



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, ILLINOIS 60532-4352

November 29, 2023

Jaime Eisenberg
Radiation Safety Officer
Saint Francis Medical Center
211 Saint Francis Dr.
Cape Girardeau, MO 63703

SUBJECT: NRC ROUTINE INSPECTION REPORT NO. 03002269/2023001(DRSS) AND
NOTICE OF VIOLATION – SAINT FRANCIS MEDICAL CENTER

Dear Jaime Eisenberg:

This letter refers to the inspection conducted on July 18, 2023, at your Saint Francis Dr. location in Cape Girardeau, Missouri, with continued in-office review through November 2, 2023. The purpose of the inspection was to review activities performed under your NRC license to ensure that these activities were being performed in accordance with NRC requirements. The purpose of the in-office review was to evaluate information not available at the time of the on-site inspection. This letter presents the results of the inspection. Luis Nieves Folch of my staff conducted a final exit meeting with you on November 2, 2023, to discuss the inspection findings.

This inspection examined activities conducted under your license as they relate to public health and safety, and to confirm compliance with the Commission's rules and regulations, and with the conditions of your license. Within these areas, the inspection consisted of selected examination of procedures and representative records, observations of activities, and interviews with personnel.

Based on the results of this inspection, the NRC has determined that one Severity Level IV violation of NRC requirements occurred.

The violation was evaluated in accordance with the NRC Enforcement Policy. The current Enforcement Policy is included on the NRC's website at <http://www.nrc.gov/about-nrc/regulatory/enforcement/enforce-pol.html>. The violation is cited in the enclosed Notice of Violation (Notice) and the circumstances surrounding it are described in detail in the subject inspection record. The violation is being cited in the enclosed Notice because the inspector identified it.

The NRC has concluded that information regarding (1) the reason for the violation, (2) the corrective actions that have been taken and the results achieved; and (3) the date when full compliance will be achieved is already adequately addressed on the docket in this letter and in additional correspondence. Therefore, you are not required to respond to this letter unless the description herein does not accurately reflect your corrective actions or your position. In that case, or if you choose to provide additional information, you should follow the instructions specified in the enclosed Notice.

In accordance with the NRC's "Agency Rules of Practice and Procedure," in 10 CFR 2.390, a copy of this letter, its enclosures, and your response, if you choose to provide one, will be made 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>. To the extent possible, any response should not include any personal privacy or proprietary information so that it can be made publicly available without redaction.

Please feel free to contact Luis Nieves Folch of my staff if you have any questions regarding this inspection. Luis can be reached at 630-829-9571 or Luis.NievesFolch@nrc.gov.

Sincerely,



Signed by Edwards, Rhex
on 11/29/23

Rhex Edwards, Chief
Materials Inspection Branch
Division of Radiological Safety and Security

Docket No. 030-02269
License No. 24-00158-03

Enclosure: Notice of Violation

cc w/encl: State of Missouri

Letter to J. Eisenberg from R. Edwards dated, November 29, 2023.

SUBJECT: NRC ROUTINE INSPECTION REPORT NO. 03002269/2023001(DRSS) AND
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ADAMS Accession Number: ML23332A100

OFFICE	RIII-DRSS		RIII-DRSS				
NAME	LNieves		REdwards				
DATE	11/28/23		11/29/23				

OFFICIAL RECORD COPY

NOTICE OF VIOLATION

Saint Francis Medical Center
Cape Girardeau, MO

License No. 24-00158-03
Docket No. 030-02269

During an NRC inspection conducted on July 18, 2023, with continued in-office review through November 2, 2023, one violation of NRC requirements was identified. In accordance with the NRC Enforcement Policy, the violation is listed below:

- A. Title 10 of the Code of Federal Regulations (10 CFR) 20.1502(a)(1) requires, in part, that each licensee monitor exposures to radiation and radioactive material at levels sufficient to demonstrate compliance with the occupational dose limits of 10 CFR Part 20. As a minimum, each licensee shall monitor occupational exposure to radiation from licensed and unlicensed radiation sources under the control of the licensee and shall supply and require the use of individual monitoring devices by adults likely to receive, in 1 year from sources external to the body, a dose in excess of 10 percent of the limits in 10 CFR 20.1201(a).

Contrary to the above, from October 2022 to April 2023, the licensee failed to monitor exposures to radiation from licensed and unlicensed radiation sources under its control that were received by an individual who was likely to receive, in 1 year from sources external to the body, a deep dose in excess of 10 percent of the limits in 10 CFR 20.1201(a) and was therefore required to use individual monitoring devices. Specifically, the licensee did not provide an individual monitoring device to an Interventional Radiologist to assess their dose for approximately six months during which four Y-90 treatments were administered.

This is a Severity Level IV violation (Section 6.3).

The NRC has concluded that information regarding the reason for the violation, the corrective actions taken and planned to correct the violation and prevent recurrence, and the date when full compliance was achieved, is already adequately addressed on the docket in (this letter, the subject inspection report, etc.). However, you are required to submit a written statement or explanation pursuant to 10 CFR 2.201 if the description therein does not accurately reflect your corrective actions or your position. In that case, or if you choose to respond, clearly mark your response as a "Reply to a Notice of Violation, IR 03002269/2023001(DRSS)" and send it to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001 with a copy to the Regional Administrator, Region III, within 30 days of the date of the letter transmitting this Notice.

If you choose to respond, your response will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>. Therefore, to the extent possible, the response should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the Public without redaction.

Enclosure

If you contest this enforcement action, you should also provide a copy of your response, with the basis for your denial, to the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001.

In accordance with 10 CFR 19.11, you may be required to post this Notice within two working days of receipt.

Dated this 29th day of November 2023.