



State of Utah

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Department of
Environmental Quality

Alan Matheson
Executive Director

DIVISION OF WASTE MANAGEMENT
AND RADIATION CONTROL
Scott T. Anderson
Director

The Director of the Division of Waste Management and Radiation Control is seeking public comment on a request from Sensus Healthcare, the manufacture of the SRT-100, for an exemption from certain provisions of the Utah Administrative Code applicable to the use of external beam radiation devices by dermatologists in superficial radiation therapy for the treatment of nonmelanoma skin cancers. Sensus is requesting exemption from the following provisions of the Utah Administrative Code: R313-30-3(3) - Training for External Beam Radiation Therapy Authorized Users; R313-30-3(4) - Training for Radiation Therapy Physicist; R313-30-3(5) - Qualifications of Operators; and R313-30-3(6) - Written safety procedures and rules.

The basis for this request is that the current rules were written at a time when most radiation therapy machines in use were for treatment of tumors within the body whereas the Sensus machine is for superficial treatment of nonmelanoma skin cancers. Sensus believes that the training requirements place an undo cost burden on the dermatologist using the SRT-100 with no health benefit.

On September 9, 2016, the Waste Management and Radiation Control Board granted a 90-day exemption for use of the Sensus SRT-100 by a local dermatologist.

Prior to taking final action on the exemption request, the Board will consider public comment on the exemption request as well as public comment on the following proposed requirements that will be imposed on all users of the Sensus SRT-100 should the Board grant the exemption.

- Sensus shall conduct training of dermatologists to allow them to be the Authorized User of the SRT-100;
- Training shall be conducted using the training materials and duration described in the Sensus July 28, 2016 exemption request to the Director (DRC-2016-008950);
- Sensus shall document the training by forwarding a Certificate of Training to the Director for each person trained;
- Sensus shall notify the Director whenever a SRT-100 unit is sold in Utah
- Facilities using SRT-100 units will be responsible for having an annual survey of the unit done by a Utah Registered Qualified Expert (QE).

Public comment period will begin on September 28, 2016 and will end on October 28, 2016. The proposed exemption would be valid until the Board adopts rules covering the training requirements for units such as the Sensus SRT-100.

Written comments will be accepted if received by 5:00 p.m. on October 28, 2016 and should be submitted to:

Scott T. Anderson, Director
Division of Waste Management and Radiation Control
Department of Environmental Quality
P.O. Box 144880
Salt Lake City, Utah 84114-4880

Comments can be hand delivered and should be addressed to:

Scott T. Anderson, Director
Division of Waste Management and Radiation Control
Multi Agency State Office Building
195 North 1950 West, 2nd Floor
Salt Lake City, Utah 84116

Comments can also be sent by electronic mail to: dwmrcpublic@utah.gov. Comments sent in electronic format should be identified by putting the following in the subject line: public comment on Sensus Exemption. All documents included in comments should be submitted as ASCII (text) files or in pdf format.

The exemption request and documents provided by Sensus in support of the exemption request can be viewed by going to the following links.