

Greetings,

I appreciate there being a public comment period <https://rules.sos.ri.gov/Promulgations/Part/216-40-20-5> on the proposed 216-RICR-40-20-5 regulations and provide below some constructive feedback.

Thank you,
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1. page 03, Sec. 5.2.A.1

I suggest to use lowercase joule since this is not a proper noun or in reference to the person's lastname. Also, please remove the antiquated term "rad" and change the wording to: "The unit of absorbed dose is the gray (Gy), equivalent to the one (1) joule/kilogram in the international system of units (SI)."

2. page 05, Sec. 5.2.A.26

So as to not be totally silent on "rad", please frame the antiquated term "rad" here as: "The previous special unit of absorbed dose (rad) has been replaced by the gray where one (1) Gy = one hundred (100) rad."

3. page 14, Sec. 5.3.4.A.4

The CCPM is defined from Canadian College of Physicists in Medicine. <https://ccpm.ca/> Please correct the wording to: "Be currently certified by the Canadian College of Physicists in Medicine (CCPM) in Radiation Oncology Physics."

4. page 27, Sec. 5.6.1.A.2

Please remove the antiquated term "rad" here and correct the wording to: "... target in any direction must not exceed one (1) cGy in any one (1) hour."

5. page 27, Sec. 5.6.1.A.2

Please remove the antiquated term "rad" here and correct the wording to: "... surface of the tube housing assembly must not exceed thirty (30) cGy per hour."

6. page 28, Sec. 5.6.4.A.3

Please remove the antiquated term "rad" here and correct the wording to: "... (1) cGy per hour at one (1) meter under any operating conditions; and"

7. page 35, Sec. 5.6.19

The scientific abbreviation for hour is "h", not "hr". Think of your speedometer (mph) and examine the scale for a modern survey meter. Please correct the wording to: "... over the range of five hundred (500) uR/h to five (5) R/h."

8. page 41, Sec. 5.7.9.A.3

Please remove the antiquated term "rad" here and correct the wording to: "... at the nominal treatment distance exceeds 4 (four) Gy; and"

9. page 65, Sec. 5.11.5.A.2

Please correct the field size units as: "Field sizes of less than three centimeters by three centimeters (3 cm x 3 cm) are considered ..."

10. page 78, Sec. 5.14.2.A.2

Please remove the antiquated term "rad" here and correct the wording to: "... output, [expressed in gray or air kerma ...]"

11. page 80, Sec. 5.14.3.A.1

Please remove the antiquated term "rad" here and correct the wording to: "... the therapeutic radiation machine, and gray at the isocenter and the"

12. page 80, Sec. 5.14.3.A.2

Please remove the antiquated term "rad" here and correct the wording to: "... output, [expressed in gray at one (1) meter],"