



DEPARTMENT OF THE AIR FORCE
WASHINGTON DC

13 December 2019

MEMORANDUM FOR NRC REGION IV
ATTN: Ms. Poston-Brown

FROM: AFRSA/SG3PB

SUBJECT: Reply to a Notice of Violation (NOV), NRC Inspection 030-28641/2019-004

This memorandum is in response to the NRC Notice of Violation (NOV), NRC Inspection 030-28641/2019-004, dated 14 November 2019, attachment 1.

Violation. 10 CFR 35.40(a) requires, in part, that written directive must be dated and signed by an authorized user before the administration of any therapeutic dose of radiation from byproduct material. Contrary to the above, in four instances between February 24, 2016 and July 13, 2017, the licensee failed to ensure that written directives were dated and signed by an authorized user before the administration of any therapeutic dose of radiation from byproduct material. Specifically, between the above dates, the licensee failed to have two written directives dated by an authorized user, failed to have additional written directives dated or signed by an authorized user.

The reason for violations, or, if contested, the basis for disputing the violation or severity level. The cited violation is a result of the inspection of the facility's Form 519, within the facility's electronic medical record (EMR) system, which is used locally to order the radionuclide for therapy and to serve as the written directive prior to administration. A redacted form is at attachment 2. The term "Written Directive" appears on the form, however this in fact is used to schedule the patient and to order the prescribed dose. The actual dose to be delivered and date of delivery, signed by the authorized user appears in the "****Draw Dosage Information****" section. All four written directives that were inspected and cited for noncompliance of 10 CFR 35.40(a) did have both an authorized user signature and a date within the "****Draw Dosage Information****" section. However, not all of the four written directives had an authorized user signature and date within "****Written Directive****" section. See attachment 3. While there were errors made as documented in attachment 3, it appears the regulatory requirements of 10 CFR 35.40(a) were met. Albeit, the "****Written Directive****" section on the form does not align with the terminology in 10 CFR 35.40(a).

The corrective steps that have been taken and the results achieved. Each of the four (4) written directives on the EMR Form 519 that was tied to this cited violation were documented as to the inconsistencies (attachment 3). A checklist was developed to ensure both the "****Draw Dosage Information****" and "****Written Directive****" sections are signed by the authorized user and dated.

BREAKING BARRIERS...SINCE 1947

ML20008D596

The corrective steps that will be taken. The clinic is making attempts to modify the EMR Form 519 to revise the “***Written Directive***” section’s title so in the future it cannot be misconstrued as a section to document regulatory compliance with 10 CFR 35.40(a).

The date when full compliance will be achieved. The cited violation is on historical paperwork and which cannot be altered, therefore feedback from the NRC inspection was appropriately noted in program files.

If you have any questions, please contact me at 703-681-6988 or email at alan.c.hale.mil@mail.mil.

HALE.ALAN.C
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HALE.ALAN.C.1250341357
Date: 2019.12.13 07:40:09
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ALAN C. HALE, Lt Col, USAF, BSC
Chief, Radiation Health
USAF Radioisotope Committee Secretariat
Air Force Medical Support Agency
Office of the Surgeon General

3 Attachments:

1. NRC NOV dated 14 November 2019
2. Form 519
3. Memos and Inspected Form 519s

cc:

NRC Region IV (Dr. Gepford)
673 SGSC/CC (Col O'Brien)
PACAF/SGPB (Col Smith)
AFIA/SGO (Maj Kice)



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION IV
1600 EAST LAMAR BOULEVARD
ARLINGTON, TEXAS 76011-4511

November 14, 2019

LTC Alan C. Hale
USAF Radioisotope Committee
AFMSA/SG3PB
7700 Arlington Blvd., Suite 5151
Falls Church, VA 22042

SUBJECT: NRC INSPECTION 030-28641/2019-004 AND NOTICE OF VIOLATION

Dear Colonel Hale:

This letter refers to the unannounced inspection conducted on August 26, 2019, at your facility in Anchorage, Alaska, with in-office review through October 29, 2019. The inspection was an examination of activities conducted under your license as they relate to public health and safety, to confirm compliance with the U.S. Nuclear Regulatory Commission's (NRC's) rules, regulations, and with the conditions of your license. Within these areas, the inspection consisted of a selected examination of procedures and representative records, independent radiation measurements, observations of activities, and interviews with personnel.

