

**From:** [Lizette Roldan-Otero](#)  
**To:** [Shannon Gray](#)  
**Cc:** [Jeremy Groom](#); [Austin Roberts](#); [John Kramer](#); [R4Enforcement](#); [Mohanned Kawasmi](#)  
**Subject:** RE: Shannon Gray Confirmatory Order  
**Date:** Monday, October 24, 2022 8:25:12 AM

---

Dear Ms. Gray

We have received your documents associated to the confirmatory order for the completion of the training. We will review the information and contact you if we have any questions.

Thanks,

Lizette

*Lizette Roldán-Otero, Ph.D., Chief*

RIV/DRSS/MIB

Office: 817-200-1455

---

**From:** R4Enforcement <[R4Enforcement.Resource@nrc.gov](mailto:R4Enforcement.Resource@nrc.gov)>  
**Sent:** Monday, October 24, 2022 7:05 AM  
**To:** Lizette Roldan-Otero <[Lizette.Roldan-Otero@nrc.gov](mailto:Lizette.Roldan-Otero@nrc.gov)>; Allyce Bolger (She/Her) <[Allyce.Bolger@nrc.gov](mailto:Allyce.Bolger@nrc.gov)>  
**Cc:** Jeremy Groom <[Jeremy.Groom@nrc.gov](mailto:Jeremy.Groom@nrc.gov)>; Austin Roberts <[Austin.Roberts@nrc.gov](mailto:Austin.Roberts@nrc.gov)>; John Kramer <[John.Kramer@nrc.gov](mailto:John.Kramer@nrc.gov)>  
**Subject:** Shannon Gray Confirmatory Order  
**Importance:** High

Email on training. Shannon requests acknowledgement of receipt.

John

---

**From:** Shannon Gray <[Shannon.Gray@avera.org](mailto:Shannon.Gray@avera.org)>  
**Sent:** Thursday, October 20, 2022 3:03 PM  
**To:** R4Enforcement <[R4Enforcement.Resource@nrc.gov](mailto:R4Enforcement.Resource@nrc.gov)>  
**Cc:** Traci Hollingshead <[Traci.Hollingshead@avera.org](mailto:Traci.Hollingshead@avera.org)>  
**Subject:** [External\_Sender] Shannon Gray Confirmatory Order  
**Importance:** High

To: Director, Division of Radiological Safety and Security  
U.S. Nuclear Regulatory Commission, Region IV

Attached is documentation of completion of three out of the 8 training sessions that fulfills part of my obligation for my confirmatory order.

2022-09-28 RadAdmin

List of personnel who attended the training  
Summary of the feedback received on the training  
Lessons learned from providing the training

2022-10-05 PETCT

List of personnel who attended the training  
Summary of the feedback received on the training  
Lessons learned from providing the training

2022-10-12 Radiation Oncology

List of personnel who attended the training  
Summary of the feedback received on the training  
Lessons learned from providing the training

Please confirm that you received this. If you have any questions please contact me.

**Shannon Gray** | PET-CT Manager | Radiology  
Avera McKennan Hospital & University Health Center  
1301 S. Cliff Ave. | Sioux Falls, SD 57105  
Direct: 605-322-5970 | Fax: 605-322-5971  
Cell: 605-366-2555  
Avera.org  
Sponsored by the Benedictine and Presentation Sisters

On September 28<sup>th</sup> Traci Hollingshead and Shannon Gray met with a group of managers and supervisors that work in various imaging departments to present our PowerPoint entitled “Deliberate Misconduct in the Workforce”. The presentation took approximately one hour, and we had time for questions at the end. A list of attendees has been attached.

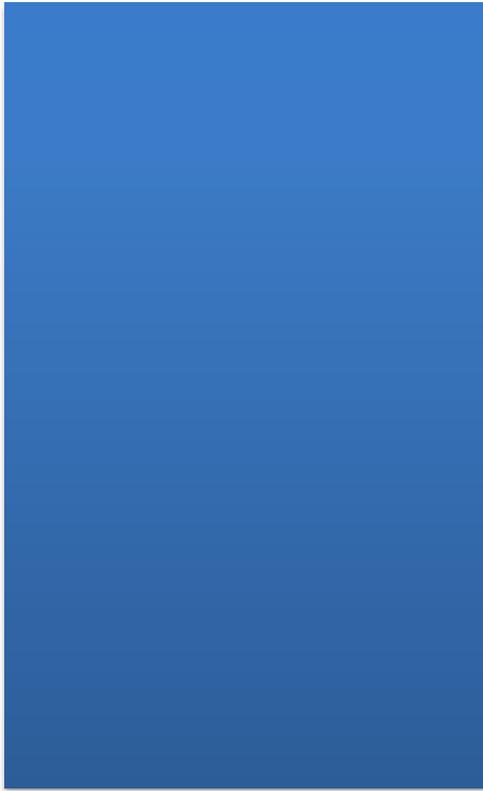
During the presentation with the group there were very few questions while we were going through the slides however, there was some discussion after. One of the participants reflected on how they would like this presentation to be shared with all the group so they could in turn share with their staff and help them understand how a department can get so off track. The group reflected that once you start allowing short cuts it is easy to allow more and more and before you know it you are allowing behavior and accepting of things that are not ethical, in compliance and or in the best interest of the patient.

