



**DEPARTMENT OF VETERANS AFFAIRS**  
**Veterans Health Administration**  
**National Health Physics Program**  
**2200 Fort Roots Drive**  
**North Little Rock, AR 72114**

**MAR 08 2007**

In Reply Refer To: 598/115HP/NLR

Cassandra F. Frazier  
Division of Nuclear Material Safety  
Region III  
Nuclear Regulatory Commission (NRC)  
2443 Warrenville Road, Suite 210  
Lisle, Illinois 60532-4352

Re: NRC License 03-23853-01VA

Dear Ms. Frazier:

I am responding to your letter of January 31, 2007, which provided a questionnaire with a list of information to provide for the NRC inspection at North Little Rock, Arkansas, in April 2007.

This letter and our enclosed response, with the requested information, are in an electronic format as a .pdf file. I am sending the file to you as an e-mail attachment. In addition, I will provide a hard copy of the response for NRC use during the inspection.

The information in the response is current approximately through February 15, 2007. My staff and I will be available to assist you during the inspection, address any additional issues, or provide updated information.

If you have any questions, please contact me at (501) 257-1571.

Sincerely,

A handwritten signature in black ink, appearing to read "E. Lynn McGuire", is written over the typed name.

E. Lynn McGuire  
Director, National Health Physics Program

Enclosure

Enclosure to Director, National Health Physics Program, letter of March 14, 2007

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Tab A

## Responses to Questions

Ia. Management Oversight

Organizational chart that includes the Senior Executive Management through the Radiation Control Program staff (current and changes since last biennial inspection).

Tab B has the current organizational chart.



Ib. Management Oversight

Internal management audits or reviews that have been performed to assess the MML Radiation Control Program, the audit or review findings and their resolutions.

1. Tab C has a copy of the internal assessment completed in December 2006.
2. The internal assessment incorporated results from other assessments completed in calendar year 2006.

Id. Management Oversight

List of reportable events or incidents that have occurred since last biennial inspection, include any actions taken to address the problems.

1. Tab D has a list of reportable events.
2. The individual permittee files have documentation for follow-up actions including results for reactive inspections where warranted.

Ie. Management Oversight

Current membership of the Master Radiation Safety Committee, including new members, vacancies, and actions to fill those positions.

1. Tab E has the current attendance matrix for the committee.
2. The committee does not have any vacancies.

Ih. Management Oversight

Describe any recent efforts, or future plans, on your part to improve the safety performance of permittees operating below acceptable levels for ensuring public health and safety.

NHPP has not identified any permittees operating below acceptable levels for ensuring public health and safety with the exception of permittees cited violations during routine and/or reactive inspections for which the permittee corrective actions were, or are being, completed under inspection and enforcement actions guidelines.

ii. Management Oversight

Description of your perspective of your program's strengths and weaknesses. These strengths and weaknesses should be supported by examples of successes, problems, or difficulties, which occurred during this review period.

1. The master materials license program has the following strengths:

a. The VHA is a major federal healthcare system with a longstanding history of centralized control of functional programs such as health and safety, quality assurance, and clinical support.

b. The VHA executive managers on the National Radiation Safety Committee are familiar with the processes inherent in centralized control, regulatory compliance, management oversight, and external inspections.

c. The VHA fully supports NHPP with sufficient staffing, funding, and organizational authority.

d. NHPP's professional staff has significant health physics experience in medical and biomedical research uses including permitting and inspection actions.

e. Overall, the VHA has a focused, well-structured master materials license program based on sound business practices.

f. An example of success is the proactive approach to security with the following actions in calendar year 2006.

(1) Continued implementation of a Web-based sealed source inventory,

(2) Initial inspections for implementation of the NRC order for increased controls, and

(3) Development of a Web page with information such as frequently asked question related to the NRC order for increased controls. *When*

2. The VHA master materials license program faces the following challenges:

✓ a. *What & How* **Completing transition to a master materials license in an environment of increased emphasis on security and revised definitions of byproduct material.**

✓ b. **Facilitating an enhanced organizational and individual understanding of security issues with emphasis on increased controls for radioactive material quantities of concern.**

✓ c. **Adjusting and revising permit, inspection, incident response, and allegation actions to be consistent with specific NRC feedback.**

✓ d. **Coordinating with various NRC offices to address specific issues.**

Ij. Management Oversight

Updated permit list sorted by NRC program code, by inspection due date, and by priority if possible. Include the following information: Name, Permit #, Location, NRC program code, Priority, Last Inspection date, inspection due date

1. Tab F has a current permittee list.
2. Tab H has a current list used to track inspections.



## Ila. Technical Staffing and Training

Provide a staffing plan, or complete a listing of personnel using the suggested format below, that provides the professional (technical) person-years of effort applied to the MML program by individual. Include the name, position, and the fraction of time spent in the following areas: administration, materials permitting & inspection activities, event response, other. If these regulatory responsibilities are divided between offices, the table should be consolidated to include all personnel contributing to the MML radiation control program. Include all vacancies and identify all senior personnel assigned to monitor work of junior personnel. The table heading should be: Name, Position, Area of Effort, FTE%.

NHPP's staffing plan is as follows:

<u>Name</u>	<u>Position</u>	<u>% Time/Area of Effort</u>
E. Lynn McGuire	Director	80/master materials license
Edwin M. Leidholdt, Jr.	Program Manager	20/master materials license
Gary E. Williams	Program Manager	100/master materials license
Joseph R. Wissing	Program Manager	100/master materials license
Paul L. Yurko	Program Manager	100/master materials license



## Iic. Technical Staffing and Training

List technical staff who have not yet met the qualification requirements of permit reviewer/materials inspection staff. For each, list the courses or equivalent training/experience they need to attend and a tentative schedule for completion of these requirements.

1. Three technical staff has achieved interim qualification under SOP 4 pending completion of NRC core training courses for permit reviewers and permit inspectors and qualification boards. *which courses.*
2. One technical staff has completed qualification under SOP 4 and does not have any pending NRC core training courses to complete.
3. Tab G has the training plan that lists NRC core training courses projected.

IId. Technical Staffing and Training

List technical staff who left the program during this period.

Donna S. Moser  
Michael C. Simmons

\* <sup>Open</sup> → April 13, 2006 VHA

\* → Post. 10 days H.R.

• Duty location  
Little Rock

\*

## Ile. Technical Staffing and Training

List the vacant positions in each program, the length of time each position has been vacant, and a brief summary of efforts to fill the vacancy.

NHPP has one opening for a program manager effective January 5, 2007, and is following the federal government OPM process to select a replacement.

### IIIa. Status of Materials Inspections

Prepare a table identifying the permits with inspections that were/are overdue by more than 25% of the scheduled frequency at any time during the review period. The schedule for inspection frequency is set out in NRC Inspection Manual Chapter 2800. (Note: Although the licensee may be more restrictive and perform inspections more frequently, the list should be based on the inspection frequency in MC2800. Further, unless the MML licensee requests and receives approval from NRC (or has been asked by NRC and agreed) to follow a temporary instruction, the MML will be inspected in accordance with the current inspection procedure and not a temporary instruction.) The list should include initial inspections that are overdue. Include the following information: Permittee Name, Insp. Frequency, Due Date, and Time Overdue.

NHPP does not have any overdue inspections.

IIIb. Status of Materials Inspections

Do you currently have an action plan for completing overdue inspections? If so, describe the plan.

NHPP does not have any overdue inspections.

### IIIc. Status of Materials Inspections

Copy of current log or other document used to track inspections.

1. NHPP uses a networked database (RTMS) to track inspection activities and milestones.
2. Tab H has a current list used to track and plan inspection due dates.

### IIIId. Status of Materials Inspections

List of inspection frequency and program code by permit type.

1. NHPP uses inspection frequencies for the program codes in Inspection Manual Chapter 2800.
2. Refer to Tab F for a list of program codes for each facility, created from demography module of RTMS.



### IIIe. Status of Materials Inspections

List individual permittees or groups of permittees that you are inspecting at a different frequency than called for in NRC Inspection Manual Chapter 2800 and state the reason for the change.

1. NHPP uses inspection frequencies for the program codes in Inspection Manual Chapter 2800.
2. NHPP does not have different inspection frequencies.

#### IVa. Technical Quality of Inspections

List changes made to your written inspection procedures during the review period.

1. Tab C has a copy of the internal assessment completed in December 2006.
2. The internal assessment incorporated results from other assessments completed in calendar year 2006 and has a list of policy and procedural changes.
3. Internal assessment reports for previous years have similar information about changes to the written procedures and are available for review during the onsite inspection.

#### IVb. Technical Quality of Inspections

Prepare a table showing the number and types of supervisory accompaniments made during the review period, and results of those accompaniments. Include the following information: Inspector, Supervisor, NRC Program Code, and Date.

1. Internal Procedure No. 25 has procedural guidelines for management accompaniments.
2. Tab I has documentation for the management accompaniments completed in 2006.

#### IVc. Technical Quality of Inspections

Describe internal procedures for conducting supervisory accompaniments of inspectors in the field.

Internal Procedure No. 25 has procedural guidelines for management accompaniments and is available for review during the onsite inspection.

#### IVd. Technical Quality of Inspections

Describe the type of instrumentation used during inspections and methods/frequency of calibration. Are all instruments properly calibrated at the present time? Were there sufficient calibrated instruments available through the review period?

1. NHPP uses survey instrumentation suitable to perform confirmatory measurements for the types and uses of radioactive materials at permittees. The instruments have the capacity to measure exposure rate and fixed contamination using compatible detectors such as ion chambers, G-M tubes, or scintillation probes.
2. The instruments are calibrated at least annually.
3. NHPP has a sufficient number of calibrated instruments available.

#### IVe. Technical Quality of Inspections

List of inspections that resulted in violations. Include the following information: Permittee, Program code, Date of inspection, and Severity Level.

Tab M has a current list used to track completed inspections and results.

Va. Technical Quality of Permitting Actions

List any major, unusual, or complex permits issued such as amendments, terminations, new permits, decommissioning, or renewals. Also identify any new or amended permits that now require emergency plans.

1. Tab J has a current list of permitting actions.
2. Tab K has a list of permit renewals for 2005 through 2011.
3. NHPP did not issue any new or amended permits that now require emergency plans.



Vb. Technical Quality of Permitting Actions

Discuss any variances from NRC licensing policies and/or procedures during the review period.

NHPP did not authorize or issue any variances.

Vc. Technical Quality of Permitting Actions

List changes made in your written permitting procedures (new procedures, updates, policy memoranda, etc.) during the review period.

1. Tab C has a copy of the internal assessment completed in December 2006.
2. The internal assessment incorporated results from other assessments completed in calendar year 2006 and has a list of policy and procedural changes.

Vd. Technical Quality of Permitting Actions

Copy of current log or other document used to track licensing actions.

Tab J has a current list of permitting actions.

Ve. Technical Quality of Permitting Actions

List non-standard permit conditions used during the review period. Permittee, Program Code, Action Type, and Date Received.

NHPP did not use any non-standard permit conditions during the review period.

Vf. Technical Quality of Permitting Actions

List pending licensing actions, include the following information: Permittee, Program Code, Action Type, and Date Received.

Tab J has a current list of permitting actions.

Via. Responses to Events or Incidents and Safety Concerns or Allegations

List reportable events or incidents (e.g., medical events, doses to embryo/fetus or nursing child, overexposures, lost and abandoned sources, incidents requiring 24-hour or less notification, etc.) that were ongoing or occurred during the review period. Show whether the incident is open or closed and whether it was reported to the NRC. The list should be in the following format: Permittee Name, Permit #, Date of, Type of, Status, Reported to NRC, Incident/Report, and Incident.

Tab D has a list of reportable events.

Vlb. Responses to Events or Incidents and Safety Concerns or Allegations

During this review period, did any incidents occur that involved equipment or source failure or approved operating procedures that were deficient? If so, how and when were other permittees who might be affected notified? Was timely notification made to NRC?

NHPP did not have a report of, or identify, any incidents involving failure of equipment or sources.



VIc. Responses to Events or Incidents and Safety Concerns or Allegations

For incidents involving failure of equipment or sources, was information on the incident provided to NRC for evaluation of the device for an assessment of possible generic design deficiency? Please provide details for each case.

NHPP did not have a report of, or identify, any incidents involving failure of equipment or sources.

VId. Responses to Events or Incidents and Safety Concerns or Allegations

List any changes to procedures for investigating incidents and events made during the review period.

1. Tab C has a copy of the internal assessment completed in December 2006.
2. The internal assessment incorporated results from other assessments completed in calendar year 2006 and has a list of policy and procedural changes.

Vic. Responses to Events or Incidents and Safety Concerns or Allegations

List any changes to your procedures for handling safety concerns or allegations made during the period of this review.

1. Tab C has a copy of the internal assessment completed in December 2006.
2. The internal assessment incorporated results from other assessments completed in calendar year 2006 and has a list of policy and procedural changes.

VI. Responses to Events or Incidents and Safety Concerns or Allegations

List of all safety concerns or allegations received during the review period. Show whether the allegation is open or closed and whether it was referred by NRC.

Tab L has a list of allegations.

Vlg. Responses to Events or Incidents and Safety Concerns or Allegations

List of all wrongdoings identified during the review period. Show whether the action is open or closed.