The preliminary inspection findings were discussed with Col. Sean P. O'Brien, Commander of the 673rd Surgical Ops Squadron, at the conclusion of the onsite portion of the inspection on August 26, 2019. A final telephonic exit briefing was conducted with Sgt. Hayes, Certified Nuclear Medicine Technician, of Joint Base Elmendorf-Richardson on November 12, 2019, and a final exit briefing was provided electronically to you on November 13, 2019.

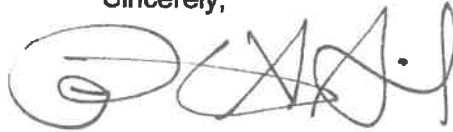
Based on the results of this inspection, the NRC has determined a Severity Level IV violation of NRC requirements occurred. This violation was evaluated in accordance with the NRC Enforcement Policy, which can be found at the NRC's Web site at <http://www.nrc.gov/about-nrc/regulatory/enforcement/enforce-pol.html>. The violation is cited and described in the enclosed Notice of Violation (Notice) because it was identified by the NRC during the inspection. The violation involved the failure to prepare written directives with the required information.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. The guidance in NRC Information Notice 96-28, "Suggested Guidance Relating to Development and Implementation of Corrective Action," may be helpful in preparing your response. You can find the Information Notice on the NRC website at: <http://pbadupws.nrc.gov/docs/ML0612/ML061240509.pdf>. Information regarding the reason for the violation, the corrective actions taken and planned to correct the violation and prevent recurrence, and the date when full compliance will be (was) achieved should be addressed. The NRC review of your response to the Notice will also determine whether further enforcement action is necessary to ensure compliance with regulatory requirements.

In accordance with 10 CFR 2.390 of the NRC's "Agency Rules of Practice and Procedure," a copy of this letter, its enclosure, and your response will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

Should you have any questions regarding this letter or the enclosed Notice, please contact Jason vonEhr at 817-200-1186, Ms. Martha Poston-Brown at 817-200-1181, or the undersigned at 817-200-1455.

Sincerely,

A handwritten signature in black ink, appearing to read 'Patricia A. Silva', with a stylized flourish at the end.

Patricia A. Silva, Chief
Materials Inspection Branch
Division of Nuclear Materials Safety

Docket: 030-28641
License: 42-23539-01AF

Enclosure:
Notice of Violation

cc:
I. Casares
State of Alaska Radiation Control

NOTICE OF VIOLATION

Department of the Air Force
Joint Base Elmendorf-Richardson
DOD-VA Joint Venture Hospital
Anchorage, Alaska

Docket No.: 030-28641
License No.: 42-23539-01AF

During an NRC inspection conducted on August 26, 2019, with in-office review through October 29, 2019, a violation of NRC requirements was identified. In accordance with the NRC Enforcement Policy, the violation is listed below:

10 CFR 35.40(a) requires, in part, that a written directive must be dated and signed by an authorized user before the administration of any therapeutic dose of radiation from byproduct material.

Contrary to the above, in four instances between February 24, 2016, and July 13, 2017, the licensee failed to ensure that written directives were dated and signed by an authorized user before the administration of any therapeutic dose of radiation from byproduct material. Specifically, between the above dates, the licensee failed to have two written directives dated by an authorized user, and failed to have two additional written directives dated or signed by an authorized user.

This is a Severity Level IV violation (NRC Enforcement Policy Section 6.3.d.1)

Pursuant to the provisions of 10 CFR 2.201, the USAF Radioisotope Committee is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001, with a copy to the Regional Administrator, Region IV, 1600 E. Lamar Blvd., Arlington, Texas 76011, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include: (1) the reason for the violations, or, if contested, the basis for disputing the violation or severity level; (2) the corrective steps that have been taken and the results achieved; (3) the corrective steps that will be taken; and (4) the date when full compliance will be achieved.

Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued requiring information as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

If you contest this enforcement action, you should also provide a copy of your response, with the basis for your denial, to the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001.

Your response will be made available electronically for public inspection in the NRC Public Document Room or in the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>. To the extent possible, your response should not include any personal privacy or proprietary information so that it can be made available to the public without redaction.

Enclosure

If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.390(b) to support a request for withholding confidential commercial or financial information).

In accordance with 10 CFR 19.11, you may be required to post this Notice within 2 working days of receipt.

Dated this 14th day of November 2019

PROCEDURE WORKSHEET
673 MED GP ELMENDORF AFB AK -- NUC MED

Pg. 1

Patient: [REDACTED]
Patient: [REDACTED]
FMP/[REDACTED] Rank: [REDACTED]
DOB: [REDACTED] Age: [REDACTED]
Register Number: [REDACTED] Sex: [REDACTED]

1. NM, THYROID THERAPY CANCER

Proc. Code: [REDACTED] Priority: ROUTINE
Exam No. : [REDACTED] Req. Location: FLIGHT MEDICINE CLINIC
Req. HCP: [REDACTED] Beeper #: [REDACTED]
Duty Phone: [REDACTED]
NO BRIEF COMMENT

36 Y/O ADAF male pilot with history of right sided overactive thyroid nodule.
+ recent thyroid uptake scan performed at JBER. Followed by off base
Endocrinology. Please perform 30mCi I-131 therapy. Provisional Diag:
Thyrototoxicosis with toxic single thyroid nodule

Exam Status: COMPLETE Scheduled Date/Time: [REDACTED]
Arrival Date/Time: [REDACTED] Departure Date/Time: [REDACTED]

WRITTEN DIRECTIVE

Dosage #1: _____ mCi/uCi R.P. _____ Route: IV / PO

Dosage #2: _____ mCi/uCi R.P. _____ Route: IV / PO

Authorized User Signature: _____ Date: _____

*** NUC MED/CT PREGNANCY STATEMENT ***

ARE YOU PREGNANT? YES: _____ NO: _____
FIRST DAY OF LAST MENSTRUAL CYCLE: _____
ARE YOU BREAST FEEDING? YES: _____ NO: _____
HAVE YOU HAD A TUBAL? YES: _____ NO: _____
HAVE YOU HAD A HYSTERECTOMY? YES: _____ NO: _____

A PREGNANCY TEST IS RECOMMENDED AND OFFERED TO THE PATIENT:

TEST COMPLETED: _____ DECLINE BY PATIENT: _____

PATIENT SIGNATURE: _____ DATE: _____

DRAW DOSAGE INFORMATION

DOSAGE #1: _____ mCi/uCi	DOSAGE #2: _____ mCi/uCi
RPH: _____	RPH: _____
ROUTE: IV / PO Site: _____	ROUTE: IV / PO Site: _____
Date: _____ Time: _____	Date: _____ Time: _____
INV/LOT#: _____	INV/LOT #: _____
Tech Initials: _____	Tech Initials: _____

I-131 THERAPY/SCAN:

Physician Verified Activity in dose Calibrator: Y / N
Patient Verified by 2 methods: Name SSAN MII ID STATE ID DOB

