

**SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION**

1. LICENSEE/LOCATION INSPECTED: Benefis Hospital 1101 26 <sup>th</sup> Street South Great Falls, Montana 59405-5193  Location: 1101 26 <sup>th</sup> St. South & 1117 29 <sup>th</sup> St. South, Great Falls, Montana REPORT NO: 030-02404/2013-001		2. NRC/REGIONAL OFFICE  U.S. Nuclear Regulatory Commission - Region IV 1600 East Lamar Boulevard Arlington, Texas 76011-4511	
3. DOCKET NUMBER 030-02404	4. LICENSE NUMBER 25-12710-01	5. DATE OF INSPECTION March 18, 2013	

**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) was/were discussed involving the following requirement(s) and Corrective Action(s):

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

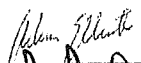


10 CFR 35.610(e) requires the licensee to ensure that operators, authorized medical physicists, and authorized users participate in drills of the emergency procedures, initially and at least annually.

Contrary to the above, the licensee failed to ensure that operators, authorized medical physicists, and authorized users participated in annual drills of the emergency procedures. Specifically, from 2008 to 2012, an annual drill of the emergency procedures was not conducted.

The licensee agreed to conduct a drill of the emergency procedures which will involve participation of the operators, authorized medical physicists, and authorized users within 30 days of this inspection and every year thereafter. The licensee will retain a record of these drills.

**Licensee's Statement of Corrective Actions for Item 4, above.**

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

Title	Printed Name	Signature	Date
LICENSEE'S REPRESENTATIVE	Adam Elliott, MS		3/26/2013
NRC INSPECTOR	R. Rick Muñoz		03/26/2013
BRANCH CHIEF	G. Michael Vasquez		3/1/13

Non-Public   
  Sensitive – Security-Related   
  Public   
  Non-Sensitive

## Munoz, Rick

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**From:** Elliott, Adam [AdamElliott@benefis.org]  
**Sent:** Tuesday, March 26, 2013 11:54 AM  
**To:** Munoz, Rick  
**Subject:** FW: NOV related to the NRC Inspection  
**Attachments:** Safety Inspection Report Signed.pdf

Hi Rick,

I had Deborah forward me your e-mail as yours didn't originally reach me (my email is [adamelliott@benefis.org](mailto:adamelliott@benefis.org) – Elliott has 2 Ts, it happens often!)

Attached is the signed Safety Inspection Report, as requested.  
We have conducted one drill already with one MD who is now out on vacation, with plans in the next two weeks to complete the drills for the remainder of the appropriate staff.

Thank you again for all your help and guidance, and the additional resources!

Adam Elliott

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**From:** Munoz, Rick [<mailto:Rick.Munoz@nrc.gov>]  
**Sent:** Tuesday, March 26, 2013 8:55 AM  
**To:** [adamelliott@benefis.org](mailto:adamelliott@benefis.org); Stratman, Deborah  
**Cc:** Cann, Kari  
**Subject:** RE: NOV related to the NRC Inspection

Hello Adam & Deb,

I have attached the NRC Form-591 documenting the violation identified during the NRC inspection on March 18, 2013. I provided a report document for yours or Deb's signature. I do not remember who you decided would sign for Kari. I only need one of your signatures, whom ever you decide. Please read the violation, and corrective actions. If you agree, sign and date the document and return it via pdf scan or fax at (817) 200-1188. You will also find an attached long and short checklist for new inspectors reviewing HDR requirements. In addition, Deb, I remember you asked a question on record retention for your written directives. I have also attached section 35.2040 which requires a 3 year retention period.

Kari,

I have also attached the CapinTec and AtomLab manufacture's calibration frequency recommendations as well as the National Standard.

Thank you for attention to this matter. I know this is a lot of information with a lot of attachments. If you have any questions, please feel free to contact me. I will be in the office through close of business tomorrow. It was a pleasure meeting and working with all of you.

Kindest Regards,

**Rick Muñoz**  
**Nuclear Materials Inspector**  
**U.S. Nuclear Regulatory Commission, Region-IV**  
**1600 East Lamar Boulevard**  
**Arlington, Texas 76011-4511**

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**From:** Cann,Kari [<mailto:KariCann@benefis.org>]  
**Sent:** Thursday, March 21, 2013 12:55 PM  
**To:** Munoz, Rick  
**Cc:** Cann,Kari  
**Subject:** email address for Benefis RSO

Hello Rick

It was a pleasure meeting you on Monday during your inspection of our facility. I certainly learned a lot from you. I want to update my email address of record for you. Please use this one ([karicann@benefis.org](mailto:karicann@benefis.org)) instead of my personal one for all correspondence regarding Benefis

Thank you again

Kari

Kari Cann, MS DABR  
Medical Physicist/ RSO  
Benefis Hospitals  
Great Falls MT  
406-788-7887