



## Materials Inspection Report

## 1. Licensee/Location Inspected:

Trinseo, LLC  
Dow Chemical Company Midland Operations Site  
Building 1604  
Midland, MI 48674

Report Number(s) 2022-001

## 2. NRC/Regional Office

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

## 3. Docket Number(s)

030-38314

## 4. License Number(s)

21-32800-01

## 5. Date(s) of Inspection

December 14, 2022

## 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. During this inspection, certain of your activities, as described below and/or attached, were in violation of NRC requirements, and were assessed at Severity Level IV, in accordance with the NRC Enforcement Policy.



A. 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, corrective action was or is being taken, and the remaining criteria in the NRC Enforcement Policy were satisfied.

(Non-cited violation(s) was/were discussed involving the following requirement(s))

B. The following violation(s) is/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)



## 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 AND DATE
LICENSEE'S REPRESENTATIVE		
NRC INSPECTOR	Ryan Craffey	 Digitally signed by Ryan J. Craffey Date: 2023.01.10 09:55:08 -05'00'
BRANCH CHIEF	Rhex Edwards	 Digitally signed by Rhex A. Edwards Date: 2023.01.11 06:51:21 -06'00'



## Materials Inspection Record

1. Licensee Name: Trinseo, LLC		2. Docket Number(s): 030-38314		3. License Number(s) 21-32800-01	
4. Report Number(s): 2022-001			5. Date(s) of Inspection: December 14, 2022		
6. Inspector(s): Ryan Craffey		7. Program Code(s): 03121		8. Priority: 5	9. Inspection Guidance Used: IP 87121
10. Licensee Contact Name(s): Melissa Zanke-Detwiler - RSO		11. Licensee E-mail Address: lzanke@trinseo.com		12. Licensee Telephone Number(s): 989-495-4807	
13. Inspection Type: <input checked="" type="checkbox"/> Routine <input type="checkbox"/> Announced <input type="checkbox"/> Non-Routine <input checked="" type="checkbox"/> Unannounced		14. Locations Inspected: <input type="checkbox"/> Hybrid <input checked="" type="checkbox"/> Main Office <input type="checkbox"/> Temporary Job Site <input type="checkbox"/> Field Office <input type="checkbox"/> Remote		15. Next Inspection Date (MM/DD/YYYY): 12/14/2027 <input checked="" type="checkbox"/> Normal <input type="checkbox"/> Extended <input type="checkbox"/> Reduced <input type="checkbox"/> No change	
16. Location(s) Inspected List:  Dow Chemical Company Michigan Operations Site Note - Visitors can access the facility via the Dow MiOps North Gate (GPS coordinates 43.600508, -84.207862) Parking is available on the north side of this building, off South Saginaw Road.					
17. Scope and Observations: <p>Trinseo was an engineered materials, base plastics and polystyrene manufacturer authorized to use fixed nuclear gauges at its production facilities on the premises of the Dow Chemical Company Michigan Operations Site in Midland, Michigan. At the time of the inspection, the licensee had 17 fixed gauges containing Cs-137 for vessel fill level measurements, as well as two fixed gauges containing Kr-85 for coating thickness measurements. The RSO and a second individual provided routine oversight of licensed material, including shutter checks, leak test collection, and implementation of lock-out/tag-out procedures. The corporate RSO for Dow Chemical Company (030-04783) provided oversight of non-routine maintenance (namely, the removal and re-installation of devices from service).</p> <p>The inspector toured several of the licensee's buildings in Midland. All areas were adequately posted, and all licensed material was adequately secured. The inspector examined nearly all devices containing Cs-137 and found them to be in good condition. Independent surveys using the licensee's survey instrumentation (intrinsically-safe devices are required here) and found no evidence of exposures exceeding limits to members of the public in accessible areas. The inspector interviewed licensee personnel to discuss the use and maintenance of devices, including routine maintenance such as leak test collection and shutter checks, non-routine maintenance such as device removal and re-installation, and response to abnormal conditions. The inspector also reviewed a selection of records, including physical inventories, leak tests, and shutter checks, and example lock-out/tag-out procedures.</p> <p>The licensee was cited during the last routine inspection in 2017 for failure to perform physical inventories and shutter checks every six months as required by LC 15 and 16.A, respectively. The inspector reviewed the licensee's corrective actions and confirmed that inventories and shutter checks had been performed every six months since then, and that the licensee continued to schedule them for every six months. Therefore, these violations are closed.</p>					
Signature and Date - Branch Chief   Digitally signed by Rhex A. Edwards Date: 2023.01.11 06:50:54 -06'00'					