

INSPECTION RECORD

Region III Inspection Report No. 03034523/08-01 License No. 13-32020-01
Docket No. 030-34523

Licensee (Name and Address): Internal Medicine Associates
550 Landmark Avenue
Bloomington, In 47403

Location (Authorized Site) Being Inspected: 550 Landmark Avenue

Licensee Contact: Dawn Kirchner Telephone No. 812-331-3404

Priority: 5 Program Code: 2201

Date of Last Inspection: August 7, 2003 Date of This Inspection: July 23, 2008

Type of Inspection: () Initial () Announced (X) Unannounced
(X) Routine () Special

Next Inspection Date: July 2013 (X) Normal () Reduced
Justification for reducing the routine inspection interval:

Summary of Findings and Actions:

- () No violations cited, clear U.S. Nuclear Regulatory Commission (NRC) Form 591 or regional letter issued
- () Non-cited violations (NCVs)
- () Violation(s), Form 591 issued
- (X) Violation(s), regional letter issued
- () Followup on previous violations

Inspector(s) Ken Lambert
(Name(s))

Date: 8/20/08

Ken Lambert
(Signature(s))

Approved Patrick L. Loudon
(Name)

Date 8.20.08

PL Loudon
(Signature)

PART I-LICENSE, INSPECTION, INCIDENT/EVENT, AND ENFORCEMENT HISTORY

1. AMENDMENTS AND PROGRAM CHANGES:
(License amendments issued since last inspection, or program changes noted in the license)

<u>AMENDMENT #</u>	<u>DATE</u>	<u>SUBJECT</u>
Amendment 5	March 18, 2004	Change in Radiation Safety Officer to Gregory M. Sutliff, M.D.
Amendment 6	July 25, 2005	Added authorized user Louise Annette Alpert, M.D.

2. INSPECTION AND ENFORCEMENT HISTORY:
(Unresolved issues; previous and repeat violations; Confirmatory Action Letters; and orders)

The last inspection did not identify any violations of regulatory requirements.

3. INCIDENT/EVENT HISTORY:
(List any incidents, or events reported to NRC since the last inspection. Citing "None" indicates that regional event logs, event files, and the licensing file have no evidence of any incidents or events since the last inspection.)

None

PART II - INSPECTION DOCUMENTATION

1. ORGANIZATION AND SCOPE OF PROGRAM:
(Management organizational structure; authorized locations of use, including field offices and temporary job sites; type, quantity, and frequency of material use; staff size; delegation of authority)

This licensee is a medical clinic that performs approximately 180 cardiac stress tests per month. The licensee also performs 2-3 MUGA studies per year. The licensee employs two full time technologists who report to the Technical Director of Cardiovascular Testing. The RSO is one of the authorized user physicians. The licensee contracts with an outside consultant to perform quarterly audits to the radiation safety program, and performs calibration and dose calibrator quality control tests.

2. SCOPE OF INSPECTION:
(Identify the inspection procedure(s) used and focus areas evaluated. If records were reviewed, indicate the type of record and time periods reviewed)

Inspection Procedure(s) Used: 87130

Focus Areas Evaluated: 03.01 - 03.07

This was a routine inspection to review the licensee's activities conducted its license as they relate to safety and compliance with the NRC's rules and regulations and with the conditions of its license.

Interviews conducted with the technologist revealed an adequate level of understanding of emergency and material handling procedures and techniques. Dose calibrator constancy checks, daily surveys, package receipt surveys, waste handling and disposal, and injection technique were described or observed.

Licensed material was observed adequately secured in the hot lab during the review and was not accessible to members of the general public.

3. INDEPENDENT AND CONFIRMATORY MEASUREMENTS:
(Areas surveyed, both restricted and unrestricted, and measurements made; comparison of data with licensee's results and regulations; and instrument type and calibration date)

The inspector performed independent dose rate surveys of the hot lab, injection area, and use areas. All readings were indistinguishable from background (0.01 millirem per hour). Measurements in the hot lab were taken in the center of the hot lab. The survey instrument used was a Ludlum, Model 2403 survey meter with a compensated GM detector. The inspector also took direct surface measurements of the injection area and tread mill with all measurements indistinguishable from background, which was 50 counts per minute. The survey instrument used was a Ludlum, Model 2403 survey meter with a GM pancake detector.

4. VIOLATIONS, NCVs, AND OTHER SAFETY ISSUES:
(State the requirement, how and when the licensee violated the requirement, and the licensee's proposed corrective action plan. For NCVs, indicate why the violation was not cited. Attach copies of all licensee documents needed to support violations.)

1. License Condition 16 requires, in part, that the licensee conduct its program in accordance with the statements, representations, and procedures contained in the application, dated June 25, 2002.

Section 10 of the application, Area Surveys, Item 1.c requires that areas designated by the RSO (radiation safety officer) to be checked for removable contamination be surveyed each week of use and evaluated in a well counter.

As of October 4, 2007, the licensee failed to perform surveys each week of use the areas designated by the RSO to be checked for removable contamination. Corrective action for this violation was to assign a single technologist to perform the weekly survey on Thursday of each week.

2. License Condition 16 requires, in part, that the licensee conduct its program in accordance with the statements, representations, and procedures contained in the application, dated June 25, 2002.

Section 10 of the application, Area Surveys, Item 1.b requires, in part, that the areas designated by the RSO for ambient dose rate surveys be surveyed at the end of each day of use with a radiation detection survey meter.

Section 10 of the application, Area Surveys, Item 4 requires, in part, that records of surveys include the following data: (a) the date areas surveyed, and equipment; (b) the initials of the person who made the survey; and (c) the measured dose rate in mR/hr (milliroentgen per hour) or contamination levels in DPM (disintegrations per minute), as appropriate.

On numerous occasions between November 2007 and July 23, 2008, the licensee failed to record the results of ambient dose rate surveys performed at the end of each day of use. The licensee indicated that it would discuss the need to document the results daily with the technologists.

3. License Condition 16 requires, in part, that the licensee conduct its program in accordance with the statements, representations, and procedures contained in the application, dated June 25, 2002.

Section 9 of the application, Calibration of the Dose Calibrator, Item 1.a, requires, in part, that the dose calibrator be tested for accuracy once each day prior to assay of patient doses.

Section 9 of the application, Calibration of the Dose Calibrator, Item 3.c requires, in part, that records include the model and serial number of the dose calibrator, radionuclide used, the date of the test, and the initials of the person performing the test.

On numerous occasions between November 2007 and July 23, 2008, the licensee failed to record the results of accuracy tests performed each day of use. The licensee indicated that it would discuss the need to document the results daily with the technologists.

Based on a review of the consultant's reports, the inspector was concerned that management was not reviewing the reports and therefore, corrective actions were not taken in response to issues identified by the consultant. The licensee's consulting physicist also identified the same violations discussed in above on multiple occasions during quarterly program audits performed since June of 2007. However, it appears that management may not have been aware of the results of the audits and corrective actions were not implemented in response to your consultant's reports. The inspector was concerned about the lack of management involvement with the radiation safety program.

5. PERSONNEL CONTACTED:
(Identify licensee personnel contacted during the inspection, including those individuals contacted by telephone.)

Use the following identification symbols:

Individual(s) present at entrance meeting

* Individual(s) present at exit meeting

*Gregory Sutliff, M.D., RSO

*Dawn Kirchner, Technical Director, Cardiovascular Testing

Suzanne, technologist

Shannon, technologist

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