

SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION

1. LICENSEE/LOCATION INSPECTED: Mid-Michigan Radiology Associates, P.C. 211 S. Crapo Road Mt. Pleasant, Michigan 48858 REPORT NUMBER(S) 2010-001	2. NRC/REGIONAL OFFICE Region III U.S. Nuclear Regulatory Commission 2443 Warrenville Road, Suite 210 Lisle, Illinois 60532-4351
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3. DOCKET NUMBER(S) 030-32468	4. LICENSEE NUMBER(S) 21-26346-01	5. DATE(S) OF INSPECTION Sept. 1, 2010
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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)

10 CFR ~~71.3 states that, except~~ ^{by} 71.5(a) requires that a licensee who transports licensed material outside of the site of usage, as specified in the NRC license, or where transport is on public highways, or who delivers licensed material to a carrier for transport, comply with the applicable requirements of the regulations appropriate to the mode of transport of the Department of Transportation (DOT) in 49 CFR Parts 107, 171-180, and 390-397
 49 CFR 172.702 requires that each hazmat employer shall ensure that each hazmat employee is trained and tested, and that no hazmat employee performs any function subject to the requirements of 49 CFR Parts 171-177 unless trained, in accordance with Subpart H of 49 CFR Part 172. The terms Hazmat Employer and Hazmat Employee are defined in 49 CFR 171.8. (continued)

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	John W. Hoyle, R.T. Manager	<i>John W. Hoyle, R.T.</i>	9-1-10
NRC INSPECTOR	Geoffrey M. Warren	<i>G. M. Warren</i>	9/1/10

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(Continued)

Contrary to the above, until Sept. 1, 2010, the licensee did not provide training for its hazmat employees as required by Subpart H to 49 CFR Part 172, and the licensee otherwise meets the definition of hazmat employer in 49 CFR 171.8. Specifically, licensee personnel transported licensed material.

As corrective action, the licensee stated that they would schedule training by Sept. 15, 2010, and will provide training at the earliest opportunity.

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6. INSPECTION PROCEDURES USED 87131	7. INSPECTION FOCUS AREAS 03.01 – 03.08		

SUPPLEMENTAL INSPECTION INFORMATION

1. PROGRAM CODE(S) 02200	2. PRIORITY 3	3. LICENSEE CONTACT David Petrella, M.D., RSO	4. TELEPHONE NUMBER 989-773-3418
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<input checked="" type="checkbox"/> Main Office Inspection	Next Inspection Date: Sept. 2013
<input type="checkbox"/> Field Office	
<input type="checkbox"/> Temporary Job Site Inspection	

PROGRAM SCOPE

The licensee was a medical facility located in Mt. Pleasant, Michigan, with authorization to use byproduct materials in Sections 35.100, 35.200, and 35.300. Licensed activities were conducted at the location indicated on the license and at temporary job sites. The licensee transported doses to a nearby cardiology clinic to perform cardiac stress tests, but these patients returned to the licensee's clinic for imaging. The nuclear medicine department was staffed with three nuclear medicine technologists, who typically administered 40 diagnostic doses monthly and one iodine-131 therapy dose annually, with the iodine in capsule form. The diagnostic procedures were predominately technetium-99m bone, hepatobiliary, and cardiac imaging. The department received unit doses as needed from a licensed nuclear pharmacy. All waste was either held for decay-in-storage (DIS) or returned to the nuclear pharmacy.

Performance Observations

The inspector observed one diagnostic administration of licensed material, including dose preparation and disposal. Licensee staff demonstrated dose calibrator constancy, survey meter QC, and package receipt and return surveys, and described waste disposal, and daily and weekly contamination surveys. The inspector noted no concerns with these activities. The inspector reviewed written directives for the three iodine-131 therapies performed since the previous inspection and identified no concerns. Interviews with licensee personnel indicated adequate knowledge of radiation safety concepts and procedures. The inspector performed independent and confirmatory radiation measurements which indicated results consistent with licensee survey records and postings.

The inspector noted that the technologists had not been given Hazmat training as required by DOT requirements. While they had not received the required training, no violations were identified concerning the transport of materials.