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
The University of Vermont Medical Center 111 Colchester Avenue Burlington, VT 05401 REPORT NUMBER(S) 2018-001	**U.S. Nuclear Regulatory Commission** **Region I, 2100 Renaissance Blvd, Suite 100** **King of Prussia, Pennsylvania 19406-2713**

3. DOCKET NUMBER(S)	4. LICENSE NUMBER(S)	5. DATE(S) OF INSPECTION
030-03289	44-10187-03	October 1-3, 2018, in office review through March 1, exit April 2, 2019

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) and corrective action(s):

[X] 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 the 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)

Please see NRC Form 591M Part 2.

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	Christina Oliver	Christina Oliver	4-2-19
NRC INSPECTOR	Janice Nguyen	Janice Nguyen	4-2-19
BRANCH CHIEF	Donna Janda	Donna Janda	4/4/19

SUNSI Review Completed By: */ RA /* Janice Nguyen [X] Public [X] Non-Sensitive

This document becomes an NRC Official Agency Record once it is signed by the Branch Chief

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(Continued)

1) 10 CFR 35.24(f) requires, in part, that the licensee's Radiation Safety Committee (RSC) must include an authorized user (AU) of each type of use permitted by the license, the Radiation Safety Officer (RSO), a representative of the nursing service, and a representative of management who is neither an AU nor a RSO.

Contrary to the above, as of February 20, 2017, the University of Vermont Medical Center's RSC did not include an authorized user (AU) of each type of use permitted by the license, the Radiation Safety Officer (RSO), a representative of the nursing service, and a representative of management who is neither an AU nor a RSO. Specifically, since the last inspection, the RSC met on July 26, 2017 and April 19, 2018, and neither meeting included a representative of the nursing service.

This is a Severity Level IV violation (Enforcement Policy Section 6.3). Corrective actions included revising the RSC charter to include a representative of nursing service and having the RSC meet on a quarterly basis to ensure more participation.

2) 10 CFR 35.61(a) requires, in part, that a licensee shall calibrate the survey instruments used to show compliance with this part and 10 CFR Part 20 before first use, annually, and following a repair that affects the calibration.

10 CFR 35.92 states, in part, that a licensee may hold byproduct material with a physical half-life of less than or equal to 120 days for decay-in-storage before disposal without regard to its radioactivity if it monitors byproduct material at the surface before disposal and determines that its radioactivity cannot be distinguished from the background radiation level with an appropriate radiation detection survey meter set on its most sensitive scale and with no interposed shielding.

Contrary to the above, as of July 7, 2017, the licensee did not calibrate the survey instruments used to show compliance with this part and 10 CFR Part 20 before first use, annually, and following a repair that affects the calibration. Specifically, before disposal of byproduct material with a physical half-life of less than or equal to 120 days, the licensee used a survey instrument to monitor the material and to determine that its radioactivity could not be distinguished from the background radiation level before disposing of the material, and that survey instrument had not been calibrated since July 7, 2016 (a period longer than annually).

This is a Severity Level IV violation (Enforcement Policy Section 6.7). Corrective actions included sending the expired meter out for calibration, with no concerns noted; and retraining staff on the requirement for annual instrument calibration.