



UNITED STATES
NUCLEAR REGULATORY COMMISSION

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

July 25, 2012

Mr. Gary Williams, Director
National Health Physics Program (115 HP/NLR)
Department of Veterans Affairs
Veterans Health Administration
2200 Fort Roots Drive
North Little Rock, AR 72114

SUBJECT: NRC INSPECTION REPORT 030-34325/12-010(DNMS) – VA CARIBBEAN
HEALTHCARE SYSTEM, SAN JUAN, PUERTO RICO

Dear Mr. Williams:

On June 26, 2012, the U.S. Nuclear Regulatory Commission (NRC) conducted a routine inspection at VA Caribbean Healthcare System in San Juan, Puerto Rico. The inspection was limited to a review of activities authorized under Permit Number 52-04359-01. The inspector conducted an exit briefing with the staff at the facility at the completion of the inspection.

The inspection was an examination of activities conducted under the Permit as they relate to radiation safety and to compliance with the Commission's rules and regulations. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, independent measurements, and observation of activities in progress. Within the scope of the inspection no violations of NRC requirements were identified; therefore, no response to this letter or the enclosed NRC Form 591M is required.

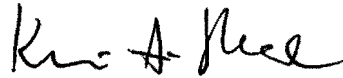
In accordance with Title 10 of the Code of Federal Regulations 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosures will be available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

G. Williams

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Should you have any questions concerning this inspection or the enclosed report, please contact me at 630-829-9854.

Sincerely,

A handwritten signature in black ink, appearing to read "Kevin G. Null". The signature is fluid and cursive, with the first name "Kevin" and last name "Null" clearly distinguishable.

Kevin G Null, Acting Chief
Materials Licensing Branch
Division of Nuclear Materials Safety

Docket No. 030-34325
License No. 03-23853-01VA
Permit No. 52-04359-01

Enclosure:
Inspection Report No. 030-34325/12-010(DNMS)

G. Williams

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Should you have any questions concerning this inspection or the enclosed report, please contact me at 630-829-9854.

Sincerely,

/RA/

Kevin G Null, Acting Chief
Materials Licensing Branch
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Docket No. 030-34325
License No. 03-23853-01VA
Permit No. 52-04359-01

Enclosure:
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*See previous concurrence

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OFFICE	RIII DNMS	RIII DNMS	RIII	RIII
NAME	HBermudez: jm*HB(T)	KGNull*KGN		
DATE	07/24/12	07/25/12		

OFFICIAL RECORD COPY

SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION

1. LICENSEE/LOCATION INSPECTED: Department of Veterans Affairs Under Secretary for Health Washington, D.C. Location: VA Caribbean Healthcare System, San Juan, PR REPORT NUMBER(S) 2012-010	2. NRC/REGIONAL OFFICE Region III U. S. Nuclear Regulatory Commission 2443 Warrenville Road, Suite 210 Lisle, IL 60532-4352
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3. DOCKET NUMBER(S) 030-34325	4. LICENSE NUMBER(S) 03-23853-01VA	5. DATE(S) OF INSPECTION 6/26/2012
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LICENSEE:
 The inspection was an examination of the activities conducted under your license as they relate to radiation safety and to compliance with the Nuclear Regulatory Commission (NRC) rules and regulations and the conditions of your license. The inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations by the inspector. The inspection findings are as follows:

- 1. Based on the inspection findings, no violations were identified.
- 2. Previous violation(s) closed.
- 3. The violation(s), specifically described to you by the inspector as non-cited violations, are not being cited because they were self-identified, non-repetitive, and corrective action was or is being taken, and the remaining criteria in the NRC Enforcement Policy, 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 in accordance with NRC Enforcement Policy. This form is a NOTICE OF VIOLATION, which may be subject to posting in accordance with 10 CFR 19.11.
 (Violations and Corrective Actions)

