

SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION

1. LICENSEE/LOCATION INSPECTED:

Neo-pet, LLC at
34555 Chagrin Blvd., Suite 200
Cleveland, Ohio 44022

REPORT NUMBER(S) 2013001

2. NRC/REGIONAL OFFICE

Region III
U. S. Nuclear Regulatory Commission
2443 Warrenville Road, Suite 210
Lisle, IL 60532-4352

3. DOCKET NUMBER(S)

150-00034

4. LICENSE NUMBER(S)

10 CFR 150.20
02220180046 (A.S. license)

5. DATE(S) OF INSPECTION

2/26/2013

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	Ken Lambert	<i>Ken Lambert</i>	3/18/13
BRANCH CHIEF	Tamara E. Bloomer	<i>T. Bloomer</i>	3/18/13

Docket File Information
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3. DOCKET NUMBER(S) 150-00034	4. LICENSE NUMBER(S) 10 CFR 150.20 02220180046 (A.S. license)	5. DATE(S) OF INSPECTION 2/26/2013
6. INSPECTION PROCEDURES USED 87130	7. INSPECTION FOCUS AREAS 03.01-03.07	

SUPPLEMENTAL INSPECTION INFORMATION

1. PROGRAM CODE(S) 02220	2. PRIORITY N/A	3. LICENSEE CONTACT Floro Miraldi, CEO & RSO	4. TELEPHONE NUMBER (440) 893-9949
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- ☐ Main Office Inspection Next Inspection Date: N/A
- ☐ Field Office Inspection
- ☒ Temporary Job Site Inspection 1907 West Sycamore Street, Kokomo, IN

PROGRAM SCOPE

Neo-pet, LLC holds an Ohio Agreement State license and conducts mobile PET imaging through the use of reciprocity. The initial reciprocity request was submitted and approved in December 2012 to work exclusively at St. Joseph Hospital in Kokomo, Indiana from 1/1/13 to 10/1/13. Neo-pet has 3 mobile PET trailers in total, and unit doses are delivered to the trailer directly from a radiopharmacy in Romeoville, IL. The technologist injects the patient in the trailer, takes them into a nuclear medicine waiting room in the hospital for approximately one hour, then brings them back into the trailer for a 30-minute to 1-hour scan. During the inspection, the technologist injected and scanned 3 patients; however, on average they may schedule as many as 12 patients in a day.

Performance Observations

An interview with the nuclear technologist revealed an adequate level of understanding of material handling procedures. Dose calibrator constancy checks, injection techniques, daily surveys, package receipt procedures, waste handling and disposal, and weekly wipe test procedures, were successfully demonstrated or observed. Patient dose logs, dosimetry records, internal audit reports, and proper reciprocity paperwork were also reviewed with no identified issues.

At the time of the inspection, the material was observed to be properly secured and was not readily accessible to the public. The technologist locked the trailer door each time she left to bring in a patient, and according to the technologist, packages are received directly to her each morning rather than being placed in a drop box located outside of the trailer. The technologist demonstrated how the packages are surveyed following receipt on both the surface, and at a distance of one meter. The survey meter used was found to be calibrated, operational, and compared well in a side by side comparison with the NRC instrument.

Independent measurements taken during the inspection did not indicate readings in excess of 10 CFR Part 20 limits in restricted or unrestricted areas. Additionally, review of the most recent personal dosimetry reports since the previous inspection indicated that exposures were minimal.