



Oregon

Theodore R. Kulongoski, Governor

Department of Human Services
Public Health Division
Environmental Public Health
Radiation Protection Services
800 NE Oregon Street, Suite 640
Portland, OR 97232-2162
Voice 971-673-0490
FAX 971-673-0553
TTY 971-673-0372

MEMORANDUM

To: Interested Parties

From: Terry D. Lindsey, Manager
Radiation Protection Services

Re: Changes to Radiation Control Administrative Rules

Date: August 21, 2008



In response to comments received concerning the proposed changes to the Oregon Administrative Rules (OAR), the following revised language will be adopted to include the concerns that have been brought to our attention by the veterinary community and other members of the public:

OAR 333-106-0601

Veterinary Medicine Radiographic Installations Additional Requirements

(3) Operating Procedures:

(a) ~~The operator~~ All individuals shall stand well away from the useful beam and the animal during radiographic exposures;

(b) No individual ~~other than the operator~~ shall be in the X-ray room while exposures are being made unless such individual's assistance is required;

(c) When an animal must be held in position during radiography, mechanical supporting or restraining devices ~~should~~ shall be available and used as appropriate.

(d) If the animal must be held by an individual, that individual shall be protected with appropriate shielding devices, such as protective gloves and apron, and that individual shall be so positioned that no part of the body will be struck by the useful beam. The exposure of any individual used for this purpose shall be monitored with appropriate personnel monitoring devices.

These changes to the existing rules allow veterinarians to decide on a case-by-case basis whether animals need to be held during radiographic procedures. Testimony and comments received during the public comment period included the above recommended rule text changes agreed upon by a veterinary working group.

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We also received comments regarding training requirements for veterinary assistants (who do not operate X-ray equipment but sometimes assist in holding animals during radiographic procedures).

*Under the current and proposed division 106 rules, veterinary assistants are **not** required to have 20 hours of Radiation Use and Safety Training (to include restraining training). However, under the worker protection division 111 rules, they are required to receive appropriate radiation use and safety awareness training (and restraining training) commensurate with their potential worker exposure risk:*

333-111-0010

Instructions to Workers

All individuals working in or frequenting any portion of a restricted area:

(1) Shall be kept informed of the storage, transfer or use of sources of radiation in such portions of the restricted area;

(2) Shall be instructed in the health protection problems associated with exposure to radiation or radioactive material, in precautions or procedures to minimize exposure and in the purposes and functions of protective devices employed;

(3) Shall be instructed in, and instructed to observe, to the extent within the worker's control, the applicable provisions of these rules and licenses for the protection of personnel from exposures to radiation or radioactive material occurring in such areas;

(4) Shall be instructed of their responsibility to report promptly to the licensee or registrant any condition which may constitute, lead to or cause a violation of Agency rules and licenses or unnecessary exposure to radiation or radioactive material;

(5) Shall be instructed in the appropriate response to warnings made in the event of any unusual occurrence or malfunction that may involve exposure to radiation or radioactive material; and

(6) Shall be advised as to the radiation exposure reports which workers shall be furnished pursuant to OAR 333-111-0015.

(7) Refresher training shall be provided at intervals not to exceed three years covering the topics identified in OAR 333-111-0010.

NOTE: *The extent of these instructions shall be commensurate with potential radiological health protection problems in the restricted area.*

Radiation protection rules do not include any language or requirement for sedation of animals. Comments received regarding sedation of animals are addressed above with the allowance for veterinarians to decide on when to restrain animals during radiographic procedures.

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Thank you for taking the time to review and comment on these proposed rule changes. The OVMA and several veterinarians and veterinary technologists have also been very helpful in providing input to this rulemaking. We appreciate your concerns and comments to ensure consideration for animal safety and cost containment for the veterinary practices in Oregon. A complete copy of the Hearing Officer Report, including all of the comments received and the Public Health Division's responses, can be found at www.healthoregon.org/rps. or can be obtained by contacting Brittany Sande, Public Health Administrative Rules Coordinator, at 971-673-1291.