

SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION

1. LICENSEE/LOCATION INSPECTED:
Mercy Health Services
North Grayling
1100 East Michigan Avenue
Grayling, MI 49738
REPORT NUMBER(S) 2011-001

2. NRC/REGIONAL OFFICE
U.S. Nuclear Regulatory Commission
Region III
2443 Warrenville Road, Suite 210
Lisle, IL 60532-4351

3. DOCKET NUMBER(S)
030-11125

4. LICENSEE NUMBER(S)
21-16489-01

5. DATE(S) OF INSPECTION
July 20, 2011

LICENSEE:

The inspection was an examination of the activities conducted under your license as they relate to radiation safety and to compliance with the Nuclear Regulatory Commission (NRC) rules and regulations and the conditions of your license. The inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations by the inspector. The inspection findings are as follows:

- 1. Based on the inspection findings, no violations were identified.
- 2. Previous violation(s) closed.
- 3. The violation(s), specifically described to you by the inspector as non-cited violations, are not being cited because they were self-identified, non-repetitive, and corrective action was or is being taken, and the remaining criteria in the NRC Enforcement Policy, to exercise discretion, were satisfied

One Non-cited violation(s) were discussed involving the following requirement(s): As required by 10 CFR 20.1802, the licensee failed to secure a package containing xenon-133 at its loading dock on February 4, 2010. The carrier delivered the package directly to the loading dock which was unattended at that time. The package remained on the loading dock for approximately 1 hour until discovered by the licensee staff.

- 4. During this inspection certain of your activities, as described below and/or attached, were in violation of NRC requirements and are being cited. This form is a NOTICE OF VIOLATION, which may be subject to posting in accordance with 10 CFR 19.11

Statement of Corrective Actions

I hereby state that, within 30 days, the actions described by me to the inspector will be taken to correct the violations identified. This statement of corrective actions is made in accordance with the requirements of 10 CFR 2.201 (corrective steps already taken, corrective steps which will be taken, date when full compliance will be achieved). I understand that no further written response to NRC will be required, unless specifically requested.

Title	Printed Name	Signature	Date
LICENSEE'S REPRESENTATIVE			
NRC INSPECTOR	Deborah A. Piskura	<i>D. Piskura</i>	07/29/2011
Branch Chief	Tamara E. Bloomer	<i>T. Bloomer</i>	7/29/11

Docket File Information
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3. DOCKET NUMBER(S) 030-11125	4. LICENSE NUMBER(S) 21-16489-01	5. DATE(S) OF INSPECTION July 20, 2011	
6. INSPECTION PROCEDURES 87130 & 87132	7. INSPECTION FOCUS AREAS 03.01-03.08		

SUPPLEMENTAL INSPECTION INFORMATION

1. PROGRAM 02120	2. PRIORITY 3	3. LICENSEE CONTACT Robert Balestrero, M.D. RSO	4. TELEPHONE NUMBER 989-348-0350
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Main Office Inspection Next Inspection Date: July 2014
 Field Office Inspection
 Temporary Job Site Inspection _____

PROGRAM SCOPE

This licensee was a small community hospital authorized to use licensed materials in Sections 35.100, 35.200, and 35.400 (I-125 and Pd-103 prostate seed implants). The licensee retained a consulting physicist who audited the nuclear medicine radiation safety program on a quarterly basis (last 6/16/2011).

The nuclear medicine department was staffed with 3 technologists who performed approximately 150+ diagnostic nuclear medicine procedures monthly which included a full spectrum of diagnostic imaging studies. The licensee utilized a Mo-99/Tc-99m generator to prepare the majority of its dosages for patient studies; the licensee performed a full spectrum of imaging studies. Occasionally, the licensee received unit doses from a licensed radiopharmacy.

The radiation therapy activities were limited to permanent prostate implants. Staff from the radiation oncology program at Munson Medical Center (NRC License No. 21-08317) performed the implants at the licensee's hospital. The licensee administered 10-15 I-125/Pd-103 permanent prostate implants annually.

This inspection consisted of interviews with select licensee personnel; a review of select records; a tour of the nuclear medicine department; and independent measurements. The inspector observed the administration of several diagnostic nuclear medicine procedures. The inspector reviewed the post-treatment plans for numerous prostate implants with physics personnel at Munson Medical Center. The inspection included observations of dose calibrator and QA checks, security of byproduct material, and use of personnel monitoring.

On 2/4/2010, a common carrier delivered a package (White I labeled) containing Xe-133 to the licensee's loading dock (unattended at that time). The licensee estimated that the package remained at the loading dock unsecured for approximately 1 hour. The licensee's procedures require that all packages containing radioactive material be delivered directly to the nuclear medicine hot lab. The licensee reported the incident to its carrier and filed an incident report. The licensee provided re-instruction to the company representative on its policies and procedures for delivery of packages containing radioactive material. This non-repetitive, licensee-identified and corrected violation is being treated as a Non-Cited Violation, consistent with Section 2.3.2.b of the Enforcement Policy.