NRC FORM 591M PART 1
(06-2010)
10 CFR 2.201

U.S NUCLEAR REGULATORY COMMISSION

SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION

1. LICENSEE/LOCATION INSPECTED:	2. NRC/REGIONAL OFFICE
Complete Health Systems G-1128 S. Linden Rd, Suite 11 Flint, MI REPORT NUMBER(S): 11-01	U.S. Nuclear Regulatory Commission, Region III 2443 Warrenville Road, Suite 210 Lisle, Illinois 60532

3. DOCKET NUMBER(S)	4. LICENSEE NUMBER(S)	5. DATE(S) OF INSPECTION
030-36714	21-32543-01	July 28, 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, NUREG-1600, to exercise discretion, were satisfied

_____Non-cited violation(s) were discussed involving the following requirement(s):

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

One violation is being cited because it was identified by the NRC inspector. (continued on Part 2, attached)

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	Muaz Jondy		7/28/11
NRC INSPECTOR	Andrew M. Bramnik	Andrew M Bramnik	7/28/2011
Branch Chief	Tamara E. Bloomer	Tamara Bloomer	8/3/11

NRC FORM 591M PART 2
(06-2010)
10 CFR 2.201

U.S NUCLEAR REGULATORY COMMISSION

SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION

1. LICENSEE/LOCATION INSPECTED:	2. NRC/REGIONAL OFFICE
Complete Health Systems REPORT NUMBER(S) 11-01	U.S. Nuclear Regulatory Commission, Region III 2443 Warrenville Road, Suite 210 Lisle, Illinois 60532

3. DOCKET NUMBER(S)	4. LICENSEE NUMBER(S)	5. DATE(S) OF INSPECTION
030-36714	21-32543-01	July 28, 2011

(Continued)

1. 10 CFR 35.80(a) states, in part, that a licensee providing mobile medical service shall obtain a letter signed by the management of each client for which services are rendered that permits the use of byproduct material at the client's address and clearly delineates the authority and responsibility of the licensee and the client.

Contrary to the above, on multiple occasions between January 2010 and July 28, 2011, the licensee provided mobile medical service to clients and did not obtain a letter in accordance with 10 CFR 35.80(a). The root cause was a lack of awareness of the requirement by licensee management. As corrective actions, the licensee will create a form letter with the required level of information and have it signed by the management of each client. The letter will be completed and signed by each active client by August 12, 2011.

NRC FORM 591 M PART 3 (06-2010) 10 CFR 2.201

U.S. NUCLEAR REGULATORY COMMISSION

Docket File Information

SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION

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030-36714	21-32543-01	July 28, 2011

6. INSPECTION PROCEDURES	7. INSPECTION FOCUS AREAS
87130	03.01 – 03.07

SUPPLEMENTAL INSPECTION INFORMATION

1.PROGRAM	2. PRIORITY	3. LICENSEE CONTACT	4. TELEPHONE NUMBER
2220	3	Anthony Bennett, M.D., RSO	810-720-3891

☒ Main Office Inspection — Next Inspection Date: July 2014

☐ Field Office Inspection _____

☐ Temporary Job Site Inspection _____

PROGRAM SCOPE

This was a routine inspection of a licensee that operated a diagnostic nuclear cardiology clinic and mobile service. Two part-time nuclear medicine technologists and one "as-needed" contract technician performed approximately 10 diagnostic cardiac stress tests daily at the main facility, and 20 tests per month at mobile sites. The licensee obtained licensed material exclusively as unit doses from an area nuclear pharmacy.

PERFORMANCE OBSERVATIONS

No work at temporary job sites was available for observation during the inspection. The inspector observed two resting doses and one stress dose of technicium-99m being administered at the base location. These observations, combined with interviews of available staff, revealed an adequate level of understanding of emergency and material handling procedures and techniques. Dose calibrator constancy checks, package receipt, transport of byproduct material, daily surveys, and waste handling and disposal procedures were demonstrated. An outside consultant performed quarterly program audits that were adequate to oversee the program.

Licensed material was adequately secured and not readily accessible to members of the general public. The licensee possessed a radiation survey meter at each location that was calibrated, operational, and performed well in side-by-side comparisons with an NRC meter. Independent measurements did not indicate readings in excess of Title 10 of the Code of Federal Regulations (10 CFR) Part 20 limits in restricted or unrestricted areas. Personal whole body and extremity dosimetry were observed being worn by the staff during the inspection, and records did not indicate doses in excess of 10 CFR Part 20 limits. Dosimetry records indicated that the highest annual whole body and extremity readings for the past three years were 472 millirem (mrem) and 571 mrem, respectively.

One violation was identified during the inspection: on multiple occasions between January 2010 and July 21, 2011, the licensee provided mobile medical service to clients and did not obtain a letter signed by client management that permitted the use of byproduct material at the client's address. This item is described in greater detail in Part 2, above.