

SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION

1. LICENSEE/LOCATION INSPECTED: Shared Imaging, LLC 801 Phoenix Lake, Avenue Streamwood, IL 60107 REPORT NUMBER(S) 2017-001	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) 030-38312	4. LICENSE NUMBER(S) 12-32798-01	5. DATE(S) OF INSPECTION 5/23/17, in-office review through 6/6/17
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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)

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			
NRC INSPECTOR	Robert G. Gattone, Jr.	<i>Robert G. Gattone, Jr.</i>	6/6/17
BRANCH CHIEF	Aaron T. McCraw	<i>[Signature]</i>	6/6/17

Docket File Information

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6. INSPECTION PROCEDURES USED 87130	7. INSPECTION FOCUS AREAS 02.01, 02.02, 02.04, and 02.05 through 02.07
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SUPPLEMENTAL INSPECTION INFORMATION

1. PROGRAM CODE(S) 02220	2. PRIORITY 3	3. LICENSEE CONTACT Robert Tokarz, RSO	4. TELEPHONE NUMBER (732) 306-5741
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Main Office Inspection Next Inspection Date: 05/23/2018
 Field Office Inspection _____
 Temporary Job Site Inspection _____

PROGRAM SCOPE

This was a re-initial inspection. The in-office review included conducting the exit meeting with the RSO, who was unavailable until 6/6/17. The licensee had not received any radioactive material yet. The licensee planned to conduct licensed activities in the future; however, it could not estimate when it would begin licensed activities. The licensee's work hours were 8:00am to 5:00pm Monday through Friday. The NRC in-office review included receipt of information that was unavailable during the onsite inspection including, in part, the final exit meeting with the Radiation Safety Officer who was unavailable during the onsite inspection.

Observations

During the last inspection, the inspector identified a minor violation of 10 CFR 30.36(d)(3) involving licensee failure to notify the NRC within 60 days after principal activities had not been conducted for a period of 24 consecutive months. Specifically, the licensee had not received any licensed material since its NRC license was issued on 9/16/10, and it did not provide the required written notification to the NRC. The cause of the violation was that the licensee was unaware of the requirement in 10 CFR 30.36(d)(3). On 5/29/14, the licensee provided written, late notification as a means of complying with 10 CFR 30.36(d)(3). As long term corrective action, the licensee committed to conduct annual audits to insure that notifications are made in accordance with 10 CFR 30.36(d)(3); however, the licensee subsequently spoke with an NRC inspector and misinterpreted that the licensee was exempt from 10 CFR 30.36(d)(3). As such, the licensee did not take actions to comply with 10 CFR 30.36(d)(3). On 5/8/17, the inspector called the RSO and identified a minor violation of 10 CFR 30.36(d)(3) involving licensee failure to notify the NRC within 60 days after principal activities had not been conducted for a period of 24 consecutive months because the licensee had not received any licensed material since its NRC license was issued on 9/16/10. The inspector informed the RSO that NRC exemptions of NRC regulatory requirements are only provided in writing by the NRC. As corrective action, on 5/16/17, the licensee provided the required notification (albeit late). As long term corrective action, the licensee planned to add a calendar reminder to himself and another licensee staff member (i.e., backup) to conduct annual audits to verify that the licensee complies with 10 CFR 30.36(d)(3). (Continued in Part 2)

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Shared Imaging, LLC
801 Phoenix Lake, Avenue
Streamwood, IL 60107

REPORT NUMBER(S) 2017-001

2. NRC/REGIONAL OFFICE

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

3. DOCKET NUMBER(S)

030-38312

4. LICENSE NUMBER(S)

12-32798-01

5. DATE(S) OF INSPECTION

5/23/17, in-office review
through 6/6/17

(Continued)

The inspector reviewed the licensee's Agreement State mobile medical diagnostic imaging licenses issued by California, New Jersey, New York State, Pennsylvania, and Texas. In addition, the inspector reviewed the licensee's Illinois Emergency Management Agency (IEMA) license for possession of calibration and reference sealed sources only, for quality assurance incident to mobile medical activities in IEMA's jurisdiction. The inspector interviewed the licensee's Compliance and Regulatory Specialist and noted that the licensee's procedures and practices used for Agreement State licensed activities included, in part: (1) security of licensed material; (2) review of occupational workers' monthly dosimeter dose results; (3) daily facility radiation surveys for ambient dose rates and removable contamination; (4) initial and refresher ALARA, radiation safety, and HAZMAT training; (5) dose calibrator calibration, (6) safe use of unsealed licensed material, including, in part, shielding, absorbent paper, and containment in the hot lab; (7) use of spill kits; and (8) decay-in-storage, including proper surveys to verify that licensed material has decayed to low background.