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Bureau of Environmental Health  
Radiation Control Program  
Schrafft Center, Suite 1M2A  
529 Main Street, Charlestown, MA 02129

January 21, 2015

RCP INFORMATION NOTICE 2015-02:

TITLE: CLARIFICATION OF DENTAL  
RADIOGRAPHIC SYSTEM  
PREVENTIVE MAINTENANCE  
REQUIREMENTS

**ADDRESSEES**

All dental registrants.

**INTENT**

The Department of Public Health, Radiation Control Program (RCP), has seen an increase in the number of inquiries related to preventative maintenance and calibration periodicity for dental facilities. This notice communicates regulatory requirements contained in 105 CMR 120.407.

**SUMMARY OF THE ISSUES**

**A. Personal Monitoring**

1. As stated in 105 CMR 120.407(E)(4), personal monitoring in accordance with 105 CMR 120.211 is **not** required.

**B. Calibration and Preventive Maintenance**

1. 105 CMR 120.407(E)(7), All dental radiographic systems require calibration and preventive maintenance to ***be performed by a registered service provider as specified in 105 CMR 120.026:***
  - (a) when it is first installed and prior to use on patients;
  - (b) after any major changes or replacement of parts and prior to use on patients:
2. A list of registered service providers can be found on the RCP webpage at:  
<http://www.mass.gov/eohhs/gov/departments/dph/programs/environmental-health/exposure-topics/radiation/registration/consultant-lists.html>
3. The periodicity of calibration and preventive maintenance depends on the type of device.

- **IF** your facility has a standard dental radiographic unit (for example, fixed intraoral dental unit, panoramic unit, pan/ceph combo unit), **THEN** 105 CMR 120.407(E) applies:

(E) Additional Operation Controls for Dental Radiographic Systems....

(c) *by having calibrations and preventative maintenance:*

1. *such preventative maintenance **shall not exceed three years:***
2. *the preventative maintenance or calibration shall be performed by a registered service provider as specified in 105 CMR 120.026.*

(d) *Preventative maintenance and calibrations shall be reviewed and signed within a reasonable time of completion of the tests but no longer than 30 days of completion of the tests by the licensed dentist, and any necessary corrective action shall be implemented within 30 days.*

(e) *Records of the last two calibrations and preventative maintenance shall be maintained at the facility.*

- **IF** your facility has a hand-held intraoral dental unit, **THEN** you are required to comply with 105 CMR 120.407 (E) **AND** 105 CMR 120.407(F) and preventative maintenance and calibration **shall not exceed three years.**
- **IF** your facility has a Cone Beam 3-D Dental Imaging Systems, **THEN** you are required to comply with 105 CMR 120.407 (E) **AND** 105 CMR 120.407(G) and preventative maintenance and calibration **shall be annual.**

C. Medical physicist

1. A medical physicist is **not** required to perform physicist surveys **nor** sign the preventative maintenance reports. A licensed dentist at your facility must review and sign the preventative maintenance and calibration report paperwork performed by the registered service provider. The dentist is validating the equipment is calibrated and in good working order.

Should you have any questions with this Information Notice, or require additional assistance, please contact Karen Farris, RT(R)(M) at 617 242-3035 ext. 2011.

Sincerely,



Jack Priest, Director,  
Radiation Control Program  
617 242-3035 ext. 2001