

Dear Sir/Madam,

Thank you for working to establish a set of state regulations for medical accelerators. The new regulations are a great step forward to establish clear guidelines promoting safety for staff and patients.

I would like to propose an exception to the "Qualifications of Operators" rule, specifically 10A NCAC 15 .1903 (f) shown below, as it would pertain to electron linear accelerators used to treat patients intra-operatively. UNC Chapel Hill uses a Mobetron linear accelerator, with energies ranging from 6MeV - 12MeV, for our intraoperative radiation program that was established more than 20 years ago. This linear accelerator, and others like it, are relatively simple devices that can be operated by an Authorized Medical Physicist and would not benefit from including a radiation therapist who is traditionally trained on Varian/Elekta/CK/Tomotherapy linear accelerators. As the Radiation Safety Officer of the Department of Radiation Oncology at UNC Chapel Hill I am confident that an intraoperative medical accelerator can be safely operated by an AMP, as we have done for our 20+ year intraoperative radiation service.

Also, these intraoperative procedures happen at all hours of the day and night, on weekends, and during holidays, when radiation therapists are not readily available. We are struggling with a shortage of radiation therapists, as are many other institutions. Currently, we do not have the bandwidth to bring a radiation therapist to the OR without disrupting our regular clinical treatments.

Based on our 20+ years of practice and our current staffing limitations, we would be grateful if the committee were to consider an exception for electron linear accelerators used to treat patients intra-operatively in the OR.

Sincerely,
Michael V Lawrence

29 (f) Qualifications of Operators:

30 (1) Direct Human Use – Operators: Individuals who will be operating a therapeutic radiation machine
31 on humans or irradiation of products to be used by humans, shall:

32 (A) Be a registered Radiation Therapy Technologists by the American Registry of Radiologic
33 Technologists; or,

34 (B) Be American Registry of Radiologic Technologists registry-eligible as Radiation Therapy
35 Technologists provided the individual is under the personal supervision of an individual
36 that meets the requirements of Subparagraph (A) of this Paragraph; and,

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