Authorized User Signature: _____



DEPARTMENT OF THE AIR FORCE
HEADQUARTERS, 673D AIR BASE WING
JOINT BASE ELMENDORF-RICHARDSON, ALASKA

26 Aug 2019

MEMORANDUM FOR PERMIT RADIATION SAFETY OFFICER

FROM: TSGT NATALIE T. SHIMASAKI

SUBJECT: I 131 Missing Written Directive Date

1. The NRC inspectors visited the Nuclear Medicine Dept. on 26 August 2019 and inspected the Written Directive Binder and discovered there was a discrepancy with an I 131 patient. The patients 519 Written directive Date had not been filled and was left blank. The Authorized User that signed the Written Directive was Dr. Bigelow according to the Written Directive Signature and the Draw Dosage Authorized User signature.
2. The patient received one pill that day and was dosed with 1 pill of I 131 which was 5.46 mCi of I 131 for a Metascan. The patient received the correct dose and was imaged 48 hours later.
3. The MFR will be placed in the Written Directive binder. Measures will be taken to thoroughly review all paperwork and ensure that all required signatures are completed. This item will be added to the Written Directive I 131 checklist.
4. This memorandum is a record of acknowledgement that the I 131 patient received a single dose of I 131 and that it was brought to the attention of the RSO that the Written Directive date was missing from the 519. For any questions or concerns, contact the Permit Radiation Safety Officer at 580-6740 or email natalie.t.shimasakialenepl@mail.mil.

A handwritten signature in black ink, appearing to read "Natalie T. Shimasaki-Alenepl", is written over a horizontal line.

NATALIE T. SHIMASAKI-ALENEPI, TSgt, USAF
NCOIC, Nuclear Medicine

PROCEDURE WORKSHEET
673 MED GP ELMENDORF AFB AK -- NUC MED

Pg. 1

Patient: [REDACTED]
FMP/ [REDACTED]
DOB: [REDACTED] Age: [REDACTED]
Reg f: [REDACTED] Sex: [REDACTED]
Rank: [REDACTED]

1. NM, I-131 WHOLE BODY SCAN (96 HOURS)

Proc. Code: [REDACTED]

Exam No. : [REDACTED]

Req. HCP: [REDACTED]

Duty Phone [REDACTED]

NO BRIEF COMMENT

Priority: ROUTINE

Req. Location: CHAMPUS SUPPORT

Beeper f: [REDACTED]

C73 Malignant Neopasm of Thyroid. Thyroid whole body imaging
Exam Status: ORDERED
Arrival Date/Time: [REDACTED] Scheduled Date/Time: [REDACTED]
Departure Date/Time: [REDACTED]

WRITTEN DIRECTIVE

Dosage f1: 5 mCi/uCi R.P. I 131 Route: IV / PO

Dosage f2: [REDACTED] mCi/uCi R.P. [REDACTED] Route: IV / PO

Authorized User Signature: [REDACTED] Date: [REDACTED]

*** NUC MED/CT PREGNANCY STATEMENT ***

ARE YOU PREGNANT? YES: [REDACTED] NO: [REDACTED]
FIRST DAY OF LAST MENSTRUAL CYCLE: [REDACTED]
ARE YOU BREAST FEEDING? YES: [REDACTED] NO: [REDACTED]
HAVE YOU HAD A TUBAL? YES: [REDACTED] NO: [REDACTED]
HAVE YOU HAD A HYSTERECTOMY? YES: [REDACTED] NO: [REDACTED]

A PREGNANCY TEST IS RECOMMENDED AND OFFERED TO THE PATIENT:
TEST COMPLETED: [REDACTED] DECLINE BY PATIENT: [REDACTED]

PATIENT SIGNATURE: [REDACTED] DATE: [REDACTED]

DRAW DOSAGE INFORMATION

DOSAGE f1: 5.46 mCi/uCi
RPH: I 131
ROUTE: IV / PO Site: Oral
Date: 2/24/14 Time: 13:10
INV/LOT #: 336230
Tech Initials: NSA

DOSAGE f2: [REDACTED] mCi/uCi
RPH: [REDACTED]
ROUTE: IV / PO Site: [REDACTED]
Date: [REDACTED] Time: [REDACTED]
INV/LOT #: [REDACTED]
Tech Initials: [REDACTED]

I-131 THERAPY SCAN

Physician Verified Activity in dose Calibrator: Y / N
Patient Verified by 2 methods: Name SSAN MIL ID STATE ID DOB [REDACTED]

Authorized User Signature: [REDACTED]



