

December 31, 2009

Mr. Stanley Hampton  
Radiation Safety Officer  
Eli Lilly and Company  
Mail Drop 2133, MCC20  
Lilly Corporate Center  
Indianapolis, IN 46285

SUBJECT: NRC INSPECTION REPORT 030-04330/09-001(DNMS) AND  
NOTICE OF VIOLATION – ELI LILLY AND COMPANY

Dear Mr. Hampton:

On December 4, 2009, the U.S. Nuclear Regulatory Commission (NRC) completed inspection activities at a number of Eli Lilly and Company facilities located at Indianapolis, Clinton and Greenfield, Indiana. The inspection included the conduct of on-site activities starting September 28 through October 2 and November 16 through 17, with continuing in-office review through December 4, 2009. The purpose of the inspection was to determine whether certain decommissioning and facility release activities were conducted safely and in accordance with NRC requirements. Specifically, inspectors reviewed the decommissioning program for: tracking of designated and formerly designated authorized radioactive material use locations; conducting and documenting radiological surveys necessary for unrestricted release of former use areas; decommissioning activities performed prior to the release of these areas; and maintaining required information important to the decommissioning and release of facilities for unrestricted use. At the conclusion of the on-site inspection on November 17, the inspectors discussed the preliminary findings with you and members of your staff. On December 4, a final exit meeting was conducted telephonically with you.

The inspection consisted of an examination of activities as they relate to safety and compliance with the Commission's rules and regulations. Areas examined during the inspection are identified in the enclosed report. Within these areas, the inspection consisted of a selective examination of procedures and representative records, interviews with personnel, and the conduct of independent NRC surveys.

Based on the results of this inspection, the NRC has determined that one Severity Level IV violation of the NRC requirements occurred. The violation was evaluated in accordance with the NRC Enforcement Policy included on the NRC website at <http://www.nrc.gov/about-nrc/regulatory/enforcement/enforce-pol.html>. The violation is cited in the enclosed Notice of Violation (Notice) and the circumstances surrounding it are described in detail in the inspection report. The violation is being cited in the Notice because it involves the failure to maintain in a single document a list of all areas designated and formerly designated restricted areas.

Stanley Hampton

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During this inspection, two unresolved items were identified regarding: 1) the lack of Building 88 pre-decommissioning radiological characterization data that supported your company's decision not to notify the NRC and not to submit a decommissioning plan to the NRC for the remediation and decommissioning activities performed in Building 88 pursuant to 10 CFR 30.36(d); and 2) a lack of information demonstrating that the final status survey conducted by your contractor was adequate to show that eight laboratories located in Building 88 and associated equipment and materials were suitable for unrestricted use pursuant to 10 CFR 20.402. Therefore, it is necessary that Eli Lilly and Company evaluate the above items, and submit a report documenting the results of the evaluation within 60 days of the date of this letter.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. The NRC will use your response, in part, to determine whether further enforcement action is necessary to ensure compliance with regulatory requirements.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC website at <http://www.nrc.gov/reading-rm/adams.html>.

We will gladly discuss any questions you may have regarding this inspection.

Sincerely,

***/RA By William G. Snell Acting for/***

Christine Lipa, Chief  
Materials Control, ISFSI, and  
Decommissioning Branch  
Division of Nuclear Materials Safety

Docket No.: 030-04330  
License No.: 13-01133-02

Enclosures:

1. Notice of Violation
2. NRC Inspection Report 030-04330/09-001(DNMS)

cc (w/encls): State of Indiana

Stanley Hampton

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During this inspection, two unresolved items were identified regarding: 1) the lack of Building 88 pre-decommissioning radiological characterization data that supported your company's decision not to notify the NRC and not to submit a decommissioning plan to the NRC for the remediation and decommissioning activities performed in Building 88 pursuant to 10 CFR 30.36(d); and 2) a lack of information demonstrating that the final status survey conducted by your contractor was adequate to show that eight laboratories located in Building 88 and associated equipment and materials were suitable for unrestricted use pursuant to 10 CFR 20.402. Therefore, it is necessary that Eli Lilly and Company evaluate the above items, and submit a report documenting the results of the evaluation within 60 days of the date of this letter.

