Final Minutes of the Radiation Protection Advisory Committee (RPAC) Meeting
Combination Virtual / In Person Meeting
April 1, 2026

Meeting called to order at 9:03 a.m.

Members in Attendance:

Aaron Fisher
Anthony Lewis Hull
Anthony Montagnese
Christine Eckenrod
Ian Irvin
Janice Wirth
John Keklak
Justin Cantley
Dr. Lara R. Paciello
Margaret Blackwood
Marian Wolford
Nate Burden
Steven King
Victor Rizzo

Members Absent:

DEP Staff in Attendance:

Alhaz Bah
Alyssa Oskin
Barbara Bookser
Benjamin Seiber
Brooke Loss
Bryan Werner
Christopher Heckert
Dale Davis
Dale Motley
Danielle Conley
David Gaisior
David Lapadat (OEA)
Denise Bleiler
Derek Stahl
Devin Seiger
Dwight Shearer
Dyran Altenburg
Elaine Crescenzi
Frank Peffer
Grace Schoeniger
Jack Palumbo
Jamie Baddorf
Jeffrey Cosklo
Jeffrey Timcik
Jennifer Minnick
John Chippo
Kristina Hoffman
Laura Griffin
Linda Davis
Lindsay Williamson
Maria Coons
Michelle Russo
Ryan Bankert
Ryan Fox
Sean Gimbel
Serena Sadjian
Stacy Sowers
Stephanie Banning
Suzanne Sarver
Thomas Raraigh
Victora Parker

Guests in Attendance:

Aaron Wilmot
Alex Khammang
Andy Madore
Brenda Colwell
Dave Allard
Bruno LaRoc
Jeffrey Ivicic
K. Kennedy
Kendall Berry
Matthew Law
Rebecca Cardin
Samuel Einstein
Trent Machamer

Introduction: Adoption of Agenda and Approval of Minutes

The meeting began with adoption of the agenda and approval of the February 4, 2026, meeting minutes, subject to minor corrections. RPAC member, Ms. Blackwood corrected the use of the word technician instead of technologist in the first paragraph. She also asked that the word Dexus be changed to DEXA on the last page.

First Open Floor:

During the first open-floor session, several members of the public provided comments. Dave Allard, the Chair of the Three Mile Island Community Advisory Panel, expressed concern about the changes that the Nuclear Regulatory Commission (NRC) is making to its regulations as ordered by Executive Order (EO) 14300. The order instructs the NRC to overhaul its standards and protections which may affect hundreds of thousands of people and cost hundreds of millions of dollars to implement the changes. The Linear No Threshold model was adopted after studying patients affected by severe exposure to radiation. One aspect of the EO is the NRC must reevaluate its use of that principle to lower the costs of the construction and maintenance of new facilities.

Andy Madore, a member of the public, stated as a diagnostic physicist there is a large amount of travel to and from company sites. Labor shortages have caused even more travel and time usage. He wanted to know if a standardized procedure could be established for the data collection process being performed onsite while a qualified expert (QE) provides remote oversight. With proper equipment and training, this should be attainable. RPAC member, Mr. Montagnese, agreed but also reminded the committee that this issue primarily affects consulting physicists. There are no requirements for such tests in our regulations except for fluoroscopy, mammography, cone beam computed tomography, and computed tomography. Mr. Montagnese suggested that a highly trained radiologic technologist could collect the data for the QE. Ms. Blackwood agreed with Mr. Montagnese's opinion and added that the radiation protection programs at each facility should review their policies to see if this method of testing would be acceptable to their program. Ms. Oskin clarified that only the above-mentioned devices need annual testing under our regulations. If a facility has a policy that requires testing, then the inspectors will ask to review those tests. Bureau Director Shearer agreed and stated that facility programs need to be audited regularly, as the inspectors are required by regulation to check whether that program is following its own policies. The methods for testing as described above also need to be communicated to other physicists across the Commonwealth to create a consistent standard. Ms. Blackwood added that once that standard is established, it needs to be communicated to the facilities receiving the service to make sure it is following that facility's policies. Mr. Montagnese asked for clarification from Bureau Director Shearer on what he meant by coordinating with other physicists to create a standard. Bureau Director Shearer noted that companies from outside the Commonwealth may seek to introduce practices or standards that differ from existing Commonwealth requirements and advocate for regulatory provisions that are not currently established. Any rules or policies established need to be based off Commonwealth

regulations and not regulations from other parts of the country. Ms. Blackwood asked if Bureau Director Shearer was recommending that other facilities should not add their own recommendations and only include rules that are in Commonwealth regulations. Bureau Director Shearer advised the committee that when adding their own requirements, facilities may include rules from other facilities that are considered "best practice" but not required by regulation. However, if a facility has those best practice requirements in their program, they then must be followed, or they could be subject to a notice of violation for not following their own program. Mr. Montagnese added that inspectors can fall prey to the same issue, such as when they attempt to enforce a best practice rule when it is not in that facility's program or Commonwealth regulations. Bureau Director Shearer agreed and challenged the management staff of the Bureau of Radiation Protection (BRP) to continue to review regulations with inspectors to make sure the inspectors are not trying to enforce anything not in the regulations.

