

INSPECTION RECORD

Region: III **Inspection Report No.** 2016001

License No. 21-13462-03

Docket No. 030-37892

Licensee: East Jordan Iron Works, Inc
301 Spring Street
East Jordan, MI 49727

Locations Inspected: Same as above

Licensee Contact: Scott Nachazel, Facility Manager

Telephone No. 231-536-2261

Program Code: 3120 **Priority:** 5

Type of Inspection: ☐ Initial ☒ Routine ☐ Announced
 ☐ Special ☒ Unannounced

Last Inspection Date: August 5, 2011 **Date of This Inspection:** April 19, 2016 with continued in-office review through June 7, 2016

Next Inspection Date: April 19, 2021 ☒ Normal ☐ Reduced

Summary of Findings and Actions:

- ☐ No violations cited, clear U.S. Nuclear Regulatory Commission (NRC) Form 591 or regional letter issued
- ☐ Non-cited violations (NCVs)
- ☐ Violation(s), Form 591 issued
- ☒ Violation, regional letter issued
- ☐ Follow-up on previous violations

Inspector Edward Kulzer, Health Physicist

/RA/ _____
Signature

Date 06/16/2016

Approved Aaron T. McCraw, Chief, MIB

/RA/ _____
Signature

Date 06/17/2016

PART I – LICENSE, INSPECTION, INCIDENT/EVENT AND ENFORCEMENT HISTORY

1. AMENDMENTS AND PROGRAM CHANGES SINCE LAST INSPECTION:

<u>AMENDMENT #</u>	<u>DATE</u>	<u>SUBJECT</u>
3	April 2009	New license issued after expiration

2. INSPECTION AND ENFORCEMENT HISTORY:

The last inspection of this licensee was on August 5, 2011. No violations of NRC requirements were identified.

3. INCIDENT/EVENT HISTORY:

No open items or events since the last routine inspection.

PART II – INSPECTION DOCUMENTATION

1. ORGANIZATION AND SCOPE OF PROGRAM:

East Jordan Iron Works is authorized under NRC Materials License No. 21-13462-03 to use licensed material for measuring physical properties of materials with nuclear gauging devices. The licensee uses Kay-Ray Model 7400P gauges, containing cesium-137 for level measurements.

2. SCOPE OF INSPECTION:

Inspection Procedure(s) Used: 87124

Focus Areas Evaluated: All

The inspector toured the licensee's main office to evaluate the licensee's measures for material security, hazard communication and exposure control. Through interviews with the proposed RSO, the inspector found that the licensee's staff was knowledgeable and conscientious of radiation protection principles and licensee procedures for use of the gauges.

The inspector reviewed a selection of licensee records for inventories, leak tests, use logs, non-routine maintenance, and audits with no issues noted. The inspector also reviewed the licensee's training records with no issues noted.

3. INDEPENDENT AND CONFIRMATORY MEASUREMENTS:

Using a Ludlum 2403 survey meter calibrated on November 23, 2015, the inspector conducted independent surveys at each of the locations inspected. The inspector found no readings which would indicate residual contamination or exposures to members of the public in excess of regulatory limits.

4. VIOLATIONS, NCVs, AND OTHER SAFETY ISSUES:

On April 19, 2016, the inspector identified a violation of Condition 12 of NRC License No. 21-13462-03, which authorized a specifically named individual to fulfill the duties and responsibilities of the Radiation Safety Officer (RSO) for the license.

Contrary to Condition 12, as of February 20, 2015, the named individual, specifically authorized by Condition 12 of the license to fulfill the duties and responsibilities as RSO, was no longer employed by the licensee and did not fulfill the duties and responsibilities of the RSO. Specifically, the individual listed as RSO left the company on February 20, 2015; and since that time, the licensee had not notified the NRC nor submitted an amendment request to name the new individual who was performing the duties and responsibilities of the RSO, and who was determined by the NRC to be technically qualified, on the license.

The inspector determined that the root cause of the violation was the lapse in management oversight of the administrative requirements of the NRC Materials License. As corrective actions to restore compliance, the licensee appointed a new individual to fulfill the duties and responsibilities of RSO and submitted a license amendment request to the NRC on April 19, 2016. The newly appointed RSO, who is also a member of licensee management, is aware of these requirements now and will ensure that any future changes to licenses are appropriately and timely communicated to the NRC.

5. PERSONNEL CONTACTED:

Scott Nachazel, Facility Manager

Scott Shepherd, Radiation Safety Officer

Attended exit meeting on June 9, 2016.