

### SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION

1. LICENSEE/LOCATION INSPECTED:  Mosaic Life Care ATTN: Nuclear Medicine 5325 Faraon St. St. Joseph, MO 64506  REPORT NUMBER(S) 202101	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)  030-14791	4. LICENSE NUMBER(S)  24-18287-01	5. DATE(S) OF INSPECTION  August 18, 2021 to September 16, 2021
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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. 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, and corrective action was or is being taken, and the remaining criteria in the NRC Enforcement Policy, to exercise discretion, were satisfied.

\_\_\_\_\_ Non-cited violation(s) were discussed involving the following requirement(s):

- 4. During this inspection, certain of your activities, as described below and/or attached, were in violation of NRC requirements and 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	DATE
LICENSEE'S REPRESENTATIVE			
NRC INSPECTOR	Luis Nieves Folch	Luis A. Nieves Folch	Digitally signed by Luis A. Nieves Folch Date: 2021.09.17 10:13:53 -05'00'
BRANCH CHIEF	Michael Kunowski	Michael A. Kunowski	Digitally signed by Michael A. Kunowski Date: 2021.09.20 04:39:01 -05'00'



### Materials Inspection Record

1. Licensee Name: Mosaic Life Care		2. Docket Number(s): 030-14791		3. License Number(s) 24-18287-01	
4. Report Number(s): 2021001			5. Date(s) of Inspection: August 18, 2021 to September 16, 2021		
6. Inspector(s): Luis Nieves		7. Program Code(s): 02230	8. Priority: 2	9. Inspection Guidance Used: 87132	
10. Licensee Contact Name(s): Julie Hanna, CNMT, ARRT		11. Licensee E-mail Address: Julie.Hanna@mymlc.com		12. Licensee Telephone Number(s): 816-271-6000	
13. Inspection Type:		14. Locations Inspected:		15. Next Inspection Date (MM/DD/YYYY):	
<input type="checkbox"/> Initial <input checked="" type="checkbox"/> Routine <input checked="" type="checkbox"/> Announced <input type="checkbox"/> Non-Routine <input type="checkbox"/> Unannounced		<input checked="" type="checkbox"/> Main Office <input checked="" type="checkbox"/> Field Office <input type="checkbox"/> Temporary Job Site <input checked="" type="checkbox"/> Remote		August 18, 2023 <input checked="" type="checkbox"/> Normal <input type="checkbox"/> Extended <input type="checkbox"/> Reduced <input type="checkbox"/> No change	

**16. Scope and Observations:**

This was an announced, routine inspection of a hospital authorized by its NRC license to use unsealed byproduct material for diagnostic and therapeutic procedures under 10 CFR 35.100, 200, 300, 400, 600, and 1000(Y-90). At the time of the inspection, the licensee performed a comprehensive spectrum of diagnostic procedures. The nuclear medicine department was staffed with eight full-time nuclear medicine technologists (NMTs) who performed approximately 120 diagnostic nuclear medicine procedures weekly. The licensee has three hot labs at their main hospital open from Mondays to Fridays. The licensee has not performed any manual brachytherapy since 2017, but they did perform four I-131, five Xofigo, and five Y-90 treatments in the last year. The licensee performed eight HDR treatments before stopping their HDR treatments in 2020 for lack of clinical need. The unit is empty without a source until further notice. The licensee retains a consultant health physicist to perform annual audits of the radiation safety program and calibrations. In accordance with current agency policy during the Covid-19 public health emergency, this inspection was announced, and performed through telephonic and video conferencing interviews with the licensee's Lead NMT, and other licensee staff, observations by the inspector via video, and review of requested documentation provided by the licensee via secured email.

**PERFORMANCE OBSERVATIONS**

The inspector conducted a virtual tour of the nuclear medicine hot labs and discussed with the NMT package receipt, surveys, and instrument quality control checks. The NMT demonstrated adequate knowledge of radiation safety principles and practices through interviews. The inspector reviewed audit reports, instrument quality control, safety committee minutes, written directives, inventory, dose calibrator linearity and accuracy, leak tests, and training. The inspector also reviewed monthly dosimetry reports which indicated annual whole-body and extremity doses were below regulatory limits.

For the HDR program, the inspector reviewed written directives, annual training, emergency procedures, daily QA, treatment plans, and security of the device.

During the last inspection, one cited violation was identified for the failure to include an authorized user of byproduct material under 10 CFR 35.400 and 35.600 on its Radiation Safety Committee. The inspector reviewed the corrective actions by talking to the Lead NMT and reviewing Radiation Safety Committee reports. This violation and a previously non-cited violation are closed.

No violations of NRC requirements were identified as a result of this inspection.

**From:** [Nieves Folch, Luis](#)  
**To:** [Hanna, Julie](#)  
**Subject:** FW: Mosaic 591  
**Date:** Monday, September 20, 2021 6:20:00 AM  
**Attachments:** [Mosaic 591M\(1\)mk.pdf](#)

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Dear Mrs. Hanna

Attach is the clear 591 report for the inspection conducted on August 18, 2021 to September 16, 2021. At this point there is no further actions on your part.

In accordance with Title 10 of the Code of Federal Regulations 2.390 of the NRC's "Rules of Practice," a copy of this message will be available electronically for public inspection in the NRC's Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC's website at <http://www.nrc.gov/reading-rm/adams.html>. Please feel free to contact me if you have any questions regarding this correspondence.

Thank you,

Luis Nieves  
Health Physicist  
U.S. Nuclear Regulatory Commission  
Division of Nuclear Materials Safety  
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Fax: (630) 515-1259