

SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION

1. LICENSEE/LOCATION INSPECTED NMED No. 140448 (Closed) Eastern Michigan University 1200 Oakwood St. Ypsilanti, MI REPORT NUMBER(S) 2018001		2. NRC/REGIONAL OFFICE Region III U. S. Nuclear Regulatory Commission 2443 Warrenville Road, Suite 210 Lisle, IL 60532-4352	
3. DOCKET NUMBER(S) 030-00818		4. LICENSE NUMBER(S) 21-06885-01	
		5. DATE(S) OF INSPECTION 1/23&24/18, with in-office review through 2/1/18	

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)

Condition 21 of Amendment No. 31 of NRC License No. 21-06885-01 states, in part, that the licensee is authorized to hold radioactive material with a physical half-life of less than or equal to 120 days for decay-in-storage before disposal in ordinary trash, provided that before disposal as ordinary trash, the waste shall be surveyed at the container surface with the appropriate survey meter set on its most sensitive scale and with no interposed shielding to determine that its radioactivity cannot be distinguished from background. Contrary to the above, on several occasions about 5 years ago, an authorized user (AU) had phosphorus-32 waste that was held for decay and the AU did not survey the container surface before disposal as ordinary trash.

The cause of the violation was an AU's oversight of the survey requirement (Continued 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	James J. McEvers	<i>James J. McEvers</i>	2/12/18
NRC INSPECTOR	Robert G. Gattone, Jr. Jason D. Draper	<i>Robert G. Gattone, Jr.</i> <i>Jason D. Draper</i>	2/7/18 2/8/18
BRANCH CHIEF	Andrew T. McCraw	<i>Andrew T. McCraw</i>	2/12/18

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(Continued)

(Continued From Part 1)

As corrective action, the licensee committed to: (1) have annual refresher training regarding the need to survey the container before disposal; and (2) post a sign by the decay-in-storage receptacle to remind applicable staff members to survey the container surface before disposal.

Docket File Information

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6. INSPECTION PROCEDURES USED

87126

7. INSPECTION FOCUS AREAS

All

SUPPLEMENTAL INSPECTION INFORMATION

1. PROGRAM CODE(S)

01110

2. PRIORITY

5

3. LICENSEE CONTACT

James McEvers, RSO

4. TELEPHONE NUMBER

(734) 218-2471

☒ Main Office Inspection

Next Inspection Date: 01/23/2023

☐ Field Office Inspection☐ Temporary Job Site Inspection

PROGRAM SCOPE

This was an unannounced, routine inspection. The licensee used less than 1-millicurie quantities of carbon-14 (C-14), hydrogen-3 (H-3), and phosphorus-32 (P-32) for research and development, as authorized. The licensee did not do animal studies using licensed material. Unsealed licensed material was non-volatile. The licensee also had several sealed sources for research and development. There were about 6 authorized users (AUs). The licensee's hours were 8:00am to 5:00pm Monday through Friday. There were no principal activities during the onsite inspection.

Performance Observations

The inspectors noted that 2 sealed sources were missing (i.e., 10 microcuries of Eu-152 (not reportable) and an unknown activity of Ba-133 (See ML18032A621 for more information regarding the Ba-133 source)). The highest annual whole body and extremity badge results for 2012 through 10/2017 were well below NRC regulatory limits. The licensee implemented corrective actions to prevent a previous violation regarding failure to prepare and submit to the members of the Radiation Safety Committee an annual summary of radiation-related matters on the Eastern Michigan University campus, as such, the previous annual summary of radiation-related matters violation is closed. The inspectors reviewed selected sealed source inventory records and observed the licensee conduct a physical inventory of the sources, as such, a previous physical inventory violation is closed. The inspectors reviewed the licensee's written report of a Nickel-63 leaking source dated 6/27/14 (NMED No. 140448) and reviewed other records showing that Agilent Technologies received the leaking source on 6/27/14, and the licensee followed the vendor's procedure for transfer of the leaking source and the leak test sample to the vendor. The inspectors observed an AU demonstrate how she had used unsealed P-32 for research and development which included, in part, use of proper personal protection equipment (e.g., gloves), conducting pre-work area surveys prior to starting the work. The inspectors observed an AU demonstrate how she would respond to a P-32 spill based on a scenario posed by the inspectors. The in-office review included information that was unavailable during the onsite inspection, including, in part, information to verify that a vendor was authorized to service devices containing licensed material. A violation of an NRC requirement was identified as a result of this inspection as stated in Part 1.