



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**

REGION III  
2443 WARRENVILLE RD. SUITE 210  
LISLE, IL 60532-4352  
August 22, 2014

Mr. John Sakioka  
Director of Technical and Business Strategy Office  
Ford Motor Company – Research & Innovation Center  
2101 Village Road, MD 1049  
Dearborn, MI 48121

**SUBJECT: NRC INITIAL INSPECTION REPORT NO. 03038693/2014001(DNMS) AND  
NOTICE OF VIOLATION – FORD MOTOR COMPANY – RESEARCH &  
INNOVATION CENTER**

Dear Mr. Sakioka:

On July 30, 2014, an inspector from the U.S. Nuclear Regulatory Commission (NRC) conducted an initial inspection at your facility in Dearborn, Michigan. The purpose of the inspection was to review activities performed under your NRC license to ensure that activities were being performed in accordance with NRC requirements. Mr. Ryan Craffey of my staff conducted an exit meeting with Mr. Scott Larkins of your staff on July 30, 2014, to discuss the inspection findings.

During this inspection, the NRC staff examined activities conducted under your license related to public health and safety. Additionally, the staff examined your compliance with the Commission's rules and regulations as well as the conditions of your license. Within these areas, the inspection consisted of selected examination of procedures and representative records, observations of activities, and interviews with personnel.

Based on the results of this inspection, the NRC has determined that one Severity Level IV violation of NRC requirements occurred. The violation was evaluated in accordance with the NRC Enforcement Policy. The current Enforcement Policy is included on the NRC's website at <http://www.nrc.gov/about-nrc/regulatory/enforcement/enforce-pol.html>. The violation concerned the licensee's failure to conduct routine surveys of areas where radioactive material was used, as required by Condition 16 of NRC License No. 21-35113-01. The violation is cited in the enclosed Notice of Violation (Notice). The NRC is citing the violation in the Notice because the inspector identified the violation.

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 useful in preparing your response. You can find the Information Notice on the NRC's website at: <http://www.nrc.gov/reading-rm/doc-collections/gen-comm/info-notices/1996/in96028.html>. The NRC will use your response, in part, to determine whether further enforcement action is necessary to ensure compliance with regulatory requirements.

In accordance with Title 10 of the *Code of Federal Regulations* (CFR) 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response will be made available electronically for public inspection in the NRC's Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC's website at <http://www.nrc.gov/reading-rm/adams.html>. To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be made publicly available without redaction.

Please feel free to contact Mr. Craffey of my staff if you have any questions regarding this inspection. Mr. Craffey can be reached at 630-829-9655.

Sincerely,

/RA/

Aaron T. McCraw, Chief  
Materials Inspection Branch  
Division of Nuclear Materials Safety

Docket No. 030-38693  
License No. 21-35113-01

Enclosure: Notice of Violation

cc w/encl: Scott Larkins, Radiation Safety Officer  
State of Michigan

J. Sakioka

- 2 -

In accordance with Title 10 of the *Code of Federal Regulations* (CFR) 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response will be made available electronically for public inspection in the NRC's Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC's website at <http://www.nrc.gov/reading-rm/adams.html>. To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be made publicly available without redaction.

Please feel free to contact Mr. Craffey of my staff if you have any questions regarding this inspection. Mr. Craffey can be reached at 630-829-9655.

Sincerely,

/RA/

Aaron T. McCraw, Chief  
Materials Inspection Branch  
Division of Nuclear Materials Safety

Docket No. 030-38693  
License No. 21-35113-01

Enclosure:  
Notice of Violation

cc w/encl: Scott Larkins, Radiation Safety Officer  
State of Michigan

DISTRIBUTION w/encl:

Darrell Roberts  
Patrick Loudon  
John Giessner

Steven Orth  
Carole Ariano  
Paul Pelke

Patricia Buckley  
Carmen Olteanu  
MIB Inspectors

ADAMS Accession Number: ML14237A334

DOCUMENT NAME: LTR -Letter NOV - Ford Motor Company.docx

☒ Publicly Available ☐ Non-Publicly Available ☐ Sensitive ☒ Non-Sensitive

To receive a copy of this document, indicate in the concurrence box "C" = Copy without attach/encl "E" = Copy with attach/encl "N" = No copy

OFFICE	RIII-DNMS		RIII-DNMS				
NAME	RJCraffey:ps*RJC		ATMcCraw*ATM				
DATE	08/19/14		08/22/14				

OFFICIAL RECORD COPY

## NOTICE OF VIOLATION

Ford Motor Company – Research & Innovation Center  
Dearborn, Michigan

License No. 21-35113-01  
Docket No. 030-38693

During a U.S. Nuclear Regulatory Commission (NRC) inspection conducted on July 30, 2014, one violation of NRC requirements was identified. In accordance with the NRC Enforcement Policy, the violation is listed below:

Condition 16 of NRC License No. 21-35113-01 states, in part, that the licensee shall conduct its program in accordance with the statements, representations, and procedures contained in the letter dated November 8, 2013 (including application dated March 25, 2013).

Item 10 of the application dated March 25, 2013, states, in part that the licensee will survey the working facility and maintain contamination levels in accordance with the survey frequencies and contamination level published in the Appendix Q to NUREG-1556, Vol. 7, "Program-Specific Guidance about Academic, Research, and Development, and Other Licensed of Limited Scope," dated December 1999.

Table Q.1 of Appendix Q to NUREG-1556, Vol. 7, indicates that, when unsealed forms of radioactive material are in use, the licensee should survey that location at a frequency based on the activity of material used, but at least monthly.

Contrary to the above, between April 30, 2014, and July 31, 2014, Ford Motor Company – Research & Innovation Center used microcurie quantities of manganese-52 and -54, and cobalt-56, -57, and -58 at its facility in Dearborn, Michigan, but did not conduct any routine surveys for contamination in those locations where individuals worked with unsealed forms of radioactive material.

This is a Severity Level IV violation (Section 6.3.D.3).

Pursuant to the provisions of CFR 2.201, Ford Motor Company – Research & Innovation Center 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 III, 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 violation, or, if contested, the basis for disputing the violation or its 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 was or will be achieved. Your response may reference or include previously 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 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.

Enclosure

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

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, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001.

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

Dated this 22<sup>nd</sup> day of August 2014.