Most of the group did not work with nuclear medicine and were unaware of the role the NRC plays in our rules and regulations and what can happen to the organization or individuals if rules and regulations are not adhered to. Support was shown for Traci and Shannon on the amount of work it took to get the department back on track with regulations and they were shocked at the condition of the department and the behavior and acceptance of not complying. Traci and Shannon wanted the leaders to understand that as a leader you are held to a higher standard and that you are responsible for the team’s behavior, and you will be judged more harshly due to your position as a leader.

The discussion was limited but good reflections were made, and we felt the group left with a better understanding of the importance of keeping the licensee in good standing with the NRC and the severity of punishments that can happen if we allow or do not take immediate action on willful misconduct.

A Survey monkey was administered to try and elicit more feedback and comments from the group. The results of this and a sign in sheet are attached.

Was this presentation helpful in improving your knowledge about deliberate misconduct in the workplace including Avera employment and NRC consequences?



■ YES

■ NO

# Comments

- None

Prior to this presentation were you aware that the NRC can take enforcement action against individuals?



# Comments

- None

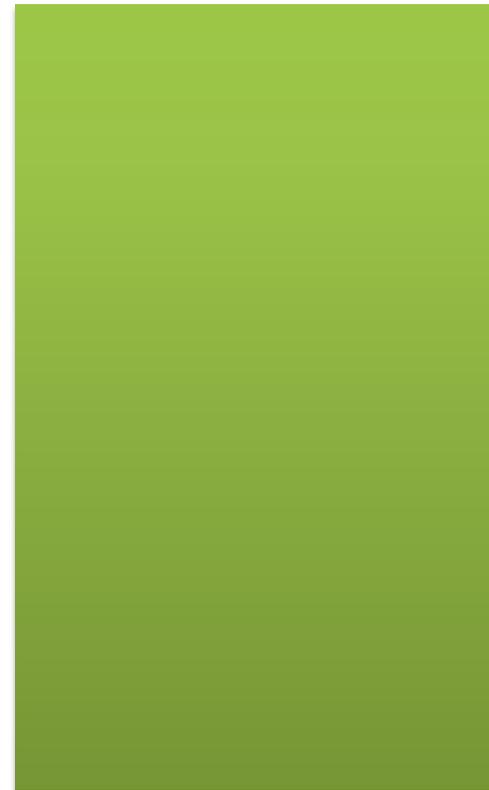
Do you have any takeaways from this presentation?  
If yes, please list in comment field.



# Comments

- Respect the protocols and rules in place. If questions stop and ask!
- There's no reason to deliberately not do required tasks, modify equipment, etc.

Do you anticipate any changes in your daily work after this attending this presentation?  
If yes, please comment.



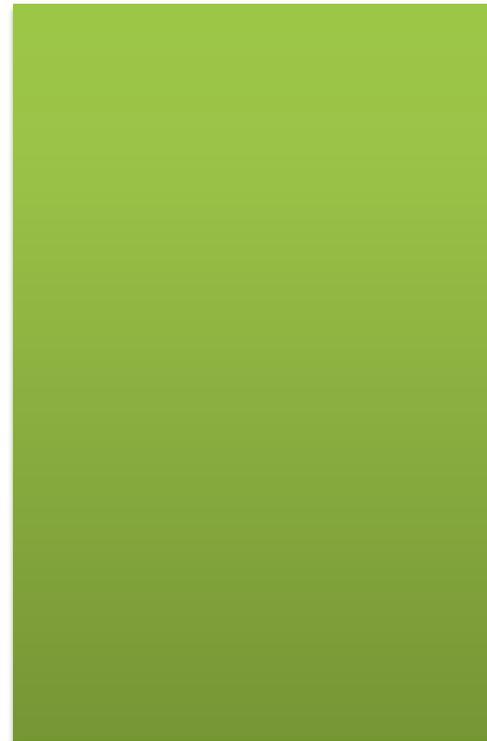
■ YES

■ NO

# Comments

- None

Do you have any suggestions for further education on this topic or other NRC regulations?  
If yes, please list below.



