

SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION

1. LICENSEE/LOCATION INSPECTED:

Waste Management
2370 Two Mile Road
Bay County, MIREPORT NUMBER(S) 040009022/2002-001³

2. NRC/REGIONAL OFFICE

REGION III
US NUCLEAR REGULATORY COMMISSION
801 WARRENVILLE ROAD
LISLE IL 60532-4351

3. DOCKET NUMBER(S)

04009022

4. LICENSE NUMBER(S)

SUC-01555

5. DATE(S) OF INSPECTION

August 5, 2003

6. INSPECTION PROCEDURES USED

IP 87104

7. INSPECTION FOCUS AREAS

Posting & site maintenance

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, NUREG-1600, 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. This form is a NOTICE OF VIOLATION, which may be subject to posting in accordance with 10 CFR 19.11.

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	Phil Mazor	<i>Phil Mazor</i>	8.5.03
NRC INSPECTOR	Eugenio A. Bonano	<i>Eugenio A. Bonano</i>	08/05/2003

MATERIALS DECOMMISSIONING INSPECTION FIELD NOTES

Region III

Inspection Report No. 040-009022/2003-001

License No. SUC-01555

Docket No. 040-09022

Licensee: Waste Management

Contact: Phillip M. Mazor

Telephone No: 616-688-5777 Ext. 17

Date of Amendment:

Last Amendment No.

Program Code:

Date of Last Inspection: July 22, 2002

Date of This Inspection: August 5, 2003

Date of Next Inspection: August 2004

Type of Inspection: ☒ Announced ☐ Unannounced
 ☒ Routine ☐ Special
 ☐ Initial Decomm. ☐ Reinspection of Decomm.
Level of Inspection: ☒ Normal ☐ Reduced ☐ Extended

Brief Description of Inspection Activities:

NRC inspectors' toured the site to observe radiological postings and site security; and to look for any changes in radiological conditions.

Brief Description of Findings and Actions:

The licensee is meeting all requirements under 10 CFR Part 20, Subpart J, Paragraph 1902, "Posting requirements", and Subpart I, "Storage and Control of Licensed Material". The sites' radiological conditions have not changed.

Summary of Findings and Action:

NRC Inspectors did not identify any violations or weaknesses in site security or radiological postings.

- ☒ No violations cited, regional letter issued
- ☐ Violation(s), clear NRC Form 591 issued
- ☐ Violation(s), regional letter issued
- ☐ Follow up on previous violations Not applicable

Inspector: Eugenio Q. B. Mazar

Date: 8-27-03

(Signature)

Approved: Christopher G. Miller

Christopher G. Miller, Chief, Decommissioning Branch

Date: 8-29-03

(Signature)

I. **SUMMARY OF DECOMMISSIONING STATUS**

- A. Licensee ceased operational program. (x) Y () N
- B. Required decommissioning financial assurance mechanisms in place. (x) Y () N
- C. Decommissioning Plan (DP) required. (x) Y () N
- D. Licensee final survey required (x) Y () N
- E. NRC confirmatory survey required. (x) Y () N
- F. NRC closeout inspection required. (x) Y () N
- G. Licensee doing decommissioning planning and preparation before dismantlement. (x) Y () N
- H. Licensee actively remediating site. () Y (x) N
- I. Licensee completed site remediation. () Y (x) N

Description of Facility Status:

The site is maintained and secured with barbed wired fence and triple-locked gates. The licensee is working on their decommissioning plan and no decommissioning activities have been conducted.

II. **INSPECTION OF KEY DECOMMISSIONING ACTIVITIES**

A. LICENSEE ACTIVITIES INSPECTED BEFORE DISMANTLEMENT

1. Licensed material used during operations has been removed from site. () Y (x) N
2. Facility license conditions are in place and met by licensee. () Y () N
3. Site security and control of contaminated material being maintained in compliance with 1801 and 20.1802. (x) Y () N
4. Support systems and services (e.g., lighting, water supply) are in place (x) Y () N
5. Decommissioning schedules are consistent with timeliness requirements in 10 CFR 30.36, 40.42, and 70.38. () Y () N
6. Licensee's record keeping is consistent with 10 CFR 30.35, 40.36, and 70.25. () Y () N
7. Financial assurance requirements are being maintained in accordance with 10 CFR 30.35, 40.36, and 70.25. () Y () N

8. Licensee is conducting site characterization in accordance with applicable radiation protection procedures. () Y () N
9. Construction of new site features (e.g., roads, rail spurs, staging areas, sediment control ponds) conforms to DP and does not compromise health and safety of workers and public. () Y () N
10. Licensee activities conform to specific license conditions and licensee programs and procedures. () Y () N
11. Other licensee activities: () Y () N

Basis for Findings: ALL BUT THREE ITEMS (#1, 3 AND 4) NOT EVALUATED DURING THIS INSPECTION.

