

**SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION**

1. LICENSEE/LOCATION INSPECTED:  Jubilant DraxImage, Inc. d/b/a Jubilant Radiopharma 790 Township Line Rd. STE. 325 Yardley, PA 19067 Location Inspected: 3101 Terrace St. Kansas City, MO, 64111  REPORT NUMBER(S) 2022001	2. NRC/REGIONAL OFFICE  Region III U. S. Nuclear Regulatory Commission 2443 Warrenville Road, Suite 210 Lisle, IL 60532-4352
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3. DOCKET NUMBER(S)  030-38280	4. LICENSE NUMBER(S)  09-32781-04MD	5. DATE(S) OF INSPECTION  March 25, 2022
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**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	Luis Nieves Folch	Luis A. Nieves Folch <small>Digitally signed by Luis A. Nieves Folch Date: 2022.04.11 12:03:45 -05'00'</small>	
BRANCH CHIEF	Michael Kunowski	Michael A. Kunowski <small>Digitally signed by Michael A. Kunowski Date: 2022.04.11 12:34:07 -05'00'</small>	

**From:** [Nieves Folch, Luis](#)  
**To:** [David.Persinger@jubl.com](mailto:David.Persinger@jubl.com)  
**Subject:** Jubilant DraxImage NRC clear 591  
**Date:** Monday, April 11, 2022 1:44:00 PM  
**Attachments:** [Jubilant KC 591 sign1mk.pdf](#)

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Dear Mr. Persinger

Attach is the clear 591 report for the inspection conducted on March 25, 2022. At this point there is no further actions on your part.

In accordance with Title 10 of the Code of Federal Regulations 2.390 of the NRC's "Rules of Practice," a copy of this message 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.

Thank you,

Luis Nieves  
Health Physicist  
U.S. Nuclear Regulatory Commission  
Division of Nuclear Materials Safety  
Office: (630) 829-9571  
Fax: (630) 515-1259



### Materials Inspection Record

1. Licensee Name: Jubilant DraxImage Inc. d/b/a Jubilant Rad		2. Docket Number(s): 030-38280		3. License Number(s) 09-32781-04MD	
4. Report Number(s): 2022001			5. Date(s) of Inspection: March 25, 2022		
6. Inspector(s): Luis Nieves		7. Program Code(s): 02500	8. Priority: 2	9. Inspection Guidance Used: 87127	
10. Licensee Contact Name(s): David Persinger, R,Ph., Radiation Safety Officer		11. Licensee E-mail Address: David.Persinger@jubl.com		12. Licensee Telephone Number(s): 816-931-0515	
13. Inspection Type:		14. Locations Inspected:		15. Next Inspection Date (MM/DD/YYYY):	
<input type="checkbox"/> Initial <input checked="" type="checkbox"/> Routine <input type="checkbox"/> Announced <input type="checkbox"/> Non-Routine <input checked="" type="checkbox"/> Unannounced		<input type="checkbox"/> Main Office <input checked="" type="checkbox"/> Field Office <input type="checkbox"/> Temporary Job Site <input type="checkbox"/> Remote		March 25, 2024 <input checked="" type="checkbox"/> Normal <input type="checkbox"/> Extended <input type="checkbox"/> Reduced <input type="checkbox"/> No change	

16. Scope and Observations:

This was an unannounced, routine inspection of a radiopharmacy located in Kansas City, Missouri. This radiopharmacy employed three pharmacists, two pharmacy technicians, and six drivers. The licensee distributed approximately 175 doses daily to 25 regular costumers. The pharmacy was open weekdays from 12:30 am through 4:00 pm, with limited hours on weekends, with deliveries made around 5:00 am, 8:00 am and 11:00 am. The licensee received two technetium-99m generators each week for preparation and distribution of unit doses and bulk technetium to clients on Sunday and Monday. In addition, the licensee compounded occasional iodine, thallium, and indium doses.

**PERFORMANCE OPSERVATIONS**

The inspector observed drawing doses of technetium, packaging and surveying of doses, pig and package surveys and wipes, verification of package contents, preparation of labels and shipping papers, shipment assembly, blocking/ bracing of packages, placement of shipping papers, waste disposal, and use of syringe shields and long-handled tools. Licensee personnel demonstrated and described daily area surveys and wipes, package receipt surveys, spill procedures, indium blood labeling, waste disposal, and other procedures. The inspector noted no concerns with these activities. Interviews with licensee personnel indicated adequate knowledge of radiation safety concepts and procedures. The inspector performed independent and confirmatory radiation measurements which indicated results consistent with licensee survey records and postings.

The inspector reviewed a selection of records, including internal audits, dose calibrator constancy, dose calibrator linearity, dose calibrator accuracy, survey meter calibration certificates, hazmat training records, well counter constancy, area surveys, and dosimetry reports.

No violations of NRC requirements were identified as a result of this inspection.