

**SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION**

<b>1. LICENSEE/LOCATION INSPECTED:</b> City of Brookings dba Brookings Health System 300 22nd Avenue Brookings, South Dakota REPORT NO.: 030-19289/2017-001		<b>2. NRC/REGIONAL OFFICE</b> U.S. Nuclear Regulatory Commission Region IV, 1600 East Lamar Blvd Arlington, Texas 76011-4511	
<b>3. DOCKET NUMBER</b> 030-19289	<b>4. LICENSE NUMBER</b> 40-19823-01	<b>5. DATE(S) OF INSPECTION</b> September 12, 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 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.

License Condition 14 A. of NRC License 40-19823-01 requires, in part, that the licensee conduct its program in accordance with license application dated July 15, 2013. That application states, in part, under Attachment 10, "Radiation Safety Program," that the licensee will implement procedures for safe use of unsealed byproduct material that meet the requirements of 10 CFR 20.1101.

Contrary to the above, from July 15, 2013, to September 12, 2017, the licensee failed to conduct its program in accordance with license application dated July 15, 2013, under Attachment 10, "Radiation Safety Program," by failing to implement the procedures for safe use of unsealed byproduct material that met the requirements of 10 CFR 20.1101. Specifically, the licensee failed to implement Brookings Health System Standard Operating Procedure "Safely Opening Packages Containing Radioactive Materials," dated January 2013, by failing to perform radiation surveys and wipe tests as required by steps 11 and 13, on the empty packages which had previously contained radioactive materials, prior to labeling the packages as empty in preparation for shipment.

The day after the NRC inspection, the licensee provided refresher training to all nuclear medicine technicians to ensure that the procedural steps will be followed for performing surveys and wipe tests on empty packages that had previously contained radioactive materials, prior to labeling the packages as empty in preparation for shipment.

**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	Michelle White	<i>Michelle White</i>	9-22-2017
NRC INSPECTOR	Jason Dykert, Health Physicist	<i>Jason Dykert</i>	9-22-2017
BRANCH CHIEF	Vivian Campbell	<i>Vivian Campbell</i>	9/22/2017

Non-Public   
  Sensitive - Security-Related   
  Public   
  Non-Sensitive