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From: Munn, Samson [smunn@tuftsmedicalcenter.org]
Sent: Monday, March 07, 2011 11:07 AM
To: NIOSH Docket Office (CDC)
Subject: 215 - NIOSH Guideline: Application of Digital Radiography for the Detection and Classification of Pneumoconiosis

Dear folks.

Thank you for the opportunity to review the draft NIOSH guideline regarding the use of digital radiography for B readings! As a B reader, a diagnostic radiologist (boarded in the U.S. and the equivalent in the UK) with close to 30 years of experience, and a co-author of an article on technical issues in chest radiography, I am well aware that these matters are indeed very important.

I have several substantive comments, as well as grammatical or syntax corrections. They are all below, in the sequence in which they appear in the draft:

- ¶ II: Current: “. . . . should review their personnel” Should be: “. . . . should review its personnel”
- ¶ II A 1: Current: “. . . . systems at the facility c) licensed” Should be: “. . . . systems at the facility, and c) licensed”
- ¶ II A 2: Current: “. . . . images should be a) certified” Should be: “. . . . images should a) be certified”
- ¶ II B 1: The paragraph is nicely written and I agree with all its contents. However, it references an article that has only to do with CR, not DR (direct digital radiography). I would suggest leaving the reference used as is but also adding one related to DR. Here are two you might perhaps consider:
 - Schreiner-Karoussou

Review of image quality standards to control digital X-ray systems *Radiat Prot Dosimetry*
(December 2005) 117(1-3): 23-25

(first published online February 7, 2006 doi:10.1093/rpd/nci722)

J Digit Imaging. 2009 Dec;22(6):656-66. Epub 2008 Sep 3.

- Application of QC_DR software for acceptance testing and routine quality control of direct digital radiography systems: initial experiences using the Italian Association of Physicist in Medicine quality control protocol.

Nitrosi A, et al

- ¶ II B 3: The draft says spatial resolution should be 2.5 line pairs per mm. That value is OK with me, too, but it should be specified that the requirement applies in both dimensions: superior-inferior (up-down) and left-to-right.
- Throughout: In some places, the word “must” is used. In many places, the word “should” is used. As you know, *should* allows more freedom than *must*. It is my recommendation that the draft be revised toward using “must” considerably more often and “should” less often. This occurs throughout the draft; an example is in ¶ II B 3: “The imaging plate should be a minimum of 35x43 cm” That writing allows – permits – any size to be used, any pitch, etc. My opinion is that many items – not all, but many – throughout the draft would benefit from conversion to “must,” thus enhancing the quality of the guidance. In turn, one would hope that that would enhance the quality of digital B readings.
- Throughout: Suggest commas between multiple citation numbers.

Thank you so much!

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