

From: [Lizette Roldan-Otero](#)
To: [Traci Hollingshead](#)
Cc: [Mohanned Kawasmi](#)
Subject: RE: Hollingshead Confirmatory Order IA-21-061
Date: Friday, November 18, 2022 5:58:51 AM

Dear Traci Hollingshead,

We have received your documents associated to the confirmatory order for the completion of a training as specified in condition A of the order. As a courtesy, I have included below a summary, according to our records, of the remaining training sessions you need to perform in order to satisfy the training requirements of the order:

- One training session performed at Avera McKennan (NRC License 40-16571-01 and/or 40-16571-02) for condition A of the order.
- Two training sessions for condition B of the order.
 - One training session at Avera St. Mary's Hospital (NRC License 40-07328-03)
 - One training session at Avera Sacred Heart Hospital (NRC License 40-01683-01)

Please let me know of any discrepancies associated to the summary of remaining training sessions.

I look forward to continue working with you. Do not hesitate to contact me if you have any questions or need further clarification on the order or questions in general.

Thanks,

Lizette
Lizette Roldán-Otero, Ph.D., Chief
RIV/DRSS/MIB
Office: 817-200-1455

From: R4Enforcement <R4Enforcement.Resource@nrc.gov>
Sent: Wednesday, November 16, 2022 8:52 AM
To: Lizette Roldan-Otero <Lizette.Roldan-Otero@nrc.gov>; Allyce Bolger (She/Her) <Allyce.Bolger@nrc.gov>
Cc: Jeremy Groom <Jeremy.Groom@nrc.gov>; Austin Roberts <Austin.Roberts@nrc.gov>; John Kramer <John.Kramer@nrc.gov>
Subject: FW: Hollingshead Confirmatory Order IA-21-061

FYI

John

From: Traci Hollingshead <Traci.Hollingshead@avera.org>
Sent: Monday, November 14, 2022 1:38 PM
To: R4Enforcement <R4Enforcement.Resource@nrc.gov>
Cc: Traci Hollingshead <Traci.Hollingshead@avera.org>; Shannon Gray <Shannon.Gray@avera.org>

Subject: [External_Sender] Hollingshead Confirmatory Order IA-21-061

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

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

2022-10-20 Nuclear Medicine

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.

Regards,

Traci

Traci Hollingshead | Radiation Safety Officer | Radiation Oncology

Avera Cancer Institute Prairie Center

1000 E. 23rd Street, Suite 100 | Sioux Falls, SD 57105

Direct: 605-322-3213 | Fax: 605-322-1626

Cell: 605-310-0916

Avera.org

Sponsored by the Benedictine and Presentation Sisters

On Thursday October 20th Traci Hollingshead and Shannon Gray met with the department of Nuclear Medicine to present the “willful misconduct in the workplace” presentation. A list of attendees is attached for the meeting.

During the presentation there were very few comments or questions. After the presentation one of the participants shared their experience with the NRC at her previous place of employment and shared the importance of making sure to always have your doses are always secured. She said that it was a violation they received and reflected on how it affected the department. This was a newer employee and she also reflected that she understood the importance of the information we were presenting. There really wasn’t much discussion that took place. One additional comment made was that “this makes sense of why things are the way they are.”

Reflections from Traci and Shannon regarding this meeting are as follows. It was nice to be able to have an open and honest conversation regarding the past several years with regards to the investigations and the actions by the NRC and what actually took place. For so long the department employees felt as though they could not openly discuss things due to the comments made by the investigators in one of the previous investigations.

In reflecting back on lessons learned Traci and Shannon were honest with the staff on how we would handle situations differently if they came up today. That we would have pushed for more corrective action for the employees who had engaged in the activities that lead to these violations. We also discussed how even though we felt we were making the right decisions based on patient care if faced with the situation again we would immediately stop work and not restart until we felt we were in total compliance with the regulations and had spoken to the NRC.

There is a mix of old and new staff in the department and some of the newer staff had no idea of the situations that took place before they started working in the department and they were quite surprised by all that had gone on. Discussions were had that while this is the past of the department much work has been done by all to move the department in a better place and this is evident by the last inspection. That there needs to be vigilance from everyone to not let the department slip backwards. We shared Dr. Elliott's reflection from previous meetings that it takes everyone to ensure that we don’t start letting little things slide and start taking short cuts. These behaviors can turn any department down a bad path and before you realize it you have a situation like we had. It takes a village to keep us on the right track.