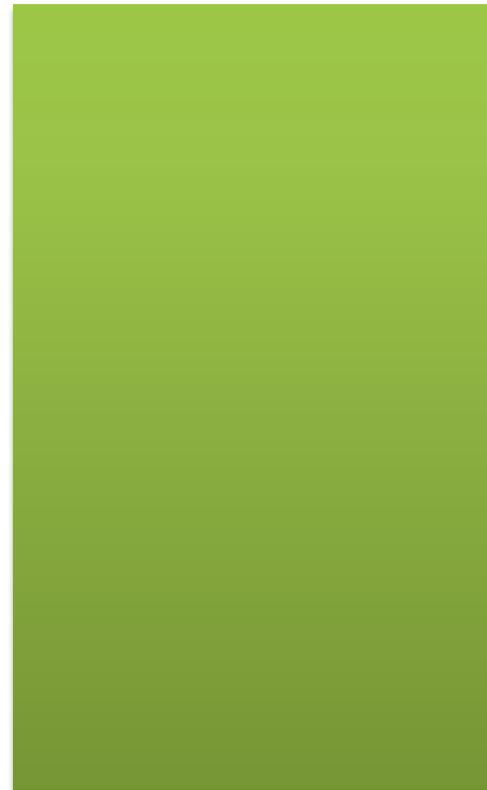
■ YES

■ NO

# Comments

- None

Do you have any questions, comments or concerns?  
If yes, please enter your email and one of the presenters will contact you.



■ YES

■ NO

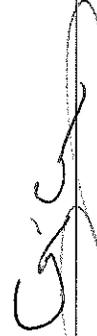
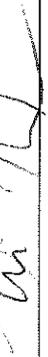
# Comments

- None

Willful Misconduct in the Workplace

Presented by: Traci Hollingshead & Shannon Gray

Date: 9-28-22

Print Name	Signature	Email Address
Scott Quinn		Scott.Quinn@avera.org
Chad Miller		chad.miller@avera.org
Lee Kiesel		lee.kiesel@avera.org
Robert Cropp		robert.cropp@avera.org
Chris Carlisle		Christopher.Carlisle@avera.org
Robin Rayman		robin.rayman@avera.org
Traci Nord		traci.nord@avera.org
Holly Westley		Holly.Westley@avera.org
Alex Davis		alex.davis@avera.org
Sean Bofner		Sean.bofner@avera.org
Mike Elliott		michael.elliott@avera.org
John Mathison		John.Mathison@avera.org
Shannon Gray		Shannon.gray75@gmail.com
Traci Hollingshead		Traci.Hollingshead@avera.org

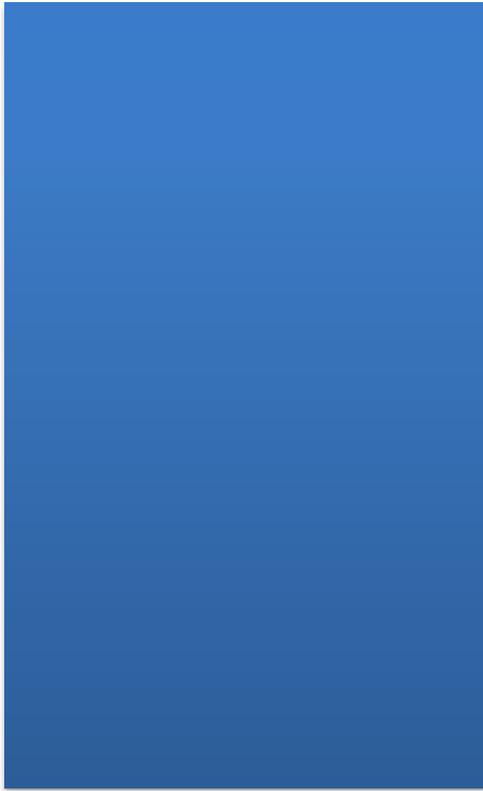
On October 5<sup>th</sup> Traci Hollingshead and Shannon Gray met with the PET/CT department to present the PowerPoint presentation "Deliberate Misconduct in the Workforce". The presentation took approximately one hour and there were questions and discussion at the end.

During the presentation there were very few questions as most of the staff was very well acquainted with the situation in nuclear medicine and the issues at hand. Some of the staff were shocked at the level of noncompliance in the department. One person didn't understand why they would break equipment and what advantage that would have. The staff were very supportive of the changes that we had implemented and education that had been done. Staff didn't understand why Traci and Shannon had action taken against them from the NRC and why others who broke and used the equipment for all those years were not held accountable. The staff were understanding of why moving forward the department and technologists will be subjected to more scrutiny and continuous education.

The group acknowledged that they understood the importance of keeping the licensee in good standing with the NRC and all regulatory bodies and if they have concerns or feel there is a safety or security issue, they need to stop work and bring it forward.