BRP Program Updates:

BRP has reduced its staffing down to 88 positions and Central Office personnel are preparing to move to the 14th floor of the Rachel Carson State Office Building in 2027. Bureau Director Shearer stated that BRP has converted 99% of its paper files into digital files in preparation for the move as well as to reduce the overall footprint of the bureau.

Radon

The Radon Division is now accepting applications and renewals electronically. Certification packets are being distributed electronically rather than through traditional mail. A 10-15 question electronic survey has been created so that homeowners can provide post-mitigation information to the Radon Division and possibly request a post-mitigation inspection. Lastly, Radon is transitioning to distributing invoices electronically for mitigation fees to replace the current fee collection method. Once CodePA is finished creating the X-ray payment portal, the Radon Division hopes to be the next Division to receive an updated, electronic, payment portal.

Nuclear Safety and Nuclear Preparedness

The Commonwealth will be participating in three graded exercises in 2026 in addition to hosting the NFL Draft, MLB All Star Game, FIFA World Cup, and various celebrations for the 250th anniversary of the founding of the United States. Crane Clean Energy Center (CCEC) has a dry run exercise scheduled for November, and a graded exercise scheduled for February. The graded exercise will be the final test to demonstrate to the NRC that it is ready for restart. At this time, the biggest issue for CCEC is getting the station reconnected to the electrical grid. The Nuclear Safety Division has 4 vacancies out of 9 positions, including 3 Nuclear Safety Specialist (NSS) positions that need filled.

Radiation Control

CodePA will be providing an update shortly on the X-ray payment portal. The new portal will provide an electronic means for the Division to send invoices, reminder letters, and accept payments. The contract for creating the portal has been awarded to MTX. BRP has budgeted to

cover that cost by money provided to DEP by the Governor's Office. Invoices are being sent out with a QR code that licensees can use to update their mailing, location, and email addresses are correct. There are currently no plans for a QR code to take licensees directly into their account. Bureau Director Shearer cannot provide a completion date, but the contract specifies 12 weeks are needed to complete the portal. Once completed, the portal will be sent to RPAC members for testing. Accelerators and vendors are currently having their invoices generated electronically. We want to add general and radioactive materials (RAM) licenses into that process as well. Ms. Blackwood asked why the form asked for an accurate mailing address. Bureau Director Shearer answered that it was included so the invoice could be mailed if the emailed invoice was returned as undeliverable.

Decommissioning and Environmental Surveillance

45 years' worth of environmental monitoring data from around the power plants shows that the plants are safe and their environmental impact is minimal. Three Mile Island Unit 2 (TMI-2) remains in a cleanup phase. After the accident most of the fuel was removed and now the small amount remaining is being removed and stored in 10-14 spent storage casks on site. Following this cleanup phase will be a normal decommissioning process. The CCEC startup has put additional pressure on the cleanup timeline and TMI-2 is seeking an extension to its 60-year termination life so that the decommissioning work will not trigger plant safety mechanisms at CCEC. Ten trenches have been enclosed at Shallow Land Disposal Area to prepare for cleanup efforts. These efforts have been ongoing at the site for over 40 years and are expected to be completed by 2032 at the cost of one billion dollars. The Environmental Protection Agency is removing contaminated soil at Remacor. The Division is assisting the Bureau of Waste Management with using gamma spectroscopy to conduct a leachate study at all 50 landfills within the Commonwealth.

Field Divisions

The Field Divisions are continuing inspections, exercises, and efforts to clean up X-ray registrations. Fourteen positions are open at this time, and a workload analysis is being reviewed to determine which positions need to be filled and which can remain open. NSS positions will be filled since they are funded through a different fund, the Central Field Division will be hiring a new manager, the Southwest Field Division will be filling a radioactive materials position, the Southeast Field Division will be hiring a clerk assistant, and Central Office will be filling the X-ray supervisor/MQSA Federal coordinator position.

