



Veterinary X-ray Inspection Process Q&A

Question: Regulations used to say that dosimeter badges could be discontinued if a period of measurement has established a minimum exposure. Has this changed?

Answer: No that has not changed. It is required that you badge for a period of time, six months. That will give you two quarters of dose monitoring which you can extrapolate for a year and if you're going to receive less than 10% of the dose, which is 500 millirem, then you can discontinue badging. However, if there are any changes such as acquiring a new x-ray machine, moving the x-ray equipment to another location or even another room or another place in the same room, or a repair is performed on the machine that could affect the output, then occupational badging would then need to be restarted to verify the dose received.

Question: How can we make sure all appropriate paperwork is prepared to submit remotely for unannounced remote inspections?

Answer: Inspection checklists are provided during the initial inspection which list routinely reviewed paperwork. Keeping your paperwork current using the inspection checklist for reference will aid in preparing for unannounced remote inspections.

Question: Are radiation gowns required for dental x-rays? How about a CBCT with a shield?

Answer: Yes, if you are going to be within six feet of an x-ray unit you'd have to be wearing lead. For therapeutic radiation machines operating above 150 kV, no individuals other than the animal may be in the treatment room during exposures.

Question: What does it mean to document how the animal was held or restrained?

Answer: The operating and safety procedures must include guidance on the holding of an animal or image receptor. Whenever possible, mechanical supporting or restraining devices must be used when the exam permits. Doing so will help keep the dose ALARA.

Question: Is there a difference between healing arts and veterinary medicine? Is there a rule change that clarifies this?

Answer: §289.227 defines healing arts as specifically for human use. §289.233 uses the term veterinary medicine and has the same meaning as found in Texas Occupations Code, Chapter 801.

Question: My digital X-ray machine is computerized for settings. Do I still need a technique chart?

Answer: A digital technique chart is sufficient. A digital technique chart is typically built into the X-ray machine and, after you select the anatomical examination, will provide the technical factors.

Question: Does the Radiation Safety Officer (RSO) have to be a DVM?

Answer: No, the RSO does not have to be a DVM. It can either be a veterinarian or a non-veterinarian, but they do need to have two years of supervised use of the respective specialty of x-ray equipment.

Question: We have CT in our practice and our technologists stand more than six feet from the machine when in use. Should they be wearing dosimetry badges when taking CTs?

Answer: Yes, the technologists should be wearing badges anytime x-ray operations are ongoing unless a history of occupational badging shows occupational workers will be receiving less than 10% of the annual dose limit.

Question: We are an equine facility that takes radiographs remotely. What happens if the inspector shows up when all units are in the field?

Answer: That is not a problem. If the paperwork is on-site, we can conduct half the inspection and return for machine testing later at a scheduled time. If the paperwork is not available, there are instances where we can come back and still consider it an unannounced inspection within 24 hours. We could try to schedule something within the next 24, possibly 48 hours, but it must be as soon as possible to maintain the integrity of the unannounced inspection.