



Protecting, Maintaining and Improving
the Health of All Minnesotans



AUGUST 2009

**Radiation Control, X-ray Unit
Minnesota Department of Health
625 Robert Street North
PO Box 64975
St. Paul, Minnesota 55164-0975**

Phone: 651.201.4545

Fax: 651.201.4606

Website: www.health.state.mn.us/xray

Email: health.xray@state.mn.us

Fee Increase effective July 1, 2009

X-ray equipment fees have increased. For more information and to download updated registration forms, please visit our website. To review the full House Bill 1362, visit <http://www.house.leg.state.mn.us>, click on Bills Search and Status, enter 1362.

Converting from film to digital

Many facilities are converting from film-screen to digital. Minnesota Rule [4732.0700](#), subpart 3 states: "A calibration or equipment performance evaluation must be performed when there is any change or replacement of components that could cause a change in the radiation output of that system." Generally, going from film to digital will affect the radiation output. For example, in dental there is a 120 mR dose at the end of the cone restriction. A facility who has gone digital needs to:

- Ensure that whenever there is a change to the equipment, a calibration is done. This includes changing collimators, tubes and going digital.
- Notify us in writing when going digital. Once MDH has been notified, film/film records may be discarded.

Service Provider applications

Individual Service Providers that do installation, repairs, or equipment performance evaluations on x-ray equipment in Minnesota must be registered with MDH. A Service Provider application is the only acceptable form of registration, resumes alone will not be accepted. The initial application and renewal application are available on our website at www.health.state.mn.us/xray, Service Provider page.

Our website is a great resource!

Check out our website for all your radiation control questions about QC, Service Providers, X-ray Operators and more at www.health.state.mn.us/xray.

Late Fees

As part of the legislative fee increase, late registrations will be assessed a late fee of 25% of the total invoice. All facilities are given 30 days to send in registration fees before it's considered late. Knowledge of your annual due date will help your facility avoid late fees. If you would like to know what your facilities renewal date is, please give us a call.

Grandfathered-in x-ray operators

X-ray Operators who were certified through the MN Operators exam prior to January 1, 2008 need to provide proof of certification as part of MDH inspections. Certification should include the test providers name and signature. If certification cannot be found:

- Contact your test provider to request a copy
- If exam was provided through your school, contact the school to request a copy
- Contact a previous employer, they may still have it on file and can provide a copy



Chapter 4732 is available at the Minnesota Bookstore for \$13.95 plus shipping and tax . Call 651.297.3000 or 1.800.657.3757 or order online at www.comm.media.state.mn.us/bookstore/bookstore.asp

Human Volunteers: Prohibited

Whenever a facility gets a new piece of equipment, it is human nature to want to try it out. Exposing humans to ionizing radiation without a doctor's order is prohibited under [4732.0305](#) and has resulted in substantial penalties to facilities, as it is one of the most serious violations. Phantoms should be used. Humans can be used to simulate positioning, as long as they are not exposed to an actual x-ray.

Processor quality control for small facilities

Quality control on the processor for small facilities (less than 10 patient films per week) is to be done weekly. Some facilities have opted to do it whenever there is a patient. This is incorrect, as the chemicals need to circulate at least weekly. Seldom used processors run the risk of oxidized chemicals. A weekly check of the processor helps identify chemical problems, and ensure patient films develop without delay.

To receive bulletins by email, please submit your request to Kelly.Sabanjo@state.mn.us. For past bulletins, visit our website at www.health.state.mn.us/xray, click on Publications.

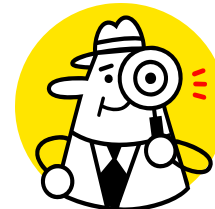


Radiation Safety Officer (RSO) training resources

RSOs are responsible for managing the radiation protection program, identifying radiation protection problems, initiating, recommending, or providing quality control tests and any corrective actions, verifying implementation of corrective actions, stopping unsafe activities and ensuring compliance with regulations. Training is not provided, but required by MDH, as indicated under [4732.0500](#):

- Minnesota Society of Radiologic Tech (MSRT), Maple Grove Medical Center, Jennifer Schmidt, Jennifer.Schmidt@presentation.edu
- Brian Hall, 612.751.5875
- Brett Muehlhauser (Industrial only), 763.463.5650, brettm@4ndtnsi.com
- Dianne Testa RDH, BS (Dental Only), 651.274.7972, diannetesta@comcast.net

Inspector's Corner



Shielding Plan Submittals

Rule Chapter [4732.0360](#) requires that "the registrant have a shielding plan complete for *new constructions or structural remodeling* of their radiation-producing equipment areas". The shielding plan must be submitted to the commissioner *prior to* any new construction or structural remodeling.

Exemptions from the shielding review:

- dental facilities with only intraoral capabilities;
- bone densitometry units;
- mammography units;
- podiatry units;
- if the replacement of a piece of radiation-producing equipment does not increase the risk of radiation beyond the dose limits in parts [4732.0400](#) to [4732.0430](#);
- self-shielded x-ray systems, such as cabinet x-ray units, x-ray diffraction or fluorescence units with interlocked shield barriers; and
- for a self-shielded accelerator, the applicant need not submit an evaluation of a shielding plan if an evaluation by an appropriate regulatory authority has been performed. The applicant must reference the evaluation and maintain a copy of the evaluated shielding plan for commissioner review.

Replacing an old machine with a new one (see above), or switching from film to digital imaging, does not require a shielding plan submittal to us.

Shared Processor

Occasionally, MDH will inspect at a facility that uses another facility's processor. How does the facility that does not own the processor know that processor quality control is being performed at the other facility? There should be a written arrangement between the two facilities regarding quality control responsibilities. The facility that uses (but does not own) the processor should check that the quality control procedures are being performed prior to running their films through. At the time of inspection, the non-processor facility should have the arrangement available for inspection and be able to tell the inspector how they ensure that quality control is being done.