NRC FORM 591M PART 1
(05-2012)
10 CFR 2.201

U.S. NUCLEAR REGULATORY COMMISSION

SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION

1. LICENSEE/LOCATION INSPECTED:	2. NRC/REGIONAL OFFICE
Schoolcraft Memorial Hospital 500 Main Street Manistique, MI 49854 REPORT NUMBER(S) 12-01	Region III U. S. Nuclear Regulatory Commission 2443 Warrenville Road, Suite 210 Lisle, IL 60532-4352

3. DOCKET NUMBER(S)	4. LICENSE NUMBER(S)	5. DATE(S) OF INSPECTION
030-29993	21-16542-03	June 27, 2012

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 violations(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.

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

10 CFR 71.91 states, in part, that each licensee shall maintain a record of each shipment of licensed material not exempt under 10 CFR 71.10, showing results of the determinations required by 10 CFR 71.87. 10 CFR 71.87 states, in part, that before each shipment of licensed material, the licensee shall determine that the level of removable contamination on the external surfaces of each package is within the limits specified in DOT regulations in 49 CFR 173.443.

(continued in Part 2)

☐ 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	TOM R. MILES DO		6/27/12
NRC INSPECTOR	Andrew M. Bramnik	Andrew M Bramnik	6/27/12
BRANCH CHIEF	Heather Peterson	for	7/9/12

NRC FORM 591M PART 2
(05-2012)
10 CFR 2.201

U.S. NUCLEAR REGULATORY COMMISSION

SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION

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Schoolcraft Memorial Hospital 500 Main Street Manistique, MI 49854 REPORT NUMBER(S) 12-01	Region III U. S. Nuclear Regulatory Commission 2443 Warrenville Road, Suite 210 Lisle, IL 60532-4352

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(Continued)

Contrary to the above, between May 13, 2011 and February 23, 2012, the licensee failed to maintain records of each shipment of licensed material. Specifically, the licensee did not maintain records of packages being returned to the nuclear pharmacy. This item was identified during a routine audit by the licensee's consultant physicist. As corrective actions, on February 23, 2012, the licensee began using a new worksheet for package return records that clearly specified the information to be recorded and was provided by the physicist/consultant.

NRC FORM 591M PART 3
(05-2012)
10 CFR 2.201

U.S. NUCLEAR REGULATORY COMMISSION

Docket File Information

SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION

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6. INSPECTION PROCEDURES USED	7. INSPECTION FOCUS AREAS
87130	03.01 - 03.07

SUPPLEMENTAL INSPECTION INFORMATION

1. PROGRAM CODE(S)	2. PRIORITY	3. LICENSEE CONTACT	4. TELEPHONE NUMBER
02121	5	William Pyle, NMT	(906) 341-3200

☑ Main Office Inspection Next Inspection Date: 06/27/2017

☐ Field Office Inspection

☐ Temporary Job Site Inspection

PROGRAM SCOPE

This was a routine inspection of a 20 bed hospital that performed approximately 12 diagnostic nuclear medicine procedures per week. One full time nuclear medicine technologist performed all patient procedures Mondays through Fridays. The licensee obtained unit doses and occasional bulk doses of licensed material from a nuclear pharmacy in Marquette, MI. The licensee performed mostly cardiac, bone, and HIDA scans, and was not authorized to administer therapeutic doses of licensed material. At the time of the inspection, the licensee was building a new hospital approximately three miles away, and was planning to relocate the nuclear medicine program to that facility in February 2013.

PERFORMANCE OBSERVATIONS

Interviews of available staff revealed an adequate level of understanding of emergency and material handling procedures and techniques. The licensee successfully demonstrated dose calibrator constancy checks, package receipt, daily surveys, and waste handling and disposal procedures. The inspector confirmed that these activities were successfully completed by reviewing selected records, and verified that the licensee's technologist was familiar with the definition of a medical event. A contract physicist performed quarterly program audits that were adequate to oversee the program.

Licensed material was adequately secured and not readily accessible to members of the general public. The licensee possessed a radiation survey meter that was calibrated, operational, and performed comparably to readings from an NRC survey meter. Personal whole body and extremity dosimetry badges were observed being worn by the staff during the inspection, and records did not indicate doses in excess of 10 CFR Part 20 limits. Dosimetry records indicated that the highest annual whole body and extremity readings since the previous inspection were 47 millirem (mrem) and 1200 mrem, respectively.

One non-cited violation for the licensee's failure to maintain records of shipments of licensed material was identified during this inspection, and is described in detail in Parts 1 and 2.