A Survey monkey was administered to try and elicit more feedback and comments from the group. The results of this and a sign in sheet are attached.

Was this presentation helpful in improving your knowledge about deliberate misconduct in the workplace including Avera employment and NRC consequences?



■ YES

■ NO

# Comments

- None

Prior to this presentation were you aware that the NRC can take enforcement action against individuals?



# Comments

- None

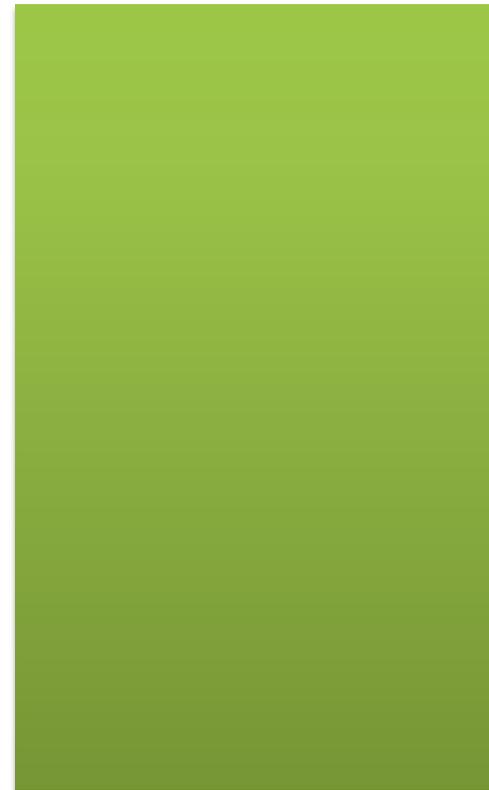
Do you have any takeaways from this presentation?  
If yes, please list in comment field.



# Comments

- Respect the protocols and rules in place. If questions stop and ask!
- There's no reason to deliberately not do required tasks, modify equipment, etc.

Do you anticipate any changes in your daily work after this attending this presentation?  
If yes, please comment.



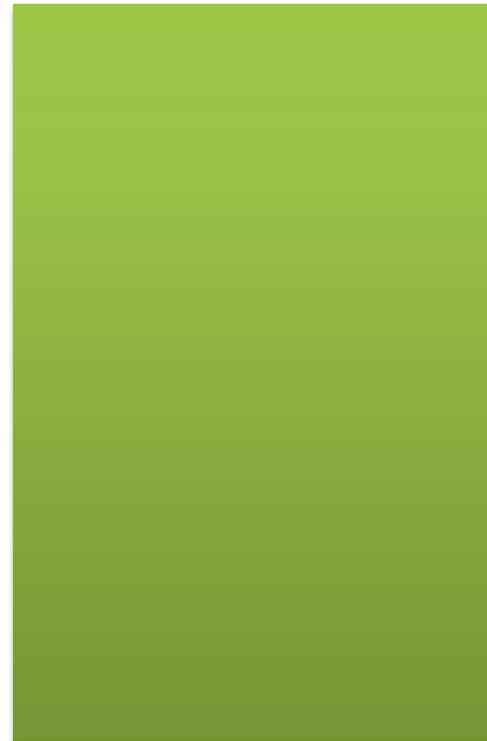
■ YES

■ NO

# Comments

- None

Do you have any suggestions for further education on this topic or other NRC regulations?  
If yes, please list below.

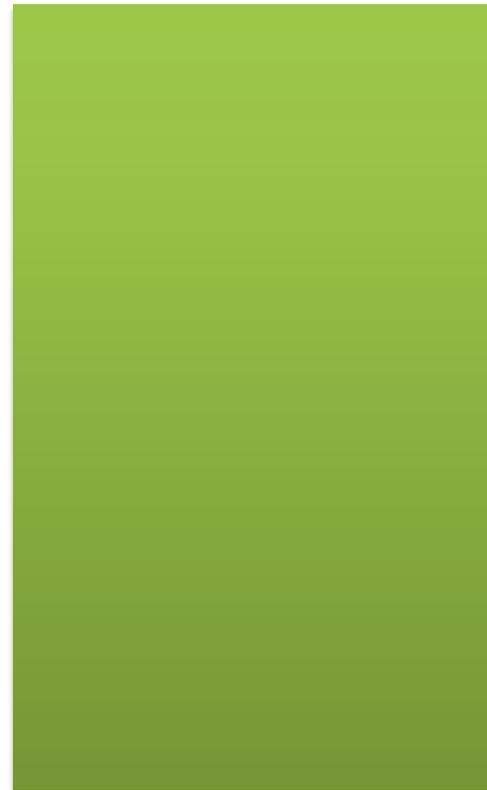


- YES
- NO

# Comments

- None

Do you have any questions, comments or concerns?  
If yes, please enter your email and one of the presenters will contact you.