Tab L has a list of allegations and includes one allegation investigation that identified a willful violation.

## Tab B

# Organization Chart for National Health Physics Program

# NATIONAL HEALTH PHYSICS PROGRAM ORGANIZATIONAL CHART

## NHPP Headquarters

2200 Fort Roots Drive (115HP)  
Building 101, Room 208E  
North Little Rock, AR. 72114  
Fax (501) 257-1570

Director:	<u>Lynn McGuire</u>	Office 501-257-1571 Cell 501-256-5332	<u>E-mail</u>
Administrative Officer:	Lisa Offutt	Office 501-257-1574 Cell n/a	<u>E-mail</u>
Program Manager:	<u>Gary Williams</u>	Office 501-257-1572 Cell 501-256-5331	<u>E-mail</u>
Information Technologist:	Kelly Mayo	Office 501-257-1571 Cell n/a	<u>E-mail</u>
Administrative Support Assistant:	Janet McNew	Office 501-257-1577 Cell n/a	<u>E-mail</u>

## NHPP Northwest Office

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## NHPP Eastern Office

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Current as of February 2007



# NATIONAL HEALTH PHYSICS PROGRAM ORGANIZATIONAL CHART

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Current as of April 2006



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Current as of December 2005

Tab C

## Internal Assessment Report

DEPARTMENT OF  
VETERANS AFFAIRS

Memorandum

Date: JAN 10 2007  
From: Executive Secretary, National Radiation Safety Committee (NRSC)  
Subj: Internal Assessment 2006  
To: Chair, NRSC

1. I completed the internal assessment during December 2006 using the procedural guidelines in Internal Procedure No. 31. The internal assessment is listed on the committee tracking matrix as issue #06-11B.
2. Attachment A is the task, narrative summary, and the recommendations. Attachment B is a description of follow-up actions for program assessments beginning with the internal assessment in December 2005. Attachment C is an evaluation of Nuclear Regulatory Commission (NRC) inventories. Attachment D is a review of the core performance indicators and available results for calendar year 2006. Attachment E is a review of VHA Directive 1105.1, standard operating procedures, and internal procedures. Attachment F is a review of NARM (naturally occurring/accelerator produced materials).
3. Based on the internal assessment, I submit the following recommendations for approval:
  - a. Issue and implement revisions to internal procedures.
  - b. Provide oversight for security and implementation of NARM.
4. I will review the attachments with the committee at the February 2007 meeting. Please let me know if you have any questions or comments.

  
E. Lynn McGuire

Attachments



### Attachment A -- Task, Narrative Summary, and Recommendations

1. The task was to complete the annual internal assessment using the procedural guidelines in Internal Procedure No. 31 with emphasis on the following.

- a. Lessons learned and other assessment results,
- b. Evaluation of Nuclear Regulatory Commission (NRC) inventories,
- c. Core performance indicators results,
- d. Directives, policies, and procedures, and
- e. NARM (naturally occurring/accelerator produced materials).

2. Lessons learned and other assessment results. See Attachment B to this internal assessment. The pending actions for the 2006 assessment results were completed with the follow-up to issue the revised internal procedures and continue with National Radiation Safety Committee (NRSC) oversight for security and NARM implementation.

3. Evaluation of NRC inventories. See Attachment C to this internal assessment. The pending action is to update the NRC inventories when requested. The NRSC provides oversight for the inventories through evaluation of security.

4. Core performance indicators results. See Attachment D to this internal assessment. Overall, the core performance indicators appear to provide for adequate and sufficient tracking of key and significant issues and do not require any changes for calendar year 2007.

5. Directives, policies, and procedures. See Attachment E to this internal assessment. The pending actions are to issue revised internal procedures.

6. NARM. See Attachment F to this internal assessment. The pending actions are to follow the NRC rulemaking process and implement NARM.

7. Recommendations for the internal assessment.

- a. Issue and implement revisions to internal procedures.
- b. Provide oversight for security and implementation of NARM.

## Attachment B - - Assessments Follow-up

1. The National Radiation Safety Committee (NRSC) approved a specific sequence of program assessments to support preparation of the annual review and audit report for the Under Secretary for Health. Procedural guidelines for the program assessments are in Internal Procedure No. 31. The annual review and audit is a commitment under Nuclear Regulatory Commission (NRC) License No. 03-23853-01VA.

2. This attachment is updated for the annual internal assessment to address the recommendations presented, developed, or discussed beginning with the internal assessment in December 2005 and continuing with other assessments in calendar year 2006. The status of recommendations from these assessments is addressed below. The program assessments include the following:

a. Internal assessment report of January 11, 2006,

b. External assessment report of March 29, 2006,

c. Other external reviews or inspections,

(1) External assessment report for inspections of February 10, 2006.

(2) External assessment report for permitting actions of February 4, 2006.

d. Lessons Learned evaluations during managers' meetings, and

(1) Lessons Learned 06-01.

(2) Lessons Learned 06-02.

e. NRSC Working Group report of April 25, 2006.

3. Internal assessment report of January 11, 2006.

a. Issue and implement revisions for internal procedures.

Status: Completed. The National Health Physics Program (NHPP) issued the revised internal procedures on January 26, 2006.

b. Provide oversight for implementation of two NRC orders for security.

Status: Completed. The NRSC is providing ongoing oversight during committee meetings and using the security status report. A plan of action and milestones for the NRC order for increased controls was approved by the committee at the May 3, 2006, meeting.

c. Delete repeated violations as a basis to determine an NHPP or NRC violation is a significant violation.



Status: Completed. Revised Internal Procedure No. 10 incorporated this change for the core performance indicators.

- d. Issue new internal procedure for the NRC order for increased controls.

Status: Completed. A working copy version of the new internal procedure was prepared in May 2006. The internal procedure was updated for this internal assessment and incorporates use of NRC enforcement policy.

4. External assessment report of March 29, 2006.

- a. Continue to update internal procedures, Frequently Asked Questions, and core performance indicators, as needed.

Status: Completed. NHPP, with NRSC oversight, updates internal procedures, information resources, and core performances primarily through the program assessment process.

- b. Evaluate completion of management accompaniments for all program managers.

Status: Completed. Management accompaniments for inspectors doing inspections have been completed for calendar year 2006.

5. External assessment report for inspections of February 10, 2006.

- a. Encourage permittee senior management and Radiation Safety Officer attendance at the inspection entrance and exit meetings.

Status: Completed. Staff participation at inspection meetings is normally within the discretion of the individual inspector, with consideration to specific circumstances.

- b. Ensure non-cited violations are cited on NHPP Form 591.

Status: Completed. The individual inspection report where a non-cited violation was not on the NHPP Form 591 was corrected. The issue was reviewed during the March 28, 2006, managers' meeting.

- c. Review external assessment report with the professional staff and include as part of the annual program assessment process.

Status: Completed. The report was reviewed during the March 28, 2006, managers' meeting and is included with the program assessment process.

6. External assessment report for permitting actions of February 4, 2006.

- a. Continue with permitting processes under the NHPP internal procedures, NUREG-1556 series document, and NRC license.

Status: Completed. Permitting actions follow applicable NHPP and NRC guidelines. This is confirmed during the program assessment process.

- b. Review required documentation for permitting actions during managers' meetings.

Status: Completed. The report was reviewed during the March 28, 2006, managers' meeting and is included with the program assessment process.

#### 7. Lessons Learned 06-01.

- a. Revise permitting guidelines under Internal Procedure No. 2, Template 2E, at the next annual update.

Status: Completed. The guidelines were updated for this internal assessment in December 2006.

- b. Disseminate information about best practices in *NHPP Scatterings*.

Status: Completed. The *NHPP Scatterings* March/April 2006 edition outlined the best practices.

- c. Review the lessons learned at the March 28, 2006, managers' meeting.

Status: Completed. The lessons learned was reviewed during the March 28, 2006, managers' meeting and is included with the program assessment process.

#### 8. Lessons Learned 06-02.

- a. Revise/reissue inspection report for New Orleans and reevaluate their corrective actions.

Status: Completed. The inspection report was reissued on June 27, 2006. The New Orleans response was accepted on August 4, 2006. The corrective actions were confirmed during an inspection on October 18, 2006.

- b. Disseminate information about the best practices in *NHPP Scatterings*.

Status: Completed. The July/August 2006 *NHPP Scatterings* had an article to address security.

- c. Review this lessons learned at the July 27, 2006, managers' meeting.

Status: Completed. Lessons Learned 06-02 was reviewed at the managers' meeting.

#### 9. NRSC Working Group report of April 25, 2006.

- a. Continue to track corrective actions for program assessment results.

Status: Completed. This internal assessment represents the next step in tracking corrective actions to completion.

b. Track implementation of the NRC order for increased controls and report quarterly to the NRSC using the security status report.

Status: Completed. Implementation of the NRC order is being tracked and reported quarterly to the NRSC.

c. Track implementation of the proposed rulemaking for NARM and report quarterly to the NRSC on the status.

Status: Completed. Implementation of the proposed rulemaking for NARM is being tracked and reported quarterly to the NRSC.

d. Facilitate seed brachytherapy information dissemination and report quarterly to the NRSC using the therapy machine status report.

Status: Completed. A special edition newsletter was issued in June 2006. FAQ 04-06 and FAQ 06-01 were updated. The status of therapy-related issues is reported quarterly to the NRSC.



### Attachment C -- Evaluation of Nuclear Regulatory Commission (NRC) Inventories

1. NRC has an interim inventory for larger activity sealed sources. For VHA, radioactive materials in the inventory are self-shielded irradiators and Cobalt-60 teletherapy units. VHA has participated in three previous inventories.

a. The most recent interim inventory update was in June 2006.

b. The inventory identified 16 sealed sources at 14 different locations. One of the locations disposed of a sealed source in August 2006.

2. Previously, the minimum activity for the sealed sources to include in the inventory was the International Atomic Energy Agency (IAEA) Category 2 threshold for applicable radionuclides. For the next inventory in early 2007, the minimum activity has been reduced to a newly created Category "3.5" threshold, which is one-hundredth of the Category 2 thresholds.

a. A table with the Category "3.5" thresholds is provided below.

b. The change in the minimum activity might result in more sealed sources being reported than in the past inventories, especially for Iridium 192.

c. Category 1 and Category 2 sealed sources in the 2007 inventory will be incorporated into a National Source Tracking System later in 2007, as discussed in paragraph 3 below.

3. NRC revised their regulations to implement a National Source Tracking System for certain sealed sources and requires licensees to report transfer, receipt, or disposal of nationally tracked sources. Licensees will have to provide an initial inventory of the sealed sources to the National Source Tracking System and annually reconcile the information in the system with the licensee's actual inventory.

a. The final rule for the National Source Tracking System is effective February 6, 2007, with licensee compliance required not later than November 15, 2007, for reporting Category 1 sources and November 30, 2007, for reporting Category 2 sources.

b. NRC will download inventory information in the interim inventory to the National Source Tracking System to ease initial reporting. Each licensee that reported information to the interim inventory will be provided a copy of its information and asked to either verify the information or provide updated information.

c. For sealed sources that are stored in a device, the licensee must report the serial number of the source within the device but are not required to report the device number.

4. The National Radiation Safety Committee provides oversight for VHA participation in the NRC inventories quarterly by review of the security status report.

a. Neither the 2007 interim inventory nor the National Source Tracking System require the committee to establish more detailed tracking for the larger activity sealed sources than has been completed since the first interim inventory.

b. The sealed sources in Category 1 and Category 2 are also termed as "radioactive material quantities of concern." NRC EA-05-090 of November 14, 2005, order for increased controls, requires a licensee to establish specific security related controls for these sealed sources.

c. The committee reviews the status implementation of the increased controls during quarterly meetings using the security status report format.

**Category "3.5" Thresholds - - 2007 Interim Inventory**

Radionuclide	Quantity of Concern	Curies Equivalent
Actinium 227, Californium 252, Thorium 228, Thorium 229	2 GigaBecquerels	0.054
Cobalt 60	3 GigaBecquerels	0.081
Radium 226	4 GigaBecquerels	0.108
Curium 244	5 GigaBecquerels	0.135
Americium 241, Americium 241/Be, Plutonium 236, Plutonium 238, Plutonium 239, Plutonium 239/Be, Plutonium 240, Polonium 210	6 GigaBecquerels	0.162
Iridium 192	8 GigaBecquerels	0.216
Cesium 137	10 GigaBecquerels	0.270
Selenium 75	20 GigaBecquerels	0.541
Ytterbium 169	30 GigaBecquerels	0.811
Gadolinium 153, Strontium 90 (Yttrium 90)	0.10 TeraBecquerel	2.703
Thulium 170	2 TeraBecquerels	54.054
Promethium 147	4 TeraBecquerels	108.11



#### Attachment D - - Core Performance Indicators Review

1. The slides for the core performance indicators represent programmatic information on the master materials license such as workload statistics, National Health Physics Program (NHPP) performance, and medical center performance. NHPP presents updated core performance indicator results to the National Radiation Safety Committee (NRSC) at quarterly meetings using the slides and a narrative summary. This summary is for annual internal assessment completed in December 2006.

