

Dear DHSR Officers,

I am writing to submit my comments on the proposed rules for 10A NCAC 15, in response to the NC DHHS-DHSR Memorandum, “Proposed Readoption/Amendment/Repeal of Radiation Protection Commission Rules 10A NCAC 15 .0601 - .0608, .0610-.061115 .0501, .0608-.0609, .0802-.0803, .0901-.0910, .1001, .1601, .1901-.1911, .2001-.2011.”, dated August 15, 2025.

My comments are submitted from my point of view as a board-certified radiation protection professional in North Carolina. They do not necessarily represent the views of my employer. Please see below.

#	Section	Comment
1	.0602	“Healing Arts Mass Screening” definition is removed. Many screening programs, such as screening mammography, provide significant public health benefits. Does the removal of this definition mean that every such x-ray use will require a specific physician order? This will likely add significant burdens on both the patient and healthcare provider communities across the state.
2	.0603	Is this section only applicable for human use? For example, there are X-ray imaging/CT scanners that are used in non-human research and security baggage check points that certain requirements in this section will not be practical or beneficial for.
3	.0603 (b)	“...The use of a mobile or portable radiation machine as the primary method for diagnostic imaging at a permanent location, instead of a stationary radiation machine, is prohibited.” This contradicts with the shielding requirements in .0606(e), where such use seems to be allowed.
4	.0603(i)	“The uses of Cone Beam CT, Veterinary CT, CT simulation, and attenuation correction shall be exempt from <u>Paragraphs (i) and (j)</u> of this Rule.” Should these be “...exempt from <u>Paragraphs (j) and (k)</u> ” instead?
5	.0603(j)(6)	“The dosimetry system shall have been calibrated within the preceding two years by persons <u>registered</u> in accordance with Section .0200 of this Chapter, to provide such services.” Should the wording be updated to “registered or licensed”, as dosimetry systems may often be calibrated by a qualified RAM licensee in and beyond the state.
6	.0604	Is this section only applicable for human use? For example, there are X-ray imaging/CT scanners that are used in non-human

		research and security baggage check points that certain requirements in this section will not be practical or beneficial for.
7	.0604(c)	“Individuals who operate a radiation machine shall meet the requirements for the modality of use in <u>Paragraphs (e),(f),(g),(h), or (i)</u> of this Rule no later than 36 months after the effective date of this Rule.” Should the underlined references be “... <u>Paragraphs (f),(g),(h), and (i)...</u> ” instead?
8	.0604 (d)	There is no formal definition of “end-of-life imaging”.
9	.0604 (d)	“Individuals who operate a radiation machine for research purposes or for end-of-life imaging are exempt from the requirements in <u>Paragraphs (e),(f),(g),(h), or (i)</u> of this Rule.” Should the underlined references be “... <u>Paragraphs (f),(g),(h), and (i)...</u> ” instead?
10	.0604 (e)	“The uses of Cone Beam CT, Veterinary CT, CT Simulation, and CT attenuation correction shall be exempt from the requirement in <u>Subparagraph (i)</u> of this Rule.” Should the underlined references be “... <u>Subparagraph (j)...</u> ” instead?
11	.0604(i)(2)(A)	Should the referenced “Paragraph (l)” be (m) instead?
12	.0604 (j)(2)	Should the referenced “Part (A)” be (1) instead?
13	.0604 (g)(3)	“shall be enrolled in a training program for radiography” Should the underlined text be “... <u>dentistry and oral surgery</u> ” instead considering the context?
14	.0604(k)(1)	“Individuals who operate a DEXA of DXA radiation machine...”. “Of” should be “or”.
15	.0605 (b)(1)	See comment#1 above. Healing arts mass screening typically does not require a specific physician order. In the absence of this recognition of this medical practice, this could add unnecessary burden to both the patient and provider communities.
16	.0605 (b)	The referenced “Rule .0103(b)(8)” does not exist.
17	.0605 (i)	Is this section only applicable for human use? For example, there are X-ray imaging/CT scanners that are used in non-human research and security baggage check points that certain requirements in this section will not be practical or beneficial for.
18	.0606(b)(1)	“Stationary radiation machine systems” include common interventional fluoroscopy systems, whose exposure switches are at table-side and on the foot pedal. Based on the requirements set in this paragraph, such systems would not be in compliance.
19	.0606 (b)(1)(A)	“behind a protected barrier <u>40 inches (1 meter)</u> from the edge of the control booth” Should the underlined text be “...at least 1 meter away”?
20	.0606 (b)(2)(A)	7 feet is 2.1 meters, instead of 2.3 meters.

21	.0607 (g)	The referenced “paragraph (c) of this Rule.” is a web address to FDA regulations. This may be a typo, otherwise this item is confusing.
----	-----------	---

Thank you for your time and consideration.

Yours sincerely,

Chu Wang PhD, DABMP, CHP

Radiation Safety Officer
Director, Radiation Safety Division, Occupational and Environmental Safety Office
Associate Faculty & Medical Health Physics Track Director, Medical Physics Graduate Program
Assistant Professor, Department of Radiology

Duke University
409 Elf Street, Durham, NC 27705
chu.wang@duke.edu
(919) 668-3187 – office | (919) 668-2783 – fax