



Great Falls Clinic
Hospital
406-216-8000
3010 15th Ave. S.
Great Falls, MT 59405

Great Falls Clinic
Emergency Room
406-216-8082
3010 15th Ave. S.
Great Falls, MT 59405

Great Falls Clinic
Specialty Center
406-454-2171
3000 15th Ave. S.
Great Falls, MT 59405

Great Falls Clinic
Immediate Care Center
406-454-7200
3000 15th Ave. S.
Great Falls, MT 59405

Great Falls Clinic
Clinic Cancer Care
406-454-2171
3000 15th Ave. S.
Great Falls, MT 59405

Great Falls Clinic
Surgery Center
406-771-3500
1509 29th St. S.
Great Falls, MT 59405

Great Falls Clinic
Main Clinic
406-454-2171
1400 29th St. S.
Great Falls, MT 59405

Great Falls Clinic
Northwest Clinic
406-268-1600
1600 Division Rd.
Great Falls, MT 59404

Montana Plastic
Surgery Center
406-727-6363
1600 9th St. S.
Great Falls, MT 59405

Lizette Roldán-Otero, PhD
Chief, Materials Inspection Branch
Division of Radiological Safety & Security, Region IV
817-200-1455

Janine F. Katanic, PhD, CHP
Senior Health Physicist
Materials Inspection Branch
Division of Radiological Safety & Security, Region IV

September 12, 2022

NRC INSPECTION - CMSC, LLC dba GREAT FALLS CLINIC HOSPITAL
Response to Apparent Violations in NRC Inspection Report 030-35944/2022-001; EA-22-052

Dear Drs Roldan-Otero and Katanic,

Here is our written response the Apparent Violations associated with the NRC inspection of our facility that occurred on March 16, 2022.

Background:

Two apparent violations were identified regarding the licensee's failure to:

- (1) Ensure that written directives for administrations of quantities greater than 30 microcuries of sodium iodide I-131 contained the dosage, and
- (2) Ensure that written directives were dated and signed by an authorized user (AU) before the administration of sodium iodide I-131 greater than 30 microcuries.

For each apparent violation we will provide:

- (1) The reason for the apparent violation
- (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 has been achieved.

Response:

For item 1: The WD has been updated make it clearer that the mCi or uCi must be specifically selected by the au. We have also conducted training with the au and NMT to verify understanding of the need for being specific about the units of dose. Corrective action has been to revisit and revise the WD form (4/12/2022) and full compliance was achieved on 4/28/2022 when we successfully treated an I-131 patient for the first time since 2019.

For Item 2: I (RSO) have spoken with the au in question and he believes he is fully qualified to perform procedures with > 30uCi however he is unable to provide me with the necessary training documentation. We have a concerted effort in place at both this hospital and the other Great Falls hospital to provide training and documentation of the



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training for procedures involving >30uCi. Once we have 3 documented cases for this type of use we will submit an amendment request adding him for that use. We have trained current NM personnel in the importance of verifying that the au is listed on the current license. Full compliance was achieved on 4/28/2022.

Per email correspondence with Dr. Roldan-Otero this response is being sent only to her and Dr Katanic and not to others identified in the initial letter dated August 22, 2022.

Please feel free to contact our RSO Kari Cann at 406-788-7887 or kndcann@aol.com

Thank you for your time reviewing this response,

A handwritten signature in black ink, appearing to read "April Hammond".

April Hammond, Director of Radiology
CMSC, LLC
dba Great Falls Clinic Hospital
LLC
3010 15th Avenue South
Great Falls, MT 59405

A handwritten signature in black ink, appearing to read "Kari Cann".

Kari Cann, MS DABR
Great Falls Clinic Hospital
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406-788-7887