B. LICENSEE ACTIVITIES INSPECTED DURING DECONTAMINATION, DISMANTLEMENT, AND SITE REMEDIATION

1. Site security and control of contaminated material being maintained in compliance with 10 CFR Part 20. (x) Y () N
2. Decontamination and dismantlement of structures are being performed consistent with DP and sound industry practice (structures include buildings, utilities, treatment lagoons, etc.). () Y () N
3. Decontamination and remediation of the following are being performed consistent with DP and sound industry practice:
 - a. Soil () Y () N
 - b. Sediment () Y () N
 - c. Surface waters () Y () N
 - d. Groundwater () Y () N
 - e. Other mediums: (incinerator ash) () Y () N
 - f. Ground water is being monitored () Y () N
4. Licensee release and disposal of decommissioning wastes are consistent with DP and approved by NRC for:
 - a. Liquid wastes (e.g., groundwater, surface water, liquid from treatment ponds, process liquids). () Y () N
 - b. Solid wastes (e.g., building materials, process and other facility equipment, concrete rubble, soil). () Y () N
 - c. Other wastes: () Y () N
5. Temporary, onsite storage of low-level radioactive wastes from decommissioning meets license conditions and guidance in IP 84890. () Y () N

6. Packaging and shipment of radioactive waste materials meet requirements in 40 CFR Parts 173-178 and 10 CFR Part 71. ☐ Y ☐ N
7. Restoration of site - Licensee has restored site to meet license conditions and NRC-approved plans. ☐ Y ☐ N

Basis for Findings: ALL BUT ONE ITEM (#1) NOT EVALUATED DURING THIS INSPECTION.

C. LICENSEE ACTIVITIES INSPECTED AFTER COMPLETION OF SITE REMEDIATION

1. Licensee has submitted NRC Form 314 for inspection licensed material in accordance with 10 CFR 30.36, 40.42, and 70.38. ☐ Y ☐ N
2. Licensee's final survey program is acceptable (see Appendix B for inspection items for final Surveys). ☐ Y ☐ N
3. NRC confirmatory survey performed. ☐ Y ☐ N
4. Site maintenance activities (if any, for restricted use) conform to license conditions and NRC-approved plans and are in place and functional. ☐ Y ☐ N

Basis for Findings: THIS SECTION NOT EVALUATED DURING THIS INSPECTION.

III. INSPECTION OF STANDARD HEALTH AND SAFETY AREAS FROM THE OPERATIONAL INSPECTION PROGRAM

A. GENERAL OVERVIEW

- A. Describe the licensee's decommissioning organizational structure:
- B. Licensee is performing decommissioning activities in compliance with DP. ☐ Y ☐ N
- C. Licensee is performing decommissioning activities in compliance with its approved DP. ☐ Y ☐ N
- D. Licensee has implemented procedures for the decommissioning activities identified in the DP. ☐ Y ☐ N
- E. The RSC and RSO fulfill license requirements to deal with all decommissioning activities. ☐ Y ☐ N

Basis for Findings: THIS SECTION NOT EVALUATED DURING THIS INSPECTION.
NO DECOMMISSIONING ACTIVITIES CONDUCTED THIS YEAR.

B. FACILITIES

1. Describe, from field observation, the licensee-identified facilities and outdoor areas to be decommissioned: Hazardous waste landfill has thorium buried in three locations. The main deposit is located in a cell with slurry walls and clay cap.
2. The licensee's remediation plan includes all the contaminated facilities and areas onsite and offsite. () Y () N
3. All essential systems and services (e.g., electrical power, water supply, communications systems) are in place and functional for the planned decommissioning activities (x) Y () N
4. Licensee's emergency plan is in place and operative for the duration of decommissioning. () Y () N
5. For complex sites needing site characterization, describe the key site characterization activities to be performed by the licensee to determine the nature and extent of contamination.
6. Licensee's characterization activities performed in conformance with good industry practice. () Y () N

Basis for Findings: ALL BUT TWO ITEMS (#1 AND 3) NOT EVALUATED DURING THIS INSPECTION.

C. EQUIPMENT AND INSTRUMENTATION

1. Survey instruments are applicable to contaminants of interest. () Y () N
2. Use of survey instruments appropriate for site. () Y () N

Basis for Findings: THIS SECTION NOT EVALUATED DURING THIS INSPECTION.

