

June 20, 2016

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United States Nuclear Regulatory Commission  
Region IV  
1600 E. Lamar BLVD  
Arlington, TX 76011

DNMS

Diagnostic Imaging Services of Idaho  
1951 Bench Rd., suite F  
Pocatello, ID 83201  
NRC RAM: 11-34221-01

RE: Docket No. 030-36948

Subject: NRC inspection report 030-36948/2015-001 and notice of violation.

- A. 10 CFR 20.1801 requires that the licensee shall secure from unauthorized removal or access licensed materials that are stored in controlled or restricted areas.

Contrary to the above, on May 18, 2015 the licensee failed to secure from unauthorized removal or access licensed materials that are stored in controlled or restricted areas. Specifically, the licensee's mobile nuclear medicine coach was unsecured and unattended, the door to the hot lab closet inside the mobile nuclear medicine coach was unsecured, and a package containing approximately 320 mCi of technetium-99m and was not secured from unauthorized removal or access.

#### RESPONSE

Our policy is to have the coach locked when not within or in visible range. Peter Aagard and I have reviewed the policy and procedure for Diagnostic Imaging as outlined in 10 CFR 20.1801. A monthly "surprise" visit will be made by the RSO to assure compliance.

- B. 10 CFR 35.60(b) requires the licensee shall calibrate the instrumentation required by 10 CFR 35.60(a) in accordance with nationally recognized standards or the manufacturer's instructions.

Contrary to the above, from August 15, 2013 to May 18, 2015 the licensee failed to calibrate the instrumentation required by 10 CFR 35.60(a) in accordance with nationally recognized standards or the manufacturer's instructions. Specifically, the licensee utilized a Capintec Model CRC-15R dose calibrator to perform direct measurements of unsealed byproduct material and did not perform the calibrations in accordance with the manufacturer's instructions. The manufacturer's instructions for the Capintec Model CRC-15R dose calibrator specify that cobalt-57 sources used to perform calibrations must be greater than 50  $\mu$ Ci at the time of calibration. During the period from August 15, 2013 to May 18, 2015 the cobalt-57 calibration source utilized by the licensee to perform calibrations of the Capintec Model CRC-15R dose calibrator was less than 4  $\mu$ Ci.

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## RESPONSE

A new Co-57 E vial source has been purchased for dose calibrator calibrations as specified by the manufacturer.

A yearly review with attention to dose calibrator quality control has been initiated.

- C. 10 CFR 35.80(a)(1) requires that a licensee providing mobile medical services shall obtain the letter signed by the management of each client for which services are rendered that permits the use of byproduct material at the client's address and clearly delineates the authority and responsibility of the licensee and the client.

Contrary to the above, on May 18, 2015 the mobile medical services licensee failed to obtain a letter signed by the management of each client for which services are rendered that permits the use of byproduct material at the clients address and clearly delineates the authority and responsibility of the licensee and the client. Specifically, on May 18, 2015, the mobile medical service licensee was performing license activity at a clients address (Blackfoot Medical Clinic) and the signed letter from the client dated April 20 2005, did not clearly delineate the authority and responsibility of the licensee in the client.

## RESPONSE

A comprehensive review of all contracts which specify letters signed by the management of each client for which services are rendered that permits the use of byproduct material at the client's address and clearly delineates the authority and responsibility of the licensee and the client was completed May 18, 2015. All deficient contracts were brought to comply with 10 CFR 35.80(a)(1), and are available for review.

- D. License Condition 14 of NRC license 11-34221-01, Amendment No. 5, requires that the licensee is authorized to transport licensed material in accordance with the provisions of 10 CFR 71, "Packaging and Transportation of Radioactive Material". 10 CFR 71.5(a) requires, in part, that each licensee who transports licensed material outside 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, shall comply with the applicable requirements of the US Department of Transportation (DOT) regulations in 49 CFR Parts 107, 171 through 180, and 390 through 397, appropriate to the mode of transport.

Contrary to the above, on May 18, 2015, the licensee transported licensed Class 7 (radioactive) material on public highways and failed to comply with applicable provisions of the US DOT regulations in 49 CFR 177.182(d). Specifically the licensee transported Class 7 (radioactive) material in a package that was not blocked and braced so that cannot change position during conditions normally incident to transportation.

## RESPONSE

Our policy is to transported Class 7 (radioactive) material in a package that is blocked and braced so that cannot change position during conditions normally incident to transportation. In the hot lab there is a box specifically built for this purpose.

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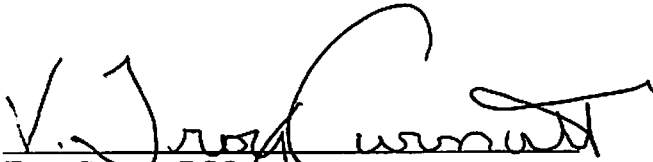
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Peter Aagard and I have reviewed the policy and procedure for Diagnostic Imaging as outlined in 49 CFR 177.182(d). Commitments have been made to transport Class 7 (radioactive) material in the box specifically designed for this purpose. A monthly "surprise" visit will be made by the RSO to assure compliance.

If you have any questions, do not hesitate to contact me.  
Thank you for your time.

A handwritten signature in black ink, appearing to read "Troy Curmutt", written over a horizontal line.

Troy Curmutt RSO  
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