



## COMMONWEALTH of VIRGINIA

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**TO:** Virginia Department of Planning and Budget

**FROM:** Steve Harrison, Acting Director – Division of Radiological Health

**DATE:** April 4, 2012

**RE:** Economic Impact Analysis for 12VAC5-481 “Virginia Radiation Protection Regulations”

The Division of Radiological Health has reviewed the Economic Impact Analysis prepared by the Virginia Department of Planning and Budget dated March 17, 2012. The Division has the following comments:

1. In the Estimated Economic Impact section on Page 1, it states “Private inspectors charge approximately \$250 per unit inspection.” According to footnote 1 it states “source: interview with a Virginia private inspector”. The Division recommends the sentence be changed to: “One private inspector charges approximately \$250 per unit inspection.
2. The next sentence states “There are approximately 1250 units in the Commonwealth. Thus there would be approximately \$250,000 savings annually.” These units are not required to be inspected thus this statement is not accurate. DPB’s sentence should be amended to include “if the units are required to be inspected”. This analysis is based upon 12VAC5-481-2110 which states “Radiation surveys as required by 12VAC5-481-750.” The regulation in 12VAC5-481-750 is a radiation survey and not an inspection. The Division will begin to develop a new regulatory action to address this.
3. The Division recommends that a statement be included in the “Small Businesses” section that this is based upon one private inspector’s cost and if the unit was required to be inspected under 12VAC5-481. Currently the regulations for analytical X-ray equipment under Part VIII are not required to be inspected. The Division will begin to develop a new regulatory action to address this.

If you have any questions feel free to contact me at 804-864-8151.

Sincerely,

Steve Harrison  
Acting Director, Division of Radiological Health