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We will gladly discuss any questions you may have regarding this inspection.

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## NOTICE OF VIOLATION

Eli Lilly and Company  
Indianapolis, Indiana

Docket No. 030-04330  
License No. 13-01133-02

During a Nuclear Regulatory Commission (NRC) inspection completed on December 4, 2009, one violation of the NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions", the violation is listed below:

Title 10 CFR 30.35 requires, in part, that each person licensed under this part or parts 32 through 36 and 39 of this chapter keep records of information important to the decommissioning of a facility in an identified location until the site is released for unrestricted use. Specifically, 10 CFR 30.35(g)(3) requires, in part, that a list contained in a single document must be kept of all areas designated and formerly designated restricted areas as defined in 10 CFR 20.1003.

Contrary to the above, as of November 17, 2009, the licensee failed to keep a list contained in a single document of all areas designated and formerly designated restricted areas.

This is a Severity Level IV violation (Supplement VI).

Pursuant to the provisions of 10 CFR 2.201, Eli Lilly and Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555, with a copy to the Regional Administrator, Region III, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for the violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation or severity level; (2) the corrective steps that have been taken and the results achieved; (3) the corrective steps that will be taken to avoid further violations; and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

If you contest this enforcement action, you should also provide a copy of your response, with the basis for your denial, to the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001.

Because your response will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC website at <http://www.nrc.gov/reading-rm/adams.html>, to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the public without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response

ENCLOSURE 1

Notice of Violation

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that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.390(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

In accordance with 10 CFR 19.11, you may be required to post this Notice within two working days.

Dated this 31st day of December 2009

ENCLOSURE 1

U. S. NUCLEAR REGULATORY COMMISSION

REGION III

Docket No: 030-04330

License No: 13-01133-02

Report No: 030-04330/09-001 (DNMS)

Licensee: Eli Lilly and Company

Facilities: Corporate Center, Building 88  
Indianapolis, Indiana 46285  
  
Greenfield Laboratories (Incinerator), Greenfield, Indiana  
  
Clinton Laboratories (Incinerator), Clinton, Indiana

Dates: September 28 through October 2, and November 16  
through 17 2009, (on-site), with continuing in-office review  
through December 4, and final telephone exit on  
December 4, 2009.

Inspectors: George M. McCann, Senior Health Physicist  
Samuel J. Mulay, Health Physicist  
Matthew Meyer, Hydrogeologist, FSME

Approved by: Christine A. Lipa, Chief  
Materials Control, ISFSI, and  
Decommissioning Branch  
Division of Nuclear Materials Safety

## EXECUTIVE SUMMARY

### Eli Lilly and Company NRC Inspection Report: 030-04330/09-001(DNMS)

This inspection focused on the licensee's decommissioning program for: tracking of designated and formerly designated authorized radioactive material use locations; conducting and documenting radiological surveys necessary for unrestricted use of formerly designated radiological use areas; decommissioning activities performed prior to the release of these areas; and maintenance of required information important to the decommissioning of a facility until the site is released for unrestricted use.

#### **Closeout Inspection and Surveys**

- The inspectors determined that, overall the licensee's program for managing and tracking current locations of restricted use was managed adequately. However, the inspectors identified one violation for failure to have a single document listing former and current locations designated as restricted areas as required by 10 CFR 30.35(g)(3). The inspectors identified two unresolved inspection items, one pertaining to 10 CFR 30.36(d) regarding notification of the Nuclear Regulatory Commission (NRC) and determination whether a decommissioning plan must be submitted to the NRC for approval, and a second unresolved item concerning the acceptability of the licensee's final status survey information to determine if the radiological conditions in the Building 88 Laboratories were sufficient to demonstrate compliance with the NRC unrestricted use limits. (Section 1.0)
- The inspectors concluded that the radiological surveys of the Greenfield and Clinton Laboratories incinerators and Clinton C-19 Waste Storage Facility were sufficient to demonstrate compliance with the NRC unrestricted use limit. (Section 1.0)
- Differences between the licensee's actual site conditions and the site conditions used in the licensee's current Financial Cost Estimate were noted during this inspection. The inspectors' observations of on-site conditions will be provided to the NRC's Licensing Branch for evaluation during their review of the revised cost estimate. (Section 1.0)