2. This narrative summary is for available results of January through October 2006.

a. NHPP completed 42 inspections and 11 site visits. The inspection reports required an average of 17 days to complete. NHPP cited seven violations.

b. The Nuclear Regulatory Commission (NRC) completed 12 inspections. NRC cited one violation.

c. NHPP had 145 permit actions for an average of 15 actions per month with actions averaging 10 days to complete.

d. NHPP received one allegation.

e. NHPP received two reports related to incidents. One was for receipt of a contaminated package. The contaminated package did not represent a program deficiency by the permittee. The other was for loss of tritium exit signs. The exit signs were not under the master materials license. The loss was reported to the NRSC for information.

f. NHPP completed 14 communications for Radiation Safety Officers. The format for communications included bimonthly and special edition newsletters.

g. NHPP did not identify any significant violations, significant permit actions, or program deficiencies.

3. NHPP did not identify any results for which an additional root cause analysis is required or any recommended changes for the core performance indicators for calendar year 2007.

## Attachment E - - Directives, Policies, and Procedures Review

### Standard Operating Procedures (SOPs) and policy directive

1. SOP 1, SOP 2, and SOP 5 have an effective date of February 20, 2004. SOP 3 has an effective date of November 3, 2005. SOP 4 has an effective date of May 25, 2001. SOP 6 has an effective date of May 4, 2001.
2. A review of the six SOPs for the internal assessment did not identify any proposed revisions or changes.
3. VHA Directive 1105.1, "Management of Radioactive Materials," has an effective date of September 22, 2004, and must be recertified on or before the last working day of September 2009.
4. A review of the directive did not identify any proposed revisions or lack of consistency with Nuclear Regulatory Commission (NRC) requirements.

### Internal Procedures

1. Internal procedures are reviewed at least annually. The usual changes are for minor format revisions such as a revised effective date or to clarify or expand procedural guidelines to reflect assessment findings or recommendations. Specific changes for implementation in calendar year 2007 are outlined below. The general date for implementation is January 31, 2007.

a. Internal Procedure No. 1, "NHPP Internal Procedures"

Completed January 31, 2007: Revise list of internal procedures and templates to include new effective dates and new templates.

b. Internal Procedure No. 2, "Permit Amendment Requests and Notifications"

Completed January 31, 2007: Revise to include subparagraph about tracking expedited reviews.

c. Internal Procedure No. 3, "Preparing and Transmitting NHPP Inspection Actions"

Completed January 31, 2007: Revise to remove routine use of security worksheets and substitute decommissioning and closeout survey worksheets; change section for security to note NRC order for increased controls; revise generic inspection plan for 2007 focus areas and rearrange section for records review.

d. Internal Procedure No. 4, "NRC Inspection Actions"

Completed January 31, 2007: Minor changes only.



e. Internal Procedure No. 5, "Letter of Understanding (LOU) Implementation"

Completed January 31, 2007: Minor changes only.

f. Internal Procedure No. 6, "Incidents -- Preparation, Notification, and Response"

Completed January 31, 2007: Minor changes only.

g. Internal Procedure No. 7, "NHPP Information Systems"

Completed January 31, 2007: Revise section about information protection for sensitive and safeguards information.

h. Internal Procedure No. 8, "NHPP Files and Records Repository -- Director's Office"

Completed January 31, 2007: Revise to clarify protection for sensitive and safeguards information; clarify filing for docket files.

i. Internal Procedure No. 9, "NHPP Files -- Regional Offices"

Completed January 31, 2007: Revise to clarify protection for sensitive and safeguards information.

j. Internal Procedure No. 10, "Core Performance Indicators"

Completed January 31, 2007: Minor changes only.

k. Internal Procedure No. 11, "Libraries and Technical Documentation"

Completed January 31, 2007: Minor changes only.

l. Internal Procedure No. 12, "National Radiation Safety Committee"

Completed January 31, 2007: Revise logistical tasks; provide for electronic signature.

m. Internal Procedure No. 13, "VHA Consultative Support"

Completed January 31, 2007: Minor changes only.

n. Internal Procedure No. 14, "Timeliness Goals and Due Dates"

Completed January 31, 2007: Minor changes only.

o. Internal Procedure No. 15, "Interactions with Permittees"

Completed January 31, 2007: Add section to avoid unauthorized disclosure of sensitive information.

p. Internal Procedure No. 16, "Amendment Requests to Delete a Location of Use - - Medical"

Completed January 31, 2007: Add two templates to use during routine inspections to evaluate decommissioning files and closeout survey results.

q. Internal Procedure No. 17, "Monthly Reports"

Completed January 31, 2007: Minor changes only.

r. Internal Procedure No. 18, "NHPP Scatterings"

Completed January 31, 2007: Clarified periodic newsletters are issued for two month periods.

s. Internal Procedure No. 19, "Communicating with the Nuclear Regulatory Commission"

Completed January 31, 2007: Minor changes only.

t. Internal Procedure No. 20, "NHPP Web Sites"

Completed January 31, 2007: Provide additional comments about not posting safeguards or sensitive information on NHPP Web sites.

u. Internal Procedure No. 21, "Medical Events - Notification, Response, and Reports"

Completed January 31, 2007: Minor changes only.

v. Internal Procedure No. 22, "Permit Renewals"

Completed January 31, 2007: Minor changes only.

w. Internal Procedure No. 23, "Lessons Learned"

Completed January 31, 2007: Minor changes only.

x. Internal Procedure No. 24, "Coordination with Nuclear Regulatory Commission (NRC) Project Manager"

Completed January 31, 2007: Add note about release of privacy, confidential, or NRC order for increased controls information.

y. Internal Procedure No. 25, "Management Accompaniments"

Completed January 31, 2007: Minor changes only.

z. Internal Procedure No. 26, "Inspection Scheduling"

Completed January 31, 2007: Clarify section on inspection scheduling if change in program codes results in a more frequent inspection priority.

aa. Internal Procedure No. 27, "Equipment for NHPP Inspections"

Completed January 31, 2007: Minor changes only.

bb. Internal Procedure No. 28, "Financial Assurance for Decommissioning"

Completed January 31, 2007: Minor changes only.

cc. Internal Procedure No. 29, "Permits"

Completed January 31, 2007: Minor changes only.

dd. Internal Procedure No. 30, "Orientation for Radiation Safety Officers"

Completed January 31, 2007: Minor changes only.

ee. Internal Procedure No. 31, "Internal and External Assessments"

Completed January 31, 2007: Minor changes only.

ff. Internal Procedure No. 32, "Qualifications, Professional Development, Continuing Education, and Training"

Completed January 31, 2007: Minor changes only.

gg. Internal Procedure No. 33, "Root Cause Analysis"

Completed January 31, 2007: Minor changes only.

hh. Internal Procedure No. 34, "Amendment Requests to Delete a Location of Use - - Research"

Completed January 31, 2007: Minor changes only.

ii. Internal Procedure No. 35, "Allegations and Radiation Safety Concerns"

Completed January 31, 2007: Add a note about a current allegation investigation.



jj. Internal Procedure No. 36, "Security Audits and Evaluations"

Completed January 31, 2007: Revise extensively to reduce emphasis on security audits.

kk. Internal Procedure No. 37, "Web-Based Scaled Source Inventory"

Completed January 31, 2007: Minor changes only.

ll. Internal Procedure No. 38, "Continuity of Operations"

Completed January 31, 2007: Minor changes only.

mm. Internal Procedure No. 39, "Implementation of Nuclear Regulatory Commission (NRC) Order for Increased Controls"

Completed January 31, 2007: Revise to add reference to NRC EGM 06-003 and delete specific templates.

Follow-Up

Issue revised internal procedures.



## Attachment F -- NARM

1. The Nuclear Regulatory Commission (NRC) has proposed to change its regulations to include jurisdiction over certain radium sources, accelerator-produced radioactive materials, and certain naturally occurring radioactive material. These radioactive materials are often termed as NARM.

- a. The regulatory change is required by the Energy Policy Act of 2005 dated August 8, 2005.
- b. The energy act expanded the definition of byproduct material to include any discrete source of Radium 226 and any material made radioactive by use of a particle accelerator.
- c. The rulemaking process has been underway since late 2005. Some of the key events in the rulemaking process are noted below.

(1) Energy Policy Act - August 8, 2005,

(2) Proposed rule to states - January 2006,

(3) Proposed rule to NRC Commissioners - March 2006,

(4) Public briefing - May 15, 2006,

(5) *Federal Register* notice with proposed rule - July 28, 2006, and

(6) Final rule with a target date initially around February 2007, but now delayed.

2. The *Federal Register* notice with the proposed rule was published to solicit federal agency, licensee, and public comments. The National Health Physics Program (NHPP) sent comments for VHA. A summary of the types of comments is noted below. Of these, the most important for VHA are for licensing practices, such as for noncommercial or commercial distribution of radioactive materials.

- a. Definition of discrete source.
- b. Specific details about regulating Radium 226.
- c. Procedures to evaluate historical sites contaminated with NARM or Radium 226.
- d. Specific details about how to complete licensing under the new regulations.
- e. Specific values/quantities for the derived air concentration and annual limit of intake for certain radionuclides.
- f. Whether to grandfather approvals for certain physician authorized users, authorized medical physicists, and Radiation Safety Officers.

- g. Clarification on licensing for noncommercial distribution of radioactive materials.
  - h. Decommissioning guidelines for accelerators including specific components and the overall facility.
  - i. Licensing fee categories.
3. In 2006, NHPP has followed the rulemaking process and updated the National Radiation Safety Committee (NRSC) quarterly.
- a. NHPP attended a public briefing on May 15, 2006, distributed the proposed rule, and provided comments on the proposed rulemaking to NRC.
  - b. NHPP issued FAQ 06-02 with general information about the NARM rulemaking.
  - c. NHPP has an Intranet Web site under construction to post additional information, as the rulemaking process continues.
4. Based on information from the NRC staff in early December 2006, the NARM rulemaking is behind schedule.
- a. The NRC staff is resolving some issues related to Radium 226 and estimates the rulemaking process is two or three months behind the previous schedule.
  - b. The final rule is not likely to be published as planned in February 2007.
  - c. The final rule will be accompanied by revisions to two regulatory guides and the issuing of one new regulatory guide. These regulatory guides are in the NUREG-1556 series.
- (1) NUREG-1556, Volume 9, Revision 2, "Consolidated Guidance about Material Licenses: Program Specific Guidance about Medical Licenses," will be changed to include revisions for sample licenses, addition of requirements for sensitive information, incorporation of the changes in 10 CFR 35, addition of SI units, removal of references to 10 CFR 35 Subpart J, and addition of NARM materials.
- (2) NUREG-1556, Volume 13, "Consolidated Guidance about Material Licenses: Program Specific Guidance about Commercial Radiopharmacy Licenses," will be changed to include revisions to add NARM materials, reference to new NUREG-1556, Volume 21, providing some radiation safety recommendations for handling high energy photon-emitting radionuclides, and noting Radium-226 sources need to be identified and licensed.
- (3) NUREG-1556, Volume 21, "Consolidated Guidance about Material Licenses: Program Specific Guidance about Possession of Licenses for Production of Radioactive Materials Using an Accelerator," is a new guide to require listing accelerator produced activation products as radioactive materials, radiation safety training for maintenance and repair, and description of facility layouts.



5. The most likely impacts related to the NARM rulemaking for VHA are permitting actions such as the following.

a. Issuing revised permits with higher possession limits for some radionuclides that were not previously listed on VHA permits,

b. Requesting an NRC license for commercial distribution of positron emission tomography or PET radionuclides, and

c. Issuing a permit for two cyclotron facilities.

6. The proposed actions based on the internal assessment are for NHPP to continue to follow the rulemaking process and update the NRSC quarterly.