DEPARTMENT OF THE AIR FORCE
HEADQUARTERS, 673D AIR BASE WING
JOINT BASE ELMENDORF-RICHARDSON, ALASKA

26 Aug 2019

MEMORANDUM FOR PERMIT RADIATION SAFETY OFFICER

FROM: TSGT NATALIE T. SHIMASAKI

SUBJECT: I 131 Missing Written Directive Signature and Date

1. The NRC inspectors visited the Nuclear Medicine Dept. on 26 August 2019 and inspected the Written Directive Binder and discovered there was a discrepancy with an I 131 patient. The patients 519 was missing the Written directive Authorized User signature and Date. The radiologist that was present to confirm the dose in the dose calibrator and witness the patient receiving the I 131 dose was Dr. Shirley. There was no paper trail to show that the Authorized User was the same authorized User that confirmed the dose and dosing.
2. The patient received one pill that day and was dosed with 1 pill of I 131 which was 4.94 mCi of I 131 for a Metascan. The patient received the correct dose and was imaged 48 hours later.
3. The MFR will be placed in the Written Directive binder. Measures will be taken to thoroughly review all paperwork and ensure that all required signatures are completed. This item will be added to the Written Directive I 131 checklist.
4. This memorandum is a record of acknowledgement that the I 131 patient received a single dose of I 131 and that it has been brought to the attention of the RSO that the Written Directive signature is missing. For any questions or concerns, contact the Permit Radiation Safety Officer at 580-6740 or email natalie.t.shimasakialenepl@mail.mil.

A handwritten signature in black ink, appearing to read "Natalie T. Shimasaki-Alenepl", is written over a horizontal line.

NATALIE T. SHIMASAKI-ALENEPI, TSgt, USAF
NCOIC, Nuclear Medicine

PROCEDURE WORKSHEET
673 MED GP ELMENDORF AFB AK -- NUC MED

Pg. 1

Patient: [REDACTED]
FMP/ [REDACTED] Rank: [REDACTED]
DOB: [REDACTED] Age: [REDACTED]
Reg #: [REDACTED] Sex: [REDACTED] Pregnant?

1. NM, I-131 WHOLE BODY SCAN (96 HOURS)

Proc. Code: [REDACTED]

Exam No. : [REDACTED]

Req. HCP: ABBATE, SAMUEL

Duty Phone: [REDACTED]

Please fax report to [REDACTED]

Priority: ROUTINE

Req. Location: CHAMPUS SUPPORT

Beeper #: [REDACTED]

May 3 +5

C73 Thyroid Cancer. Please do I-131 whole body imaging

Exam Status: ORDERED

Arrival Date/Time: [REDACTED]

Scheduled Date/Time: [REDACTED]

Departure Date/Time: [REDACTED]

WRITTEN DIRECTIVE

Dosage #1: 5.0 mCi/uCi R.P. I-131 Route: IV / PO

Dosage #2: [REDACTED] mCi/uCi R.P. [REDACTED] Route: IV / PO

Authorized User Signature: [REDACTED] Date: [REDACTED]

*** NUC MED/CT PREGNANCY STATEMENT ***

DOSAGE #1: 4.44 mCi/uCi
RPH: [REDACTED]
ROUTE: IV / PO Site: [REDACTED]
Date: [REDACTED] Time: 12:00
INV/LOT #: [REDACTED]
Tech Initials: [REDACTED]

DOSAGE #2: [REDACTED] mCi/uCi
RPH: [REDACTED]
ROUTE: IV / PO Site: [REDACTED]
Date: [REDACTED] Time: [REDACTED]
INV/LOT #: [REDACTED]
Tech Initials: [REDACTED]

I-131 THERAPY/SCAN:

Physician Verified Activity in dose Calibrator: Y / N
Patient Verified by 2 methods: Name SSAN MIL ID STATE ID DOB

Authorized User Signature: [REDACTED]