After the meeting we administered a survey monkey to get additional feedback from the attendees. The results are attached included in the email.

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

- Do the right thing.
- Thank you for being honest with us. It's definitely an eye opener. Many of the newer people are not aware of the situation and it's the first of hearing about it. So thank you for being honest and talking about it.
- When I first started in the nuclear medicine department, I was in the mindset that whatever happened before I started didn't matter to me. Knowing the details of the violations, really helped me understand why the department is the way it is.

Comments

- Be professional and take pride in my hard earned education.
- While I don't feel I need to make changes in my daily work habits I will probably be more mindful and actively thinking about regulations.
- I think it would be beneficial to have a quiz at the end that the employee signs
- I will continue to do my best to do everything correct every time.

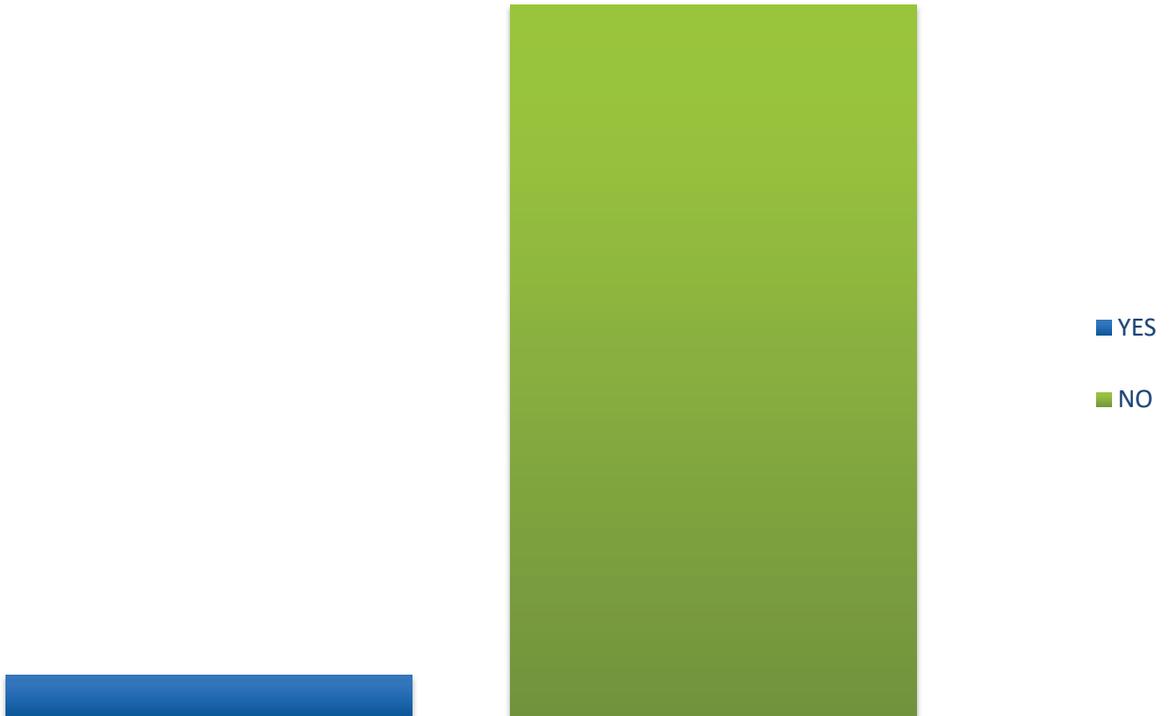
Do you anticipate any changes in your daily work after this attending this presentation?
If yes, please comment.



Comments

- I'll definitely be more on the side of NOT taking any shortcuts.
- Not to be afraid to talk to management if I find something that could possibly become a Willful Misconduct.
- Renewed diligence.
- Keep safety and compliance at the forefront of every situation.

