

NRC FORM 591M PART 1 (07-2012) 10 CFR 2.201 **U.S. NUCLEAR REGULATORY COMMISSION**
SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION

1. LICENSEE/LOCATION INSPECTED: Mercy Hospital Grayling 1100 East Michigan Avenue Grayling, MI 49738 REPORT NUMBER(S) 03011125/2014001		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) 030-11125	4. LICENSE NUMBER(S) 21-16489-01	5. DATE(S) OF INSPECTION 06/11/2014
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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)
 Contrary to License Condition 15 of NRC License Number 21-16489-01, which requires that the licensee conduct its program in accordance with Rules for the Safe Use of Radiopharmaceuticals, referenced in its application, dated May 17, 2011, the licensee was drinking in a radioactive material usage area. Section 16 of the licensee's procedure states do not eat, drink, smoke, or apply cosmetics in radioactive material preparation, usage, storage or waste areas or any restricted areas as defined by the RSO. Specifically, licensee staff placed a cup with coffee on the counter near where a radioactive dosage of Tc-99m was located in preparation for a patient injection during the stress phase of a cardiac stress test. Corrective action implemented by the licensee was to re-instruct the staff that eating or drinking was not allowed in radioactive material, preparation, usage or storage areas.

Statement of Corrective Actions

I hereby state that, within 90 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	Robert Balestrero	<i>Robert Bale</i>	6/25/14
NRC INSPECTOR	Ken Lambert	<i>Ken Lambert</i>	6/25/14
BRANCH CHIEF	Aaron T. McCraw	<i>[Signature]</i>	6/25/14

Docket File Information
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6. INSPECTION PROCEDURES USED 87131	7. INSPECTION FOCUS AREAS 03.01 - 03.09
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SUPPLEMENTAL INSPECTION INFORMATION

1. PROGRAM CODE(S) 2120	2. PRIORITY 3	3. LICENSEE CONTACT Robert L Balestrero, M.D., RSO	4. TELEPHONE NUMBER (989) 348-0350
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Main Office Inspection Next Inspection Date: 06/11/2017
 Field Office Inspection
 Temporary Job Site Inspection

PROGRAM SCOPE

This was a routine inspection of a small community hospital authorized to use licensed radioactive materials under 10 CFR 35.100, 35.200, and 35.400. The licensee employed 1 FT and 1 PT technologist who performed 120-160 patients per month, with 60 percent cardiac stress tests, with the remainder bone, HIDA, gastric emptying, and lung scans (using Tc-99m). The licensee received a 2.5 curie generator weekly on Mondays. The licensee contracted with a health physics consultant who performed quarterly audits of the radiation safety program. Radiation therapy activities were limited to permanent prostate seed implants using Pd-102 or I-125. Staff from the radiation oncology program at Munson Medical Center (NRC License No. 21-08317-01) performed the implants at the licensee's facility. The licensee administered 5-8 implants per year. All records for the seed implants are kept at Munson Medical Center, including the written directive and pre and post treatment plans.

OBSERVATIONS AND FINDINGS

Licensed material was observed adequately secured within the hot lab during the inspection and was not readily accessible to members of the general public. Interviews conducted with the technologists revealed an adequate level of understanding of radiation safety practices and emergency procedures. The inspector reviewed dose calibrator daily checks, quarterly linearity and annual accuracy checks, package receipt surveys, daily and weekly surveys, waste handling and disposal records, and radiation safety committee meeting minutes. Licensee staff demonstrated daily dose calibrator checks, well counter, and daily and weekly surveys. The inspector observed an injection of Tc-99m, and a package receipt survey. The licensee exchanged badges on a quarterly basis and used a NVLAP approved vendor. Records reviewed indicated that the maximum exposures were 117 millirem (mrem) deep-dose equivalent (DDE) and 120 mrem shallow-dose equivalent (SDE) for 2014 through March 31; 480 mrem DDE and 510 mrem SDE for 2013; and 442 mrem DDE and 550 mrem SDE for 2012. Independent measurements taken in the hot lab, imaging and unrestricted areas were comparable to the licensee's survey data.

The inspector verified that corrective actions to a non-cited violation involving a package carrier leaving a radioactive material package on the licensee's unoccupied loading dock. Corrective actions included instructing the carrier to ensure RAM packages are left with licensee personnel. There have been no issues since carrier staff were re-instructed on the proper protocol.

Continued on NRC Form 591 Part 2

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Mercy Hospital Grayling
1100 East Michigan Avenue
Grayling, MI 49738

REPORT NUMBER(S) 03011125/2014001

2. NRC/REGIONAL OFFICE

Region III
U. S. Nuclear Regulatory Commission
2443 Warrenville Road, Suite 210
Lisle, IL 60532-4352

3. DOCKET NUMBER(S)

030-11125

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5. DATE(S) OF INSPECTION

06/11/2014

(Continued)

Continued from NRC Form 591 Part 3

The inspector identified a violation involving drinking in an area where radioactive materials were used contrary to Section 16 of the licensee's procedure, Rules for the Safe Use of Radiopharmaceuticals, dated June 4, 2014. The procedure is referenced in the licensee's application, dated May 17, 2011, and is "tied down" to the license through License Condition 15.