■ YES

■ NO

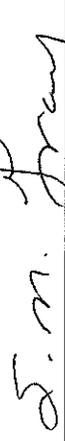
# Comments

- None

Willful Misconduct in the Workplace

Presented by: Traci Hollingshead & Shannon Gray

Date: 10-5-22

Print Name	Signature	Email Address
Traci Hollingshead		Traci.Hollingshead@Avera.org
Jim Rinehart		james.rinehart@avera.org
Robin Morey-Maker		robin.moreymaker@avera.org
Samantha Anderson		Samantha.anderson@avera.org
Susie Lammers	Susie Lammers	susan.lammers@avera.org
Shannon Gray		Shannon.Gray@avera.org

On October 12<sup>th</sup> Traci Hollingshead and Shannon Gray presented the PowerPoint presentation “Deliberate Misconduct in the Workforce” to the department of Radiation Oncology. The presentation took approximately one hour and there was time for discussion and questions at the end.

During the presentation there were very few questions. After the presentation one person did ask if a diagnostic physicist could do the dose calibrator testing and quality control? They felt that if there had been a person like this dedicated to the department that this incident would have been prevented. We said that they could and that we do have a physicist that does support the department now but at the time the person who was the one breaking the equipment was the person doing the quality control and had told everyone that an efficacy study had been performed to prove the placement of the dippers were not causing any issues with the dose calculations.

Again, it was reflected several times of why someone would purposely break equipment. There were a few CT techs in the department that reached out with lots of questions for Traci to try and gain a better understanding of the situation. Afterwards some staff were surprised and confused as to why Traci and Shannon were in trouble with the NRC when they were trying to fix the problem that had gone on for so much time. Some staff expressed shock that this was occurring in the department and why it went on for so long.

A Survey monkey was administered to try and elicit more feedback and comments from the group. The results of this and a sign in sheet are attached.

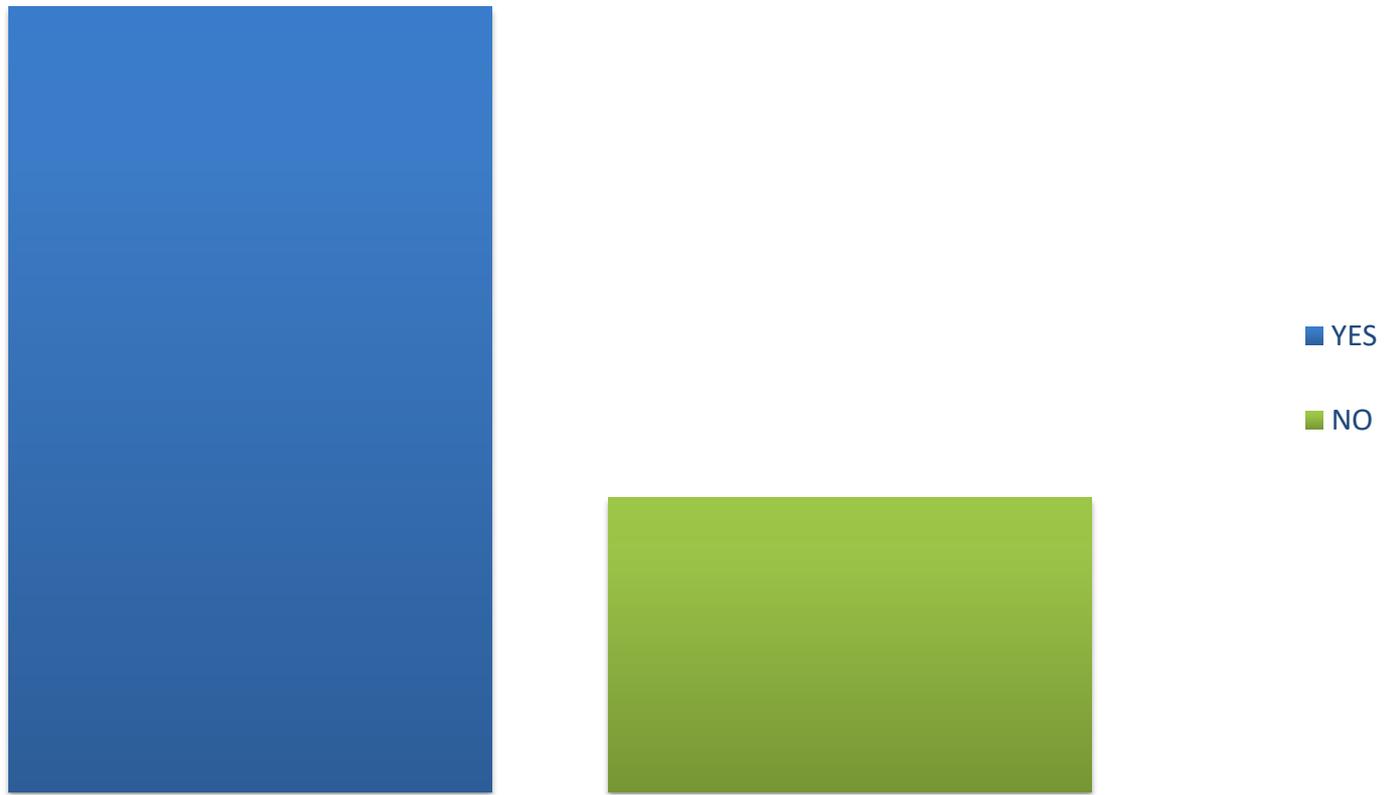
Was this presentation helpful in improving your knowledge about deliberate misconduct in the workplace including Avera employment and NRC consequences?