## Tab D

### List of Reportable Events

# VHA Incidents 2004

Event #	Event Date	Event Type	Location	Notification	Report	Issue Brief
40465	12/29/2003	Medical Event - written directive error	Ann Arbor	<u>1/22/2004</u>	<u>2/4/2004</u>	<u>6/9/2004</u>
40490	1/29/2004	Medical Event - sodium iodide	Boston	<u>1/30/2004</u>	<u>2/12/2004</u>	<u>6/10/2004</u>
40672	2/23/2004	Loss Of Material - research waste	Boston	<u>4/13/2004</u>	<u>5/11/2004</u>	<u>6/8/2004</u>
40634	3/31/2004	Medical Event - seed brachytherapy	Los Angeles	<u>4/2/2004</u>	<u>4/14/2004</u>	<u>7/19/2004</u>
40707	4/20/2004	Dose To Embryo/Fetus - sodium iodide	Birmingham	<u>4/27/2004</u>	<u>5/11/2004</u>	<u>6/9/2004</u>
40690	4/21/2004	Package Exceeding Contamination Limits	Chicago	<u>4/21/2004</u>		<u>6/9/2004</u>
40729	5/5/2004	Loss Of Material - exit sign	Milwaukee	<u>5/6/2004</u>	<u>6/2/2004</u>	<u>6/9/2004</u>
40989	8/27/2004	Package Exceeding Radiation Levels	Durham	<u>8/27/2004</u>		<u>8/27/2004</u>
41044	9/26/2004	Package Exceeding Contamination Limits	Milwaukee	<u>9/16/2004</u>		<u>9/16/2004</u>
41153	10/26/2004	Loss Of Material - research I-125	New Orleans	<u>10/27/2004</u>	<u>11/23/2004</u>	<u>12/1/2004</u>

## VHA Incidents 2005

Event #	Event Date	Event Type	Location	Notification	Report	Issue Brief
41371	1/10/2005	Loss Of Material - dose calibrator source	Battle Creek	<u>2/4/2005</u>	<u>2/28/2005</u>	<u>4/14/2005</u>
41439	2/24/2005	Package Exceeding Contamination Limits	Las Vegas	<u>2/24/2005</u>		<u>3/1/2005</u>
41443	2/24/2005	Medical Event - seed brachytherapy	Durham	<u>2/25/2005</u>	<u>3/9/2005</u>	<u>4/12/2005</u>
41592	4/9/2005	Medical Event - teletherapy	Dallas	<u>4/12/2005</u>	<u>4/26/2005</u>	<u>4/26/2005</u>
41658	4/29/2005	Package Exceeding Contamination Limits	Durham	<u>5/2/2005</u>		<u>5/5/2005</u>
41855	7/19/2005	Package Exceeding Contamination Limits	Biloxi	<u>7/20/2005</u>		<u>7/20/2005</u>
42117	8/30/2005	Loss Of Material - waste	New Orleans	<u>11/4/2005</u>	<u>12/1/2005</u>	<u>1/31/2006</u>
42038	10/3/2005	Medical Event - seed brachytherapy	Philadelphia	<u>2/3/2006</u>	<u>1/24/2006</u>	<u>2/21/2006</u>

## VHA Incidents 2006

Event #	Event Date	Event Type	Location	Notification	Report	Issue Brief
42485	4/10/2006	Loss of Material - exit sign	Milwaukee	<u>4/10/2006</u>	<u>4/24/2006</u>	<u>4/10/2006</u>
42507	4/18/2006	Package Exceeding Contamination Limits	Birmingham	<u>4/18/2006</u>		<u>4/19/2006</u>



## Tab E

### Attendance Matrix for National Radiation Safety Committee

NRSC Attendance Matrix for Calendar Years 2006 and 2007

Tab E

Current member/ Representative for	2/8/06	5/3/06	8/2/06	11/8/06	2/7/07	5/2/07	8/8/07	11/7/07
Charles M. Anderson, M.D., Ph.D., Chair	P	P	P	P	P			
Jonathan B. Perlin, M.D., Ph.D. Office of Under Secretary for Health/Management	Alt	Alt	Alt	Alt	NA	NA	NA	NA
Michael J. Kussman, M.D., MS, MACP Office of Under Secretary for Health/Management	NA	NA	NA	NA	Alt			
David Spencer, M.D. Office of Medical Inspector	P	Alt	P	P	NA	NA	NA	NA
Linda Tsan, M.D., FAAFP Office of Medical Inspector	NA	NA	NA	NA	P			
Brenda A. Cuccherini, Ph.D. Office of R&D	A	A	Alt	P	P			
E. Lynn McGuire RCPO and Executive Secretary	P	P	P	P	P			
Milton D. Gross, M.D. Office of Nuclear Medicine & Radiation Safety Service	P	P	P	P	Alt			
Neil S. Otchin, M.D. Office of Public Health & Environmental Hazards	P	P	P	P	P			
Johnny W. Scott, M.D., Ph.D. Office of Pathology & Laboratory Medicine Service	P	P	P	P	P			
Michelle DeGrandi Office of General Counsel	NA	NA	NA	P	P			
Rosemarie J. Paradis, RN, MS Office of Nursing Services	Alt	P	Alt	A	Alt			
Pradeep Kumar, M.D. Radiation Oncology	P	P	P	P	P			
Mark VanDrunen, M.D. Office of Radiology Service	P	P	P	P	P			
Sheila D. Rosenfeld Field Radiation Worker	Alt	P	P	P	Alt			
Raj Lakshman, Ph.D. Field Research	P	P	A	P	P			
Walter L. Furr, III Field Radiation Safety Officer	P	P	P	P	P			

Notes:

1. P (present at meeting or by conference call); Alt (represented by approved alternate); A (absent); or NA (not applicable since person was not or is not projected to be a committee member or representative at the meeting)
2. For the 2/07/07 meeting, the alternates were Vernon Wilkes for Michael Kussman, M.D., MS, MACP; Debra Clickner, RN, for Rosemarie Paradis, RN, MS; Lorraine Fig, M.D., for Milton Gross, M.D.; and Larry Chandler for Sheila Rosenfeld.
3. For the 2/07/07 meeting, the guests were Cassandra Frazier and Richard Struckmeyer from NRC.



Tab F

## Permittee List

Tab G

## Training Plan

Revised February 22, 2007

Training Plan -- NRC Core Course Training for NHPP Staff

NRC Core Course	Training Completed	Projected CY-06	Projected CY-07
G-101 or G-108 Fundamentals of Inspection	EL, GW, JW, PY	NA	NA
G-109 Licensing Practices/Procedures	EL, GW, JW, PY	NA	NA
G-205 Root Cause or Equivalent	JW, GW <sup>1</sup> , EL <sup>1</sup> , PY <sup>1</sup>	NA	NA
G-304 Inspecting for Performance	EL, JW, GW, PY	NA	NA
H-201 Health Physics Technology or Equivalent	GW <sup>1</sup> , JW <sup>1</sup> , PY <sup>1</sup> , EL <sup>#</sup>	NA	NA
H-304 Diagnostic/Therapeutic Nuclear Medicine	EL, GW, JW, PY	NA	NA
H-308 Transportation of Radioactive Materials or Equivalent	PY, JW, EL (GW) <i>scheduled to Oct.</i>	NA	GW
H-313 Brachytherapy, Gamma Knife and Emerging Technologies	EL, GW, JW, PY	NA	NA
OP Effective Communication for NRC Inspectors	EL <sup>#</sup> , GW <sup>1</sup> , PY <sup>#</sup> <i>Thombe (JW)</i>	NA	JW
G-111 OSHA Indoctrination Course	EL, GW, JW, PY	NA	NA

## Notes:

(1) EL Edwin M. Leidholdt; GW Gary E. Williams; JW Joseph R. Wissing; PY Paul L. Yurko

(2) NA not applicable; <sup>1</sup> Equivalent Training; <sup>2</sup> Equivalent Training Partial/Pending,

(3) Equivalent courses approved by National Radiation Safety Committee

G-205 TapRooT® Incident Investigation &amp; Root Cause Analysis Training and Patient Safety Improvement Training Conference

H-201 ORISE' Introduction to Radiation Safety and Radiation Safety Officer Training

H-308 ORISE Packaging and Transportation of Radioactive Materials and Associated Hazard Classes

H-308 Technical Management Services, Inc. Transportation and Packaging of Radioactive Materials

OP AMA Seminar #2580, "Effective Presentation Skills for Technical Professionals," plus required reading

# Receipt of course certificate pending

## Tab H

### Current List Used to Track Inspections



prty	City	last NRC (preMML)	NHPP	NHPP1	DueDate1	+25% window	Insp by NHPP/sche duled	by	Current Due Date
2	St. Louis Sat.Wichita	01/02/94	05/28/98	08/07/01	Jan-96	Jul-96			Jan-96
2	St. Louis Sat.Marion	10/25/01		09/02/99	Oct-03	Apr-04			Oct-03
2	St. Louis Sat.Cheyenne	02/04/03	09/02/98	07/24/01	Feb-05	Aug-05			Feb-05
2	St. Louis Sat.Ft Harrison	08/09/95	08/07/00	09/30/03	Sep-05	Mar-06			Sep-05
3	Northport	04/20/00	03/19/01	01/14/04	Jan-07	Oct-07			Jan-07
3	Roseburg	08/29/00	01/25/00	02/23/04	Feb-07	Nov-07	Jul-07	GW	Feb-07
3	San Juan	03/17/99	06/06/01	03/10/04	Mar-07	Dec-07	May-07	JW	Mar-07
3	Salisbury	08/13/02	03/20/00	03/24/04	Mar-07	Dec-07	Oct-07	JW	Mar-07
3	Long Beach	07/14/03	07/10/01	04/12/04	Apr-07	Jan-08	Apr-07	JW	Apr-07
3	Fargo	10/20/99	05/15/01	04/20/04	Apr-07	Jan-08	Apr-07	GW	Apr-07
2	Los Angeles	07/31/06	10/13/04	05/03/05	May-07	Nov-07	Mar-07	JW	May-07
2	Denver	02/06/03	11/16/98	05/10/05	May-07	Nov-07	May-07	JW	May-07
2	San Francisco	02/11/04	03/07/02	05/11/05	May-07	Nov-07	Jul-07	GW	May-07
3	Wilkes-Barre	04/18/00	02/26/02	05/11/04	May-07	Feb-08	May-07	PY	May-07
3	Reno	05/19/99	03/24/98	05/19/04	May-07	Feb-08	May-07	GW	May-07
3	Muskogee	01/26/00	04/15/98	05/25/04	May-07	Feb-08	May-07	PY	May-07
2	Omaha	03/01/05	05/29/01	05/25/05	May-07	Nov-07	Jun-07	GW	May-07
2	Memphis	09/10/03	06/24/03	06/07/05	Jun-07	Dec-07	Oct-07	JW	Jun-07
3	Dayton	05/08/06	12/03/02	06/08/04	Jun-07	Mar-08	May-07	JW	Jun-07
3	Chillicothe	11/30/00	04/26/00	06/09/04	Jun-07	Mar-08	May-07	JW	Jun-07
3	Montgomery	04/26/01	03/01/00	06/15/04	Jun-07	Mar-08	Jun-07	PY	Jun-07
3	Mountain Home	08/10/00	07/19/00	06/16/04	Jun-07	Mar-08	Jun-07	PY	Jun-07
3	Bay Pines	06/09/99	08/21/02	06/17/04	Jun-07	Mar-08	Mar-07	PY	Jun-07
3	Biloxi	11/07/00	03/02/00	06/17/04	Jun-07	Mar-08	Apr-07	PY	Jun-07
3	North Chicago	07/27/99	06/06/01	07/14/04	Jul-07	Apr-08	May-07	JW	Jul-07
3	Richmond	01/20/04	09/12/00	07/14/04	Jul-07	Apr-08	Aug-07	PY	Jul-07
3	Saginaw	01/11/05	11/08/01	07/20/04	Jul-07	Apr-08	Jun-07	JW	Jul-07
3	Manchester	06/29/01	04/06/00	07/21/04	Jul-07	Apr-08	Jun-07	GW	Jul-07
3	Beckley	02/10/99	07/22/99	07/22/04	Jul-07	Apr-08	Jul-07	PY	Jul-07
3	Iron Mountain	06/06/06	05/19/99	07/22/04	Jul-07	Apr-08	Jul-07	JW	Jul-07
3	White River Junction	02/16/05	03/21/01	07/22/04	Jul-07	Apr-08	Jun-07	GW	Jul-07
3	Togus	02/23/06	07/15/99	07/27/04	Jul-07	Apr-08	Jun-07	GW	Jul-07
2	Portland	09/07/06	08/19/03	08/09/05	Aug-07	Feb-08	Aug-07	JW	Aug-07
3	Fayetteville	10/24/01	02/29/00	08/10/04	Aug-07	May-08	Oct-07	PY	Aug-07
2	Palo Alto	03/04/03	11/07/01	08/16/05	Aug-07	Feb-08	Aug-07	JW	Aug-07
3	Hampton	02/12/01	11/14/00	08/30/04	Aug-07	May-08	Aug-07	PY	Aug-07
3	Salem	09/21/00	03/27/02	09/01/04	Sep-07	May-08	Jul-07	PY	Sep-07
3	Wilmington	05/23/01	02/10/99	09/01/04	Sep-07	May-08	Sep-07	PY	Sep-07
2	Oklahoma City	01/26/04	11/06/03	09/07/05	Sep-07	Mar-08	Sep-07	JW	Sep-07
3	Baltimore	09/28/01	9/27/2000	09/09/04	Sep-07	Jun-08	Aug-07	GW	Sep-07
3	Hot Springs	12/14/99	04/29/98	09/15/04	Sep-07	Jun-08	Sep-07	GW	Sep-07
3	Pittsburgh	03/15/05	10/16/01	09/15/04	Sep-07	Jun-08			Sep-07
3	Las Vegas	10/23/01	06/21/99	09/21/04	Sep-07	Jun-08	Oct-07	PY	Sep-07
2	Lexington	02/19/04	09/09/03	09/21/05	Sep-07	Mar-08	Sep-07	JW	Sep-07

