

**SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION**

<p>1. LICENSEE/LOCATION INSPECTED:</p> <p>Cardinal Health Nuclear Pharmacy Services, Dublin, Ohio Location Inspected: 1909 Beltway Drive St. Louis, MO 63114</p> <p>REPORT NUMBER(S) 2018005</p>	<p>2. NRC/REGIONAL OFFICE</p> <p>Region III U. S. Nuclear Regulatory Commission 2443 Warrenville Road, Suite 210 Lisle, IL 60532-4352</p>	
<p>3. DOCKET NUMBER(S)</p> <p>030-36973</p>	<p>4. LICENSE NUMBER(S)</p> <p>34-29200-01MD</p>	<p>5. DATE(S) OF INSPECTION</p> <p>7/24/18</p>

**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>[Signature]</i> for RGG	10/5/18
BRANCH CHIEF	Geoffrey Warren	<i>[Signature]</i>	10/5/18

**Docket File Information**  
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6. INSPECTION PROCEDURES USED  87127	7. INSPECTION FOCUS AREAS  02.01
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**SUPPLEMENTAL INSPECTION INFORMATION**

1. PROGRAM CODE(S)  02500	2. PRIORITY  2	3. LICENSEE CONTACT  Glenn Sullivan, Corp. RSO	4. TELEPHONE NUMBER  (614) 757-9586
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Main Office Inspection                      Next Inspection Date:                      TBD  
 Field Office Inspection    1909 Beltway Drive, St. Louis, MO  
 Temporary Job Site Inspection                      \_\_\_\_\_

**PROGRAM SCOPE**

This was an unannounced, escalated enforcement followup inspection at the licensee's St. Louis, Missouri location. On February 28, 2017, the licensee failed to secure radioactive material from unauthorized removal or access as required by Title 10 of the Code of Federal Regulations (CFR) Section 20.1801. Specifically, two molybdenum-99/technetium-99m generators were unsecured in the St. Louis Missouri facility's vestibule because the vestibule's exterior door was unlocked due to a malfunction of the lock's electronic solenoid mechanism. The violation was categorized at Severity Level III.

**Performance Observations**

The inspector: (1) noted that the facility RSO stated that there were no security incidents since the last inspection; (2) noted that the licensee conducted monthly checks for exterior door latches; (3) observed the licensee's exit door Preventive Maintenance Records that were done monthly which included verification that the lock was clean, no sign of damage, and secured; (4) noted that the licensee followed the manufacturer's instructions for ensuring the lock's electronic solenoid mechanism is clean and not lubricating the lock's electronic solenoid mechanism; (5) observed that the licensee opened up the vestibule and moved an interior door deeper into the facility, and the interior was dead bolted during off-duty hours; (6) reviewed the licensee's "Vestibule Security Procedure Upon Closing" procedure that requires: closing personnel to physically test the exterior doors prior to leaving to verify the integrity of the locking mechanism and ensure that the exterior doors are latched and remain closed by pushing/pulling the locked exit door and observing if it will remain in a secure, locked condition, and if it does not remain in a secure, locked condition, closing personnel will remain at the facility until the locking mechanism can be repaired or relieved by another authorized individual, Associated Couriers, Inc. will be instructed to contact the on-call pharmacist should they encounter an exit door that does not remain secure after exit, and the driver must remain at the facility until the on-call pharmacist arrives to take charge of the situation; (7) reviewed the licensee's Memorandum of Understanding (MOU) "Delivery Security to Associated Couriers, Inc. Manager" that states each driver is expected to be trained in the procedures of maintaining security of licensed material, and each driver should have a complete understanding of the importance of maintaining

(Continued on Part 3 (next page))

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Temporary Job Site Inspection    \_\_\_\_\_

**PROGRAM SCOPE**

security of licensed material, and request that drivers test the exterior vestibule door for security prior to leaving and notifying the after hours contact on call pharmacist should a problem with the door be observed, and if the driver tests the door and it cannot lock, the after hours pharmacist will tell the courier to maintain constant surveillance of the licensed material until the pharmacist arrives to take control of the delivery; (8) reviewed Associated Couriers, Inc.'s signature in response to the licensee's MOU acknowledging that it will comply with the MOU; and (9) reviewed a Radiation Safety Meeting record showing that all of the radiopharmacists were informed about the security procedure.

## Warren, Geoffrey

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**From:** Warren, Geoffrey  
**Sent:** Friday, October 05, 2018 12:48 PM  
**To:** 'Sullivan, Glenn'  
**Cc:** Gattone, Robert  
**Subject:** NRC Inspection Report - St. Louis MO  
**Attachments:** Cardinal Health 2018005 - St Louis MO - 591M.pdf

Enclosed is the inspection report for the NRC's inspection at the Cardinal Health facility in St. Louis, Missouri, in July, as we discussed by telephone this morning. This was a follow-up inspection to the previous escalated enforcement at that site. No violations were identified as a result of this inspection, and the previous violation was closed. No response is required to the report or to this message.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this message and its attachment will be available electronically for public inspection in the NRC's Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC's website at <http://www.nrc.gov/reading-rm/adams.html>.

Please feel free to contact me if you have any questions regarding this correspondence.

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Geoffrey Warren  
Senior Health Physicist (Inspector)  
NRC Region III, Lisle, IL  
630-829-9742