DEPARTMENT OF THE AIR FORCE
HEADQUARTERS, 673D AIR BASE WING
JOINT BASE ELMENDORF-RICHARDSON, ALASKA

26 Aug 2019

MEMORANDUM FOR PERMIT RADIATION SAFETY OFFICER

FROM: TSGT NATALIE T. SHIMASAKI

SUBJECT: I 131 Missing Written Directive Signature

1. The NRC inspectors visited the Nuclear Medicine Dept. on 26 August 2019 and inspected the Written Directive Binder and discovered there was a discrepancy with an I 131 patient. The patients 519 was Written directive Authorized User signature was the patients signature and not the authorized User. The radiologist that was present to confirm the dose in the dose calibrator and witness the patient receiving the I 131 dose was Dr. Baril. Dr. Baril's signature or the other authorized User was not on the Written Directive Authorized Users signature line, it was the patient's signature.
2. The patient received one pill that day and was dosed with 1 pill of I 131 which was 4.95 mCi of I 131 for a Metascan. The patient received the correct dose and was imaged 48 hours later.
3. The MFR will be placed in the Written Directive binder. Measures will be taken to thoroughly review all paperwork and ensure that all required signatures are completed. This item will be added to the Written Directive I 131 checklist.
4. This memorandum is a record of acknowledgement that the I 131 patient received a single dose of I 131 and that it was brought to the attention of the RSO that the Written Directive signature was performed by the patient and not the Authorized Users. For any questions or concerns, contact the Permit Radiation Safety Officer at 580-6740 or email natalie.t.shimasakialenepl@mail.mil.

A handwritten signature in black ink, appearing to read "Natalie T. Shimasaki-Alenepl", is written over a horizontal line.

NATALIE T. SHIMASAKI-ALENEPI, TSgt, USAF
NCOIC, Nuclear Medicine

PROCEDURE WORKSHEET
673 MED GP ELMENDORF AFB AK -- NUC MED

Pg.

Patient: [REDACTED]
FMP/SSN: [REDACTED] Rank: [REDACTED]
DOB: [REDACTED] Age: [REDACTED]
Reg f: [REDACTED] Sex: [REDACTED] Pregnant?

1. NM, I-131 WHOLE BODY SCAN (96 HOURS)

Proc. Code: [REDACTED]

Exam No. : [REDACTED]

Req. HCP: ABBATE, SAMUEL

Duty Phone: [REDACTED]

NO BRIEF COMMENT

Priority: ROUTINE

Req. Location: CHAMPUS SUPPORT

Beeper f: [REDACTED]

I-131 metascan for thyroid cancer c73. please send results to dr samuel abbate

Exam Status: ORDERED

Arrival Date/Time: [REDACTED]

Scheduled Date/Time: [REDACTED]

Departure Date/Time: [REDACTED]

WRITTEN DIRECTIVE

Dosage f1: 5.0 mCi/uCi R.P. I-131 Route: IV / PO

Dosage f2: [REDACTED] mCi/uCi R.P. [REDACTED] Route: IV / PO

Authorized User Signature: [REDACTED] Date: [REDACTED]

*** NUC MED/CT PREGNANCY STATEMENT ***

DRAW DOSAGE INFORMATION

DOSAGE f1: 4.95 mCi/uCi
RPH: I-131
ROUTE: IV / PO Site: Oral
Date: 7/12/19 Time: 13:05
INV/LOT #: 357863
Tech Initials: NSR

DOSAGE f2: [REDACTED] mCi/uCi
RPH: [REDACTED]
ROUTE: IV / PO Site: [REDACTED]
Date: [REDACTED] Time: [REDACTED]
INV/LOT #: [REDACTED]
Tech Initials: [REDACTED]

I-131 THERAPY/SCAN:

Physician Verified Activity in dose Calibrator: (Y) / N
Patient Verified by 2 methods: Name SSAN MIL ID STATE ID (DOB)

