



## Materials Inspection Report

<b>1. Licensee/Location Inspected:</b>  Covenant Medical Center, Inc. 1447 N. Harrison Saginaw, MI 48602  <b>Report Number(s)</b> 2024-001	<b>2. NRC/Regional Office</b>  Region III U. S. Nuclear Regulatory Commission 2443 Warrenville Road, Suite 210 Lisle, IL 60532-4352
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<b>3. Docket Number(s)</b> 030-02012	<b>4. License Number(s)</b> 21-01492-02	<b>5. Date(s) of Inspection</b> 6/27-28/2024
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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))
  - 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	Deborah A. Piskura, Daniel Fiedorek	Deborah A. Piskura <small>Digitally signed by Deborah A. Piskura Date: 2024.07.10 14:22:49 -05'00'</small> DANIEL FIEDOREK <small>Digitally signed by DANIEL FIEDOREK Date: 2024.07.10 14:18:11 -05'00'</small>
BRANCH CHIEF	Rhex A. Edwards, Chief, MIB	<small>Digitally signed by RHEX EDWARDS Date: 2024.07.24 06:41:19 -05'00'</small>



**Materials Inspection Record**

<b>1. Licensee Name:</b> Covenant Medical Center, Inc.		<b>2. Docket Number(s):</b> 030-02012		<b>3. License Number(s)</b> 21-01492-02	
<b>4. Report Number(s):</b> 03002012/2024-001			<b>5. Date(s) of Inspection:</b> 6/27-28/2024		
<b>6. Inspector(s):</b> Deborah A. Piskura, Daniel Fiedorek		<b>7. Program Code(s):</b> 02230	<b>8. Priority:</b> 2	<b>9. Inspection Guidance Used:</b> 87130 and 87132	
<b>10. Licensee Contact Name(s):</b> Daniel A. Dryden, M.S. RSO		<b>11. Licensee E-mail Address:</b> Daniel.Dryden@CHS-MI.com		<b>12. Licensee Telephone Number(s):</b> 989-586-5016	
<b>13. Inspection Type:</b> <input checked="" type="checkbox"/> Routine <input type="checkbox"/> Announced <input type="checkbox"/> Non-Routine <input checked="" type="checkbox"/> Unannounced		<b>14. Locations Inspected:</b> <input type="checkbox"/> Hybrid <input checked="" type="checkbox"/> Main Office <input checked="" type="checkbox"/> Field Office <input type="checkbox"/> Temporary Job Site <input type="checkbox"/> Remote		<b>15. Next Inspection Date (MM/DD/YYYY):</b> 06/28/2026 <input checked="" type="checkbox"/> Normal <input type="checkbox"/> Extended <input type="checkbox"/> Reduced <input type="checkbox"/> No change	
<b>16. Location(s) Inspected List:</b> 700 Cooper Ave, Saginaw, MI, 48602 (Main Hospital) 900 Cooper Ave, Saginaw, MI, 48602 (Center for the Heart) 5400 Mackinaw Rd, Saginaw, MI, 48604 (Radiation Oncology Center)					
<b>17. Scope and Observations:</b> This was an unannounced routine inspection of a 600 bed community hospital authorized to conduct licensed activities at three locations of use in Saginaw, Michigan. The licensee was authorized to use licensed material permitted by Sections 35.100, 35.200, 35.300, 35.400 (I-125 prostate seeds and Cs-131 GammaTile ®), 35.600 (Ir-192 within an HDR unit), and 35.1000 (Y-90 TheraSpheres incident to disposal). The licensee retained the services of a consultant medical physicist who audited the nuclear medicine radiation safety activities quarterly.  Collectively, the nuclear medicine department was staffed with seven full-time NMTs who performed approximately 500-700 diagnostic imaging studies per month. The department performed a full spectrum of diagnostic studies. The licensee received unit doses and bulk Tc-99m from a licensed nuclear pharmacy. The main hospital administered several I-131 doses for thyroid carcinoma, hyperthyroidism, and whole body follow up treatments annually. The licensee obtained I-131 in capsule form. The licensee released patients in accordance with Section 35.75. No other beta or alpha emitters were currently administered by the licensee. The licensee transferred all Y-90 waste on January 4, 2024, using the services of an authorized waste broker. The licensee plans to submit an amendment request to remove their authorization for 35.1000 material.  The radiation therapy activities were performed by two contract AMPs, two AUs, and three dosimetrists. The licensee administered approximately 25 patient treatments per year utilizing the HDR; these treatments included gynecological and skin surface cancers. No I-125 implants had been administered since the last NRC inspection. The licensee administered one Cs-131 GammaTile implant since the last inspection (treatment on 2/22/2024).  The inspection consisted of interviews with licensee personnel, a review of selected records, tours of all three locations where diagnostic activities were performed and a tour of the HDR treatment suite. The tours included independent surveys taken with a RadEye G survey meter, S/N 30713 last calibrated on 4/5/2024; no elevated readings were identified. No patient administrations or treatments were observed during this inspection. The licensee demonstrated daily HDR safety and quality assurance checks for the inspectors. The nuclear medicine staff					

### Materials Inspection Record (Continued)

demonstrated daily dose calibrator QA checks, package receipt and area surveys, and an inventory of select sealed sources. All locations had adequate postings and all material was secured from unauthorized access. At all locations licensee personnel were knowledgeable of radiation safety practices and utilized appropriate personnel monitoring and calibrated survey meters. The inspectors reviewed the GammaTile treatment written directive and treatment plan.

The maximum dose for licensee staff for 2024 at the time of the inspection was 95 mrem whole body dose and 438 mrem extremity dose. For 2023 the highest dose to licensee staff was 462 mrem whole body dose and 2226 mrem extremity dose.

No violations of NRC requirements were identified during this inspection.

Signature and Date - Branch Chief



Digitally signed by RHEX EDWARDS  
Date: 2024.07.24 06:40:58 -05'00'

**From:** [Daniel Fiedorek](#)  
**To:** [daniel.dryden@CHS-MI.com](mailto:daniel.dryden@CHS-MI.com)  
**Cc:** [Deborah Piskura](#)  
**Subject:** NRC Inspection Form 591 for Covenant Medical Center, Inc.  
**Date:** Wednesday, July 24, 2024 9:31:00 AM  
**Attachments:** [Covenant NRC 591M 2024001.pdf](#)

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Good Morning Dan,

Attached is the NRC Form 591 Inspection Report from Debbie and I's inspection of Covenant that began on June 27, 2024. As was discussed at the exit meeting no violations were identified and no response is required. Please keep this report with your NRC records. If you have any questions, please feel free to reach out to Debbie or I.

Also, in accordance with 10 CFR 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 Reading Room or NRC's Agencywide Documents Access and Management System (ADAMS), which can be found on the NRC website at <http://www.nrc.gov/reading-rm/adams.html>.

Thank You!

Daniel Fiedorek  
U.S. NRC | Region III  
Division of Radiological Safety and Security (DRSS)  
Materials Inspection Branch (MIB)  
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