

Dear Sir/Madam,

In regard to the new rules (see excerpt below), the Department of Radiation Oncology at UNC Chapel Hill would like to propose an exception for electron linear accelerators used to treat patients intra-operatively in the OR. These linear accelerators are relatively simple devices that can be operated by the physicist and does not need a radiation therapist who is traditionally trained on Varian/Elekta/CK/Tomotherapy linear accelerators. Moreover, these procedures happen at all hours of day and night, when radiation therapists are not readily available. We are struggling with a shortage of radiation therapists, as are many other institutions, so do not have the bandwidth to bring a radiation therapist to the OR without disrupting regular clinical treatments.

Consequently, 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.

Best regards

Shiva Das

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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