

SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION

1. LICENSEE/LOCATION INSPECTED

Signet Puerto Rico, LLP
VALLE ARRIBA HEIGHTS
AC-8 AVENIDA MONSERRATE
CAROLINA, PR

2. NRC/REGIONAL OFFICE

Region 1
475 Allendale Rd
Suite 102
King of Prussia, PA 19406

REPORT NUMBER(S) 2023001

3. DOCKET NUMBER(S)

030-34449

4. LICENSE NUMBER(S)

52-25390-01

5. DATE(S) OF INSPECTION

02/08/2023 - 08/08/2023

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 the 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)

A: 10 CFR 35.67(g) requires, in part, that a licensee in possession of sealed sources, shall conduct a semi-annual physical inventory of all such sources in its possession.

Contrary to the above, from January 1, 2022, through February 19, 2023, the licensee did not accurately conduct a semi-annual physical inventory of all such sources in its possession. Specifically, the licensee did not inventory four Co-57 sources (SNs 2132-137; 1919-187; 1646-183; & 2285-17-3) and one Cs-137 button source (SN 2337). Additionally, conduct of the semi-annual inventory failed to identify a missing Cs-137 reference coin (SN W08598-142) in licensee possession.

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

B: 10 CFR 35.60(b) requires, in part, that the licensee shall calibrate the instrumentation required in paragraph (a) of this section in accordance with nationally recognized standards or the manufacturer's instructions.

Contrary to the above, the licensee had not conducted the required quarterly linearity or annual accuracy tests on their dose calibrator. Specifically, the licensee was conducting the linearity semi-annually and not quarterly as required for calendar year 2020, 2021, and 2022. Additionally, they did not conduct the required annual accuracy test for 2022.

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

C: 10 CFR 71.5(a) requires, in part, that the licensee comply with all Federal DOT training requirements.

49 CFR 172, Subpart H, requires, in part, that all persons who offer radioactive materials for shipment, be trained for shipping such material every three years.

Contrary to the above, on February 19, 2023, it was determined that the two nuclear medicine technologists had not received the required DOT HAZMAT training within the last 3 years.

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

Corrective actions included conducting: 1) an inventory for all sealed sources in their possession, 2) the required dose calibrator test, and 3) the required DOT HAZMAT training for the nuclear medicine technologists.

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A: 10 CFR 35.67(g) requires, in part, that a licensee in possession of sealed sources, shall conduct a semi-annual physical inventory of all such sources in its possession.

A: We have updated our procedures and our inventory records. Inventories are scheduled to be performed in January and July and a copy of it will be send to the administrator.

B: 10 CFR 35.60(b) requires, in part, that the licensee shall calibrate the instrumentation required in paragraph (a) of this section in accordance with nationally recognized standards or the manufacturer's instructions.

B: We have updated our procedures. Linearity tests are scheduled for January, April, July and October and and administration will be notified of the date performed.


C: 10 CFR 71.5(a) requires, in part, that the licensee comply with all Federal DOT training requirements.

49 CFR 172, Subpart H, requires, in part, that all persons who offer radioactive materials for shipment, be trained for shipping such material every three years.

C: Facility nuclear medicine technologists personnel were trained on 49 CFR 172.704 they were also educated on decay in storage option before returning unuse materials.

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	Nivia Souffront		08/28/2023
NRC INSPECTOR	Shawn Seeley	Shawn W. Seeley <small>Digitally signed by Shawn W. Seeley Date: 2023.09.06 16:55:24 -04'00'</small>	
BRANCH CHIEF	Anne DeFrancisco	Anne E. DeFrancisco <small>Digitally signed by Anne E. DeFrancisco Date: 2023.10.17 15:05:01 -04'00'</small>	