revised 3/7/2007



prty	City	last NRC (preMML)	NHPP	NHPP1	DueDate1	+25% window	Insp by NHPP/sche duled	by	Current Due Date
	St. Louis Sat.Kansas								
2	City	09/14/99	11/28/01	09/22/05	Sep-07	Mar-08			Sep-07
2	Iowa City	11/30/04	11/19/03	10/19/05	Oct-07	Apr-08			Oct-07
3	Shreveport	01/25/01	05/23/00	10/19/04	Oct-07	Jul-08			Oct-07
2	Boston	07/07/03	11/04/03	10/27/05	Oct-07	Apr-08			Oct-07
2	Dallas	03/16/05	10/15/03	11/07/05	Nov-07	May-08			Nov-07
2	Little Rock	02/03/04	09/17/03	11/09/05	Nov-07	May-08			Nov-07
2	Chicago	12/19/06	11/18/03	11/30/05	Nov-07	May-08			Nov-07
3	Phoenix	10/26/99	06/28/00	12/13/04	Dec-07	Sep-08			Dec-07
2	Seattle	02/10/04	06/29/05	12/14/05	Dec-07	Jun-08			Dec-07
2	Houston	08/07/03	01/21/04	01/11/06	Jan-08	Jul-08			Jan-08
2	West Haven	08/19/03	01/15/04	01/11/06	Jan-08	Jul-08			Jan-08
2	Philadelphia	08/06/03	01/29/04	01/26/06	Jan-08	Jul-08			Jan-08
3	Des Moines	01/23/02	12/13/01	02/01/05	Feb-08	Oct-08			Feb-08
3	Decatur	02/06/02	02/03/00	02/08/05	Feb-08	Nov-08			Feb-08
2	San Antonio	02/12/02	02/11/04	02/08/06	Feb-08	Aug-08			Feb-08
3	Danville	01/14/02	10/26/99	02/10/05	Feb-08	Nov-08			Feb-08
3	Charleston	07/24/03	01/22/01	02/23/05	Feb-08	Nov-08			Feb-08
2	Gainesville	01/11/05	02/26/04	02/23/06	Feb-08	Aug-08			Feb-08
3	Kerrville	02/13/02	12/08/99	03/08/05	Mar-08	Dec-08			Mar-08
3	Huntington	11/29/01	07/21/99	03/24/05	Mar-08	Dec-08			Mar-08
3	Boise	08/31/06	08/15/01	04/14/05	Apr-08	Jan-09			Apr-08
2	Birmingham	10/11/06	04/28/04	04/19/06	Apr-08	Oct-08			Apr-08
3	Temple	03/20/02	09/05/01	04/20/05	Apr-08	Jan-09			Apr-08
	St. Louis Sat.Poplar								
2	Bluff	05/03/06		09/21/00	May-08	Oct-08			May-08
2	Minneapolis	08/05/03	05/05/04	05/04/06	May-08	Nov-08			May-08
2	Columbia MO	06/26/03	04/08/04	05/09/06	May-08	Nov-08			May-08
2	Indianapolis	06/30/03	05/20/04	05/15/06	May-08	Nov-08			May-08
3	Asheville	02/07/02	03/21/00	05/16/05	May-08	Feb-09			May-08
5	Prescott	05/29/98	05/14/98	05/30/03	May-08	May-09	Nov-07	JW	May-08
2	Albuquerque	08/30/01	02/25/04	06/01/06	May-08	Nov-08			May-08
2	Tampa	06/10/99	06/16/04	06/12/06	Jun-08	Dec-08			Jun-08
2	Nashville	02/17/04	06/22/04	06/13/06	Jun-08	Dec-08			Jun-08
3	Loma Linda	08/06/02	01/11/01	06/22/05	Jun-08	Mar-09			Jun-08
2	Salt Lake City	08/20/01	11/30/04	06/28/06	Jun-08	Dec-08			Jun-08
2	Durham	03/02/04	08/10/04	07/20/06	Jul-08	Jan-09			Jul-08
2	Albany	02/24/04	07/28/04	08/07/06	Aug-08	Feb-09			Aug-08
2	Buffalo	02/26/04	08/17/04	08/14/06	Aug-08	Feb-09			Aug-08
2	Milwaukee	11/16/01	09/23/04	09/19/06	Sep-08	Mar-09			Sep-08
2	Jackson	11/09/00	06/21/04	09/20/06	Sep-08	Mar-09			Sep-08
2	Ann Arbor	01/20/04	10/04/04	10/11/06	Oct-08	Apr-09			Oct-08
2	New Orleans	01/30/01	10/13/04	10/18/06	Oct-08	Apr-09			Oct-08
2	St Louis	05/03/06	10/19/04	10/25/06	Oct-08	Apr-09			Oct-08
2	Hines	04/20/04	11/09/04	11/15/06	Nov-08	May-09			Nov-08
3	Augusta	03/24/05	02/06/01	11/16/05	Nov-08	Aug-09			Nov-08
2	Brooklyn	02/14/05	12/08/04	11/30/06	Nov-08	May-09			Nov-08
2	New York	01/29/04	11/29/04	12/06/06	Dec-08	Jun-09			Dec-08
2	Madison	02/12/04	12/16/04	12/11/06	Dec-08	Jun-09			Dec-08

revised 3/7/2007



prty	City	last NRC (preMML)	NHPP	NHPP1	DueDate1	+25% window	Insp by NHPP/sche duled	by	Current Due Date
3	Columbia SC	09/06/06	06/15/00	12/14/05	Dec-08	Sep-09			Dec-08
2	Detroit	06/12/03	01/10/05	01/12/07	Jan-09	Jul-09			Jan-09
2	Cleveland	02/02/04	01/12/05	01/23/07	Jan-09	Jul-09			Jan-09
3	Bronx	02/11/03	01/19/00	01/25/06	Jan-09	Oct-09			Jan-09
2	Miami	03/22/05	02/08/05	02/06/07	Feb-09	Aug-09			Feb-09
2	San Diego	03/10/05	02/22/05	02/21/07	Feb-09	Aug-09			Feb-09
3	Washington	02/05/03	10/10/01	03/02/06	Mar-09	Nov-09			Mar-09
5	Lincoln	10/28/99	05/29/01	05/07/04	May-09	May-10	Mar-07	PY	May-09
3	Clarksburg	08/19/97	05/15/03	05/18/06	May-09	Feb-10			May-09
3	West Palm Beach	04/24/02	03/07/05	06/13/06	Jun-09	Mar-10			Jun-09
3	Leavenworth	08/02/00	07/30/03	06/28/06	Jun-09	Mar-10			Jun-09
3	Bedford	06/28/01	12/14/99	07/12/06	Jul-09	Apr-10			Jul-09
3	Cincinnati	02/14/05	08/13/03	08/23/06	Aug-09	May-10			Aug-09
3	Martinez	09/29/98	10/08/03	09/13/06	Sep-09	Jun-10			Sep-09
3	Battle Creek	10/27/98	09/30/03	09/22/06	Sep-09	Jun-10			Sep-09
3	Martinsburg	11/04/98	11/06/03	09/28/06	Sep-09	Jun-10			Sep-09
3	Sioux Falls	06/16/00	10/28/03	10/03/06	Oct-09	Jul-10			Oct-09
3	Tucson	07/16/03	11/10/03	11/15/06	Nov-09	Aug-10			Nov-09
3	Providence	08/09/06	12/11/03	11/29/06	Nov-09	Aug-10			Nov-09
3	Louisville	06/28/99	12/03/03	12/13/06	Dec-09	Sep-10			Dec-09
3	Castle Point	10/31/00	10/06/05	01/10/07	Jan-10	Oct-10			Jan-10
3	Fresno	01/27/99	01/13/04	01/18/07	Jan-10	Oct-10			Jan-10
3	East Orange	02/21/01	02/19/04	02/21/07	Feb-10	Nov-10			Feb-10
5	Kansas City	09/14/00	11/28/01	09/22/05	Sep-10	Sep-11			Sep-10
5	Fort Wayne	03/29/02	05/24/00	04/19/06	Apr-11	Apr-12			Apr-11
5	Syracuse	06/07/99	06/04/03	06/14/06	Jun-11	Jun-12			Jun-11
5	Dublin	04/10/02	02/02/00	08/16/06	Aug-11	Aug-12			Aug-11
5	Big Spring	03/22/05	05/13/03	11/28/06	Nov-11	Nov-12			Nov-11

## Tab I

### Copies of Management Accompaniment Documentation

VHA National Health Physics Program  
Inspector Accompaniment

1. Date prepared: 7/12/06  
2. Date(s) of accompaniment: June 13, 2006  
3. Inspector: Donna Moser  
4. Location (permittee): Nashville, Tennessee  
5. Permit type: Broad-scope medical and research  
6. Inspector performance: (Yes, indicates acceptable performance; No, indicates areas for improvement)

*Initials  
Procedural  
25.*

- |  |                                      |    |
|--|--------------------------------------|----|
| a. Inspection plan   | <input checked="" type="radio"/> Yes | No |
| b. Logistical arrangements                                       | <input checked="" type="radio"/> Yes | No |
| c. Entrance and exit briefs                                      | <input checked="" type="radio"/> Yes | No |
| d. Inspection with emphasis on performance-based evaluation      | <input checked="" type="radio"/> Yes | No |
| e. Health and safety issues - - highest priority                 | <input checked="" type="radio"/> Yes | No |
| f. Regulatory and technical understanding                        | <input checked="" type="radio"/> Yes | No |
| g. Interactions with permittee staff                             | <input checked="" type="radio"/> Yes | No |
| h. Inspection report, inspection record, and other documentation | <input checked="" type="radio"/> Yes | No |

7. Explanation: (required if "No" in question 6 above)

8. Recommendations and/or comments:



E. Lynn McGuire  
Radiation Control Program Officer

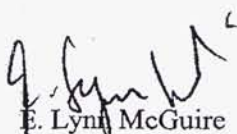
**VHA National Health Physics Program  
Inspector Accompaniment**

1. Date prepared: 10/23/06
2. Date(s) of accompaniment: October 18, 2006
3. Inspector: Gary Williams
4. Location (permittee): New Orleans, Louisiana
5. Permit type: Broad-scope medical and research
6. Inspector performance: (Yes, indicates acceptable performance; No, indicates areas for improvement)

- |  |     |    |
|--|-----|----|
| a. Inspection plan   | Yes | No |
| b. Logistical arrangements                                       | Yes | No |
| c. Entrance and exit briefs                                      | Yes | No |
| d. Inspection with emphasis on performance-based evaluation      | Yes | No |
| e. Health and safety issues - - highest priority                 | Yes | No |
| f. Regulatory and technical understanding                        | Yes | No |
| g. Interactions with permittee staff                             | Yes | No |
| h. Inspection report, inspection record, and other documentation | Yes | No |

7. Explanation: (required if "No" in question 6 above)

8. Recommendations and/or comments:



E. Lynn McGuire

Radiation Control Program Officer



**VHA National Health Physics Program  
Inspector Accompaniment**

1. Date prepared: 12/21/06
2. Date(s) of accompaniment: December 6, 2006
3. Inspector: Paul Yurko
4. Location (permittee): New York, New York
5. Permit type: Broad-scope medical and research
6. Inspector performance: (Yes, indicates acceptable performance; No, indicates areas for improvement)

- |  |                                      |                          |
|--|--------------------------------------|--------------------------|
| a. Inspection plan   | <input checked="" type="radio"/> Yes | <input type="radio"/> No |
| b. Logistical arrangements                                       | <input checked="" type="radio"/> Yes | <input type="radio"/> No |
| c. Entrance and exit briefs                                      | <input checked="" type="radio"/> Yes | <input type="radio"/> No |
| d. Inspection with emphasis on performance-based evaluation      | <input checked="" type="radio"/> Yes | <input type="radio"/> No |
| e. Health and safety issues - - highest priority                 | <input checked="" type="radio"/> Yes | <input type="radio"/> No |
| f. Regulatory and technical understanding                        | <input checked="" type="radio"/> Yes | <input type="radio"/> No |
| g. Interactions with permittee staff                             | <input checked="" type="radio"/> Yes | <input type="radio"/> No |
| h. Inspection report, inspection record, and other documentation | <input checked="" type="radio"/> Yes | <input type="radio"/> No |

7. Explanation: (required if "No" in question 6 above)

8. Recommendations and/or comments:

  
E. Lynn McGuire  
Radiation Control Program Officer




**VHA National Health Physics Program  
Inspector Accompaniment**

1. Date prepared: 2/4/07
2. Date(s) of accompaniment: November 15, 2006
3. Inspector: Joseph Wissing
4. Location (permittee): Tucson, Arizona
5. Permit type: Limited-scope medical and broad-scope research
6. Inspector performance: (Yes, indicates acceptable performance; No, indicates areas for improvement)

- |  |                                      |    |
|--|--------------------------------------|----|
| a. Inspection plan   | <input checked="" type="radio"/> Yes | No |
| b. Logistical arrangements                                       | <input checked="" type="radio"/> Yes | No |
| c. Entrance and exit briefs                                      | <input checked="" type="radio"/> Yes | No |
| d. Inspection with emphasis on performance-based evaluation      | <input checked="" type="radio"/> Yes | No |
| e. Health and safety issues - - highest priority                 | <input checked="" type="radio"/> Yes | No |
| f. Regulatory and technical understanding                        | <input checked="" type="radio"/> Yes | No |
| g. Interactions with permittee staff                             | <input checked="" type="radio"/> Yes | No |
| h. Inspection report, inspection record, and other documentation | <input checked="" type="radio"/> Yes | No |

