

SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION

1 LICENSEE/LOCATION INSPECTED: Providence Medical Group 2723 South 7th Street Terre Haute, IN 47802 REPORT NUMBER(S) 15-01		2 NRC/REGIONAL OFFICE Region III U. S. Nuclear Regulatory Commission 2443 Warrenville Road, Suite 210 Lisle, IL 60532-4352	
3 DOCKET NUMBER(S) 030-35131	4 LICENSE NUMBER(S) 13-32192-01	5 DATE(S) OF INSPECTION 4/16/2015	

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)

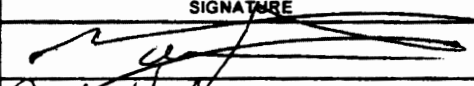
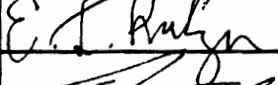
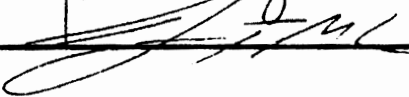
In license Condition 15.A. of NRC License 13-32192-01, letter dated February 12, 2009, Item 10 (a) describes the licensee as performing a prospective evaluation demonstrating that unmonitored individuals are not likely to receive, in one year, a radiation dose in excess of 10% of the allowable limits in 10 CFR Part 20 or provide dosimetry that meets the requirements listed under "Criteria: in NUREG-1556, Vol. 9" dated October 2002.

Contrary to the above, on April 16, 2015, the inspector observed that the licensee provided no documentation demonstrating that dosimetry was no longer required to be worn, and the individuals were not wearing finger badges.

As a corrective action, the Radiation Safety Officer agreed to conduct training on wearing protective equipment and to monitor the required dosimetry.

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	N. Mercho, MD, RSO		4/21/15
NRC INSPECTOR	E.L. Kulzer		4/22/15
BRANCH CHIEF	A.T. McCraw		4/23/15

Docket File Information
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6. INSPECTION PROCEDURES USED IP 87120	7. INSPECTION FOCUS AREAS 03.01 through 03.07
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SUPPLEMENTAL INSPECTION INFORMATION

1. PROGRAM CODE(S) 2201	2. PRIORITY 5	3. LICENSEE CONTACT N. Mercho, MD, RSO	4. TELEPHONE NUMBER (812) 232-8164
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Main Office Inspection Next Inspection Date: 04/16/2020

Field Office Inspection _____

Temporary Job Site Inspection _____

PROGRAM SCOPE

This was a routine inspection of a private clinic performing approximately five-six diagnostic nuclear medicine procedures per day. Two nuclear medicine technologists perform all patient procedures Monday through Thursday. The licensee obtains licensed material as unit doses from an area nuclear pharmacy, and does not use bulk doses, or molybdenum/technetium generators.

The inspector observed one stress dose of technetium-99m being administered. This activity in conjunction 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, daily surveys, waste handling and disposal procedures were successfully demonstrated. An outside consultant performs semi annual program audits that oversee licensed activities. Licensed material was observed as adequately secured during the review and was not readily accessible to members of the public. A survey meter was found to be calibrated and operational, and performed well in side-by-side comparison with an NRC instrument.

Independent measurements taken did not indicate readings in excess of Title 10 of the Federal Regulations (10 CFR) Part 20 limits in restricted or unrestricted areas. Personal whole body and extremity dosimetry were observed being worn by some, but not all, staff during the inspection. Because not all staff wore the extremity badges, the dosimetry records were questionable. Dosimetry records indicated that the extremity ratings for 2014 of 439 millirem (whole body) and 85 millirem (extremity) appeared to justify this finding.

The inspector observed a violation of Condition 15.A. of NRC License 13-32192-01 letter dated February 12, 2009, Item 10(a) which describes the licensee performing a prospective evaluation demonstrating that unmonitored individuals are not likely to receive, in one year, a radiation dose in excess of 10% of the allowable limits in 10 CFR Part 20 or provide dosimetry that meets the requirements listed under "Criteria: in NUREG-1556, Vol. 9" dated October 2002.

Kulzer, Edward

From: Amy Hawkins <ahawkins@provmed.net>
Sent: Friday, April 24, 2015 10:16 AM
To: Kulzer, Edward
Subject: Signed document
Attachments: NRC inpect2015.tif

Mr Kulzer,

Here is the signed document by Dr N. Mercho that you have requested. Dr Mercho discussed this issue with us and also as Technologist have discussed the importance of this issue. We are and will be wearing our ring badges. Thank you for your time.

If you have any questions or concerns, please do not hesitate to call me.

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Amy Hawkins R.T. CNMT
Providence Medical Group
812-232-8164

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