



CLEVELAND-CLIFFS INC.
Cleveland-Cliffs Steel Corporation
Dearborn Works
4001 Miller Road, Dearborn, MI 48120
P 313.317.8900 clevelandcliffs.com

January 17, 2023

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk, Washington, DC 20555-0001
CC: Regional Administrator, Region III

Via E-mail: Erin.Kennedy@nrc.gov
Ryan.Craffey@nrc.gov

RE: Reply to a Notice of Violation, IR 03031548/2022001 (DRSS)

To Whom It May Concern,

Cleveland-Cliffs Steel Corporation - Dearborn Works (CCSC or Company) is providing this timely response to the United States Nuclear Regulatory Commission's (NRC) Notice of Violation (NOV) dated December 23, 2022.

1. Reason for the violation:

CCSC was cited for not having an approved Radiation Safety Officer (RSO) during the period between June 3, 2022 and October 18, 2022 due to the fact that the plant's former RSO unexpectedly departed the Company on June 3, 2022.

2. Company's Response including Corrective Steps and Results:

CCSC acknowledges that its former RSO unexpectedly resigned from the Company on June 3, 2022. In response to that departure, the Company took comprehensive actions to designate a new RSO and ensure that there would be no recurrence. Those corrective actions included the following:

- (1) The Company retained an independent industry expert, Applied Health Physics, LLC (AHP), a professional radiological consulting company, to provide ongoing industry guidance and program oversight of the plant's Radiation Protection Program.
- (2) Following completion of the necessary compliance training provided by AHP, the Company submitted a request for an expedited license amendment for Materials License number 21-26151-01 on September 28, 2022 to designate Mr. Wayne Langdon as its RSO. In addition, the Company re-submitted an application for license renewal on October 18, 2022 (previously submitted on May 26, 2022). Mr. Langdon's training certification was included with each of the two submittals. (Please see attached Exhibit A)
- (3) In accordance with AHP's recommendations and based upon the review of NRC Information Notice #96-28, the Company has modified the plant's Safety Procedures to include the plant's Radiation Protection Program, as amended on October 18, 2022, to address the cited issue. The amendment to the Radiation Protection Program provides that the designated RSO shall be a formal member of the plant's Safety Committee. In the event the designated RSO leaves the Company or is no longer able to perform the RSO duties, an alternative RSO, with the

appropriate training and qualifications, shall be designated as the RSO and a timely notification to that effect shall be made to the NRC.

- (4) In addition to the currently designated RSO, and in a further effort to address the potential for recurrence of this issue, additional Company employees have completed the RSO training and would be available to assume the role of designated RSO if needed.

3. Achievement of Full Compliance:

It is the Company's priority to comply with the NRC regulations, and full compliance was achieved on October 18, 2022. The corrective actions identified in this response shall be monitored by the plant's Safety Committee, the Radiation Safety Committee, the RSO and AHP to ensure regulatory compliance with the NRC regulations.

Please direct any questions or comments to Mr. Wayne Langdon by calling (313) 244-7419 or email at Wayne.Langdon@clevelandcliffs.com.

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read "J. K. Green", is written over the printed name.

Jason Green
Section Manager Safety
Cleveland-Cliffs Steel Corporation
Dearborn Works

CC: Wayne Langdon, CCSC
Todd Mobley, AHP

Ryan Craffey

From: Green, Jason <Jason.Green@ClevelandCliffs.com>
Sent: Tuesday, January 17, 2023 2:08 PM
To: Erin Kennedy; Ryan Craffey
Cc: Combs, Ladale; Langdon, Wayne A; Westerhoff, Donald
Subject: [External_Sender] Reply to a Notice of Violation, IR 03031548/2022001 (DRSS)
Attachments: 0596_001.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

All, attached is Cleveland Cliffs Dearborn Works electronic response to the NRC in addition, the NRC should be receiving a hard copy tomorrow via USPS.

Thanks



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