## Report Details<sup>1</sup>

### **1.0 Closeout Inspections and Surveys (IP 83890)**

#### **1.1 Inspection Scope**

The inspectors reviewed and evaluated the licensee's management oversight procedures, practices and documentation used to track areas formerly designated for use of licensed radioactive material, and the subsequent decommissioning and release of those areas for unrestricted use. The company's health physics management and staff were also interviewed regarding the maintenance and tracking of decommissioning records necessary for the release of areas for unrestricted use and license termination pursuant to requirements of 10 CFR Part 30.35 "Financial Assurance and Recordkeeping for Decommissioning," and 10 CFR 30.36 "Expiration and termination of licenses and decommissioning of sites and separate buildings or outdoor areas".

The inspectors evaluated the licensee's procedures and practices for survey, decontamination and the release of areas for unrestricted use associated with decommissioning activities. The inspectors also performed independent confirmatory radiological surveys in the Clinton Labs C19 Waste Storage Facility; the Clinton Laboratories C10 Rotary Kiln Incinerator; the Building 88 Radiosynthesis Laboratories 432W, 432E, 430, 420, and 428, and collected three soil samples in the area around the former Greenfield Building 253 incinerator footprint, which had been demolished by the licensee prior to the Nuclear Regulatory Commission (NRC) inspection. The NRC confirmatory surveys in the Building 88 Radiosynthesis Laboratories included direct radiological measurements and the collection of thirty-six wipe tests for removable contamination. The inspectors also performed limited scoping surveys in randomly selected Building 88 third floor former use areas, and surveyed the licensee's current Radiosynthesis Laboratories that replaced the Building 88 Radiosynthesis Laboratories.

The inspectors reviewed and/or evaluated the following documents: 1) Computer database record, "Eli Lilly and Company, Radiation Safety Officer, Information and Records Stored at the Corporate Records Center"; 2) Eli Lilly and Company letter dated May 4, 2009, license amendment, with attachments requesting release of: a) Lilly Corporate Center, Building 88, fourth floor, Radiosynthesis Laboratories; b) Greenfield Laboratories, Building 253, Incinerator; c) Tippecanoe Laboratories, Building TL 41, Waste Storage Facility; d) Clinton Laboratories, Building C-10 Incinerator, C-19 Waste Storage Facility; 3) Eli Lilly and Company, October 30, 2009, letter regarding NRC requests for additional information; 4) Eli Lilly and Company, HSE Surveying of Radioactive Use, Non-use and Storage Areas, Procedure RS-010-05, effective 10/01/07; 5) Eli Lilly and Company, Calibration of Portable Radiation Survey Instruments Dose Rate (Radiation Level), RS-047-03, effective 03/31/08; 6) Eli Lilly and Company, Calibration of Radiation Portable Survey Instruments for Surface Contamination (Efficiency), RS-054-04, effective 2/28/09; and 7) Eli Lilly and Company, Decommissioning Cost Estimate dated October 26, 2007.

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<sup>1</sup>A list of acronyms used in the report is included at the end of the Report Details.

## 1.2 Observations and Findings

The licensee maintained spill and incident records and reports. Other than Building 88 Laboratory vacuum lines, which were under-going decommissioning activities at the time of this inspection, the records did not indicate, nor was the licensee aware of, any incidents with persistent contamination that would need to be addressed during future decommissioning activities. Records related to drawings and structures of restricted areas where radioactive material is used were maintained by the licensee's health physics office. The licensee maintains a computer program, which was implemented in 1989, that tracks current authorized materials users, licensed materials each user is authorized to use, and locations where licensed materials are authorized to be used.