D. MATERIALS

1. Radioactive materials licensed during operations have been removed offsite; residual quantities conform to license conditions. () Y (x) N
2. Security and control of licensed materials, including contaminated areas, is being maintained. (x) Y () N

Basis for Findings: NRC inspectors' toured the site and observed radiological postings and site security. The licensee is meeting all requirements under 10 CFR Part 20, Subpart J, Paragraph 1902, "Posting requirements", and Subpart I, "Storage and Control of Licensed Material".

E. TRAINING

1. Licensee has developed training program for new decommissioning activities (e.g., demolition of structures, excavation of soil); program is adequate. () Y () N
2. Training program being effectively implemented. () Y () N

Basis for Findings: THIS SECTION NOT EVALUATED DURING THIS INSPECTION.

F. AREA RADIATION SURVEYS AND CONTAMINATION CONTROL

1. Area surveys are being performed in areas being decommissioned () Y () N
2. Where active remediation (e.g., demolition of structures, excavation of soil) is being performed, radiation levels in unrestricted areas do not exceed 2 mrem in any one hour. () Y () N

Basis for findings: THIS SECTION NOT EVALUATED DURING THIS INSPECTION. NO DECOMMISSIONING ACTIVITIES CONDUCTED THIS YEAR.

G. RADIATION PROTECTION

1. The licensee's approved health physics program is being implemented in the field for new decommissioning activities. () Y () N
2. Site security and control of contaminated material are in compliance with 10 CFR 20.1801 and 20.1802. (x) Y () N

Basis for Findings: ITEM ONE NOT EVALUATED. ITEM TWO WAS BASED ON OBSERVATIONS

H. RADIOACTIVE WASTE MANAGEMENT/EFFLUENTS/ENVIRONMENTAL MONITORING

1. Offsite disposal of decommissioning wastes conforms to free release criteria and disposal site requirements. () Y () N
2. All new effluent releases conform to DP and applicable regulations. () Y () N
3. The licensee's environmental monitoring program is being implemented in conformance with the Dand all applicable limits are being met. () Y () N
4. Temporary storage/staging areas for radioactive wastes from building demolition, equipment dismantlement, soil excavation, etc., are adequately posted and protected. () Y () N

Basis for Findings: THIS SECTION NOT EVALUATED DURING THIS INSPECTION. NO DECOMMISSIONING ACTIVITIES CONDUCTED THIS YEAR.

I. RECORD KEEPING FOR DECOMMISSIONING

1. Copies of the licensee's decommissioning cost estimates and funding methods are on file. () Y () N
2. Licensee has adequate records for decommissioning activities performed (e.g., for decontamination and dismantlement of structures; decontamination and remediation of soil, sediment, surface waters, groundwater; surveys of remediated facilities). () Y () N
3. Licensee's financial assurance conforms with the financial assurance requirements of NRC-approved possession limits and NRC regulations. () Y () N

Basis for Findings: THIS SECTION NOT EVALUATED DURING THIS INSPECTION. NO DECOMMISSIONING ACTIVITIES CONDUCTED THIS YEAR.

J. TRANSPORTATION

1. Describe the licensee's program to package and ship decommissioning waste materials:
2. Licensee's program meets all applicable 10 CFR and 49 CFR requirements for marking labeling, placarding, and shipping paper requirements for radioactive waste shipments. () Y () N

Basis for Findings: THIS SECTION NOT EVALUATED DURING THIS INSPECTION. NO DECOMMISSIONING ACTIVITIES CONDUCTED THIS YEAR.

K. POSTING AND LABELING

1. All contaminated areas, waste processing areas, and waste handling areas are posted in conformance with regulations. (x) Y () N
2. Packaged radioactive waste materials are labeled in accordance with regulations. () Y () N

Basis for Findings: ITEM ONE WAS BASED ON OBSERVATIONS. ITEM TWO WAS NOT EVALUATED DURING THIS INSPECTION.

L. OCCUPATIONAL HEALTH AND SAFETY

1. Describe the occupational health and safety observations made at the licensee's facilities:
2. Licensee and Occupational Safety and Health Administration were informed of occupational health and safety issues observed during the inspection. () Y () N

Basis for Findings: THIS SECTION NOT EVALUATED DURING THIS INSPECTION. NO DECOMMISSIONING ACTIVITIES CONDUCTED THIS YEAR.

IV. **VIOLATIONS, NON-CITED VIOLATIONS, FOLLOWUP ITEMS, AND OTHER ISSUES**

Briefly state (1) the requirements and (2) how and when the licensee violated the requirement. For non-cited violations, indicate why the violation was not cited. Briefly describe follow-up items and other issues.

NONE