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Complying with the Missouri Radiation Control Program 3/19/14

The following information describes new and existing procedures that must be followed by facilities in Missouri to be compliant with the Missouri Radiation Control Program (MRCP).

Registration of Equipment

Newly installed or newly acquired x-ray equipment must be registered with the MRCP. The forms are available on the MRCP website at:

http://health.mo.gov/safety/radprotection/.

In addition to the forms and general information, there is a very good set of FAQs, specifically available at:

http://health.mo.gov/safety/radprotection/pdf/QE-FAQ.pdf

There are some important points about registering equipment that we would like to emphasize:

1) An email address must be included on the registration form. This is the primary method in which you and the MRCP will communicate.
2) Be certain to keep the MRCP aware of any personnel changes at your facility as they might relate to the provided email.
3) The MRCP email address is mrcp@health.mo.gov
4) X-ray equipment must be re-registered every two years.

After Equipment Registration

The MRCP will send you a registration confirmation. On the form you will find the facility's MRCP registration number, facility type, facility class (A, B, C, or D), date of registration, and the date that the registration expires. The class assigned to the facility is dependent both on the types of equipment registered, the facility workload specified, and any past compliance history of the facility.

There will also be a field called "Next Qualified Expert (QE) Survey Due By", with a date specified. You are required to have your x-ray producing equipment inspected by a Qualified Expert (QE) before this specified date. A QE is a person recognized by the state of Missouri to be competent in evaluating x-ray equipment. A list of QEs is available on the MRCP's webpage.

The facility class specified for your facility determines how often you must have your equipment inspected. The details are:

Class A: Inspections required every 12 months.
Class B: Inspections required every 24 months.
Class C: Inspections required every 4 years.
Class D: Inspections required every 6 years.

Other regulatory or accreditation bodies that your facility is subject to, or your own organizations standards, might require more frequent inspections.

Equipment Inspections and Corrective Action

Certain equipment must be inspected by a qualified expert before it is used on patients. These specific types of equipment are radiotherapy, mammography, fluoroscopy, and computed tomography systems. All other x-ray equipment must be inspected within 90 days of installation.

After equipment inspections are completed, the qualified expert must provide the facility a complete report of the results, including any situations that should be corrected by service or must be corrected by service. A "triage code" will be assigned to each piece of equipment tested which reflects the findings of the QE:

Triage Code 0: No concerns or findings.
Triage Code 1: Minor findings, recommendations only. Further action is optional.
Triage Code 2: Significant findings, system out of compliance. Corrective action required within 30 days.
Triage Code 3: Unsafe findings. System may not be used until corrected.

Any service that is performed on your x-ray systems should be documented and the documentation retained for future use and interaction with the MRCP. Make certain that service documents reflect the date on which the service was provided, in order to meet the 30 day time period required for corrective action.

QE Survey Summaries and the MRCP

The QE is required to provide the MRCP with a summary report of the equipment inspections before the facility's survey due date. This summary form will list the equipment tested at the facility and the triage code assigned after the inspection.

The MRCP will use the information submitted to ensure that the equipment registered to your facility is in correct operating order and that any required corrective action has been performed. If a piece of equipment was assigned a triage code of 2 or 3, the MRCP will contact your facility and request documentation of the original inspection report, and any service records that addressed the problems found.

The MRCP will also perform onsite visits of problematic registrations, and facilities with poor compliance histories, as well as investigate any received complaints.

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At Integrated Science Support (ISS), we consider it good radiation safety practice to have any equipment inspected by a qualified expert before it is used on a patient, and also once every 12 months, regardless of your facility's class.

After our inspections are complete, we will provide a verbal summary of our findings and a detailed report of the inspection. Inspection reports are provided in PDF format directly by email. Any level 2 or 3 triage codes will be discussed and explained before our physicists leave the facility so that appropriate corrective action may be started immediately.

Before your facility's QE summary report due date, we will provide this document to your facility with an explanation of what the MRCP will require for any level 2 or 3 triage code reports. We will provide the summary report directly to the MRCP before your facility's due date.

Summary

1) Register your equipment with the MRCP.
2) Renew your registration every 2 years.
3) Ensure up-to-date contact information for your facility is provided to the MRCP.
4) Have your equipment surveyed by a qualified expert.
5) Correct problems identified by the QE in a timely manner.
6) Retain all documentation related to the equipment inspections and any corrective action taken.