7. Explanation: (required if "No" in question 6 above)

8. Recommendations and/or comments:

  
E. Lynn McGuire

Radiation Control Program Officer

## Tab J

### Current List of Permitting Actions

Second Quarter 2007 Permit Actions				Actions Sent to Facility		
				Deficiency Letter		
Permittee Name	Permit Number	Permit Action	Date Rec'd from Facility	Date DL Sent to Facility	Date DL Rec'd From Facility	Date Sent to Facility
Boston	20-00671-02	Delete AOU, (Brockton)	3/31/2006	4/6/2006, 4/6/2006 requested NRC docket files, 5/18/06 requested Brockton docket files, 8/17/2006	4/6/2006, 5/17/06 rcvd W. Roxbury docket files, 7/21/2006 Boston Docket Files rcvd.	
Bronx	31-00636-07	Add /Delete AUs	11/3/2006	11/6/2006, 12/4/2006	12/4/2006, 1/18/2007	
Brooklyn	31-02892-03	Delete AUs	1/9/2007	1/16/2007	1/16/2007, 1/23/2007	
Castle Point	31-11399-01	Add Sources	12/18/2006	1/2/2007	1/8/2007	1/29/2007
Castle Point	31-11399-01	Change AOU	1/24/2007			1/29/2007
Dayton	34-05015-01	Add AU	1/24/2007			
Dublin	10-09569-01	Add AU				
Fresno	04-01935-03	Change AOU	1/30/2007		1/23/2007	
Hampton	45-07569-01	Delete LOU	11/28/2006	12/19/2006		
Indianapolis	13-00694-03	Add Source	1/9/2007			1/23/2007
Las Vegas	27-23287-02	Notification Renewal				1/29/2007
Long Beach	04-00689-07	Notification Renewal				1/29/2007
Martinez	04-02956-02	Change AOU	1/9/2007			
Miami	09-00239-06	Change HDR MP	11/16/2006	11/20/2006		
Richmond	45-09413-06	Add HDR	1/3/2007			
San Francisco	04-00421-05	Renewal	12/29/2006			
Tucson	02-06186-01	Delete LOU	1/30/2007			



First Quarter 2007 Permit Actions				Actions Sent to Facility		
				Deficiency Letter		
Permittee Name	Permit Number	Permit Action	Date Rec'd from Facility	Date DL Sent to Facility	Date DL Rec'd From Facility	Date Sent to Facility
Bay Pines	09-04233-03	Add PET	10/17/2006	10/19/2006, 11/2/2006	10/19/2006, 10/23/2006, 11/22/2006	12/1/2006
Boston	20-00671-02	Delete AOU, (Brockton)	3/31/2006	4/6/2006, 4/6/2006 requested NRC docket files, 5/18/06 requested Brockton docket files 8/17/2006	5/2/2006, 5/17/06 rcvd W. Roxbury docket files, 7/21/2006 Boston Docket Files rcvd.	
Brooklyn	31-02892-03	Add Med Physicist	9/25/2006	9/26/2006, 10/23/2006, 11/2/2006	10/13/2006, 10/23/2006	withdrawn
Bronx	31-00636-07	Add AOU	11/3/2006	11/6/2006, 12/4/2006	12/4/2006	
Decatur	10-01169-01	Add Use for AU	11/27/2006			12/11/2006
Castle Point	31-11399-01	Add Sources	12/18/2006	12/21/2006	12/26/2006	
Fayetteville	32-13654-01	Renewal	10/11/2006			11/2/2006
Hampton	45-07569-01	Renewal	7/25/2006	8/2/2006, 8/31/2006, 9/7/2006, 9/21/2006	8/28/2006, 8/31/2006, 9/5/2006, 9/7/2006, 10/6/2006, 10/18/2006	11/3/2006
Hampton	45-07569-01	Delete AU/Sources	11/15/2006			12/11/2006
Hampton	45-07569-01	Delete LOU	11/28/2006	12/19/2006		
Lexington	16-08896-04	Notification Renewal				12/20/2006
Martinez	04-02956-02	Add AOU	11/8/2006			11/30/2006
Martinez	04-02956-02	Add AOU	11/28/2006			12/13/2006
Martinsburg	47-00714-02	Add AUs	9/1/2006	9/1/06, 9/5/2006	9/26/2006	10/19/2006
Miami	09-00239-06	Add Mobile PET	10/5/2006			withdrawn
Miami	09-00239-06	Change RSO	11/16/2006			12/14/2006
Miami	09-00239-06	Change HDR MP	11/16/2006	11/20/2006		
Minneapolis	22-01859-01	Renewal	9/12/2006	9/19/2006	10/3/2006	10/25/2006
Mountain Home	41-19792-01	Add AUs	9/7/2006	9/18/2006		void

First Quarter 2007 Permit Actions				Actions Sent to Facility		
				Deficiency Letter		
Permittee Name	Permit Number	Permit Action	Date Rec'd from Facility	Date DL Sent to Facility	Date DL Rec'd From Facility	Date Sent to Facility
New Orleans	17-01322-07	Change Facility Name, Shift Sources to Storage only	10/19/2006			11/2/2006
Northport	31-13511-04	Authorization	12/5/2006			12/11/2006
Palo Alto	04-23242-01	Delete AU				11/28/2006
Providence	38-04946-01	Notification Renewal	12/5/2006	12/18/2006	12/18/2006	12/20/2006
Richmond	45-09413-06	Add AU	9/26/2006	10/6/2006	10/24/2006	10/31/2006
Salisbury	32-15483-01	Add AU	10/17/2006			11/2/2006
San Francisco	04-00421-05	Delete AU	12/29/2006			
Seattle	46-00990-01	Renewal	11/20/2006	11/21/2006	11/21/2006	12/21/2006
St. Louis	24-00144-05	Change RSO	10/11/2006			10/19/2006
Syracuse	31-00845-01	Increase Possession Limits	10/11/2006			10/19/2006
Temple	42-10739-03	Delete AUs	11/14/2006			12/11/2006
West Palm Beach	09-25328-01	Delete AU	10/27/2006			11/17/2006
Wilkes-Barre	37-13483-01	Transport Mobile PET	12/7/2006	12/7/2006	12/18/2006	12/21/2006
		Add LOU				



# Fourth Quarter 2006

## Permit Actions

### Actions Sent to Facility

#### Deficiency Letter

Permittee Name	Permit Number	Permit Action	Date Rec'd from Facility	Date DL Sent to Facility	Date DL Rec'd From Facility	Date Sent to Facility
Ann Arbor	21-00159-04	Increase Possession Limits	9/7/2006			9/18/2006
Augusta	10-08389-03	Add/Delete AUs	8/15/2006			8/28/2006
Big Spring	42-08655-01	Renewal	6/19/2006	6/21/2006	7/5/2006	7/21/2006
Biloxi	23-12255-02	Renewal	6/13/2006			7/11/2006
Boston	20-00671-02	Delete AOU (Brockton)	3/31/2006	4/6/2006 facility RFI, 4/6/2006 request NRC docket files, 5/18/06 request Brockton docket files	5/2/2006 rcvd facility reply, 5/17/06 rcvd W. Roxbury docket files, 7/21/2006 rcvd Boston Docket Files	
Bronx	31-00636-07	Add AOU	6/30/2006			7/17/2006
Brooklyn	31-02892-03	Add Med Physicist	9/25/2006	9/25/2006		
Columbia,MO	24-15235-03	Increase Possession Limits	8/16/2006			8/28/2006
Decatur	10-01169-01	Delete AUs /Add Source	9/11/2006			9/27/2006
Denver	05-01401-02	Delete Source	9/5/2006	9/6/2006	9/6/006, 9/7/2006	9/21/2006
Fayetteville	32-13654-01	Renewal Notification				8/28/2006
Fort Wayne	13-11983-01	Renewal	6/13/2006			7/11/2006
Hampton	45-07569-01	Renewal	7/25/2006	8/2/2006, 8/31/2006, 9/7/2006, 9/21/2006	8/28/2006, 8/31/2006, 9/5/2006, 9/7/2006	
Iowa City	14-00822-01	Change RSO	8/11/2006	8/11/2006	8/11/2006	8/28/2006
Madison	48-01183-01	Renewal	8/31/2006	9/8/2006	9/8/2006	9/21/2006
Martinez	04-02956-02	Add AU/Delete AUs	9/12/2006	9/12/2006	9/13/2006, 9/18/2006	9/27/2006

Fourth Quarter 2006 Permit Actions				Actions Sent to Facility		
				Deficiency Letter		
Permittee Name	Permit Number	Permit Action	Date Rec'd from Facility	Date DL Sent to Facility	Date DL Rec'd From Facility	Date Sent to Facility
Martinsburg	47-00714-02	Mailing Address Change	7/6/2006			7/19/2006
Martinsburg	47-00714-02	Add AU	9/1/2006	9/1/2006, 9/5/2006	9/26/2006	
Minneapolis	22-01859-01	Renewal Notification				7/25/2006
Minneapolis	22-01859-01	Renewal	9/12/2006	9/19/2006		
Mountain Home	41-19792-01	Add AUs	9/7/2006	9/18/2006		
Northport	31-13511-04	Change AOU	7/5/2006			7/18/2006
Prescott	02-12726-01	Add AOU	6/16/2006	6/22/2006	6/26/2006	7/13/2006
Richmond	45-09413-06	Add AU	9/26/2006			
Salem	45-09669-02	Add AU	7/28/2006	7/31/2006	8/2/2006	8/16/2006
Salisbury	32-15483-01	Add AU, Change RSO	7/21/2006	7/31/2006, 8/4/2006,	7/31/2006, 8/1/2006, 8/7/2006	8/18/2006
San Francisco	04-00421-05	Renewal Notification				9/29/2006
San Juan	52-04359-01	Renewal	5/2/2006	5/16/2006, 5/17/2006, 6/1/2006	5/17/2006, 5/30/2006, 8/21/2006	9/1/2006
Shreveport	17-12273-01	Add AU	8/11/2006			9/5/2006
Sioux Falls	40-16336-01	Delete AUs	7/26/2006			8/4/2006
Temple	42-10739-03	Add AU	7/13/2006			7/20/2006
Wilkes-Barre	37-13483-01	Del AOU	6/28/2006	7/6/2006, 8/16/2006	8/14/2006	withdrawn
West Palm Beach	09-25328-01	Add AU	8/29/2006	9/8/2006	9/11/2006	9/28/2006



# Third Quarter 2006

## Permit Actions

### Actions Sent to Facility

#### Deficiency Letter

Permittee Name	Permit Number	Permit Action	Date Rec'd from Facility	Date DL Sent to Facility	Date DL Rec'd From Facility	Date Sent to Facility
Augusta	10-08389-03	Renewal	4/3/2006	4/6/2006, 5/23/06	4/25/2006, 5/25/06	6/9/2006
Baltimore	19-01058-01	Add AU	4/25/2006			5/1/2006
Beckley	47-15696-01	Add AU	5/8/2006			5/22/2006
Big Spring	42-08655-01	Renewal	6/19/2006	6/21/2006		
Biloxi	23-12255-02	Renewal Notification				4/25/2006
Biloxi	23-12255-02	Renewal	6/13/2006			
				4/6/2006, 4/6/2006 requested NRC docket files, 5/18/06 requested Brockton docket files	4/6/2006, 5/17/06 rcvd W. Roxbury docket files	
Boston	20-00671-02	Delete AOU (Brockton)	3/31/2006			
Bronx	31-00636-07	Add AU/AOU	5/22/2006			
Bronx	31-00636-07	Add AOU	6/30/2006			
Brooklyn	31-02892-03	Del AU	4/18/2006			4/27/2006
Brooklyn	31-02892-03	Add AU, Add/Del AOU	5/15/2006	5/16/2006	5/16/2006	
Chillicothe	34-26267-01	Renewal	4/26/2006	4/27/2006	5/4/2006	5/25/2006
Columbia, SC	39-09703-01	Delete AOU	3/2/2006	3/3/2006	4/11/2006	Withdrawn 4/11/2006
Dallas	42-00220-06	Del source	5/11/2006	5/11/2006	5/24/2006, 6/5/2006	6/27/2006
Decatur	10-01169-01	Del AUs	4/19/2006			4/24/2006
Decatur	10-01169-01	Del AU	6/22/2006			6/23/2006
Fort Wayne	13-11983-01	Chg RSO/Del AUs	4/10/2006			4/18/2006
Fort Wayne	13-11983-01	Renewal	6/13/2006			
Madison	48-01183-01	Renewal Notification				6/21/2006
Manchester	28-27885-01	Chg RSO, Del/Add AU	4/12/2006	4/12/2006	4/13/2006	4/26/2006
Martinez	04-02956-02	Add/Del AUs	5/2/2006			5/10/2006
Martinsburg	47-00714-02	Chg RSO	5/2/2006	5/9/2006	6/5/2006	6/23/2006
Memphis	41-00119-08	Change RSO	3/28/2006			4/4/2006
Montgomery	01-03042-02	Renewal Notification				4/25/2006
Montgomery	01-03042-02	Renewal	5/19/2006	5/24/2006	5/30/2006	6/21/2006
Mountain Home	41-19792-01	Delete AOU	3/17/2006	3/20/2006	4/4/2006	4/26/2006
Nashville	41-00104-04	Chg RSO	4/21/2006	4/21/2006	4/21/2006	5/9/2006
Prescott	02-12726-01	Add AOU	6/16/2006	6/22/2006	6/26/2006	
Salisbury	32-15483-01	Add AOU	4/27/2006			5/10/2006

