



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, ILLINOIS 60532-4352

April 25, 2019

Edwin M. Leidholdt, Jr., Ph.D., Director
National Health Physics Program (115 HP/NLR)
Department of Veterans Affairs
Veterans Health Administration
2200 Fort Roots Drive
North Little Rock, AR 72114

SUBJECT: NRC INSPECTION REPORT 03034325/2019002 (DNMS) – VA BOSTON
HEALTHCARE SYSTEM, BOSTON, MASSACHUSETTS

Dear Dr. Leidholdt:

On March 27, 2019, the U.S. Nuclear Regulatory Commission (NRC) completed a routine inspection at the VA Boston Healthcare System, Boston, Massachusetts. The inspection was limited to a review of activities authorized under Permit No. 20-00671-02. The inspector conducted an exit meeting with the management and staff at the facility at the completion of the inspection.

The inspection was an examination of activities conducted under the Permit as they relate to radiation safety and to compliance with the Commission's rules and regulations. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, independent measurements, and observation of activities in progress. Within the scope of the inspection, no violations of NRC requirements were identified; therefore, no response to this letter or the enclosed NRC Form 591M is required.

In accordance with Title 10 of the *Code of Federal Regulations* (CFR) 2.390 of the NRC's "rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC's Public Document Room or 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>).

E. Leidholdt, Jr.,

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Should you have any questions concerning this inspection or the enclosed report, please contact Bryan Parker of my staff at 678-828-7050.

Sincerely,

/RA/

Patricia J. Pelke, Chief
Materials Licensing Branch
Division of Nuclear Materials Safety

Docket No. 030-34325
License No. 03-23853-01VA
Permit No. 20-00671-02

Enclosure:
IR 03034325/2019002

SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION

<p>1. LICENSEE/LOCATION INSPECTED:</p> <p>Department of Veterans Affairs VA Boston Healthcare System 150 South Huntington Ave. Boston, MA 02130</p> <p>REPORT NUMBER(S) 03034325/2019002</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>030-34325</p>	<p>4. LICENSE NUMBER(S)</p> <p>03-23853-01VA</p>	<p>5. DATE(S) OF INSPECTION</p> <p>March 26-27, 2019</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:

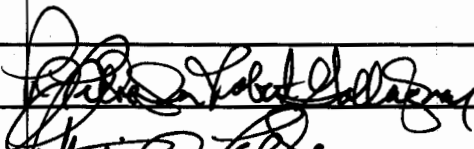

- 1. Based on the inspection findings, no violations were identified.
- 2. Previous violation(s) closed.
- 3. The violation(s), specifically described to you by the inspector as non-cited violations, are not being cited because they were self-identified, non-repetitive, and corrective action was or is 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 Gallagher (Region I)		4/25/2019
BRANCH CHIEF	Patricia J. Pelke		4/25/2019

Docket File Information
SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION

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3. DOCKET NUMBER(S) 030-34325	4. LICENSE NUMBER(S) 03-23853-01VA	5. DATE(S) OF INSPECTION March 26-27, 2019
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6. INSPECTION PROCEDURES USED 87130, 87131, 87132, 87134	7. INSPECTION FOCUS AREAS All
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SUPPLEMENTAL INSPECTION INFORMATION

1. PROGRAM CODE(S) 03614	2. PRIORITY 2	3. LICENSEE CONTACT Ed Leidholdt, Ph.D., Director, NHPP	4. TELEPHONE NUMBER (501) 257-1571
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Main Office Inspection Next Inspection Date: _____

Field Office Inspection Boston and West Roxbury, MA locations

Temporary Job Site Inspection _____

PROGRAM SCOPE

This was an unannounced, routine inspection of a permittee under the Department of Veterans Affairs (DVA) Master Materials License. The permittee was a broad scope medical facility operating under a permit issued by the DVA's National Health Physics Program (NHPP) and is authorized for medical diagnosis, therapy (both unsealed and sealed), and research in humans; they are also authorized for research and development, including animal studies, instrument calibration, student instruction and in vitro studies.

The hospital has a full time Radiation Safety Officer (RSO) who oversees radiation safety activities, including training in radiation safety, sealed source inventory/leak tests, surveys, and program audits. The Radiation Safety Committee (RSC) oversees the program and meets quarterly.

The Nuclear Medicine (NM) Department at the Boston location operates Monday through Friday and performs standard diagnostic imaging and includes an active PET department (7-8 patients per day), all of which uses unit doses which are assayed prior to administration. The West Roxbury location operates Monday through Friday and performs standard diagnostic procedures (except PET) and radiation therapy. The West Roxbury staff performed six I-131 therapies, three Y-90 microsphere therapies, and three Ra-223 therapies in the fourth quarter of 2018. The inspector reviewed the written directives and determined the therapies were performed in accordance with the written directives. No brachytherapy procedures have been performed since the last inspection performed by the NHPP (September 2017).

At the time of this inspection the permittee had no active research program.

The inspector toured the facility to evaluate the permittee's measures for materials security, hazard communication and exposure control. The inspector observed permittee staff performing diagnostic administrations of licensed materials including preparation, injection and disposal. No therapies were scheduled to be performed at the time of the inspection.



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PROGRAM SCOPE

The inspector performed independent and confirmatory radiological surveys which indicated results consistent with survey records, regulatory limits, and licensee postings. The inspector reviewed a selection of records including annual program audits, Radiation Safety Committee minutes, leak test/inventories, instrument calibrations, and personnel dosimetry. The review of dosimetry records indicated no exposures of regulatory concern.

An exit briefing was held with the Assistant Directors for both the Boston and West Roxbury campuses, the Chief of Staff, Radiation Safety Officer, and other representatives of senior management to discuss the results of the inspection. Within the scope of this inspection, no violations were identified.



Letter to Edwin Leidholdt, Jr., from Patricia J. Pelke dated April 25, 2019.

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HEALTHCARE SYSTEM, BOSTON, MASSACHUSETTS

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Darrell Roberts
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OFFICE	RIII DNMS	C	RIII DNMS	C	RIII	C	RIII	
NAME	RGellagher:ps		BParker		PJPelke			
DATE	04/23/19		04/23/19		04/25/19			

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