



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION III  
2443 WARRENVILLE RD. SUITE 210  
LISLE, IL 60532-4352

July 31, 2022

Edwin M. Leidholdt, Ph.D. Director  
National Health Physics Program (115 HP/NLR)  
Department of Veterans Affairs  
Veterans Health Administration  
2200 Fort Roots Drive  
Building 101  
North Little Rock, AR 72114

SUBJECT: NRC INSPECTION REPORT 03034325/2022009(DNMS) – VA MEDICAL  
CENTER, IRON MOUNTAIN, MICHIGAN

Dear Dr. Leidholdt:

On May 18, 2022, the U.S. Nuclear Regulatory Commission (NRC) conducted a routine inspection at the VA Medical Center, Iron Mountain, Michigan. The inspection was limited to a review of activities authorized under Permit Number 21-12916-01. 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 Public Document Room or the NRC's Agencywide Documents Access and Management System (ADAMS, accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>).

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

Sincerely,

**Michael M.  
LaFranzo**

 Digitally signed by Michael M.  
LaFranzo  
Date: 2022.07.31 14:39:29 -05'00'

Michael LaFranzo, Acting Chief  
Materials Licensing Branch  
Division of Nuclear Materials Safety

Docket No. 030-34325  
License No. 03-23853-01VA  
Permit No. 21-12916-01

Enclosure:  
IR 03034325/2022009



## Materials Inspection Report

<b>1. Licensee/Location Inspected:</b>  Department of Veterans Affairs Under Secretary of Health Washington, D.C. 20420 Location Inspected: Iron Mountain, MI  <b>Report Number(s)</b> 2022-009	<b>2. NRC/Regional Office</b>  Region III U. S. Nuclear Regulatory Commission 2443 Warrenville Road, Suite 210 Lisle, IL 60532-4352
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<b>3. Docket Number(s)</b> 030-34325	<b>4. License Number(s)</b> 03-23853-01VA	<b>5. Date(s) of Inspection</b> May 18, 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. During this inspection, certain of your activities, as described below and/or attached, were in violation of NRC requirements, and were assessed at Severity Level IV, in accordance with the NRC Enforcement Policy.

A. 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, corrective action was or is being taken, and the remaining criteria in the NRC Enforcement Policy were satisfied.  
 (Non-cited violation(s) was/were discussed involving the following requirement(s))

B. The following violation(s) is/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 AND DATE
LICENSEE'S REPRESENTATIVE		
NRC INSPECTOR	Ryan Craffey	<i>R. Craffey</i> <small>Digitally signed by Ryan J. Craffey Date: 2022.07.27 17:18:40 -04'00'</small>
BRANCH CHIEF	Michael LaFranzo	Michael M. LaFranzo <small>Digitally signed by Michael M. LaFranzo Date: 2022.07.31 14:37:50 -05'00'</small>



### Materials Inspection Record

<b>1. Licensee Name:</b> Department of Veterans Affairs		<b>2. Docket Number(s):</b> 030-34325		<b>3. License Number(s)</b> 03-23853-01VA	
<b>4. Report Number(s):</b> 2022-009			<b>5. Date(s) of Inspection:</b> May 18, 2022		
<b>6. Inspector(s):</b> Ryan Craffey		<b>7. Program Code(s):</b> 03614	<b>8. Priority:</b> 2	<b>9. Inspection Guidance Used:</b> IP 87130	
<b>10. Licensee Contact Name(s):</b> Clint Abell - Program Manager Alex Paul - Site RSO		<b>11. Licensee E-mail Address:</b> clinton.abell@va.gov alex.paul@va.gov		<b>12. Licensee Telephone Number(s):</b> 501-708-5013 507-383-9519	
<b>13. Inspection Type:</b> <input type="checkbox"/> Initial <input checked="" type="checkbox"/> Routine <input checked="" type="checkbox"/> Announced <input type="checkbox"/> Non-Routine <input type="checkbox"/> Unannounced		<b>14. Locations Inspected:</b> <input type="checkbox"/> Main Office <input checked="" type="checkbox"/> Field Office <input type="checkbox"/> Temporary Job Site <input type="checkbox"/> Remote		<b>15. Next Inspection Date (MM/DD/YYYY):</b> No Change <input type="checkbox"/> Normal <input type="checkbox"/> Extended <input type="checkbox"/> Reduced <input checked="" type="checkbox"/> No change	

**16. Scope and Observations:**

The Oscar G. Johnson VA Medical Center in Iron Mountain, Michigan was authorized by VA MML Permit No. 21-12916-01 to use diagnostic and therapeutic radiopharmaceuticals. At the time of the inspection, two full-time nuclear medicine technologists performed 2-8 diagnostic administrations each weekday using unit and bulk doses from a radiopharmacy in Marquette, Michigan. Although authorized to perform therapeutic administrations, the permittee has not done so since 2017. Permitted activities are overseen by the RSO for Clement J. Zablocki VA Medical Center in Milwaukee, Wisconsin. The RSO performs quarterly audits of the program, and is assisted in his oversight by a medical physics consultant, who performs semiannual audits of the program.

The inspector toured the VA Medical Center in Iron Mountain. All areas were adequately posted, and all licensed material was adequately secured. Independent and confirmatory surveys in the department and found no residual contamination or exposures to members of the public in excess of regulatory limits. Both of the permittee's survey instruments (one pancake GM and one end-window GM) were calibrated and operable and responded appropriately to radiation fields. The inspector observed the administration of two cardiac stress tests using Tc-99m, as well as the receipt of packages containing licensed material, and noted the use of adequate ALARA practices throughout. The RSO demonstrated the conduct of sealed source inventories and leak tests; all sources were accounted for, and no evidence of leakage was noted. All staff were knowledgeable of radiation protection principles and regulatory requirements, and wore appropriate dosimetry as required.

The inspector reviewed a selection of the permittee's records, including RSO and consultant audits, dose calibrator quality control records, sealed source inventory, leak test, and return documentation, hazmat training and testing, and personnel dosimetry reports, which documented occupational exposures that well below regulatory limits. The inspector also reviewed the permittee's procedures for therapeutic administrations, including templates for written directives, patient instruction, and release calculations, in the event the permittee resumes these activities in future.

No violations of NRC regulations were identified as a result of this inspection. The inspector held an exit meeting with the RSO and representatives of the Medical Center's management as well as a representative of the National Health Physics Program immediately following the inspection.