

**MARYLAND RADIATION CONTROL ADVISORY BOARD
MINUTES**

November 1, 2022

**Maryland Department of the Environment (MDE)
Air and Radiation Administration
Radiological Health Program**

MEMBERS PRESENT

**Sean Austin, CHP (Chair)
David Bisson, CHP
Mahadevappa Mahesh, Ph.D.
Josephine M. Piccone, Ph.D.
Stewart Becker, Ph.D.
Malek Daneshvar, CHP
Thomas Beck, Ph.D.**

MEMBERS ABSENT

**Jeanette Linder, M.D.
Ms. Anita Doreen Smith
Gregory Smith, CHP
Mr. John S. Wojtowycz
David O'Neill, Ph.D.**

OTHERS PRESENT

Maryland Department of the Environment Staff/Radiological Health Program (RHP):

**Ms. Eva Nair, Manager, Radiological Health Program
Ms. Shannon Page, Radiological Health Program
Mr. Atnatiwos Meshesha, Radiological Health Program**

Ms. Kerry Lewis, Radiological Health Program, Recording Secretary

Meeting Convened

The November 2022 Radiation Control Advisory Board (RCAB) meeting was held virtually on Google Meets and was called to order at 02:03 p.m. by RCAB Chair, Sean Austin.

Introduction

The RCAB Chair completed roll call.

The minutes was approved then the first order of business and approval for last meetings minutes was approved by David Bisson and Tom Beck all in favor and minutes approved as drafted.

Regulation Discussions:

Supplement 32 Response to Comments

Shannon Page provided an update on COMAR 26.12.01.01 Supplement 32 to address the public comments. The following COMAR sections for Supplement 32 will be updated and reflected in Supplement 33.

Section F.8(d)(3) – Provision should be removed:

Maryland will adopt the CRCPD’s regulation for Part X and remove the statement in Section F.8(d)(3): “Notwithstanding the requirements of F.8(d)(i) and F.8(d)(ii), the registrant for any therapeutic radiation machine subject to F.8 may also submit the training of the prospective authorized provider physician for Agency review on a case-by-case basis.”

Section D.1201(a)(ii) – Phone number is incomplete:

The Department will update the omitted/incomplete phone number in the redline strikeout version.

Section D.1202(a)(iii) – Subsection language change for “other”:

The Department is required to adopt specific NRC RATS regulations, the language used must be the same. Section 20.2202 (d) (2) includes the word “other.”

Section D.1209 Proposed Language:

The Department recognizes that using the term “Agency” is consistent with other regulations and will update this section in Supplement 33.

Section D.1210 – Missing Miscellaneous edit:

the parentheses were missing in Section D.1210. The missing parentheses will be added to Section D.1210 in Supplement 33.

Section E.47 - Proposed Language:

While the proposed language in NRC regulation section 34.47 “Personnel Monitoring” and as part of the NRC RATS ID: 2020-1 is not the same as the proposed language in

Supplement 32, the use of “thirty (30) days” is acceptable as it is contained in a Category C regulation.

Section F.8:

Section F. 8, paragraph (ii) will be reworded in Supplement 33 as follows: “Facility design information including shielding specifications for a new installation of a therapeutic radiation machine or installation of a therapeutic radiation machine into a room not previously approved for a radiation machine of higher energy shall be submitted for Agency approval prior to installation of the therapeutic radiation machine.”

The Department will remove the reference to “simultaneous” in Supplement 33.

The Department will relocate this regulation as proposed in Supplement 33 because this regulation pertains to the design and construction of a facility and not Equipment. This section has been added to denote the required amount of shielding needed to protect the public and occupational workers from unnecessary exposure.

Section F.8(e)(2):

The Department will correct the typographical error for the word “receive” and reflect the correct spelling in Supplement 33.

Atnatiwos Meshesha provided the following responses to the questions posed by RCAB committee members during the RCAB committee meeting.

Decay-in-storage provisions - Parts D and G:

The state has no specific regulation that speaks to decay-in-storage but there are provisions that governs the disposal of radioactive waste. The NRC regulations are referred as a guideline to determine radioactive waste disposals. During application licensees are referenced to the NUREG (for example NUREG 1556, Vol. 9, Rev. 3) on decay-in-storage sample procedure which is easier to implement. It was suggested that regulations be updated to provide guidance to licensees on how long radioactive waste should be stored at a facility.

Limitations on storage of waste with half-lives greater than 90 days:

There are special conditions for a few Maryland licenses that are allowed to store waste for a short period of time, such as RAM waste cleaners. For the consideration of an extension, all manifests and past records are checked, and reviews are done on a case-by-case basis. The recommendation is that all waste should be removed and properly disposed of by authorized waste disposal facilities or authorized waste vendors.

Issuance of timely renewal letters/seven-month requirement to submit license renewal request:

The issuance of timely renewal letters is on a case-by case basis if the approval of a license will not be issued prior to the license expiring.

A reason that reviewing and approving licenses may take longer is due to recent 2021 IMPEP’s recommendations and qualification process, the adoption of the NRC’s

protection program applies to medical licensees upon request of amendments and renewals; qualification checks are undergoing to verify all medical authorized users, authorized medical physicists, and radiation safety officers meet the requirements and are up to date with their qualifications

Letters are also sent to remind licensees of their license expirations. There is an automatic reply via the newly created email system to acknowledge receipt of license applications. Efforts are undergoing to hire and qualify more licensing reviewers.

Submission of annual dose reports to individuals who receive less than 100 mrem in one year:

The objective of individual monitoring is to determine and assess doses to individuals and, ensure occupational radiation levels if overexposure or accidental exposure does not occur or exceeds the accepted safety limit.

A motion was made by David Bisson CHP and seconded by Thomas Beck Ph.D. to draft a letter to the Secretary of the Maryland Department of Environment for consideration to be given to remove the requirements for issuing written individual radiation exposures that are less than 100 mrem per year, as the required annual individual dose written reports can be cumbersome and costly to some licensees. The NRC and some other agreement state have regulations which only requires notification of annual doses to occupational workers (not necessarily in writing).

Adoption of Part X of CRCPD Suggested State Regulations

Proposed changes to COMAR's part F based on public comments received for Supplement 32 will be addressed in supplement 33. The department will also propose additional changes to COMAR's Part F based on changes made to Part X of CRCPD's suggested state regulations. These additional changes will be in proposed Supplement 33.

Old Business

There was an update of the staffing issues discussed in the previous meeting on April 28, 2022. RHP is still experiencing staffing issues and has since lost multiple staff. The program currently has 6 vacancies.

The board was asked what their preference was between virtual and live meetings. Most members did not oppose the live meetings but liked the idea of a virtual option.

Meeting Closed

The meeting was adjourned at 3:32 p.m.