



CENTRAL MONTANA MEDICAL CENTER

408 Wendell Avenue • Lewistown, Montana 59457 • Phone (406) 535-7711

December 5, 2013

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

SUBJECT: REPLY TO A NOTICE OF VIOLATION - INSPECTION REPORT 030-14819/2013-001 AND NOTICE OF VIOLATION

Please see Central Montana Medical Center's response to the Notice of Violation referenced above.

Findings:

During the unannounced Nuclear Regulatory Commission (NRC) inspection, the health physicist noted that a Central Montana Medical Center (CMMC) staff member could not produce the required Radiation Safety Badge.

Although the staff member clearly understands the importance of wearing the radiation safety badge, the Radiation Safety Badge was, inadvertently, sent down to Laundry. This badge was later recovered after the inspection.

CMMC's failure to fully act on the lost Radiation Safety Badge by not ordering another badge immediately was also noted by NRC physicist. CMMC should have overnighted another badge immediately and have a spare badge available at all times.

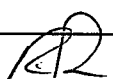
After the inspection, CMMC's Radiation Safety Policy was reviewed regarding Radiation Safety Badges. It was determined CMMC Radiology Department Policy RAD-RSP.002 *Personnel External Exposure Monitoring Program* needed revision.

Root Cause of Violation:

The CMMC Radiology policy states and requires all personnel in radiation producing areas to wear radiation safety badges.

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RGN-IV

CENTRAL MONTANA MEDICAL CENTER
Lewistown, Montana

Orig. Effec. Date: 12/94
Approved By: S. Wier
Revised: 12/95, 1/97, 3/98, 12/01, 10/07, 12/13
Approved By: 

POLICY NO. RAD-RSP.002
PAGE 1 OF 1

SUBJECT: PERSONNEL EXTERNAL EXPOSURE MONITORING PROGRAM
DEPARTMENT: RADIOLOGY
AFFECTED DEPARTMENTS: RADIOLOGY

POLICY

To assure that occupational exposures are maintained ALARA. The department will have available an extra Radiation Safety badge in the event a staff member's Radiation Safety Badge becomes lost or damaged. In addition, any lost or damaged badges will be ordered with overnight delivery.

PROCEDURE

1. The RSO will promptly review all exposure reports to look for workers or groups of workers whose exposure is unexpectedly high.
2. All individuals who are occupationally exposed to ionizing photon radiation on a regular basis will be issued a film or TLD whole body monitor that will be processed by a contract service on a monthly basis.
3. All individuals who, on a regular basis, handle radioactive material that emits ionizing photons will be issued a film or TLD finger monitor that will be processed by a contract service on a monthly basis.
4. Other individuals who are exposed to radiation on an occasional basis such as secretarial personnel who work in x-ray but do not work with patients, and nurses who occasionally care for patients who have received diagnostic dosages will not normally be issued exposure monitors.

The violation that occurred in this situation was due to a staff member accidentally discarding the Radiation Safety Badge. This happens rarely, but none the less, it still happens. Consequently, one of the preventative measures that will remediate this violation is to keep additional Radiation Safety Badges available so staff can always be monitored. The staff needs a heightened awareness of wearing badges and notice if someone is without a badge.

Corrective Action:

After the November 7, 2013 inspection, the following has taken place.

1. The missing Radiation Safety Badge was recovered from Laundry.
2. Additional Radiation Safety Badge has been ordered to keep on hand.
3. A Verbal disciplinary note was placed in the CMMC staff member's file regarding misplaced Radiation Safety Badge.
4. Changed CMMC Radiology Department policy RAD-RSP.002 to indicate that an extra Radiation Safety Badge will always be available for misplaced badges.
5. Reviewed with staff members the importance of Radiation Safety monitoring with particular attention to Radiation Safety Badges.
6. Review CMMC Radiology Department policy RAD-RSP.002 with staff.
7. Add a Radiation Badge distribution holder. This will allow the Radiation Safety Officer and management to track badges. Radiology staff will store Radiation Safety Badges at this location when out of the building.
8. CMMC Radiology Department Manager will perform Radiation Safety Badge inspections each month for six months. If 100% compliant, then inspections will decrease to quarterly inspections. The results of the inspections will also be available to CMMC administration through the Quality Improvement process and with the Radiation Safety Officer.

These corrective actions have been initiated with success as of December 5, 2013. The Radiation Safety Badge inspection will be on going. If there are any more questions or concerns, please contact Dr. V. Anne Hingle, M. D., and Radiology Safety Officer at 406-535-6205.

Sincerely,



Dr. V. Anne Hingle, M. D.
Radiation Safety Officer

cc w/encl: Regional Administrator