However, the licensee did not maintain a single document that listed all of the areas formerly and currently designated as restricted areas, nor did the licensee have in place a process to up-date this record every 24 months. Title 10 CFR 30.35(g) requires, in part, that each person licensed under Part 30 keep records of information important to the decommissioning of a facility in an identified location until the site is released for unrestricted use. Specifically, 10 CFR 30.35(g)(3) requires that a list contained in a single document and updated every two years, be kept of all areas designated and formerly designated restricted areas as defined in 10 CFR 20.1003. The licensee's failure to maintain a list of current and former locations designated as restricted areas of use constitutes a violation of 10 CFR 30.35(g)(3). This is a Severity Level IV violation (VIO 030-04330/09-001-01).

The licensee evaluated three buildings and two areas of use to determine if it was necessary to notify the NRC pursuant to 10 CFR 30.36(d) after cessation of licensed activities. Specifically, the licensee determined that the notification requirements of 10 CFR 30.36(d) were not triggered for the Greenfield Building 253 incinerator; the Clinton Labs C19 Waste Storage Facility; the Clinton Labs C10 Rotary Kiln Incinerator; and the Tiptecanoe Labs TL41 Waste Storage Area, since there was no measurable residual activity. The triggering event under 10 CFR 30.36(d)(4) is that "no principal activities have been conducted for a period of 24 months in any separate building or outdoor area that contains residual radioactivity such that the building or outdoor area is unsuitable for release in accordance with NRC requirements." The licensee believed that it was not necessary to notify the NRC regarding cessation of activities in the Building 88 Radiosynthesis Laboratories because the licensee was only releasing a portion of the building and because it was the licensee's intent to clean that portion of the building to releasable levels prior to the request for release.

Based on the NRC review of licensee waste disposal and close-out survey records, and the results of the NRC confirmatory surveys in the Clinton Labs C19 Waste Storage Facility and the Clinton Labs C10 Rotary Kiln Incinerator, the NRC did not identify any radiological levels greater than ambient radiological background levels. Additionally, based on the review of licensee disposal records and closeout survey records, and results of radioanalysis of three soil samples collected by the NRC near the Greenfield Building 253 incinerator footprint (ADAMS Accession No. ML093510989), the NRC did not identify any radiological levels greater than ambient radiological background. The licensee's closeout survey report for the Tiptecanoe Labs TL41 Waste Storage Area did not identify any direct radiological levels greater than ambient background levels, nor were any of the licensee's wipe tests for removable contamination greater than 200 disintegrations per minute, which was the licensee's institutional clean-up level.

The NRC inspectors noted that the licensee considered the Building 88 Radiosynthesis Laboratories as a special use facility, and that this area is specifically referenced in the licensee's license, and thus may be considered a separate area outside the authority of the licensee's broadscope license, which allows the licensee to establish and release certain categories of laboratories without NRC review and approval. Additionally, based on a review of the survey report for the Building 88 Laboratories, the inspectors noted that the licensee's contractor performed two general decontamination activities in the Building 88 Radiosynthesis Laboratories prior to and after the initiation of the final status survey. It appeared that these activities were performed due to contamination being identified in excess of the unrestricted radiological use limits. The inspectors were not able to ascertain from past radiological characterization data, the radiological levels in the Building 88 Laboratories at the time a decision was made to cease licensed activities, and prior to the initiation of decommissioning activities, and thus could not make a determination whether these areas were suitable at the time a decision was made to cease licensed activities for unrestricted use. The NRC inspectors also noted that the licensee's contractor removed ventilation ductwork, hoods, vacuum lines, pipes and drains, using potentially aggressive techniques and procedures that may have not been previously authorized by the licensee's license as an authorized activity.

