

Extensions for Certification Evaluation of Radiation Machines and Facilities Subject to 105 CMR 120 during the State of Emergency

Due to the State of Emergency, the Massachusetts Department of Public Health Radiation Control Program (RCP) is providing the extensions to certain regulatory requirements listed below. Facilities that utilize any of these extensions must document the action to file and establish a reasonable schedule showing the date by which the deferred requirements will be completed. RCP will review this documentation during the facility's next inspection.

Radiation machine and facility certification evaluations (105 CMR 120.400, Xrays in the Healing Arts)

Radiation machines and facilities requiring an initial certification evaluation within 90 days of use may defer this evaluation an additional 90 days. Please note the requirements of 120.403 A 2 a. and b. still remain in force and an evaluation of those machines prior to performing any human examination is still required.

Radiation machines and facilities that are due for a certification evaluation, as per 105 CMR 120.400. of the Regulations, during the months of April, May or June of 2020 may defer this evaluation an additional 3 months.

Surveys instruments used to show compliance with 105 CMR 120.200 and 120.500. ("Calibration of Survey Instruments" 105 CMR 120.533 (B)(2)(a.))

Surveys instruments used to show compliance with 105 CMR 120.200 and 120.500 due for calibration during the months of April, May or June of 2020 may defer this calibration an additional 3 months.

Sealed Source Leak Tests (105 CMR 120.223 (A)(2))

Leak tests for sealed sources under 120.223(A)(2) required to be conducted during the months of April, May or June of 2020 may defer compliance with these requirements an additional 3 months.

Sealed Source Possession Requirements (105 CMR 120.536(B)(2), ("Requirements for Possession of Sealed Sources and Brachytherapy Sources"))

Leak tests for sealed sources and Brachytherapy sources under 105 CMR 120.536(B)(2), required to be conducted during the months of April, May or June of 2020 may defer compliance with these requirements an additional 3 months.

Calibration of Radiation/Contamination Survey Equipment (105 CMR 120.225 (C), Surveys and Monitoring)

Radiation/contamination survey equipment that is due for a calibration per 105 CMR 120.225(C) during the months of April, May or June of 2020 may defer this evaluation an additional 3 months.

Radiation/Contamination Survey Frequency (105 CMR 120.225 (A), Surveys and Monitoring)

105 CMR 225 (A) does not specify a frequency for radiation/contamination surveys. However, in your License Application you may have committed to NUREG 1556 "Program-Specific Guidance About Medical Use Licenses." or a similar NUREG.

In the body of NUREG 1556 it states:

The radiation protection program that licensees are required to develop, document, and implement in accordance with 10 CFR 20.1101 must include provisions for area surveys. Surveys, as defined in 10 CFR 20.1003, are evaluations of radiological conditions and potential hazards. These evaluations, as required by 10 CFR 20.1501, may be measurements (e.g., radiation levels measured with survey instruments or results of wipe tests for contamination), calculations, or a combination of measurements and calculations.

Those facilities making extensions or eliminating surveys should document to file and establish a reasonable schedule showing the date by which the deferred surveys will be completed. RCP will review this documentation during the facility's next inspection.

Radiation Worker Training (105 CMR 120.750, Notice to Employees Standards for Protection Against Radiation; Notices, Instructions and Reports to Workers; Inspections)

The frequency of refresher training for radiation workers is not specified in 105 CMR 120.750. However, Licensees may have an annual commitment in their License Conditions. Training due in April, May or June 2020, may be deferred an additional 3 months. Please note, however, that such training can include communicating radiation program updates via email or providing a hard copy to individuals and posting the information in their work area.

Please feel free to contact the Radiation Control Program with any questions at 617-242-305 or via email at jack.priest@mass.gov.