Revised Informational Bulletin 2022-01

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To: Whole Body Imager X-ray Registrants

From: David M. Howe, Program Director
Radiation Protection Services

Subject: Whole Body Imager Operation and Annual Inspection Requirements

The Center for Health Protection, Radiation Protection Services (RPS) is releasing this revised informational bulletin to advise facilities who utilize Whole Body Imaging how to maintain compliance with current Oregon Administrative Rules (OAR's), specifically OAR 333-122-0380(1)&(9).

The use of Whole Body Imagers is relatively new in the State of Oregon. RPS has adopted rules to ensure these X-ray devices are used appropriately. Prior to their use, Whole Body Imagers must be registered with RPS, with payment of a device registration fee, and each X-ray operator must receive formal training, as provided by the manufacturer and according to the information provided in the operator's manual.

The safety of operators, as well as persons being imaged, is dependent upon facilities adhering to current OARs. RPS requires that all Whole Body Imagers meet standards outlined in ANSI/HPSN43.17-2009 Radiation Safety for Personnel Security Screening Systems Using X-ray or Gamma Radiation, according to OAR 333-122-0380(1).

The ANSI/HPSN43.17-2009 standard requires entities utilizing these devices to maintain proper record keeping. Records of individuals being screened must be kept, maintained, and made available for inspection to ensure that individuals being screened do not exceed 250 µSv (25 mrem) in a 12-month period. It is the facilities’ responsibility to ensure that their record keeping system, either by computer system or written logbook, meets this standard.

RPS conducts onsite inspections of these devices and completes a review to make sure that adequate record keeping is maintained per ANSI/HPSN43.17-2009. RPS would also like to clarify the requirement of OAR 333-122-0380(9) which pertains to annual inspections.

OAR 333-122-0380(9) states that the X-ray machine must be inspected annually by an Authority-approved qualified expert to ensure the radiation output meets the standards outlined in ANSI/HPSN43.17-2009.
The intent of this OAR is to ensure that the radiation output of the devices’ dose per screening (e.g., dose to the body of the person being imaged) meets the ANSI/HPSN43.17-2009 Standard.

Facilities may be having their Whole Body Imager inspected annually by the manufacturer. Most often, these radiation surveys only measure “scatter” or “leakage” radiation from the machine during operation. This type of survey will not meet the requirements of OAR 333-122-0380(9).

The annual inspection must specifically account for the dose per screening and ensure that the dose is within the limitations set forth by ANSI/HPSN43.17-2009. Facilities may need to find a third party approved health physics vendor to perform this type of annual inspection. RPS maintains a list of Oregon approved X-ray vendors that may be able to assist with this type of inspection.

If you need further clarification, or to view the current list of approved vendors, please feel free to contact Thomas Mynes, Radiation Protection Services, 503-890-5773 or email; thomas.e.mynes@dhsoha.state.or.us.