



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, ILLINOIS 60532-4352

September 25, 2008

E. Lynn McGuire, Director
National Health Physics Program (115HP/NLR)
Department of Veterans Affairs
Veterans Health Administration
2200 Fort Roots Drive
Little Rock, AR 72114

**SUBJECT: NRC INSPECTION REPORT 030-34325/08-13(DNMS) (FORM 591M PART 1)
MEDICAL CENTER, DENVER, COLORADO**

Dear Mr. McGuire:

This refers to the inspection conducted on August 28, 2008, at the Department of Veterans Affairs, Medical Center, Denver, Colorado. The inspection was limited to a review of activities authorized under Permit No. 05-01401-02. The inspector conducted an exit briefing with the staff at the Medical Center at the completion of the inspection.

Within the program areas reviewed during this inspection, the inspector did not identify any violations of NRC requirements. Therefore, you are not required to respond to this letter.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). The NRC's document system is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

We will gladly discuss any questions you have concerning this inspection.

Sincerely,

A handwritten signature in black ink, appearing to read "Patricia J. Pelke".

Patricia J. Pelke, Chief
Materials Licensing Branch

Docket No. 030-34325
License No. 03-23853-01VA
Permit No. 05-01401-02

Enclosure:
Inspection Report 030-34325/08-13(DNMS) (Form 591M Part 1)

SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION

1. LICENSEE/LOCATION INSPECTED:

VA Eastern Colorado Health Care System
1055 Clermont Street
Denver, Colorado 80220

2. NRC/REGIONAL OFFICE

USNRC Region IV
612 East Lamar Blvd., Suite 400
Arlington, Texas 76011-4125

REPORT NUMBER(S) **2008-013**

3. DOCKET NUMBER(S)

030-34325

4. LICENSEE NUMBER(S)

03-23853-01VA

5. DATE(S) OF INSPECTION

August 28, 2008

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 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 10 CFR 19.11.

(Violations and Corrective Actions)

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

I hereby state that, within 30 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			
NRC INSPECTOR	R. Rick Muñoz		08/28/08

(1/2008 edited by RIV)

10 CFR 2.201

Docket File Information
SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION



1. LICENSEE VA Eastern Colorado Health Care System		2. NRC/REGIONAL OFFICE USNRC Region IV	
REPORT NUMBER(S) 2008-013			
3. DOCKET NUMBER(S) 030-34325	4. LICENSE NUMBER(S) 03-23853-01VA	5. DATE(S) OF INSPECTION 08/28/2008	
6. INSPECTION PROCEDURES USED 87134, 86740		7. INSPECTION FOCUS AREAS 03.03-03.07	

SUPPLEMENTAL INSPECTION INFORMATION

1. PROGRAM CODE(S) 2110	2. PRIORITY 3	3. LICENSEE CONTACT Peter G. Vernig	4. TELEPHONE NUMBER (303) 399-8020
X Main Office Inspection	1055 Clermont St. Denver Colorado		Next Inspection Date: TBD
Field Office Inspection			
Temporary Job Site Inspection			

PROGRAM SCOPE

This was an unannounced inspection for VA permit 05-01401-02 with broad scope authorization. The RSO listed on the permit is Peter G. Vernig.

This program consists of a nuclear medicine department that performs both diagnostic and therapeutic administrations. The VA employs three CNMTs working from 7-4 daily and on-call basis. The department receives a 3.5 Curie generator per week and single unit doses as prescribed by 5 authorized users. A dose calibrator is used and adequately maintained. Approximately 8-10 scans are performed each day, mostly hearts and bones with some HIDA & gastric emptying. I-131 <30 mCi is used 25/year and doses >30 mCi is used ~9/year all in capsule form (out-patient release). Patients are released in accordance with 10 CFR 35.75 (NUREG 1556, Vol 9, app U & Reg Guide 8.39). The hot lab/image rooms are kept locked. The hot lab is keyed in conjunction with a proxy card access. Access is strictly controlled. All waste generated is disposed of by decay-in-storage maintained in the hot lab. Survey instruments are calibrated in-house using a Tech-Ops 20 mCi Cs-137 source, also maintained in a controlled dedicated room within the hot lab area. The RSO performs a QM review quarterly (WD-60-70) and radiation safety program annually. Problems identified are tracked, corrected, documented and followed-up through the radiation safety committee.

The research program is composed of 9 Principle Investigators including the RSO. The research labs were using micro curie quantities of P-32 exclusively. Currently, there is no animal study research using radioactive material. All P-32 in use and storage was properly labeled and secured. The VA discontinued the use of C-14 and H-3 two years ago. The primary investigators are approved by the radiation safety committee through an internal permit process prior to receiving and using licensed material. Five research labs were visited and interviews were conducted with laboratory technicians and primary investigators. Cognizant personnel interviewed were knowledgeable and demonstrated appropriate radiation protection practices. P-32 research lab waste is stored in two locations and is disposed using decay-in-storage. C-14 and H-3 waste is awaiting disposal. Radiation safety training is provided annually to all radiation workers by the radiation safety office.

The 200 mCi Co-60 Gamma Cell was removed from the facility in July 2006 and shipped to Southwest Research Institute.

Performance Observations:

During the inspection, the inspector and members of the VA's staff reviewed the radiation safety program. Permit personnel including the Nuc Med and Research Labs described and demonstrated the processes used to document and protocols for the receipt of and disposal of licensed material. Individuals demonstrated or discussed the use of radiation survey instrumentation and calibration; material accountability; dose ordering, preparation and administration; wipe test analysis; dosimetry; routine security of radioactive material; dose calibrator tests; RSC minutes; audits; and any reportable events. Review of licensee inventory records verified that all licensed material in the licensee's possession had been maintained adequately. The inspector walked down the licensee's materials waste storage and use locations and through direct observation and the conduct of independent radiological surveys, verified the presence and location of licensed material inventoried. No inventory differences or reporting issues were identified.

The last inspection conducted February 6-7, 2003 identified one violation of 10 CFR 20.1801 related to security of radioactive material. Research laboratory building #23 was found to have 2 mCi of P-32 and was unsecured. All laboratories were visited during this inspection and entry doors checked for security were locked as required. In addition, radioactive material was found locked within each refrigeration unit in a specially designed lock box. This violation is closed.

No violations of safety significance were noted during this inspection.

Persons Present::

Peter Vernig, RSO

Amy Ipson, CNMT

Ellen Mangione, M.D., Chief of Staff

Marilyn Lynn, Chief of Quality Management & Education

Christina White, Special Assistant to the Director

Judith Burke, Acting Director

Brad McCollam, Acting Associate Director