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	Hector Bermudez	<i>Hector Bermudez by phone</i>	7/24/12
BRANCH CHIEF	Kevin G. Null	<i>Kevin G. Null</i>	7/25/12

Docket File Information

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6. INSPECTION PROCEDURES USED 87134	7. INSPECTION FOCUS AREAS 3.01 - 3.07
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SUPPLEMENTAL INSPECTION INFORMATION

1. PROGRAM CODE(S) 2110	2. PRIORITY 2	3. LICENSEE CONTACT Gary Williams	4. TELEPHONE NUMBER (501) 257-1572
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Main Office Inspection Next Inspection Date: _____
 Field Office Inspection San Juan VA Medical Center
 Temporary Job Site Inspection _____

PROGRAM SCOPE

The VA Caribbean Healthcare System in San Juan, Puerto Rico (the Permittee), is a Department of Veterans Affairs (DVA) facility authorized under a Veterans Health Administration permit for broad scope medical and research use. The DVA is authorized to issue permits to DVA facilities under the U.S. Nuclear Regulatory Commission's (NRC) Master Materials License No. 03-23853-01VA. The Permittee is authorized for use of byproduct material in diagnostic and therapeutic nuclear medicine procedures, instrument calibrations, research and development (including animal studies, student instruction and in-vitro studies). Although authorized, there are no research or brachytherapy activities taking place. The permit authorizes possession and use of byproduct material only at the Permittee's facility located at 10 Calle Casia, San Juan, Puerto Rico. There are nine nuclear medicine technologists plus a supervisor at the facility performing approximately 30 procedures per day including approximately 3-4 Positron Emission Tomography (PET) studies per day. There are four Authorized Users and four nurses in the department. The Permittee primarily uses unit doses from a local radiopharmacy, and on rare occasions a generator for use on weekends as needed. Other than sodium iodide I-131 in capsule form, the Permittee does not use other radiopharmaceuticals for therapeutic purposes. The Permittee performs about eight procedures that require a written directive per quarter: mostly I-131 whole body studies and an occasional carcinoma therapy (no hyperthyroidism cases in years). The Permittee has an active Radiation Safety Committee (RSC) which has been meeting on a quarterly basis. The Permittee's radiation safety staff oversees the daily implementation of the radiation safety program to include activities such as quarterly audits of the Permittee's radiation safety program, semi-annual inventory of sealed sources, radiation safety training, radiation exposure control, instrument calibrations, student instruction, package receipts, radioactive waste management and disposal, etc.

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(Continued)

Observations

Through discussions with Permittee staff members, reviews of records, direct observations, and independent radiation measurements, the inspector determined that there are seven cameras including one PET CT camera and one treadmill used for cardiac studies. The Permittee possessed and used four dose calibrators, which were being kept calibrated in accordance with the manufacturer's instructions. The inspector observed Permittee staff wearing appropriate radiation monitoring devices and noted that occupational radiation exposures were well within regulatory limits. Permittee personnel demonstrated sufficient knowledge of radiation safety procedures, contamination control, security requirements and NRC regulations. The inspector conducted independent measurements throughout the nuclear medicine department and did not identify radiation levels that exceeded regulatory compliance limits. The inspector also reviewed selected records such as dosimetry, RSC meeting minutes, written directives, instrument calibrations and radiation survey results and did not identify any issues. Containers of waste were appropriately labeled and secured, and the nuclear medicine department was adequately secured. The Permittee trains about seven nuclear medicine technologists per year. The inspector reviewed the permittee's radiation safety training program and found it to be adequate. There has been no transportation of permitted materials in several years, but the Permittee is planning to make a shipment in the near future. Based on interviews conducted by the inspector, Permittee staff appeared to be aware of applicable transportation regulations. The Permittee has a survey meter calibration facility and calibration procedures were found to be adequate. The inspector noted that a non-cited violation identified during a recent inspection conducted by the DVA's National Health Physics Program had been corrected and has not recurred.

No violations of NRC requirements were identified.