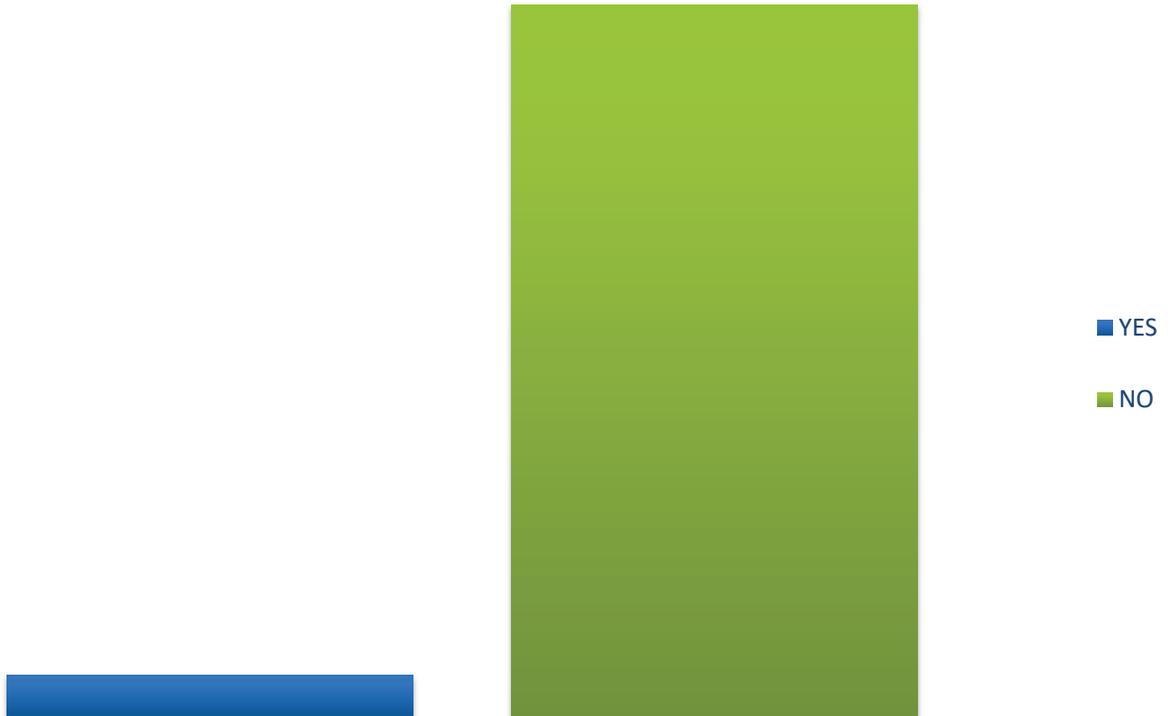
Do you have any suggestions for further education on this topic or other NRC regulations?
If yes, please list below.



Comments

- I enjoyed the presentation it was very educational.

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



Comments

- The presentation was very informative.

Willful Misconduct in the Workplace

Presented by: Traci Hollingshead & Shannon Gray

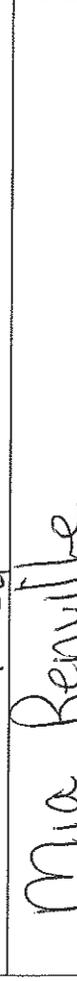
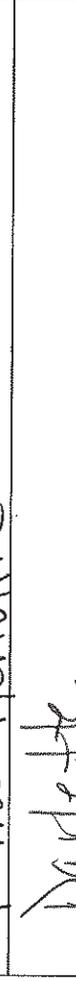
Date: 10-20-2022

Print Name	Signature
Shannon Gray	S. m. Gray
Traci Hollingshead	Traci Hollingshead
Evelyn Rick	Evelyn Aguirre
Mark F.	Mark F. Popke
Joe Van Beek	Joe Van Beek
Christina Casazza	Christina Casazza
Myriah Hollinsworth	Myriah Hollinsworth
Elissa Weatherly	Elissa Weatherly
Stephanie Claussen	Stephanie Claussen
Angela Luebbe	Angela Luebbe
Karina Nelson	Karina Nelson
Cindy Jongejans Ron Oppok	Cindy Jongejans Ron Oppok

Willful Misconduct in the Workplace

Presented by: Traci Hollingshead & Shannon Gray

Date: 10-20-2022

Print Name	Signature
Trisha Laake	
Mary Hennings-Frank	
Joe Reiland	
Mia Benville	
Dorette	
Terah	

From: [Rick Determan](#)
To: [Traci Hollingshead](#)
Subject: meeting
Date: Monday, October 31, 2022 9:55:32 AM

I confirm that I attended the presentation on willful misconduct in the workplace presented by Shannon Grey and Traci Hollingshead on 10/20/22

From: [Lizette Roldan-Otero](#)
To: [Traci Hollingshead](#)
Cc: [Mohanned Kawasmi](#)
Subject: RE: Traci Hollingshead Confirmatory Order IA-21-061
Date: Friday, November 18, 2022 6:09:15 AM

