

May 3, 2016

Senator Jordan and members – Sunset Review Committee

The proposal to sunset the Radiation Advisory Council and substitute ad hoc committees of stakeholders when needed negates the value of cooperative relationships developed in the RAC. Ad hoc gatherings of stakeholders dealing with specific issues might lead to adversarial discussions by committee members selected to represent specific interests.

While I am designated as the nuclear medicine participant on the RAC, I consider myself as representing the citizens of Ohio and possessing particular expertise in nuclear medicine and by my background also in radiology along with an interest in radiation health and safety. Our other committee members come to feel the same way, employing their specific expertise as representatives of the citizens of Ohio. Committee members might start as representing a parochial interest but over time the focus of interest becomes Ohio. This would likely not be the case in the ad hoc environment.

Ohio has an outstanding radiation health and safety program – one of the best in the United States. When we have failures in Ohio leading to unnecessary radiation exposure they have been isolated limited events usually due to a failure by an operator to honor their own written standard operating procedures rather than a systemic problem.

A while ago we recognized that around the country the most egregious radiation errors in radiology occur when radiation generating equipment has been repaired and placed back in service without being properly calibrated. To prevent such an event in Ohio the Bureau of Radiological Health promulgated that repaired equipment must be certified by a qualified expert before going back into service. Ohio has one of the strongest qualified expert programs in the country. Qualified experts must obtain certification of qualification from ODH in each specific field they serve. For example, a qualified expert in Radiology is not assumed to be qualified in Nuclear Medicine or in industrial applications.

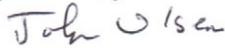
The new standard of requiring a qualified expert to sign off on the accuracy of calibration after repairs created considerable resistance by facility operators. Large facilities such as major hospitals could usually meet the standard of certification by a qualified expert with only modest

inconvenience to themselves, but smaller facilities and most rural facilities found this a very difficult requirement. The large hid behind the small in universal opposition to ODH. Over the course of several meetings and due to relationships, we were able to overcome the initial adversarial nature of discussion. The Bureau and facility representatives were able to resolve the issue over multiple discussions whereby clear lines of responsibility for signing off on a repair had to be established ahead of time with the qualified expert deputizing specific intermediaries trained by the expert to initially evaluate but with the expert being ultimately responsible for the calibration sign off and the whole process being incorporated into a culture of safety.

We have not had a serious radiation accident in Ohio for many years. Ohio has stayed out of the news but ultimately in the above example it was relationships that led to a constructive resolution and this might not have been achieved in the ad hoc environment, because the participants called “stakeholders” would have been the very people opposed to ODH policy.

I believe that the RAC and its two subcommittees make a significant contribution to radiation health in Ohio, and I hope the Sunset Review Committee considers very carefully the wisdom of sunseting the RAC.

Respectively submitted,



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