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:	2. NRC/REGIONAL OFFICE
Washington County Memorial Hospital 300 Healthway Potosi, MO 63664 REPORT NUMBER(S) 2017001	Region III U. S. Nuclear Regulatory Commission 2443 Warrenville Road, Suite 210 Lisle, IL 60532-4352

3. DOCKET NUMBER(S)	4. LICENSE NUMBER(S)	5. DATE(S) OF INSPECTION
030-35711	24-32317-01	September 14, 2017

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 violations(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 10 CFR 20.1906(b)(1), as of September 14, 2017, Washington County Memorial Hospital routinely received labeled packages containing radioactive material in the form of unsealed liquid, but did not monitor the external surfaces of these packages for radioactive contamination.

As corrective action, the licensee immediately committed to monitor the external surfaces of all future incoming labeled packages for radioactive contamination using equipment and methods already employed to monitor for radioactive contamination in restricted areas of the facility. The licensee also committed to document the results of this monitoring, and to update applicable procedures and forms as necessary.

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	michele c. meyer	Michele C Meyer	10-24-17
NRC INSPECTOR	Ryan Craffey	Ryan Craffey	09/22/2017
BRANCH CHIEF	Aaron McCraw	[signature]	09/28/2017

NRC FORM 591M PART 3
(07-2012)
10 CFR 2.201

U.S. NUCLEAR REGULATORY COMMISSION

Docket File Information

SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION

1. LICENSEE/LOCATION INSPECTED:	2. NRC/REGIONAL OFFICE
Washington County Memorial Hospital 300 Healthway Potosi, MO 63664 REPORT NUMBER(S) 2017001	Region III U. S. Nuclear Regulatory Commission 2443 Warrenville Road, Suite 210 Lisle, IL 60532-4352

3. DOCKET NUMBER(S)	4. LICENSE NUMBER(S)	5. DATE(S) OF INSPECTION
030-35711	24-32317-01	September 14, 2017

6. INSPECTION PROCEDURES USED	7. INSPECTION FOCUS AREAS
87131	All

SUPPLEMENTAL INSPECTION INFORMATION

1. PROGRAM CODE(S)	2. PRIORITY	3. LICENSEE CONTACT	4. TELEPHONE NUMBER
02120	3	Randy Dunn - Dir. of Medical Imaging	(573) 438-1148

☑ Main Office Inspection Next Inspection Date: 09/14/2021

☐ Field Office Inspection

☐ Temporary Job Site Inspection

PROGRAM SCOPE

This was an unannounced routine inspection of a community hospital authorized to use byproduct material for diagnostic and therapeutic medical purposes at its facility in Potosi, Missouri. At the time of the inspection, two nuclear medicine technologists performed 10-15 diagnostic administrations per month using unit doses from a radiopharmacy in the St. Louis area. Although authorized to perform therapeutic administrations of I-131, the licensee had not performed any since the last inspection. The licensee retained the services of a medical physics consultant to perform instrument and camera quality control and to audit the radiation safety program quarterly.

PERFORMANCE OBSERVATIONS: The inspector toured the hospital in Potosi to evaluate the licensee's measures for materials security, hazard communication and exposure control. The inspector conducted independent surveys of the facility, and found no exposures in excess of regulatory limits to members of the public, nor any evidence of residual contamination. The inspector was unable to observe the conduct of licensed activities, as none were scheduled for the week of the inspection. Instead, one of the licensee's technologists demonstrated the implementation of licensee procedures for package receipt, dose preparation and administration, area surveys, and radioactive waste handling. The inspector also reviewed a selection of records, including consultant audits, dose administration records, sealed source inventories and leak tests, dose calibrator quality control records, hazmat training documentation, and dosimetry reports.

The inspector identified a SLIV violation of 10 CFR 20.1906(b)(1) for the licensee's failure to monitor the external surfaces of incoming labeled packages for radioactive contamination. The inspector found that the licensee did monitor the external surfaces of incoming packages for radiation levels upon receipt, however this monitoring was unable to quantify any potential contamination. The root cause of the violation was a misunderstanding of regulatory requirements; the licensee believed that the pharmacy's monitoring of outgoing packages for contamination met the requirement. However, 10 CFR 20.1906(c) states that such monitoring must be performed by the licensee after receipt of the package, not to exceed 3 hours. As corrective action, the licensee immediately committed to monitor the external surfaces of all future incoming labeled packages for radioactive contamination using equipment and methods already employed to monitor for radioactive contamination in restricted areas of the facility. The licensee also committed to document the results of this monitoring, to update applicable procedures and forms as necessary.