Dear Traci Hollingshead,

We have received your documents associated to the confirmatory order for the completion of the training at Avera St. Luke's (NRC License 40-18000-01) as specified in condition B of the order. As a courtesy, I have included a summary below, according to our records, of the remaining training sessions you need to perform in order to satisfy the training requirements of the order:

- One training session performed at Avera McKennan (NRC License 40-16571-01 and/or 40-16571-02) for condition A of the order.
- Two training sessions for condition B of the order.
 - One training session at Avera St. Mary's Hospital (NRC License 40-07328-03)
 - One training session at Avera Sacred Heart Hospital (NRC License 40-01683-01)

Please let me know of any discrepancies associated to the listed summary of the remaining training sessions.

I look forward to continue working with you. Do not hesitate to contact me if you have any questions or need further clarification on the order or questions in general.

Thanks,

Lizette
Lizette Roldán-Otero, Ph.D., Chief
RIV/DRSS/MIB
Office: 817-200-1455

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Cc: Jeremy Groom <Jeremy.Groom@nrc.gov>; Austin Roberts <Austin.Roberts@nrc.gov>; John Kramer <John.Kramer@nrc.gov>
Subject: FW: Traci Hollingshead Confirmatory Order IA-21-061

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Cc: Traci Hollingshead <Traci.Hollingshead@avera.org>; Shannon Gray <Shannon.Gray@avera.org>

Subject: [External_Sender] Traci Hollingshead Confirmatory Order IA-21-061

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

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

2022-11-08 Avera Aberdeen

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.

Regards,
Traci

Traci Hollingshead | Radiation Safety Officer | Radiation Oncology

Avera Cancer Institute Prairie Center

1000 E. 23rd Street, Suite 100 | Sioux Falls, SD 57105

Direct: 605-322-3213 | Fax: 605-322-1626

Cell: 605-310-0916

Avera.org

Sponsored by the Benedictine and Presentation Sisters

On Tuesday November 8th Traci Hollingshead and Shannon Gray met with Avera St. Luke's hospital to present the "willful misconduct in the workplace" powerpoint to the nuclear medicine department and the radiation oncology department. This presentation was done via Webex. A list of attendees is attached for the meeting.

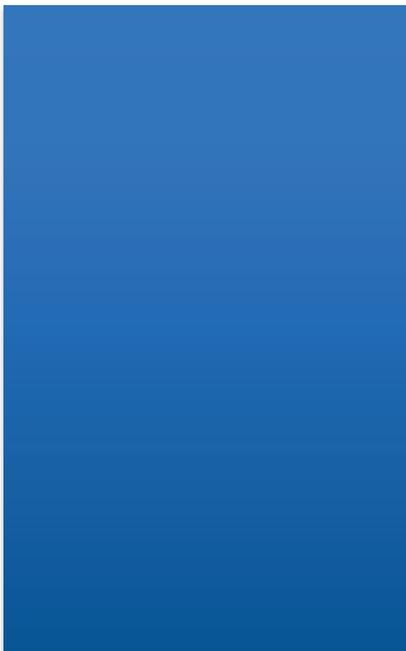
During the presentation there were very few comments or questions. After the presentation one of the attendees shared their empathy for all that Traci and Shannon had gone through leading up to this point. They reflected that it is a challenge to keep a department in good standing with the regulations and "even though you think you have everyone in compliance something else pops up or people start to revert to bad behavior." They shared their experiences with badging issues and violation they had dealt with in the past and how challenging it was to always keep everyone in line with regulations.

Another person reached out after the presentation and thanked Traci and Shannon for being so up front and honest with our experiences. He said he appreciated the candor and "know that your sharing will help with enforcing the need to stay vigilant and not become complacent".

Reflections from Traci and Shannon regarding this meeting are as follows. While sharing the presentation can be draining and humbling, it is nice to hear that people are appreciative of the information and can relate to the difficulties in changing a culture that has been so ingrained in a department and staff. It is also validating to get feedback from others on their shared experiences and hear their shock at all the things that were taking place in the department.

After the meeting we administered a survey monkey to get additional feedback from the attendees. The results are attached included in the email.