# Third Quarter 2006

## Permit Actions

### Actions Sent to Facility

### Deficiency Letter

Permittee Name	Permit Number	Permit Action	Date Rec'd from Facility	Date DL Sent to Facility	Date DL Rec'd From Facility	Date Sent to Facility
San Juan	52-04359-01	Renewal	5/2/2006	5/16/2006, 5/17/2006, 6/1/2006	5/17/2006, 5/30/2006	
Temple	42-10739-03	Add AOU	4/20/2006			4/28/2006
Temple	42-10739-03	Add/Del AOU	5/9/2006			5/18/2006
Togus	18-07561-01	Add Source	3/10/2006	3/13/2006		Withdrawn 4/10/2006
Togus	18-07561-01	Add source	4/11/2006			4/28/2006
West Haven	06-00092-05	Decommission building	2/16/2006	2/21/2006 request NRC approval	5/23/06 rcvd NRC faxed approval	5/24/2006
Wilkes-Barre	37-13483-01	Add AOU	5/25/2006			Withdrawn 6/7/2006
Wilkes-Barre	37-13483-01	Del AOU	6/28/2006			



Second Quarter 2006 Permit Actions				Actions Sent to Facility		
				Deficiency Letter		
Permittee Name	Permit Number	Permit Action	Date Rec'd from Facility	Date DL Sent to Facility	Date DL Rec'd From Facility	Date Sent to Facility
Asheville	32-05830-01	Add AU/Change RSO	10/27/2005	11/4/2005		3/15/2006
Asheville	32-05830-01	Change RSO	3/9/2006			3/15/2006
Baltimore	19-01058-01	Add AU	3/9/2006	3/9/2006	3/17/2006	3/29/2006
Bay Pines	09-04233-03	Renewal	1/23/2006			2/10/2006
Boston	20-00671-02	Delete AOU	3/31/2006			
Bronx	31-00636-07	Add Use for AU	12/28/2005	12/28/2005	1/19/2006	2/2/2006
Bronx	31-00636-07	Delete AOU/Add AOU	2/9/2006	2/15/2006	2/22/2006	3/14/2006
Chillicothe	34-26267-01	Notification Renewal				2/28/2006
Cincinnati	34-00799-03	Delete AOU	12/22/2005			1/6/2006
Clarksburg	47-15402-01	Add AUs/Change RSO	3/6/2006	3/8/2006	3/13/2006	3/30/2006
Coatesville	37-10509-01	Initial VHA Permit	2/3/2006			2/21/2006
Columbia, SC	39-09703-01	Delete AOU	3/2/2006	3/3/2006		
Danville	12-16473-01	Delete Sources	9/23/2005	10/21/2005 11/18/2005	3/8/2006	3/30/2006
Dayton	34-05015-01	Renewal	2/28/2006			3/17/2006
Denver	05-01401-02	Alt Tng requirements for IVB	11/30/2004	NRC approval request 12/2/2004		closed
Detroit	21-04234-01	Renewal	2/27/2006			3/9/2006
Durham	32-01134-01	Renewal	3/13/2006			3/30/2006
Iron Mtn	21-12916-01	Renewal	2/22/2006			3/9/2006
Iron Mtn	21-12916-01	Notification Renewal				1/30/2006
Lincoln	26-16293-01	Change RSO	2/8/2006	2/9/2006 3/1/2006	2/27/2006 3/1/2006	3/14/2006
Louisville	16-03121-02	Add/Delete AUs	1/30/2006	1/30/2006 2/23/2006	2/9/2006 2/23/2006	3/9/2006
Memphis	41-00119-08	Change RSO	3/28/2006			
Miami	09-00239-06	Delete AU/MP	2/14/2006			3/3/2006
Milwaukee	48-02130-02	Change RSO	12/22/2005			1/19/2006
Mountain Home	41-19792-01	Delete/Add AOU	3/2/2006			3/29/2006
Mountain Home	41-19792-01	Delete AOU	3/17/2006	3/20/2006		
New York	31-00032-04	Renewal	2/24/2006			3/14/2006
New York	31-00032-04	Delete Source	3/23/2006			3/29/2006
New York	31-00032-04	Notification Renewal				1/26/2006
Providence	38-04946-01	Add Source/AU	2/14/2006	2/14/2006	2/15/2006	3/3/2006

AU - Authorized User  
 AOU - Area of Use  
 RSO - Radiation Safety Officer  
 MP - Medical Physicist  
 Alt Tng - Alternative Training



# Second Quarter 2006

## Permit Actions

### Actions Sent to Facility

Deficiency Letter

Permitee Name	Permit Number	Permit Action	Date Rec'd from Facility	Date DL Sent to Facility	Date DL Rec'd From Facility	Date Sent to Facility
Roseburg	36-21137-01	Change RSO	1/26/2006	1/26/2006	1/27/2006 2/8/2006	2/22/2006
San Antonio	42-15881-01	Delete AU	2/13/2006			3/7/2006
San Diego	04-15030-01	Delete Source	1/11/2006			1/24/2006
San Juan	52-04359-01	Notification Renewal				3/29/2006
Temple	42-10739-03	Add Source	2/9/2006			2/10/2006
Togus	18-07561-01	Add Source	3/10/2006	3/13/2006		
				NRC approval request		
West Haven	06-00092-05	Decommission building	2/16/2006	2/21/2006		
West Palm Beach	09-25328-01	Add Source/Delete AU	2/28/2006			3/16/2006
West Palm Beach	09-25328-01	Add AU	2/3/2006			2/6/2006
West Palm Beach	09-25328-01	Add Mobile PET	2/3/2006			2/6/2006

AU - Authorized User

AOU - Area of Use

RSO - Radiation Safety Officer

MP - Medical Physicist

Alt Tng - Alternative Training

First Quarter 2006			Actions Sent to Facility			
Permit Actions			Deficiency Letter			
Permittee Name	Permit Number	Permit Action	Date Rec'd from Facility	Date DL Sent to Facility	Date DL Rec'd From Facility	Date Sent to Facility
Ann Arbor	21-00159-04	Renewal	11/1/2005			12/1/2005
Ann Arbor	21-00159-04	Renewal Notification				10/28/2005
Asheville	32-05830-01	Add AU/Change RSO	10/27/2005	11/4/2005		
Beckley	47-15696-01	Add AU	10/4/2005			10/18/2005
Beckley	47-15696-01	Add AU	10/17/2005			10/18/2005
Big Spring	42-08655-01	Change RSO	11/22/2005			12/1/2005
Bronx	31-00636-07	Facility Name Change	12/12/2005			12/20/2005
Bronx	31-00636-07	Add Use	12/28/2005	12/28/2005		
Brooklyn	31-02892-03	Add AU	10/5/2005			10/18/2005
Castle Point	31-11399-01	Delete AU	10/6/2005			10/27/2005
Charleston	39-12130-02	Renewal	1/19/2005	1/27/2005, 2/28/2005, 4/14/05, 5/13/2005, 6/9/2005, 9/13/2005	2/28/2005, 3/1/2005, 5/23/2005, 8/29/2005, 9/28/2005	10/7/2005
Chicago	12-02642-06	Delete AOU	4/18/2005	4/27/2005	10/20/2005	10/28/2005
Cincinnati	34-00799-03	Delete AOU	10/12/2005			10/28/2005
Cincinnati	34-00799-03	Delete AOU	12/21/2005			
Danville	12-16473-01	Delete Sources	9/23/2005	10/21/2005, 11/18/2005		
Denver	05-01401-02	Alt Tng requirements for IVB	11/30/2004	12/2/2004		NRC denied
Detroit	21-04234-01	Renewal Notification				11/28/2005
Dublin	10-09569-01	Add AU	10/21/2005	10/21/2005		withdrawn
Durham	32-01134-01	Renewal Notification				12/23/2005
Fresno	04-01935-03	Change RSO	9/22/2005			10/4/2005
Fresno	04-01935-03	Add AU	10/28/2005			11/7/2005
Gainesville	09-12467-02	Increase Source Limits	10/12/2005			10/27/2005
Jackson	23-08786-01	Renewal	10/14/2005			10/26/2005
Kansas City	24-00496-06	Add/Delete AUs	10/11/2005	10/17/2005, 11/21/2005	11/7/2005, 12/13/2005	12/20/2005
Miami	09-00239-06	Change RSO	10/26/2005	10/27/2005		withdrawn
Milwaukee	48-02130-02	Change RSO	12/21/2005			
New Orleans	17-01322-07	Add AOU	10/14/2005			10/17/2005



First Quarter 2006			Actions Sent to Facility			
Permit Actions			Deficiency Letter			
Permittee Name	Permit Number	Permit Action	Date Rec'd from Facility	Date DL Sent to Facility	Date DL Rec'd From Facility	Date Sent to Facility
Phoenix	02-10072-01	Renewal	9/26/2005	9/27/2005	9/30/2005	10/25/2005
		Add AU/ Remove Limit on Activities				
Providence	38-04946-01		10/20/2005			11/7/2005
Salisbury	32-15483-01	Add AU	10/24/2005			10/24/2005
		Add/Delete AUs				
San Antonio	42-15881-01		10/19/2005			10/24/2005
		Increase Source Limits				
Tampa	09-15294-01		10/28/2005			11/7/2005
		Change Source				
Washington	08-00942-05		11/18/2005			11/22/2005
		Add/Delete AUs				
Wilkes-Barre	37-13483-01		10/25/2005	10/25/2005	10/27/2005	11/7/2005
Wilkes-Barre	37-13483-01	Delete AU	11/22/2005			11/22/2005

Tab K

List of Permit Renewals For 2005  
Through 2011



# Permit Renewals

## Calendar Year 2005

[illegible]



# Permit Renewals

## Calendar Year 2006

[illegible]



# Permit Renewals

## Calendar Year 2007

[illegible]



# Permit Renewals

Calendar Year 2008

Current Expiration	Permitte	Current Medical Use	Current Research Use	Current Other Use	180 Day & Renewal Template Actual Date	180 Day Actual Date	90 Day Target Date	90 Day Actual Date	Renewal Request Date	Timely Filed Date	Renewal Date	New Expiration Date	Manager
3/31/08	Clarksburg	2120	0000	0000	10/3/07		1/1/08						
3/31/08	Dublin	2120	0000	0000	10/3/07		1/1/08						
3/31/08	Fargo	2120	0000	0000	10/3/07		1/1/08						
3/31/08	Hot Springs	2120	0000	0000	10/3/07		1/1/08						
3/31/08	Leavenworth	2120	0000	0000	10/3/07		1/1/08						
3/31/08	Lincoln	2120	0000	0000	10/3/07		1/1/08						
3/31/08	Muskogee	2120	0000	0000	10/3/07		1/1/08						
3/31/08	Saginaw	2120	0000	0000	10/3/07		1/1/08						
3/31/08	Sioux Falls	2120	3620	0000	10/3/07		1/1/08						
4/30/08	Albuquerque	2110	3610	0000	11/2/07		1/31/08						
4/30/08	East Orange	2120	3610	0000	11/2/07		1/31/08						
4/30/08	Martinsburg	2120	0000	0000	11/2/07		1/31/08						
4/30/08	Omaha	2110	3610	3510	11/2/07		1/31/08						
4/30/08	Providence	2120	3610	0000	11/2/07		1/31/08						
4/30/08	Shreveport	2120	3620	0000	11/2/07		1/31/08						
4/30/08	Temple	2120	3620	0000	11/2/07		1/31/08						
6/30/08	Columbia MO	2110	3610	3510	1/2/08		4/1/08						
6/30/08	Gainesville	2110	3610	2230	1/2/08		4/1/08						
6/30/08	White River Junction	2120	3620	0000	1/2/08		4/1/08						
7/31/08	Houston	2110	3610	3510	2/2/08		5/2/08						
7/31/08	Kansas City	0000	3620	0000	2/2/08		5/2/08						
8/31/08	Little Rock	2110	3610	3510	3/4/08		6/2/08						
8/31/08	Louisville	2120	3610	0000	3/4/08		6/2/08						
8/31/08	Oklahoma City	2110	3610	0000	3/4/08		6/2/08						
11/30/08	Syracuse	2120	3620	0000	6/3/08		9/1/08						
11/30/08	Cleveland	2110	3610	0000	6/3/08		9/1/08						
12/31/08	Boston	2110	3610	0000	7/4/08		10/2/08						
12/31/08	Battle Creek	2120	0000	0000	7/4/08		10/2/08						



