



Materials Inspection Report

1. Licensee/Location Inspected: St. Louis County Department of Health Environmental Health Laboratories 6121 North Hanley Road Berkeley, MO 63134 Report Number(s) 2023001	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) 030-05125	4. License Number(s) 24-11263-01	5. Date(s) of Inspection May 19, 2023
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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)
 Contrary to Condition 13. of NRC License Number 24-11263-01, amendment number 26, between 2/19/2019 and 5/18/2023, licensee did not conduct a physical inventory to account for all licensed materials every six months. The root cause was the licensee's work priority shifted to provide Covid-19 testing. As corrective action, the licensee conducted the physical inventory on 5/18/2023, all sources were accounted for and the licensee committed to establish an electronic tracking mechanism to ensure timely completion of future inventories.

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	Zahid Sulaiman, Health Physicist	Zahid M. Sulaiman <small>Digitally signed by Zahid M. Sulaiman Date: 2023.05.26 12:49:35 -05'00'</small>
BRANCH CHIEF	Rhex Edwards, Chief, MIB	 <small>Digitally signed by Rhex A. Edwards Date: 2023.06.01 10:51:36 -05'00'</small>



Materials Inspection Record

1. Licensee Name: St. Louis County Department of Health		2. Docket Number(s): 030-05125		3. License Number(s) 24-11263-01	
4. Report Number(s): 2023001			5. Date(s) of Inspection: May 19, 2023		
6. Inspector(s): Zahid Sulaiman, Health Physicist		7. Program Code(s): 03620	8. Priority: 5	9. Inspection Guidance Used: 87126	
10. Licensee Contact Name(s): Jennifer Western, RSO		11. Licensee E-mail Address: jwestern@stlouiscountymo.gov		12. Licensee Telephone Number(s): Work: 314-615-6830	
13. Inspection Type: <input type="checkbox"/> Initial <input checked="" type="checkbox"/> Routine <input checked="" type="checkbox"/> Announced <input type="checkbox"/> Non-Routine <input type="checkbox"/> Unannounced		14. Locations Inspected: <input type="checkbox"/> Hybrid <input checked="" type="checkbox"/> Main Office <input type="checkbox"/> Field Office <input type="checkbox"/> Temporary Job Site <input type="checkbox"/> Remote		15. Next Inspection Date (MM/DD/YYYY): 05/19/2028 <input checked="" type="checkbox"/> Normal <input type="checkbox"/> Extended <input type="checkbox"/> Reduced <input type="checkbox"/> No change	
16. Location(s) Inspected List: 6121 North Hanley Road Berkeley, MO 63134					
17. Scope and Observations: This was an announced routine inspection of a drinking water testing and analytical service laboratory authorized to possess microcurie quantities of byproduct materials for use as calibration and/or reference standards for calibration, and checking of the licensee's instruments. The licensee had five authorized users (AUs) who were authorized to use byproduct materials for analysis of drinking water.					
Performance Observations					
The inspection consisted of interviews with select licensee personnel, review of select records, a tour of the laboratory, and independent measurements. The inspector toured the laboratories to observe the condition, posting, and security of the radioactive materials. The inspector observed the materials were stored in a locked cabinet. The inspector interviewed the RSO and an authorized user (AU) who uses byproduct materials; all demonstrated adequate knowledge of radiation protection principles, licensee procedures, and NRC regulatory requirements. The inspector: (1) had the AU demonstrate the survey instrument battery check, the use of instrument, and package check-in procedure; (2) had the RSO demonstrate the inventory tracking system; (3) observed the RSO conduct a physical inventory of licensed material, and all the licensed material was accounted for; (4) observed the RSO and AU wearing the proper PPE (lab coats, safety glasses, and gloves); and (5) reviewed security of licensed materials and access to the laboratory. The licensee stored waste in the storage closet for decay-in-storage and disposed of waste to a licensed broker.					
The inspector reviewed the following records: annual internal program audits, radiation safety training records (initial and annual refresher), spill procedures, package receipt, licensed materials inventory tracking database, records of licensed materials usage, and waste disposal records, with no issues noted.					
The licensee identified that the physical inventory to account for all licensed materials was not conducted since 2/19/2019, as required by License Condition 13. The root cause was the licensee's work priority shifted to provide Covid-19 testing. As corrective action, the licensee conducted the physical inventory on 5/18/2023, all sources were					

Materials Inspection Record (Continued)

accounted for and the licensee committed to establish an electronic tracking mechanism to ensure timely completion of future inventories. Therefore this finding met the criteria to be considered as NCV.

Signature and Date - Branch Chief



Digitally signed by Rhex A. Edwards
Date: 2023.06.01 10:51:18 -05'00'