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



■ YES

■ NO

Comments

- None

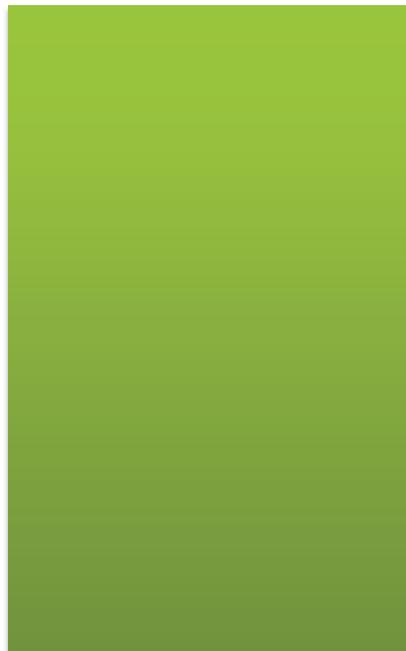
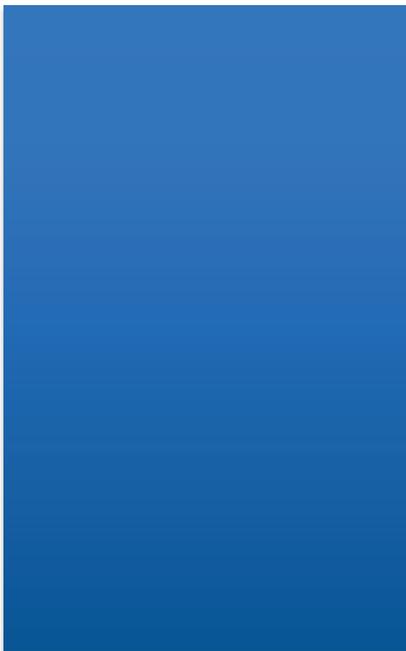
Prior to this presentation were you aware that the NRC can take enforcement action against individuals?



Comments

- None

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



■ YES
■ NO

Comments

- It shows the importance for rules and policies.
- Always be aware and halt your work if something goes wrong.
- Enforces how important QA\QC is even if it can seem inconvenient. Also the importance of correct reporting/documentating of information.

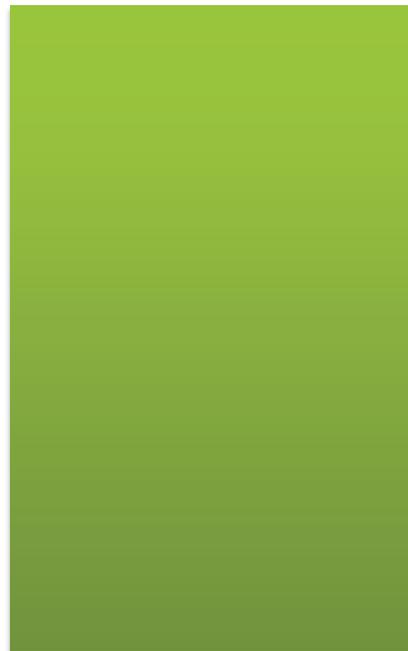
Do you anticipate any changes in your daily work after this attending this presentation?
If yes, please comment.



Comments

- I will be more aware of ensuring my staff are complying with State/Federal rules/policies.
- Just important to double and triple check work.

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



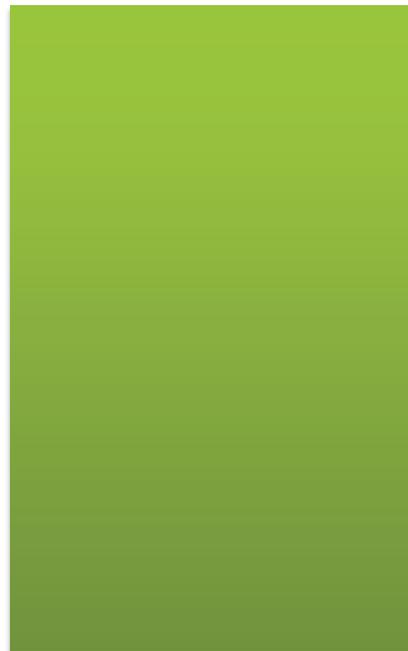
■ YES

■ 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

- Thank you for the great presentation. It was an eye opener to what can happen if staff take shortcuts.

Willful Misconduct in the Workplace

Presented by: Traci Hollingshead & Shannon Gray

Date: 11-8-22

Print Name	Signature	Email Address
Scott Holzer		scott.holzer@avera.org
Danielle Beynon		danielle.beynon@avera.org
Jeff Sahl		jeff.sahl@avera.org