# Comments

- None

Prior to this presentation were you aware that the NRC can take enforcement action against individuals?



# Comments

- None

Do you have any takeaways from this presentation?  
If yes, please list in comment field.



# Comments

- They did a great job educating on NRC policies and the importance of following them.
- If you think something might not be right - speak up - talk with coworkers and leaders about policy and process in line with current policy and industry standards.
- When you see a safety concern you should speak up.
- Always report something if you witness something that isn't right.
- I was made aware of how serious the NRC takes patient safety.

# Comments

- Integrity.
- Stop work if questioning something.
- Do what is best for the patient even if it's difficult. Seek guidance from regulatory agencies for how to proceed when something is wrong.
- Informative.
- Safety is very important. Don't cut corners.
- Avera supports individuals questioning and wants to promote a good safety culture.
- I appreciate being made aware of the NRC and their role in the clinic/hospital setting.
- Traci and Shannon were very informational.

# Comments

- Always ask questions if something doesn't feel right.
- Compliance is very important.

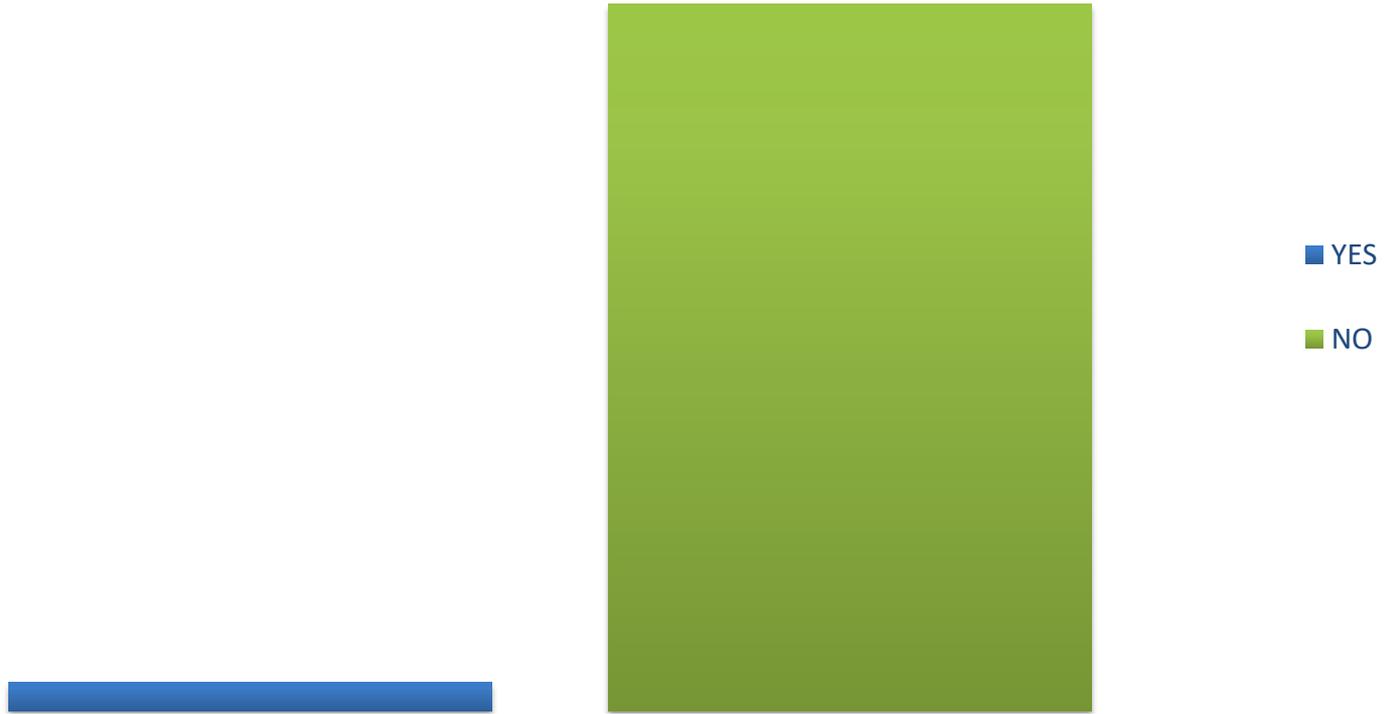
Do you anticipate any changes in your daily work after this attending this presentation?  
If yes, please comment.