Authorized User Signature: [REDACTED] SAMUEL DO

TO BE FILLED OUT BY THE PATIENT

1. WHAT IS YOUR PREFERRED METHOD OF LEARNING? [] VISUAL [] (VERBAL) [] WRITTEN
2. DO YOU HAVE ANY LEARNING BARRIERS? [] YES [] (NO)



DEPARTMENT OF THE AIR FORCE
HEADQUARTERS, 673D AIR BASE WING
JOINT BASE ELMENDORF-RICHARDSON, ALASKA

26 Aug 2019

MEMORANDUM FOR PERMIT RADIATION SAFETY OFFICER

FROM: TSGT NATALIE T. SHIMASAKI

SUBJECT: I 131 Dose Discrepancy

1. On 03 November 2018, an I 131 patient came in for a I 131 Dosing of 12 mCi per their Off-Base endocrinologist. The Patients 519 order exam paperwork had dual doses written on the 519. The first was set for 12 mCi of I 131 and the 2nd dose on the same form was 13.18 mCi of I 131 with the signature of Dr. Shirley for the 2nd dose of 13.18 mCi of I 131.
2. The patient only received one pill that day and was dosed with 1 pill of I 131 which was 13.18 mCi of I 131. There was an error on the patients 519 showing two doses and the second dose of 13.18 mCi above Dr. Shirley's signature.
3. The NRC inspectors caught this discrepancy and this MFR for record to show that the patient only received one pill for 13.18 I 131. This was brought to my attention and I will inform Dr. Shirley about this issue.
4. This memorandum is a record of acknowledgement that the I 131 patient received a single dose of I 131 for 13.18 mCi and not two doses of I 131. For any questions or concerns, contact the Permit Radiation Safety Officer at 580-6740 or email natalie.t.shimasakialenepti.mil@mail.mil.

A handwritten signature in black ink, appearing to read "Natalie T. Shimasaki-Alenepti", is located below the list of points.

NATALIE T. SHIMASAKI-ALENEPTI, TSgt, USAF
NCOIC, Nuclear Medicine

PROCEDURE WORKSHEET
673 MED GP ELMENDORF AFB AK -- NUC MED

Pg.

Patient: [REDACTED]
FMP/SSN: [REDACTED] Rank: [REDACTED]
DOB: 05 [REDACTED] Age: [REDACTED]
Reg f: [REDACTED] Sex: [REDACTED] Pregnant?

1. NM, THYROID THERAPY GRAVES

Proc. Code: [REDACTED]

Exam No. : [REDACTED]

Req. HCP: ABBATE, SAMUEL

Duty Phone: [REDACTED]

NO BRIEF COMMENT

Priority: ROUTINE

Req. Location: CHAMPUS SUPPORT

Beeper f:

Thyrotoxicosis with diffuse goiter without thyrotoxic crisis or storm. Thyroid
131 Therapy with. Dose 12 mCi.

Exam Status: ORDERED

Scheduled Date/Time:

Arrival Date/Time:

Departure Date/Time:

WRITTEN DIRECTIVE

Dosage f1: 12 mCi/uCi R.P. I 131 Route: IV / PO

Dosage f2: 13.18 mCi/uCi R.P. I 131 Route: IV / PO

A. Authorized User Signature: [Signature] Date: 11/3/17

*** NUC MED/CT PREGNANCY STATEMENT ***

DRAW DOSAGE INFORMATION

DOSAGE f1: 13.18 mCi/uCi
RPH: I 131
ROUTE: IV / PO Site: ORAL
Date: 11/03/17 Time: 09:31
INV/LOT f: 362671
Tech Initials: RJS

DOSAGE f2: [REDACTED] mCi/uCi
RPH: [REDACTED]
ROUTE: IV / PO Site: [REDACTED]
Date: [REDACTED] Time: [REDACTED]
INV/LOT f: [REDACTED]
Tech Initials: [REDACTED]

I-131 THERAPY/SCAN:

Physician Verified Activity in dose Calibrator: Y / N
Patient Verified by 2 methods: Name SSAN FIL ID STATE ID DOB

Authorized User Signature: [Signature]