Regulations

BRP is crafting a memo to the Secretary to begin a modernization package to clean up X-ray, RAM, and Radon. The package will be adding language for the acceptance of electronic payments and removing language stating that BRP will provide physical forms. NRC is moving quickly to change regulations as directed by EO 14300. Commonwealth regulations that are incorporated by reference will need to be updated, especially regulations concerning X-ray and RAM. New regulations will need to be added concerning fusion technology, microreactors, and small modular reactors. House Bill 2017 was passed in the PA House of Representatives which

adds language concerning those new technologies to the Radiation Protection Act. BRP is considering adding an administrative fee, environmental monitoring fee, and a decommissioning fee for the microreactors and small modular reactors. The predicted shelf life for the microreactors and small modular reactors is 6-8 years. The PA Senate has not assigned a number to the bill yet. BRP is hoping that the Radiation Protection Act will be amended to include language for the new technologies as well as increasing the nuclear power plant fee from $650,000 to $820,000.

CodePA Demo

Matthew Law provided a presentation on what to expect from the new X-ray payment portal. MTX will begin development of the portal in April with a target launch date to be in late summer. MTX has experience working on payment portals for other states, including the payment portal for Utah's Waste Management and Radiation Control Division, which the Bureau received a demonstration of, prior to the hiring of MTX. As the prototype portal is rolled out, RPAC members will have the opportunity to test the portal and provide feedback. X-ray is the first program that will have access to the portal, but that will be expanded across BRP and DEP as it is developed further. Paper forms and checks will still be accepted when the new portal is active. Users will be able to use the new portal to create or modify registrations, submit payments, download certificates, and schedule upcoming inspections. Mr. Montagnese asked if there would be a comprehensive drop-down menu that explains each type of modality and Ms. Blackwood asked if adding or removing modalities would be included in the portal. Mr. Law stated that those ideas were being considered for incorporation into the final portal.

Revenue Package

Formatting issues have delayed the revenue package from being reviewed by the Environmental Quality Board (EQB) until at least July. BRP is investigating a staggered approach whereas fees would increase 10% in one year and then 10% again the following year instead of a 20% increase in one year, but no decisions have been made yet. The public comment period is not open yet, and no date will be established until it goes in front of the EQB. However, BRP is open to any comments from RPAC members concerning the revenue package. Any questions that can be answered or issues addressed before the comment period will help save time and allow fee collection to ideally begin in July of 2027. RPAC member, Ms. Eckenrod asked Bureau Director Shearer if the comment period had already ended and was advised that the comment period had not ended and has not been given a start date yet. Ms. Blackwood recommended that Bureau Director Shearer remind RPAC of the steps in the process since it was not a common occurrence. Bureau Director Shearer directed this recommendation to Mr. Palumbo of the Policy Office. Mr. Palumbo advised RPAC that once the EQB adopts the regulation there will be a period where other state agencies can review the proposed rulemaking. After that, BRP will advise RPAC of when the proposed rulemaking will be published for the 30-day comment period. Once the comment period ends, Policy and BRP will work together to create a comment-response document. RPAC member, Dr. Wolford asked if comments can be made before the normal comment period. Mr. Palumbo said comments can be made before the comment period, but any comment made outside the comment period would not be included in the response document.

Bureau Director Shearer encouraged RPAC and their associates to submit their comments now so BRP can get a head start on addressing any concerns. Ms. Blackwood asked if BRP wanted comments that were made at the previous RPAC meeting to be resubmitted or if BRP only wanted new comments. Bureau Director Shearer stated that previously made comments and new comments are welcome as any repeats will be grouped together. RPAC member, Ms. Wirth, asked where she could see the entire revenue package in order to prepare her comments. Bureau Director Shearer advised her that the revenue package cannot be officially released and provided to RPAC members until it has been approved by the EQB. However, the fee increases were reviewed at the previous RPAC meeting and can be used as a reference for creating comments. RPAC member, Mr. King, asked when the proposed 20% increase would go into effect, to which Bureau Director Shearer answered that the goal was for it to go into effect in July of 2027. However, since the EQB has not reviewed the package yet, that may push the fee implementation into 2028. If that occurs, BRP would have to find other means for making up its budget shortfall, possibly receiving support from the general fund. RPAC member, Ms. Wirth, stated that the draft package was included in the previous RPAC meeting materials and that she assumed she could use it to base comments on since there would not be major changes made to the draft. Bureau Director Shearer confirmed that the numbers in the draft have not changed and could be used as an accurate reference. Dr. Wolford asked if the draft could be shared with others outside of RPAC. Bureau Director Shearer advised RPAC that the draft could be shared, but the public comment period is not open yet so any comments would need to be submitted by RPAC members. He also reminded RPAC that the fee increase was higher than anticipated due to recent economic factors affecting the expected cost of living adjustments being made to the fees. RPAC member, Ms. Wirth, said that the biggest comment from small dental practices is that the fee increase will cause more stress for them since insurance companies have not raised dental profiles in 20 years. Because the dental profiles have not been raised, it limits the amount of money that can be charged for procedures and will result in decreased revenue. Bureau Director Shearer understands the additional stress the fee increase could cause but also reminded RPAC that the fee increase for small practices was minor and a cost-of-living increase should be incorporated into their business model.