# Comments

- Using increased awareness and fostering a safe work environment.
- Always cautious on safety.
- I will be more prone to question things more than once.
- I will ask questions.
- Just to be more diligent in my daily work.

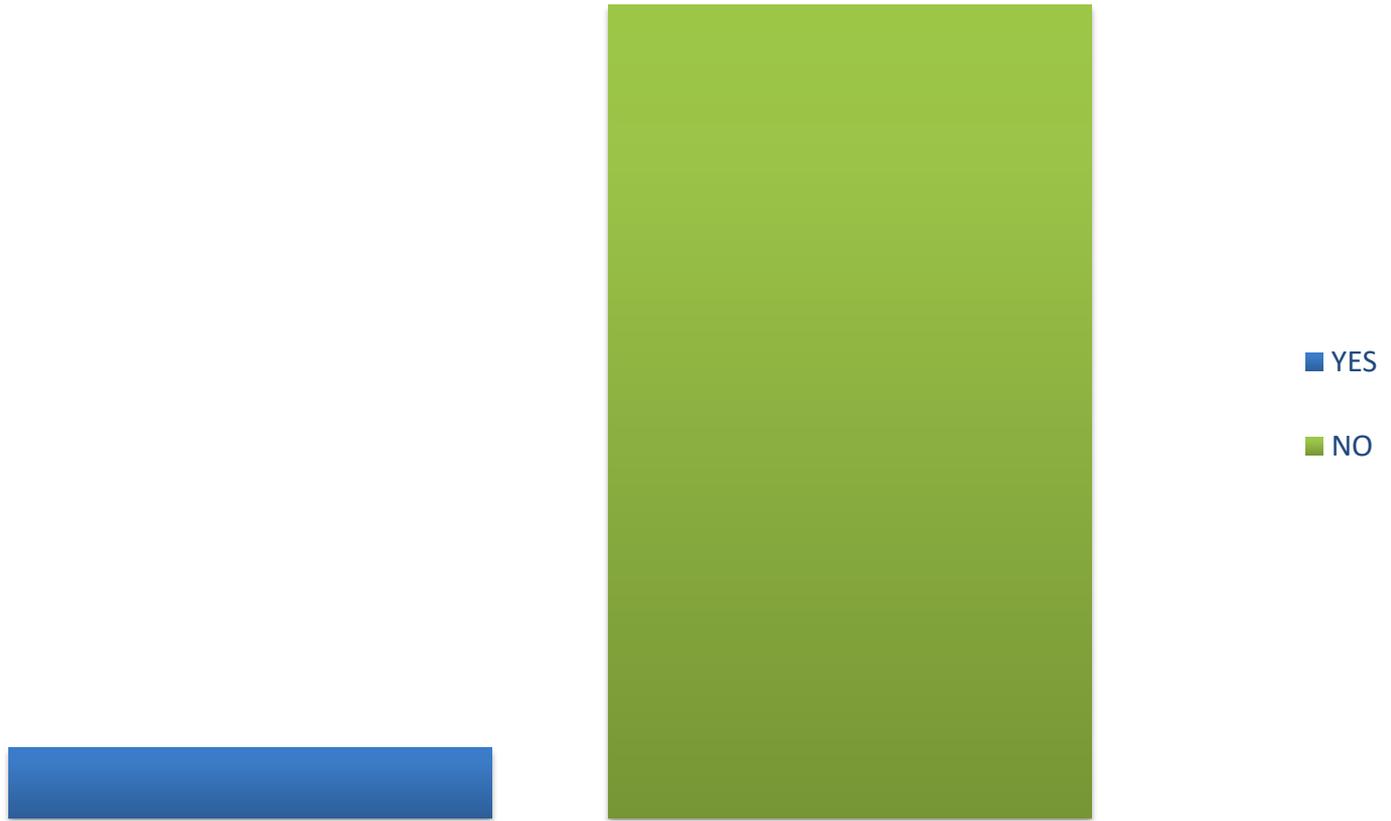
Do you have any suggestions for further education on this topic or other NRC regulations?  
If yes, please list below.



