



Materials Inspection Report

1. Licensee/Location Inspected: Associated Veterinary Specialists 12462G Natural Bridge Road Bridgeton, MO 63044 Report Number(s) 2022-001	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) 030-33561	4. License Number(s) 24-26584-01	5. Date(s) of Inspection 10/04-11/22; exit 10/19/22
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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)

(1) Contrary to Condition 16.A of NRC License No. 24-26584-01 (Amendment No. 04), as of October 4, 2022, Associated Veterinary Specialists failed to survey sharps boxes containing licensed material before disposal as ordinary trash. As corrective action, for this Severity Level IV violation, the licensee committed to retrain staff and add postings and markings to indicate the presence of radioactive material.

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	Jason Brumitt	11-8-2022
NRC INSPECTOR	Ryan Craffey	Digitally signed by Ryan J. Craffey Date: 2022.11.04 17:34:42 -04'00'
BRANCH CHIEF	Michael Kunowski	Michael A. Kunowski Digitally signed by Michael A. Kunowski Date: 2022.11.07 11:31:21 -06'00'



Materials Inspection Record

1. Licensee Name: Associated Veterinary Specialists		2. Docket Number(s): 030-33561		3. License Number(s) 24-26584-01	
4. Report Number(s): 2022-001			5. Date(s) of Inspection: October 4 and 11, 2022; exit October 19, 2022		
6. Inspector(s): Ryan Craffey		7. Program Code(s): 02400	8. Priority: 5	9. Inspection Guidance Used: IP 87144	
10. Licensee Contact Name(s): Jason Brumitt, DVM - RSO		11. Licensee E-mail Address: brumittj@gmail.com		12. Licensee Telephone Number(s): 314-323-9059	
13. Inspection Type: <input checked="" type="checkbox"/> Routine <input type="checkbox"/> Announced <input type="checkbox"/> Non-Routine <input checked="" type="checkbox"/> Unannounced		14. Locations Inspected: <input checked="" type="checkbox"/> Main Office <input type="checkbox"/> Field Office <input type="checkbox"/> Temporary Job Site <input checked="" type="checkbox"/> Remote		15. Next Inspection Date (MM/DD/YYYY): 10/04/2027 <input checked="" type="checkbox"/> Normal <input type="checkbox"/> Extended <input type="checkbox"/> Reduced <input type="checkbox"/> No change	

16. Scope and Observations:

Associated Veterinary Specialists was a veterinary clinic authorized to use byproduct material for the treatment of disease in animals at its facility in Bridgeton, Missouri. At the time of the inspection, the licensee routinely performed four administrations of I-131 per week for the treatment of feline hyperthyroidism. The licensee's RSO and a trained technician performed administrations on Tuesday mornings starting around 8 am (prior to the clinic opening to the public at 9 am), using unit doses from a local radiopharmacy. The licensee held patients at least until Thursday, when it evaluated them for safe release based on exposure rate at a meter. The licensee retained radioactive waste for decay in a locked storage shed on the premises.

On October 4, the inspector toured the facility in Bridgeton shortly after the licensee's RSO and trained technician had administered four doses of I-131 and left the premises. All areas were adequately posted, and all licensed material was adequately secured. The inspector performed independent surveys of the administration area with four dosed patients in holding and the waste storage area and found no exposures in unrestricted areas above regulatory limits to members of the public nor any evidence of residual contamination. The inspector interviewed a technologist responsible for patient holding and waste management, and reviewed a selection of available records, including survey results for patient release and decay-in-storage waste handling.

During the on-site portion of the inspection, the inspector identified two SLIV violations. The first was of LC 16.A for failing to survey sharps boxes containing residual licensed material in the form of injection syringes before disposal as ordinary trash. The root cause was a misunderstanding of requirements with inaccurate information from the waste pickup service a contributing factor. As corrective action, the licensee committed to retrain staff responsible for handling radioactive waste and to add postings and markings to indicate the presence of radioactive material in the sharps box. The second was a repeat violation of LC 18.B for failure to calibrate survey instruments semi-annually per its commitment in Item 9 of the letter dated November 5, 2015, providing additional information for its renewal application. The root cause was an oversight, with the discontinuation during the COVID PHE of an automated pick-up service by the company providing calibration services a contributing factor. As corrective action, the licensee had one meter calibrated on October 10, 2022 and the other calibrated on October 12, 2022, added calibration expiration dates to each meter, and added electronic reminder "appointments" for the meters in its client scheduling software.

On October 11, the inspector met with the RSO and trained technician via video teleconference and observed the receipt of packages containing licensed material, four administrations of liquid I-131 via subcutaneous injection, and area surveys of the facility post-administration. The staff implemented adequate ALARA and contamination control practices throughout, and wore whole-body and extremity dosimetry as assigned.