

SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION

1. LICENSEE/LOCATION INSPECTED: General Dynamics Land Systems 38500 Mound Road, Sterling Heights, MI Location Inspected: Anniston, AL REPORT NUMBER(S) 2016001		2. NRC/REGIONAL OFFICE Region III U. S. Nuclear Regulatory Commission 2443 Warrenville Road, Suite 210 Lisle, IL 60532-4352	
3. DOCKET NUMBER(S) 030-19731	4. LICENSE NUMBER(S) 21-21068-01	5. DATE(S) OF INSPECTION 03/24/16, with in-office review through 05/03/16	

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):

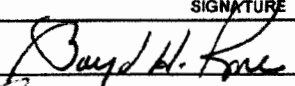
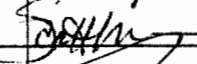

- ☒ 4. During this inspection, certain of your activities, as described below and/or attached, were in violation of NRC requirements and are being cited in accordance with NRC Enforcement Policy. This form is a NOTICE OF VIOLATION, which may be subject to posting in accordance with 10 CFR 19.11.
(Violations and Corrective Actions)

A. Contrary to 10 CFR 20.1101(c), as of March 24, 2016, General Dynamics Land Systems (GDLS) did not periodically (at least annually) review the radiation protection program content and implementation. Specifically, the licensee did not review the program content in the years 2013 and 2014.

The root cause of the violation appeared to be that the RSO failed to set firm schedules and dates to effect and document radiation protection program reviews and the did not ensure that the individuals conducting the program reviews were provided with guidance and a template for documenting the program reviews. As corrective action, the RSO stated that the licensee will conduct a review of the program annually and that the licensee will implement a system of reminders to ensure future reviews are conducted in accordance with the requirements of 10 CFR 20.1101(c).
(Notice continues on Part 2)

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	Boyd H. Rose, Radiation Safety Officer		5/12/16
NRC INSPECTOR	Scott Wilson (Region I)		5/10/2016
BRANCH CHIEF	Aaron McCraw		5/16/16

SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION

1. LICENSEE/LOCATION INSPECTED: General Dynamics Land Systems 38500 Mound Road, Sterling Heights, MI Location Inspected: Anniston, AL REPORT NUMBER(S) 2016001		2. NRC/REGIONAL OFFICE Region III U. S. Nuclear Regulatory Commission 2443 Warrenville Road, Suite 210 Lisle, IL 60532-4352	
3. DOCKET NUMBER(S) 030-19731	4. LICENSE NUMBER(S) 21-21068-01	5. DATE(S) OF INSPECTION 03/24/16, with in-office review through 05/03/16	

(Continued)

B. Contrary to Condition 13 of NRC Materials License 21-21068-01, between September 19, 2012, and March 24, 2016, General Dynamics Land Systems did not conduct a physical inventory every six (6) months to account for all sealed sources received and possessed under the license. Specifically, the licensee maintained a system of product accountability as a running inventory of sealed military devices containing sealed sources that were received, issued or removed from production and stored pending customer disposition; but did not conduct a physical inventory every six (6) months to account for all sealed sources received and possessed under the license.

The root cause appeared to be that GDLS relied upon existing processes to track and account for byproduct materials in its possession and the RSO believed this method met the requirements of the license condition. As corrective and preventative actions, the RSO stated that a physical inventory to account for all sealed sources received and possessed under the license would be conducted within 30 days, and that the licensee will implement a system of reminders to ensure sealed source physical inventories are completed at the required intervals in the future.

Docket File Information

SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION

1. LICENSEE/LOCATION INSPECTED:

General Dynamics Land Systems
38500 Mound Road, Sterling Heights, MI
Location Inspected: Anniston, AL

REPORT NUMBER(S) 2016001

2. NRC/REGIONAL OFFICE

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

3. DOCKET NUMBER(S)

030-19731

4. LICENSE NUMBER(S)

21-21068-01

5. DATE(S) OF INSPECTION

03/24/16, with in-office review
through 05/03/16

6. INSPECTION PROCEDURES USED

87125

7. INSPECTION FOCUS AREAS

03.01 - 03.07

SUPPLEMENTAL INSPECTION INFORMATION

1. PROGRAM CODE(S)

03214

2. PRIORITY

5

3. LICENSEE CONTACT

Henry Rose, RSO

4. TELEPHONE NUMBER

(586) 825-4503

- ☐ Main Office Inspection Next Inspection Date: No change
- ☒ Field Office Inspection Anniston Army Depot, Anniston, AL
- ☐ Temporary Job Site Inspection

PROGRAM SCOPE

General Dynamics Land Systems (licensee) is a Department of Defense contractor authorized for the storage and use of sealed sources of byproduct materials license in chemical agent detectors. This was an announced, routine inspection of the licensee's activities at Anniston Army Depot. At the licensee's Anniston field office, chemical agent detectors containing byproduct materials were received, stored, and installed or removed from military vehicles. The licensee's activities at the time of this inspection were limited to storage of the chemical detectors awaiting orders from the military. The licensee does not perform any maintenance on the devices at this location.

PERFORMANCE OBSERVATIONS

The inspection was announced due to the remote location and Army Depot personnel access requirements. The inspector interviewed the licensee's staff and site radiation safety officer (RSO), reviewed all available records of training, material inventory, annual program reviews, and surveys. The site RSO was new to the position and the records available for review were limited. The RSO appeared to have an adequate level of understanding of emergency and material handling procedures. The inspector toured the storage location and observed adequate security of the materials in storage. Independent confirmatory surveys of restricted and unrestricted areas were conducted and the results were well below regulatory requirements. The licensee's RSO and a staff member described how the devices containing byproduct materials were received, processed, inventoried, and shipped. The licensee had performed a prospective evaluation and determined that workers were not required to wear dosimetry badges. Licensee staff members received training that was adequate to familiarize them with radioactive material and the ALARA principle.

Two violations of NRC requirements were identified during this inspection, regarding (1) the failure to review the content and implementation of the program as required by 10 CFR 20.1101(c); and (2) the failure to conduct a physical inventory every six (6) months to account for all sealed sources received and possessed under the license, as required by Condition 13 of the license. Details regarding the root causes of and corrective actions for these violations can be found in Parts 1 and 2 of this form.