



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

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

November 20, 2008

Susan Langhorst, Ph.D.
Radiation Safety Officer
Washington University in St. Louis
Campus Box 8053
660 S. Euclid Avenue
St. Louis, MO 63110-1093

SUBJECT: NRC INSPECTION REPORT NO. 030-02271/08-02 (DNMS) –
WASHINGTON UNIVERSITY IN ST. LOUIS

Dear Dr. Langhorst:

This refers to the inspection conducted on November 17, 2008, at the Washington University in St. Louis facility. Please disregard and dispose of the NRC Form 591M dated October 17, 2008, which gives the incorrect date for the inspection. As a result of the inspection, the enclosed revised NRC Form 591M, SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION, is issued for License No. 24-00167-11. You will note that this form indicates that no violation was identified and that previous violations are closed. It is not necessary that you acknowledge receipt of this form.

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 for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS). ADAMS 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,

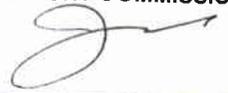


John R. Madera, Chief
Materials Inspection Branch

Docket No.030-02271
License No. 24-00167-11

Enclosure: NRC Form 591M

SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION



1. LICENSEE/LOCATION INSPECTED: Washington University in St. Louis 660 S. Euclid Avenue St. Louis, Missouri 63110-1093 REPORT NUMBER(S) 2008-002		2. NRC/REGIONAL OFFICE Region III U.S. Nuclear Regulatory Commission 2443 Warrenville Road, Suite 210 Lisle, Illinois 60532-4351	
3. DOCKET NUMBER(S) 030-02271	4. LICENSEE NUMBER(S) 24-00167-11	5. DATE(S) OF INSPECTION November 17, 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. (From NRC Inspection Report No. 030-02271/2008-001)
- 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)

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	Geoffrey M. Warren		11/19/08



**SAFETY INSPECTION REPORT
AND COMPLIANCE INSPECTION**

1. LICENSEE Washington University in St. Louis REPORT NUMBER(S) 2008-002		2. NRC/REGIONAL OFFICE NRC Region III 2443 Warrenville Road, Suite 210 Lisle, Illinois 60532-4351	
3. DOCKET NUMBER(S) 030-02271	4. LICENSE NUMBER(S) 24-00167-11	5. DATE(S) OF INSPECTION Nov. 17, 2008	
6. INSPECTION PROCEDURES USED 87134	7. INSPECTION FOCUS AREAS Limited to review of previous violations and corrective actions		

SUPPLEMENTAL INSPECTION INFORMATION

1. PROGRAM CODE(S) 02110	2. PRIORITY 2	3. LICENSEE CONTACT Susan Langhorst, Ph.D., RSO	4. TELEPHONE NUMBER 314-362-2988
<input checked="" type="checkbox"/> Main Office Inspection		Next Inspection Date: <u>No change – Dec. 2008</u>	
<input type="checkbox"/> Field Office		_____	
<input type="checkbox"/> Temporary Job Site Inspection		_____	

PROGRAM SCOPE

This inspection was performed as a followup to escalated enforcement. An inspection was conducted in May 2008 to review an event where iodine-125 seeds were disposed improperly following a prostate implant procedure. Two violations were identified during that inspection, concerning: 1) failure to maintain surveillance or secure licensed material in accordance with 10 CFR 20.1801 and 20.1802, and 2) failure to perform surveys to account for all sources following an implant procedure in accordance with 10 CFR 35.404(a).

The licensee completed corrective actions including 1) in-service training for personnel involved in the event and for oncology staff; 2) developing a credentialing program for personnel involved in brachytherapy procedures; and 3) requiring visual and survey verification of extra seeds in the operating room following an implant procedure. The inspector reviewed training records, credentialing forms, and seed verification forms; interviewed oncology staff concerning the training, credentialing, and seed verification procedures; and noted no concerns with the implementation of the corrective actions. In addition to credentialing for brachytherapy procedures, the licensee has begun credentialing for high dose rate remote afterloader (HDR) and iodine-131 radiopharmaceutical therapy procedures.

Based on the above information, the inspector determined that the licensee has corrected the violations from the May 2008 inspection, and has implemented the corrective actions they committed to in their response to the violations. Because of this, the violations are considered closed.