



Stephen Hoffman

From: ecomment@pa.gov
Sent: Thursday, September 9, 2021 5:21 PM
To: Environment-Committee@pasenate.com; environmentalcommittee@pahouse.net; regcomments@pa.gov; Troutman, Nick; gking; lversen, Sarah A.; Emily.Eyster; IRRC
Cc: c-jflanaga@pa.gov
Subject: Comment received - Proposed Rulemaking: Radiation Safety Requirements for Non-Healing Arts Radiation Generating Devices (#7-555)

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Re: eComment System

The Department of Environmental Protection has received the following comments on Proposed Rulemaking: Radiation Safety Requirements for Non-Healing Arts Radiation Generating Devices (#7-555).

Commenter Information:

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Comments entered:

§ 227a.52. Radiation-producing devices used in individual security screening, paragraph 3 is confusing and should be rewritten consistent with ANSI N43.17-2009. More specifically:

1. For general use systems:
 - a. The reference effective dose from a single screening shall not exceed 25 microrem (0.25 uSv).
 - b. The reference effective dose received by an individual shall not exceed shall not exceed 25 mrem (250 uSv) in on year.
2. For limited use systems:
 - a. The reference effective dose from a single screening shall not exceed 1 mrem (10 uSv)
 - b. The reference effective dose received by an individual shall not exceed shall not exceed 25 mrem (250 uSv) in on year.
 - c. Documented procedures must be in place to ensure that not individual exceeds 25 mrem (250 uSv) in on year.
3. The statement in paragraph 3 "when equipment is capable of operation greater than 25 rem in a 12-month period at the facility". Appears to be an error. I can find no reference to this in either ANSI or the suggested state regulations.
4. Regarding the training requirements for RSOs in paragraph 4, I believe the 8 hour requirement is excessive. The RSO on these units do not perform surveys, dose calculations,

dosimetry, etc. In my experience, 4 hours of training is appropriate with emphasis on regulatory compliance and record keeping requirements. I suggest that RSO be required to take the 2 hour operator radiation safety class and in addition a 4 hour RSO class.

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,
Jessica Shirley

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