# Comments

- Perhaps incorporate some scenarios into presentations.

Do you have any questions, comments or concerns?  
If yes, please enter your email and one of the presenters will contact you.



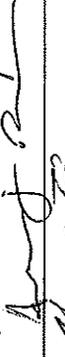
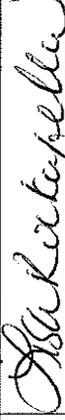
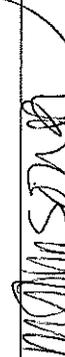
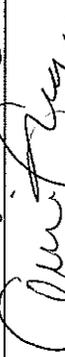
# Comments

- They did a great job educating on NRC policies and the importance of following them.
- Traci and Shannon did a nice job in the presentation

Willful Misconduct in the Workplace

Presented by: Traci Hollingshead & Shannon Gray

10-12-2022

Name	Signature	Name	Signature
Dr. Michael Elliott	See Attached	Andrea Malm	See Attached
Dr. Kyle Arneson		Mary Black	
Dr. Joel Grow		Chris Sheng	See Attached
Dr. Charles Murphy		Quyen Nguyen	See Attached
Dawn Sommer		Jennifer Sweetman	
Laurie Gilmore		Shannon Gray	
Andrew Renke		Traci Hollingshead	
Adrian Anton		Justine B.	
Allison Becker		Jill Kosi	
Steve Moeckly			
Brian Petruzzello			
Ronda Tietjen			
Dawn Beck			
Lisa Rockafellow			
Theresa DeJager	See Attached		
Molly Johnson			
Carrie Ensz			
Julie Baumberger			
Noah Arvidson			
Tracey Smoot	See Attached		

**Traci Hollingshead**

---

**From:** Traci Hollingshead  
**Sent:** Thursday, October 20, 2022 10:05 AM  
**To:** Traci Hollingshead  
**Subject:** FW: sign in sheet

**From:** Tracey Smoot  
**Sent:** Thursday, October 20, 2022 10:04 AM  
**To:** Traci Hollingshead <Traci.Hollingshead@avera.org>  
**Subject:** RE: sign in sheet

Hi Traci  
I confirm that I attend the presentation on Willful Misconduct in the Workplace presented by Shannon Gray and Traci Hollingshead on 10/12/22

Tracey Smoot

---

**Traci Hollingshead**

**From:** Christopher Sheng  
**Sent:** Wednesday, October 19, 2022 9:57 AM  
**To:** Traci Hollingshead  
**Subject:** Attendance

Hi Traci

I confirm that I attended the presentation on Willful Misconduct in the Workplace presented by Shannon Gray and Traci Hollingshead on 10/12/22

-Chris

**Traci Hollingshead**

---

**From:** Quyen Nguyen  
**Sent:** Wednesday, October 19, 2022 10:13 AM  
**To:** Traci Hollingshead  
**Subject:** RE: sign in sheet

Hi Traci,  
I confirm that I attend the presentation on Willful Misconduct in the Workplace presented by Shannon Gray and Traci Hollingshead on 10/12/22  
Thank you,  
Quyen Nguyen

**Traci Hollingshead**

---

**From:** Theresa Delager  
**Sent:** Wednesday, October 19, 2022 10:19 AM  
**To:** Traci Hollingshead  
**Subject:** Willful Misconduct in the Workplace presentation - attendance confirmation Theresa A Delager CMD

I confirm that I attend the presentation on Willful Misconduct in the Workplace presented by Shannon Gray and Traci Hollingshead on 10/12/22  
Theresa A Delager CMD

**Traci Hollingshead**

---

**From:**

Andrea Malm

**Sent:**

Wednesday, October 19, 2022 9:57 AM

**To:**

Traci Hollingshead

**Subject:**

Willfull Misconduct in the Workplace Presentation

I confirm that I attended the presentation on Willfull Misconduct in the Workplace presented by Shannon Gray and Traci Hollingshead on 10/12/22.

Thanks,  
Traci

**Andrea Marie Malm CMD**  
Avera Cancer Institute-Prairie Center  
1000 E 23<sup>rd</sup> St Suite 100  
Sioux Falls, SD 57105  
(989)-390-4963

**Traci Hollingshead**

---

**From:** Michael Elliott  
**Sent:** Thursday, October 20, 2022 9:18 AM  
**To:** Traci Hollingshead  
**Subject:** Attendance

Traci,

I confirm that I attended the presentation on *Willful Misconduct in the Workplace* presented by Shannon Gray and Traci Hollingshead on 10/12/22

Mike Elliott, MD, MBA  
Avera McKennan CMO  
Sent from my iPhone