



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

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

September 26, 2019

EA-19-061

Ms. Amanda Dill
Radiation Safety Officer
Harrison Steel Castings Company
P.O. Box 60
Attica, IN 47918

SUBJECT: HARRISON STEEL CASTING COMPANY - NOTICE OF VIOLATION;
NRC SPECIAL INSPECTION REPORT NO. 03004335/2019001(DNMS)

Dear Ms. Dill:

This letter refers to the in-office review from May 16, 2019, through July 22, 2019, of the circumstances surrounding the May 15 and May 16, 2019, incident at your facility in Attica, Indiana. The in-office review consisted of interviews with personnel and an examination of information you provided to the NRC. Details of the in-office review were provided in the non-public version of the NRC Special Inspection Report No. 03004335/2019001(DNMS), issued on July 31, 2019. During the in-office review, the NRC determined that an apparent violation of NRC requirements occurred. The circumstances surrounding the apparent violation, the significance of the issue, and the need for lasting and effective corrective action were discussed with you at the exit meeting on July 22, 2019.

In the letter transmitting the report, we provided you with the opportunity to address the apparent violation identified in the report by either attending a predecisional enforcement conference or by providing a written response before we made our final enforcement decision. In a letter received August 15, 2019, you provided a response to the apparent violation.

Based on the information developed during the in-office review and the information that you provided in your response to the report, received August 15, 2019, the NRC has determined that a violation of NRC requirements occurred. The violation is cited in the enclosed Notice of Violation (Notice)(Enclosure 1)(non-public) and the circumstances surrounding it are described in detail in the non-public version of the subject inspection report. The violation is of concern to the

Enclosures 1 and 2 contain Sensitive Unclassified Non-Safeguards Information. When separated from Enclosures 1 and 2, this transmittal document is decontrolled.

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NRC for the reasons stated in the Determination of Severity Level and Description of Corrective Actions (Enclosure 2) (non-public). Therefore, this violation has been categorized in accordance with the NRC Enforcement Policy at Severity Level III. In accordance with the NRC Enforcement Policy, a base civil penalty in the amount of \$14,500 is considered for a Severity Level III violation.

Because your facility has not been the subject of escalated enforcement actions within the last two inspections, the NRC considered whether credit was warranted for *Corrective Action* in accordance with the civil penalty assessment process in Section 2.3.4 of the Enforcement Policy. In your letter received August 15, 2019, you described the corrective actions taken to correct the violation. These corrective actions are also documented in Enclosure 2. Based on these corrective actions, the NRC has determined that *Corrective Action* credit is warranted.

Therefore, to encourage prompt and comprehensive correction of violations, and in recognition of the absence of previous escalated enforcement action, I have been authorized, after consultation with the Director, Office of Enforcement, not to propose a civil penalty in this case. However, significant violations in the future could result in a civil penalty. In addition, issuance of this Severity Level III violation constitutes escalated enforcement action that may subject you to increased inspection effort. The NRC also includes significant enforcement actions on its Web site at <http://www.nrc.gov/reading-rm/doc-collections/enforcement/actions/>.

The NRC has concluded that information regarding: (1) the reason for the violation; (2) the corrective actions that have been taken and the results achieved; and (3) the date when full compliance was achieved is already adequately addressed on the docket in the NRC Special Inspection Report No.03004335/2019001 (DNMS) and your letter received August 15, 2019. Therefore, you are not required to respond to this letter unless the description therein does not accurately reflect your corrective actions or your position. In that case, or if you choose to provide additional information, you should follow the instructions specified in the enclosed Notice.

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 will be made available electronically for public inspection in the NRC Public Document Room or in the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

However, the enclosures to this letter contain security-related information in accordance with 10 CFR 2.390(d)(1) and its disclosure to unauthorized individuals could present a security vulnerability. Therefore, the material in the enclosures will not be made available electronically for public inspection in the NRC Public Document Room or in the NRC's ADAMS. If you choose

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to respond and security-related information is necessary to provide an acceptable response, please mark the top of each page of your entire response “Security-Related Information – Withhold under 10 CFR 2.390” and follow the instructions for withholding in 10 CFR 2.390(b)(1).

Sincerely,

/RA by John B. Giessner acting for/

Darrell J. Roberts
Regional Administrator

Docket No. 030-04335
License No. 13-02141-01

Enclosures:

1. Notice of Violation (non-public)
2. Final Determination of Significance (non-public)

cc w/o encls: State of Indiana

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A. Dill

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Letter to A. Dill from Darrell J. Roberts, Regional Administrator dated September 26, 2019

SUBJECT: HARRISON STEEL CASTING COMPANY - NOTICE OF VIOLATION;
NRC ROUTINE INSPECTION REPORT NO. 03004335/2019001(DNMS)

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OFC	RIII/EICS	RIII/DNMS	RIII/DNMS	OE	RIII/EICS	RIII/ORA
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DATE	08/28/19	09/03/19	09/04/19	09/17/19	09/16/19	09/26/19

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1 OE Concurrence received by email from Thomas Marenchin.

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