Section 30.36(d) of 10 CFR 30.36 "Expiration and termination of licenses and decommissioning of sites and separate buildings or outdoor areas", directs licensee's to notify the NRC within 60 days whenever the licensee has decided to permanently cease principal activities or when no principal activities have been conducted for a period of 24 months in any separate building or outdoor area that contains residual radioactivity such that the building or outdoor area is unsuitable for release in accordance with the NRC requirements. Additionally, in conjunction with the notification, the licensee is to either begin decommissioning its site or any separate building or outdoor area that contains residual radioactivity so that the building or outdoor area is suitable for release in accordance with the NRC requirements, or submit within 12 months of notification a decommissioning plan, if required by 10 CFR 30.36(g)(1).

Due to license nuances and the lack of information the inspectors identified three issues pertaining to 10 CFR 30.36 as follows: 1) the licensee's authority to free release the Building 88 Laboratories without notifying the NRC; 2) the issue regarding the lack of pre-decommissioning characterization survey information to determine if the laboratories contained residual radioactivity such that the Building 88 Laboratories were unsuitable for release when a decision was made to cease licensed activities; and 3) lack of information to determine if the licensee's license authorized the decontamination activities and procedures employed, or should the licensee have submitted a decommissioning plan. These issues are being treated as an unresolved inspection items (URI 030-04330/09-001-01) pending completion of further NRC review.

The NRC inspectors performed independent confirmatory surveys in five of the Building 88 Laboratories. The inspectors direct scanning surveys identified spotty contamination on floors, sinks, laboratory cabinets and shelves ranging from ambient background values (approximately 4200 disintegrations per minute per one hundred centimeters square (dpm/100 cm<sup>2</sup>) to areas as high as 9,700,000 dpm/100 cm<sup>2</sup> (on a laboratory countertop). The inspectors also collected 36 wipe tests for removable contamination that were analyzed by the Oak Ridge Institute for Science and Education (ORISE) (ADAMS Accession No. ML093510989). The results of the tests for removable contamination ranged from the minimum detectable concentrations (MDC) to

66,380 dpm/100 cm<sup>2</sup> for hydrogen-3, and from the MDC to 147,250 dpm/100 cm<sup>2</sup> for removable carbon-14 contamination.

The licensee's final status survey report for Building 88 Laboratories indicated that the radionuclide of concern was carbon-14, and that the company chose to use 370,000 dpm/100 cm<sup>2</sup> total activity and 37,000 dpm/100 cm<sup>2</sup> removable activity to demonstrate compliance with the NRC's unrestricted use criteria for structural release and large equipment that remained within the laboratories. The licensee's final status survey report also indicated that all surfaces with activity in excess of the release limits were decontaminated or removed and disposed of as radioactive waste.

Title 10 CFR 20.1501 requires that each licensee make or cause to be made surveys that may be necessary for the licensee to comply with the regulations in Part 20 and that are reasonable under the circumstances to evaluate the extent of radiation levels, concentrations or quantities of radioactive materials, and the potential radiological hazards that could be present.

Based on the review of the licensee's decommissioning contractor's final status survey and results of the NRC's confirmatory survey, issues pertaining to the adequacy of the licensee's survey to demonstrate the acceptability of the Building 88 Laboratories for unrestricted use pursuant to 10 CFR 20.1402 have been identified as follows: 1) the NRC inspectors identified contamination greater than the licensee's specified release limits in the five laboratories surveyed; 2) the license release limit applicability is indicated as being limited to "structural release and large equipment that remained within the labs," but the inspectors were informed that some of the large equipment is occasionally donated to local institutions, 3) that the licensee's release criteria is not incorporated by reference in its license; 4) that the radiological conditions behind laboratory counters and sinks may not have been evaluated, 5) the contamination limits used for the release of "large equipment" may not be acceptable to the NRC; and 6) the licensee's contractor's report does not discuss hydrogen-3 contamination. This issue is being treated as an unresolved inspection item (URI 030-04330/09-001-02) pending further NRC review.

