

NRC FORM 591M PART 1 <small>(10-2011) 10 CFR 2.201</small>		U.S. NUCLEAR REGULATORY COMMISSION	
SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION			
1. LICENSEE/LOCATION INSPECTED Liberty Hospital Nuclear Medicine Department 2525 Glenn W. Hendren Dr ve Liberty, MO 64069 REPORT NUMBER(S) 14-01		2. NRC/REGIONAL OFFICE Region III U. S. Nuclear Regulatory Commission 2443 Warrenville Road, Suite 210 Lisle, IL 60532-4352	
3. DOCKET NUMBER(S) 030-10532	4. LICENSE NUMBER(S) 24-16178-01	5. DATE(S) OF INSPECTION March 10, 2014	

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 examination of procedures and representative records, interviews with personnel, and observations by the inspector. The inspection findings are as follows:

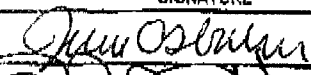

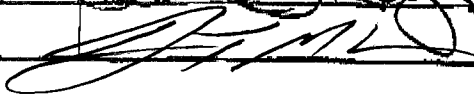
- 1. Based on the inspection findings, no violations were identified.
- 2. Previous violation(s) closed.
- 3. The violation(s), specifically described to you by the inspector as non-cited violations, are not being cited because they were self-identified, non-repetitive, and corrective action was or is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

Title 10 CFR 71.5(e) requires that a licensee who transports licensed material outside of the site of usage, as specified in the NRC license, or where transport is on public highways, or who delivers licensed material to a carrier for transport comply with the applicable requirements of the regulations appropriate to the mode of transport of the Department of Transportation (DOT) in 49 CFR Parts 107, 171-180, and 390-397.

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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	Julie Osburn, Director, Diagnostic Imaging		3-21-14
NRC INSPECTOR	Robert P. Hays		3/19/14
BRANCH CHIEF	Aaron T. M. Crow		4/4/14

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(Continued)

Title 49 CFR 172.704(a) specifies the elements of hazmat employee training as: (1) general awareness/familiarization training, (2) function-specific training, and (3) safety training. 49 CFR 172.704(c) requires, in part, that a hazmat employee receive initial training, and recurrent training at least once every three years.

Contrary to the above, the licensee did not provide training for its hazmat employees which satisfied the requirements in Subpart H to 49 CFR Part 172, in that during the period between March 9, 2011, and March 10, 2014, a period greater than three years, the licensee did not provide at least once during the prior three years, recurrent training for its hazmat employees as required and the licensee otherwise meets the definition of a hazmat employer in 49 CFR 171.8.

This is a Severity Level IV Violation (Section 6.3.d.4).

The licensee was not aware of the requirements for recurring hazmat training for the staff who are involved in shipping and receiving Class 7 hazardous material. The licensee has already taken corrective actions by obtaining a hazmat training module which includes the subject matter elements as required in 49 CFR 172.704(a). The hazmat training has already been provided to the majority of the staff and all staff will have completed the hazmat training by March 21, 2014.

Docket File Information

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6. INSPECTION PROCEDURES USED 87131, 87132	7. INSPECTION FOCUS AREAS 03.01-03.07
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SUPPLEMENTAL INSPECTION INFORMATION

1. PROGRAM CODE(S) 02120	2. PRIORITY 3	3. LICENSEE CONTACT	4. TELEPHONE NUMBER
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Main Office Inspection Next Inspection Date: 08/15/2016

Field Office Inspection 2521 Glenn W. Hendren Drive, 3rd floor

Temporary Job Site Inspection _____

PROGRAM SCOPE

The licensee was a medical institution with authorization by the license for two locations to use byproduct materials for diagnostic and therapeutic medical procedures under 10 CFR 35.100, 35.200, 35.300, and 35.400. At 2521 Glenn W. Hendren Drive, 3rd floor (Cardiovascular Specialists), the licensee routinely conducts a daily average of 6-8 patient cardiac studies with a staff of 1-2 nuclear medicine technologists (NMTs), Monday-Friday. At the hospital, two NMTs perform nuclear procedures with the majority of diagnostic studies are bones, gastric, or gall bladder tests. I-123 is used for uptake studies. Administrations of iodine-131 requiring a written directive, average 1-3 procedures per month, including post-thyroidectomy ablations. The licensee receives licensed material as unit doses from a Kansas City nuclear pharmacy as needed. The licensee also performed palladium-109 prostate implant procedures and averaged 1 case per month, using pre-loaded needles.

Performance Observations

During the inspection, the licensee's staff demonstrated/discussed: (1) radiation detection instruments and required surveys; (2) package receipt and check-in procedures; (3) wipe test counting; (4) unit dose and safe handling procedures; (5) dose calibrator tests; (6) palladium-103 seed procedures and inventories; (7) waste handling; (8) other sealed source inventories and leak tests; (9) routine security and storage of licensed material; (10) semi-annual radiation safety program audits; (11) minor contamination events (none); (12) written directives; (13) 10 CFR 35.75 patient release procedures; (14) dosimetry: [CY 2013: 487mr-DDE; 5920mr-SDE]; and (15) HAZMAT refresher training. A violation of 49 CFR 172.704(c) was identified for failing to provide recurrent HAZMAT training at least once every three years.

The inspector performed independent and confirmatory radiation measurements, which indicated results consistent with licensee survey records and postings.