

SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION

<p>1. LICENSEE/LOCATION INSPECTED: RCHP Billings-Missoula LLC dba Community Medical Center 2827 Fort Missoula Road Missoula, Montana 59804 Location: 2827 Fort Missoula Road and 2837 Fort Missoula Road, Missoula, MT</p> <p>REPORT NO: 030-14921/2015-001</p>	<p>2. NRC/REGIONAL OFFICE U.S. Nuclear Regulatory Commission - Region IV 1600 East Lamar Boulevard Arlington, Texas 76011-4511</p>
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<p>3. DOCKET NUMBER 030-14921</p>	<p>4. LICENSE NUMBER 25-18361-01</p>	<p>5. DATES OF INSPECTION June 16 through July 21, 2015</p>
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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) 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.

1. Title 10 Code of Federal Regulations Part 20.1906(c) requires, in part, that each licensee who expects to receive a package containing radioactive material shall monitor the external surfaces of the labeled package for radioactive contamination.

License Condition 18.A states, in part, that the licensee shall conduct its program in accordance with the license application. Item 10: "Safe Use of Unsealed Licensed Material" of the license application dated April 18, 2013, states "the licensee will develop and implement written procedures for the safe use of unsealed byproduct material that meet the requirements of 10 CFR Part 20."

Contrary to the above, from July 29, 2002 through July 21, 2015, the licensee failed to develop and implement written procedures for the safe use of unsealed byproduct material that meet the requirements of Title 10 CFR 20.1906(c). Specifically, there were no written procedures in place for instructions on how to perform wipe tests to monitor the external surfaces of transportation packages of Tc-99m for radioactive contamination. Policy number DN1127 "Nuclear Medicine-Wipe Tests in Nuclear Cardiology" did address how to perform the weekly wipe tests using the Sun Nuclear Wipe Counter, however it did not address monitoring transportation packages for radioactive contamination.

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	Naomi R. Matten	<i>Naomi R. Matten</i>	8/4/15
NRC INSPECTOR	R. Rick Muñoz Jason Dykert	<i>R. Rick Muñoz</i> <i>Jason Dykert</i>	07/21/2015
BRANCH CHIEF	G. Michael Vasquez	<i>G. Michael Vasquez</i>	9/1/2015

SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION

1. LICENSEE RCHP Billings-Missoula LLC dba Community Medical Center 2827 Fort Missoula Road Missoula, Montana 59804 Location: 2827 Fort Missoula Road and 2837 Fort Missoula Road, Missoula, MT REPORT NUMBER 030-14921/2015-001		2. NRC/REGIONAL OFFICE U.S. Nuclear Regulatory Commission - Region IV 1600 East Lamar Boulevard Arlington, Texas 76011-4511	
3. DOCKET NUMBER 030-14921	4. LICENSE NUMBER 25-18361-01	5. DATES OF INSPECTION June 16 through July 21, 2015	

(Continued)

2. Title 10 Code of Federal Regulations Part 20.1501(c) requires that the licensee ensure that instruments and equipment used for quantitative radiation measurements be calibrated periodically for the radiation measurement.

License Condition 18.A states, in part, that the licensee shall conduct its program in accordance with the license application. Item 10: "Safe Use of Unsealed Licensed Material" of the license application dated April 18, 2013, states "the licensee will develop and implement written procedures for the safe use of unsealed byproduct material that meet the requirements of 10 CFR Part 20."

Contrary to the above, from July 29, 2002 through June 16, 2014, the licensee failed to develop and implement written procedures for the safe use of unsealed byproduct material that meet the requirements of Title 10 CFR 20.1501(c). Specifically, the licensee failed to ensure that a Sun Nuclear Corporation Model 1501 instrument, serial number 3165907, used at the Montana Heart Center to monitor for radioactive contamination was calibrated annually as recommended by the manufacturer.

The licensee removed the Sun wipe test counter from service on June 19, 2015. The licensee committed to updating Procedure DN1127 by August 20, 2015, and to create a new procedure for wipe tests of transport packages to monitor for radioactive contamination.

For the interim, the licensee will now analyze incoming package wipes and weekly area wipes using the approved procedures governing the Atom Lab 950 well counter, an appropriately calibrated instrument, located in the nuclear medicine department.

Munoz, Rick

From: Munoz, Rick
Sent: Tuesday, July 21, 2015 10:27 AM
To: 'Fitz, Christopher'
Cc: Dykert, Jason
Subject: RE: NRC Inspection Report Re: Telephone Message
Attachments: NOV - COMMUNITY MEDICAL CENTER 2015.pdf

Chris,

I have attached the NRC Inspection report documenting the two violations identified. Please take a moment to read the violations identified and more importantly, the corrective actions you have committed to in achieving compliance. If you agree with the violations and corrective actions, please sign and date the document. Scan or fax the document back to me then I will call you to finalize the action via a telephonic exit brief. Feel free to contact me if you have any questions. I will be in the office the rest of today. Otherwise I will get from my next trip on August 4, 2015.

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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Munoz, Rick

From: Munoz, Rick
Sent: Wednesday, August 05, 2015 6:36 AM
To: Matten, Naomi
Cc: 'CFitz@billingsclinic.org'; Ryan-O'Hara, Kimberly
Subject: RE: Community Medical Center Safety Inspection Report and Compliance Inspection

Naomi,

In reference to the final exit briefing conducted telephonically with you and your staff yesterday afternoon, I would again like to take this opportunity to thank you and your staff for your prompt response and proactive attention to the violations identified during the onsite NRC inspection conducted June 16 with continued in-office review through July 21, 2015. If you have any questions about this inspection or questions in the future, do not hesitate to contact me. No additional response is required.

Regards,

Rick Muñoz
Nuclear Materials Inspector
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From: Matten, Naomi [mailto:NMatten@communitymed.org]
Sent: Tuesday, August 04, 2015 3:06 PM
To: Munoz, Rick
Cc: 'CFitz@billingsclinic.org'; Ryan-O'Hara, Kimberly
Subject: [External_Sender] Community Medical Center Safety Inspection Report and Compliance Inspection

Naomi Matten MT(ASCP)

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