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NRC FORM 581M PART 1

U.S. NUCLEAR REGULATORY COMMISSION

(10-2006)  
10 CFR 2.201

### SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION

1. LICENSEE/LOCATION INSPECTED:  
**Moberly Regional Medical Center**  
**Moberly, Missouri**

REPORT                      2007-001

2. NRC/REGIONAL OFFICE:  
**REGION III**  
**US NUCLEAR REGULATORY COMMISSION**  
**2443 WARRENVILLE ROAD, SUITE 210**  
**LIBLE, ILLINOIS 60532**

3. DOCKET NUMBER(S)  
**030-14054**

4. LICENSEE NUMBER(S)  
**24-18695-01**

5. DATE(S) OF INSPECTION  
**4/25/2007**

**LICENSEE:**

The inspection was an examination of the activities conducted under your license as they relate to radiation safety and to compliance with the Nuclear Regulatory Commission (NRC) rules and regulations and the conditions of your license. The inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations by the inspector. The inspection findings are as follows:

- 1. Based on the inspection findings, no violations were identified.
- 2. Previous violation(s) closed.
- 3. The violation(s), specifically described to you by the inspector as non-cited violations, are not being cited because they were self-identified, non-repetitive, and corrective action was or is being taken, and the remaining criteria in the NRC Enforcement Policy, NUREG-1600, to exercise discretion, were satisfied.

\_\_\_\_\_ Non-Cited Violation(s) was/were discussed involving the following requirement(s) and Corrective Action(s):

- 4. During this inspection certain of your activities, as described below and/or attached, were in violation of NRC requirements and are being cited. This form is a NOTICE OF VIOLATION, which may be subject to posting in accordance with 10 CFR 19.11.

(Violations and Corrective Actions)

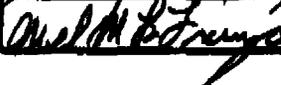
Condition 12.B of License No. 24-18695-01 authorizes individuals to work as an authorized user for medical use permitted under 10 CFR 35.300.

Contrary to the above, on 2/17/05 and 3/21/07, an individual, not authorized as an authorized user for medical use permitted under 10 CFR 35.300, authorized the administration of Iodine-131 in unsealed form that required a written directive pursuant to 10 CFR 36.40. 10 CFR 35.300 titled "Use of Unsealed byproduct material for which a written directive is required" states, in part, that a licensee may use any unsealed byproduct material prepared for medical use and for which a written directive is required. The individual authorized the administration of approximately 10 millicuries of Iodine-131 on 2/17/05 and 3/21/07.

Corrective Actions: The licensee submitted an amendment on or about May 7, 2007 to request the physician be authorized for medical use permitted under 10 CFR 35.300.

**Licensee's Statement of Corrective Actions for Item 4, above.**

I hereby state that, within 90 days, the actions described by me to the inspector will be taken to correct the violations identified. This statement of corrective actions is made in accordance with the requirements of 10 CFR 2.201 (corrective steps already taken, corrective steps which will be taken, date when full compliance will be achieved). I understand that no further written response to NRC will be required, unless specifically requested.

Title	Printed Name	Signature	Date
LICENSEE'S REPRESENTATIVE	Larry Rodgers		5/17/07
NRC INSPECTOR	Michael LaFranzo		5/16/07

**Docket File Information**  
**SAFETY INSPECTION REPORT**  
**AND COMPLIANCE INSPECTION**

1. LICENSEE <b>Moberly Regional Medical Center</b> REPORT NUMBER(S) 2007-001		2. NRC/REGIONAL OFFICE <b>Region III</b>	
3. DOCKET NUMBER(S) <b>030-14054</b>	4. LICENSE NUMBER(S) <b>24-18695-01</b>	5. DATE(S) OF INSPECTION <b>4/25/2007</b>	
6. INSPECTION PROCEDURES USED <b>87130/87131</b>		7. INSPECTION FOCUS AREAS <b>3.1-3.7</b>	

**SUPPLEMENTAL INSPECTION INFORMATION**

1. PROGRAM CODE(S) <b>02120</b>	2. PRIORITY <b>3</b>	3. LICENSEE CONTACT <b>John Harkness - RSO</b>	4. TELEPHONE NUMBER <b>660-269-3164</b>
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Main Office Inspection      Next Inspection Date: **4/2010**

Field Office \_\_\_\_\_

Temporary Job Site \_\_\_\_\_

**PROGRAM SCOPE**

The licensee was a regional hospital located in Moberly, Missouri with authorization to perform licensed activities permitted under 10 CFR 35.100, 35.200 and 35.300. The nuclear medicine department was staffed with one full-time technologist and nine authorized users. The licensee administers approximately 100-150 diagnostic doses per month. The licensee receives unit doses and some bulk doses of technetium-99m. The licensee performs approximately 3-6 iodine-131 therapies per year; administrations are less than 33 millicuries in capsule form. All waste was either held for decay-in-storage (DIS) or returned to the radiopharmacy.

**Performance Observations**

The inspector interviewed several individuals and noted each had adequate knowledge regarding radiation safety practices. The licensee demonstrated package receipt surveys, daily dose calibrator constancy checks and area surveys; no issues were identified. The inspector reviewed selected documents including dosimetry records, radiological surveys and RAM receipts; no issues were identified. The inspector performed independent radiation measurements where licensed material was used; no abnormal radiation levels were identified.

During a review of the licensee's written directives, the inspector noted that on two occasions an authorized user, whom was approved for 35.100 and 35.200 activities, was approving administrations of iodine-131 (requiring a written directive) but was not permitted to perform activities under 35.300. The licensee indicated that they thought the individual was authorized for 35.300 activities under the license. The NRC determined that the authorized user was technically qualified and could have been approved for such activities if the licensee had requested an amendment to the license. A description of the violation and corrective actions are described in the 591M part 1. The licensee committed to more carefully reviewing those individuals whom where signing written directives to ensure compliance with NRC regulations.