.org](mailto:Xiaoqian.Wen@ChristianaCare.org))  
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Comments entered:

To whom it may concern,

We would like to submit two comments regarding the proposed rule, specifically Chapter 219.3 and Chapter 228.36.

In Chapter 219.3, you have proposed to change the definitions of medical report event " (i) An administration of a therapeutic radiation dose to the wrong individual, wrong treatment site or using a treatment delivery intended for another individual." We believe that the administration of a therapeutic radiation dose to the wrong individual and using a treatment delivery intended for another individual are the essentially the same thing. No treatment can be delivered without a treatment plan. If the treatment is delivered to the wrong individual, the treatment must be intended to a different individual.

In Chapter 228.36, the proposed rule states "An independent radiation monitoring system shall be provided so that the individuals entering or present in a potential very high radiation area become aware of the existence of the hazard. Independent radiation monitors shall be tested for response [at least annually] daily and after each servicing or repair." The daily testing of the Primalert is conducted as part of the morning QA when the beam is turned on. The Cs-137 check source is not utilized for the daily testing. Can you please confirm the current testing method (using the beam not the check source) satisfies the daily testing requirement?

Regards,

Carol Wen

Xiaoqian (Carol) Wen, M.S., CHP  
Radiation Safety Officer  
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No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,  
Jessica Shirley

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