# Permit Renewals

## Calendar Year 2009

Current Expiration	Permitte	Current Medical Use	Current Research Use	Current Other Use	180 Day Target Date	180 Day & Renewal Template Actual Date	90 Day Target Date	90 Day Actual Date	Renewal Request Date	Timely Filed Date	Renewal Date	New Expiration Date	Manager
1/31/09	Boise	2120	3620	0000	8/4/08		11/2/08						
1/31/09	Northport	2120	3610	0000	8/4/08		11/2/08						
1/31/09	Miami	2120	3610	2230	8/4/08		11/2/08						
1/31/09	Asheville	2120	0000	0000	8/4/08		11/2/08						
2/28/09	Dallas	2110	3610	2230	9/1/08		11/30/08						
2/28/09	Bronx	2120	3620	0000	9/1/08		11/30/08						
3/31/09	Philadelphia	2110	3610	0000	10/2/08		12/31/08						
4/30/09	Buffalo	2110	3610	0000	11/1/08		1/30/09						
4/30/09	Portland	2110	3610	3510	11/1/08		1/30/09						
5/31/09	Decatur	2120	3620	0000	12/2/08		3/2/09						
5/31/09	New Orleans	2110	3610	0000	12/2/08		3/2/09						
6/30/09	Milwaukee	2110	3610	0000	1/1/09		4/1/09						
6/30/09	Reno	2120	3620	0000	1/1/09		4/1/09						
7/31/09	Denver	2110	3610	3510	2/1/09		5/2/09						
7/31/09	West Haven	2110	3610	3510	2/1/09		5/2/09						
8/31/09	Baltimore	2120	3610	3510	3/4/09		6/2/09						
9/30/09	Hines	2110	3610	2300	4/3/09		7/2/09						
9/30/09	Iowa City	2110	3610	3510	4/3/09		7/2/09						
9/30/09	Pittsburgh	2120	3610	0000	4/3/09		7/2/09						
10/31/09	Bedford	0000	3620	0000	5/4/09		8/2/09						
10/31/09	Kerrville	2120	0000	0000	5/4/09		8/2/09						
10/31/09	Birmingham	2110	3610	0000	5/4/09		8/2/09						
11/30/09	Memphis	2110	3610	3510	6/3/09		9/1/09						
12/31/09	Tucson	2120	3610	0000	7/4/09		10/2/09						

# Permit Renewals

## Calendar Year 2010

Current Expiration	Permitte	Current Medical Use	Current Research Use	Current Other Use	180 Day Target Date	180 Day & Renewal Template Actual Date	90 Day Target Date	90 Day Actual Date	Renewal Request Date	Timely Filed Date	Renewal Date	New Expiration Date	Manager
1/31/10	Richmond	2120	3610	0000	8/4/09		11/2/09						
1/31/10	Des Moines	2120	0000	0000	8/4/09		11/2/09						
2/28/10	Salem	2120	0000	0000	9/1/09		11/30/09						
2/28/10	Fresno	2120	0000	0000	9/1/09		11/30/09						
2/28/10	Columbia SC	2120	3620	0000	9/1/09		11/30/09						
2/28/10	Prescott	2120	0000	0000	9/1/09		11/30/09						
2/28/10	West Palm Beach	2120	0000	0000	9/1/09		11/30/09						
3/31/10	Seattle	2110	3610	0000	10/2/09		12/31/09						
3/31/10	San Diego	2110	3610	0000	10/2/09		12/31/09						
3/31/10	Togus	2120	0000	0000	10/2/09		12/31/09						
4/30/10	Huntington	2120	3620	0000	11/1/09		1/30/10						
5/31/10	Loma Linda	2120	3610	0000	12/2/09		3/2/10						
5/31/10	Washington	2120	3610	0000	12/2/09		3/2/10						
6/30/10	Salt Lake City	2110	3610	0000	1/1/10		4/1/10						
7/31/10	Indianapolis	2110	3610	0000	2/1/10		5/2/10						
8/31/10	Albany	2110	3610	0000	3/4/10		6/2/10						
8/31/10	Beckley	2120	0000	0000	3/4/10		6/2/10						
8/31/10	Salisbury	2120	0000	0000	3/4/10		6/2/10						
8/31/10	Tampa	2110	3610	0000	3/4/10		6/2/10						
9/30/10	Nashville	2110	3610	0000	4/3/10		7/2/10						
10/31/10	Charleston	2120	0000	0000	5/4/10		8/2/10						
10/31/10	Jackson	2110	3610	0000	5/4/10		8/2/10						
10/31/10	Phoenix	2120	3620	0000	5/4/10		8/2/10						
12/31/10	Ann Arbor	2110	3610	0000	7/4/10		10/2/10						



# Permit Renewals

Calendar Year 2011

Current Expiration	Permitte	Current Medical Use	Current Research Use	Current Other Use	180 Day Target Date	180 Day & Renewal Template Actual Date	90 Day Target Date	90 Day Actual Date	Renewal Request Date	Timely Filed Date	Renewal Date	New Expiration Date	Manager
2/28/11	Bay Pines	2120	3620	0000	9/1/10		11/30/10						
3/31/11	Detroit	2110	3610	0000	10/2/10		12/31/10						
3/31/11	Durham	2110	3610	3510	10/2/10		12/31/10						
3/31/11	Iron Mountain	2120	0000	0000	10/2/10		12/31/10						
3/31/11	New York	2110	3610	3510	10/2/10		12/31/10						
3/31/11	Dayton	2120	0000	0000	10/2/10		12/31/10						
5/31/11	Chillicothe	2120	0000	0000	12/2/10		3/2/11						
6/30/11	Augusta	2120	0000	0000	1/1/11		4/1/11						
6/30/11	Montgomery	2120	0000	0000	1/1/11		4/1/11						
7/31/11	Fort Wayne	2120	0000	0000	2/1/11		5/2/11						
7/31/11	Biloxi	2120	0000	0000	2/1/11		5/2/11						
7/31/11	Big Spring	2120	0000	0000	2/1/11		5/2/11						
9/30/11	San Juan	2110	3610	0000	4/3/11		7/2/11						
9/30/11	Madison	2110	3610	0000	4/3/11		7/2/11						
10/31/11	Minneapolis	2110	3610	0000	5/4/11		8/2/11						
11/30/11	Fayetteville	2120	0000	0000	6/3/11		9/1/11						
11/30/11	Hampton	2120	3620	0000	6/3/11		9/1/11						

Tab L

## List of Allegations



Allegations for 2006

One allegation was received by NHPP on April 5, 2006. The file is kept in the locked cabinet of the Administrative Officer's office. A copy will be provided during the inspection.



**DEPARTMENT OF VETERANS AFFAIRS**  
**Veterans Health Administration**  
**National Health Physics Program**  
**2200 Fort Roots Drive**  
**North Little Rock, AR 72114**

JAN 31 2007

In Reply Refer To: 598/115HP/NLR

Gary L. Shear  
Enforcement & Investigations Officer  
Nuclear Regulatory Commission (NRC)  
Region III  
2443 Warrenville Road, Suite 210  
Lisle, Illinois 60532-4352

Re: Tracking Number 06-A-0080


Dear Mr. Shear:

We are responding to your letter dated December 12, 2006, which requested information about one of our permittees. Based on the circumstances noted in your letter, we completed a reactive inspection on January 10-11, 2007.

We are enclosing a detailed response to the issues raised in your letter. Documentation for the reactive inspection is also enclosed.

If you have any questions, please contact Gary E. Williams at (501) 257-1571.

Sincerely,

  
E. Lynn McGuire  
Director, National Health Physics Program

Enclosures

1. This enclosure is an evaluation for issues raised in the Nuclear Regulatory Commission (NRC) letter of December 12, 2006. NRC's tracking number is 06-A-0080. Responses to the questions in NRC's letter are in paragraphs 3 through 7 below. The response format is first to list the question in italics, and then provide a summary response. Paragraph 3 has specific responses for the individual concerns.

2. Results are for circumstances at the VA Hudson Valley Health Care System, Castle Point, New York, which holds VHA Permit Number 31-11399-01. NHPP completed an inspection at the permittee on January 10-11, 2007. A copy of the inspection documentation (i.e., inspection plan, report, and record) is attached as additional information.

3. *If the concerns were substantiated*

a. Nuclear Medicine Service is causing members of the public to receive excessive radiation doses

This concern was not substantiated.

The inspector evaluated potential public dose related to radioactive material use by calculating possible exposure rates and a total annual dose for the most likely scenario. This scenario is for a patient injected with 20 mCi  $^{99m}\text{Tc}$  functioning as a point source from the location of the scanning table.

The nominal exposure constant for 20 mCi  $^{99m}\text{Tc}$  is approximately 1 mR per hour at 1 meter. The most likely areas for public dose are areas in the hallway and Chaplain's Office which are at least 4 meters from the scanning table; so the 2 mrem in any 1 hour dose limit is not exceeded in the scenario.

The workload for the scenario to calculate a total annual dose is five patients per day with each patient on the scanning table for one hour. This results in approximately 5 mR per day, 25 mR per week, and 1250 mR per year at 1 meter.

Given locations in the hallway and Chaplain's Office are at least 4 meters from the scanning table, the possible total annual dose by inverse square calculation is approximately 78 mrem in a year. This is less than the total annual dose limit.

A consultant physicist radiation survey report of the new location of use is attached. This report also has closeout survey results for the former location of use. For this survey with 35 mCi  $^{99m}\text{Tc}$  in the dose calibrator, exposure rate results did not identify a location within the nuclear medicine or adjacent areas that exceeded 2 mR per hour.

b. Nuclear Medicine Service was moved some months ago from a lead shielded location to a new location which is not shielded

This concern was substantiated, but an adverse health and safety outcome was not identified.



The inspector confirmed the service was relocated in 2004 from a former radiology imaging room that was lead-lined to a room that was not lead-lined. Shielding in the former location of use was not required to protect members of the public or workers from byproduct radioactive materials. Similar shielding was not required for the new location of use.

c. The Chaplain's office located next to the Nuclear Medicine Service may be receiving excessive radiation

This concern was not substantiated.

Results of the dose evaluation were provided in paragraph 3a above.

The inspector interviewed the receptionist in the Chaplain's office and did not determine any concerns by the receptionist.

A facility diagram of the new location of use is attached. The Chaplain's office is located adjacent to the new location, on the bottom right hand corner of the diagram. A storage closet in the nuclear medicine area is immediately adjacent to the Chaplain's office which adds distance from any possible radioactive material source. Radioactive materials are not used or stored in the closet.

d. Members of the public, standing or walking in the general vicinity of the Nuclear Medicine Service, may be receiving excessive doses of radiation

This concern was not substantiated.

Results of the dose evaluation were provided in paragraph 3a above.

e. Monitored technicians are receiving excessive radiation doses because they receive minimal breaks and work too many hours

This concern was not substantiated related to radiation doses. The concern related to breaks and work hours is not within the scope of NHPP.

The inspector reviewed dosimetry results to the one monitored nuclear medicine technician and determined past results were less than 10% of the dose limit and consistent with ALARA (as low as reasonably achievable).

In addition, the inspector reviewed the Nuclear Medicine Service workload statistics for a random 10-day period, from October 16 through October 27, 2006. Results of that review are attached. The facility utilizes the term "exams" for charges. The term "visits" refers to the actual number of patient procedures. The maximum activity utilized per patient procedure is 25 mCi.



The actual number of patient procedures which would involve radioactive material is 54 for the 10-day period, an average of 5.4 per day. The inspector concluded this workload does not appear to be excessive based on comparison to similar VA facilities.

f. The issue was reported to the VA Inspector General's Office over a month ago and no response was received

This concern was not evaluated.

NHPP does not have any information related to the alleged's identity and is not privy to interactions with the Office of Inspector General. NHPP sent a copy of NRC's letter to the Office of Inspector General for information.

g. The concern was reported to the Joint Commission on Accreditation of Healthcare Organizations (JCAHO) and no response was received

This concern was not substantiated.

NHPP is usually not privy to interactions with JCAHO. However, during the inspection, the health care system management voluntarily offered the inspector a copy of a letter to the JCAHO Office of Quality Monitoring. The letter was in response to JCAHO Case #54651 which was an inquiry from JCAHO regarding a concern about radiation levels and worker exposure.

A copy of the health care system letter to JCAHO is attached. One of the attachments to the health care system letter from the consultant physicist is also included. The consultant physicist radiation survey report is noted above and previously listed as an attachment to this enclosure.

*4. The organization or individual conducting the evaluation was independent*

NHPP completed the evaluation. NHPP is the Veterans Health Administration (VHA) program office established to implement the master materials license and is independent from the VA Hudson Valley Health Care System, Castle Point, New York.

*5. The evaluation was of sufficient depth and scope to determine that the appropriate root causes and generic implications were considered*

NHPP's evaluation included a review of the permit files, telephone discussions with key permittee staff, and an on-site inspection to review specific concerns raised in NRC's letter.

The inspector followed NRC inspection guidelines and procedures and noted one regulatory violation for failure to submit a notification under 10 CFR 35.14, for changes in a location of use for radioactive materials under 10 CFR 35.100 and 35.200.

The cause for the violation was evaluated using the TapRooT© System and determined to be "procedures, not followed/not used." Circumstances related to the violation did not have any generic implications for the permittee.

**From:** "Williams, Gary E" <Gary.Williams3@va.gov>  
**To:** <cff@nrc.gov>  
**Date:** 2/8/2007 9:37:40 AM  
**Subject:** inspection record for West Palm Beach

Sandy,

Per our discussion yesterday, I am attaching the inspection record for West Palm Beach.

I understand you might have additional questions related to the nature and extent of the comprehensive training noted in the inspection report.

Further, you might have other points to clarify with the inspector, Joe Wissing.

If you want to have a conference call with us, please contact Lisa Offutt to arrange the call.

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Gary E. Williams  
National Health Physics Program  
Veterans Health Administration  
North Little Rock, Arkansas  
(501) 257-1572

**CC:** "Lisa R Offutt (Fourmentaux, Lisa R)" <lisa.offutt@va.gov>, "Lynn McGuire (McGuire, Lynn)" <Lynn.McGuire@va.gov>, "Wissing Joe (Wissing, Joe)" <joseph.wissing@med.va.gov>, <PJP2@nrc.gov>