

I wish to provide a comment for rule 10A NCAC15.0212.

Page 1, states:

"Radiation machines or radiation generating devices that are not able to meet the equipment requirements of 30 these Rules shall not be sold, installed, or used prior to the agency completing a review of information regarding the radiation machine and determining if the use of the radiation machine is allowed. The user or manufacturer of the radiation machine shall submit the following to the agency for review: "

Further, page 2 states:

"(5) an independent equipment survey to include the following: 1 (A) all equipment settings available to the operator; 2 (B) output at the highest setting; 3 (C) leakage radiation around the radiation machine; 4 (6) an area survey to include the following: 5 (A) radiation levels in adjacent areas, the operator location, and annual exposure to operator; 6 (B) the survey instrument used; and 7 (C) the name and legible signature of the person who performed the survey; and "

Comment: Perhaps I am missing something, but I am unclear how one could provide the information required on page 2 without first buying, installing, and using the equipment to generate the radiation needed to fulfill the radiation surveys. If this is not what is intended, then I would clarify what information should be submitted to the agency prior to buying, installing, and using the equipment as it reads to me that the information must include surveys, etc. listed on page 2.

Respectfully,

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