Review of Nuclear Material Events Database (NMED) and Medical Reportable Events (MRE):
There were 5 NMED events since the last RPAC meeting. Two events involved a leaking source, 2 events were medical in nature, and the last event was the loss or potential loss of a source. RPAC member, Mr. Montagnese asked if the 2 events involving leaking sources were at medical facilities. Mr. Chippo of BRP was unaware if that is where the events took place and will check the reports for more details. Ms. Schoeniger of BRP and RPAC member, Mr. Keklak advised Mr. Chippo that the second leaking source was in the Nuclear Medicine Department. Mr. Keklak asked if there were any updates on the lost source. Ms. Schoeniger stated that the gauge was still missing and the company was currently looking at contractors to go through the scrap metal facility to find it.

There were 4 MRE events since the last RPAC meeting. The first event was a patient receiving 10.9 Gy instead of the prescribed 9 Gy. The second event was a misalignment to a patient

leading to 1000 cGy being delivered outside of the intended target. The third event was a patient receiving treatment that missed the targeted lesion. The fourth event was a patient being positioned incorrectly and receiving an unintended dose of 330 cGy.

Second Open Floor:

A member of the public provided a written comment asking how many non-destructive testing companies have a RAM license vs. a reciprocity license. The Commonwealth's current fee is not in line with the rest of the industry and recommended a fee between $10-15,000 with reciprocity being set at 50%, and an amendment fee between $100 and $200. He also recommended a limit increase in the small business category from 5 million to 10 million and from 350,000 to 10 million instead of 5 million. Bureau Director Shearer cautioned RPAC members and members of the public to avoid comparing Commonwealth fees to those in other states because each state's radiation program is different. Other states may have lower fees because their programs may receive money from the general fund, have additional revenue streams for being part of their Department of Health, or may not be an Agreement State.

Dr. Wolford is concerned that physicists are telling dental offices that shielding and annual evaluations are not necessary. Dr. Wolford was curious if BRP was receiving questions about shielding since the article concerning shielding was published by the American Dental Association (ADA). Ms. Oskin clarified that there are occupational and public dose limits and the Code of Federal Regulations for room shielding states that shielding studies are being completed on CBCT. While the shielding evaluation is not required by regulations, all practices must meet the requirements in § 20.1201 and § 20.1301. Bureau Director Shearer added that exposure doses must be maintained, but that EO 14300 is aiming to change the public dose limits. That change could have a major effect on shielding requirements going forward. Mr. Keklak stated that he has been performing area surveys in New Jersey for 30 years and has never encountered a standard intraoral, panoramic, or self-contained dental unit needing additional shielding. Mr. Montagnese encouraged Dr. Wolford's constituents to question their physicists on whether they are doing something out of good practice or because it is a requirement. The registrant is responsible for compliance so they should engage with the physicists on what is and what is not in the Commonwealth's regulations. Dr. Wolford then asked if there had been any discussion or regulation changes concerning lead apron shielding of the thyroid. Ms. Oskin answered that there is no requirement in the Commonwealth for lead apron shielding of the thyroid. She further advised all registrants to follow the guidelines of the ADA or the Pennsylvania Dental Association and that it is even discouraged to have a lead collar on for a panoramic scan because it interferes with the image. Mr. Montagnese asked if BRP was aware of the Burlington lead apron recall. Facilities are returning lead aprons that were produced in 2025 due to major flaws in the shielding. Ms. Blackwood stated that they had 246 devices recalled and received an OSHA complaint. Her facility then decided to X-ray each device before returning it and have not found any major flaws yet. Other members of RPAC stated that their facilities have done the same and found a small number of devices that contain flaws. Ms. Blackwood advised

RPAC to make sure their constituents were aware of the changes caused by EO 14300 and the upcoming BRP fee package.

The meeting adjourned at 10:59 a.m. The next RPAC meeting is scheduled for October 28, 2026 and is expected to be a combination of virtual and in person.