The licensee was maintaining and managing financial records, and the company's funding instrument, which are important to the future decommissioning of buildings and areas where licensed materials had been used. The inspectors reviewed an October 26, 2007 Decommissioning Cost Estimate (DCE) that had been submitted to the NRC on March 24, 2008 for review. The inspectors noted some differences between actual site conditions and the site conditions used to determine the current cost estimate. In particular, the eight labs located in Building 88 were removed from the DCE prior to completion of decommissioning activities and Final Status Surveys. Also, further evaluation will be needed to assess if the DCE adequately reflects Final Status Survey costs as well as the 25% contingency factor needed at the time of license termination for locations that were at one time designated for the use of radioactive materials pursuant to 10 CFR 30.36(k)(3), which requires a radiation survey to be performed to demonstrate that the premises are suitable for release in accordance with the criteria for

decommissioning in 10 CFR Part 20, Subpart E, or that other information submitted by the licensee is sufficient to demonstrate that the premises are suitable for release.

### 1.3 Conclusion

The inspectors determined that, overall the licensee's program for managing and tracking current locations of restricted use was managed adequately. However, the inspectors identified one violation for failure to have a single document listing former and current locations designated as restricted areas as required by 10 CFR 30.35(g)(3). The inspectors identified two unresolved inspection items, one pertaining to 10 CFR 30.36(d) regarding notification of the NRC and determination whether a decommissioning plan must be submitted to the NRC for approval, and a second unresolved item concerning the acceptability of the licensee's final status survey information to determine if the radiological conditions in the Building 88 Laboratories were sufficient to demonstrate compliance with NRC unrestricted use limits.

The inspectors concluded that the radiological surveys of the Greenfield and Clinton Laboratories incinerators and Clinton C-19 waste storage facility were sufficient to demonstrate compliance with the NRC unrestricted use limits.

Differences between the licensee's actual site conditions and the site conditions used in the licensee's current Financial Cost Estimate were noted during this inspection. The inspectors' observations of on-site conditions will be provided to the NRC's Licensing Branch for evaluation during their review of the revised cost estimate.

### 2.0 Exit Meeting Summary

The inspectors presented preliminary inspection findings to members of the licensee's management team at the conclusion of the on-site inspection activities on November 17, 2009. The licensee did not identify any documents or processes reviewed by the inspectors as proprietary. A final exit meeting with the licensee's Radiation Safety Officer was held via telephone conference on December 4, 2009.

ATTACHMENT: SUPPLEMENTAL INFORMATION

## **SUPPLEMENTAL INFORMATION**

### **PARTIAL LIST OF PERSONS CONTACTED**

#### Licensee

- \*# S. Hampton, Eli Lilly and Company (Lilly), Radiation Safety Officer (RSO)
- \* B. Kay, Eli Lilly, Assistant Radiation Safety Officer (ARSO)
- \* C. Clem, Lilly, ARSO
- \* A. Mahin, Lilly, Health Physicist
- \* G. Rush, Lilly, Senior Director
- \* Jodie Mitchell, Lilly, Legal Counsel (via telephone)

\* Persons present at the interim exit meeting on November 17, 2009.  
# Person present at the telephonic exit meeting on December 4, 2009.

### **LIST OF PROCEDURES USED**

IP 83890: Closeout Inspections and Surveys

### **LIST OF ACRONYMS USED**

ADAMS	Agencywide Documents Access and Management System
CFR	Code of Federal Regulations
DCE	Decommissioning Cost Estimate
IP	Inspection Procedure
NRC	Nuclear Regulatory Commission
mrem/h	Millirem per hour
RSO	Radiation Safety Officer
URI	Unresolved Item
VIO	Violation

### **PARTIAL LIST OF DOCUMENTS REVIEWED**

Licensee documents reviewed and utilized during the course of this inspection are specifically identified in the "Report Details" above.

### ITEMS OPENED, CLOSED, AND DISCUSSED

<u>Opened</u>	<u>Type</u>	<u>Summary</u>
VIO 030-04330/09-001-01	VIO	Failure to account for formerly designated restricted areas.
URI 030-04330/09-001-01	URI	Issues regarding 10 CFR 30.36(d) and (g)(1), notification and decommissioning plan requirements
URI 030-04330/09-001-02	URI	Issue regarding adequacy of survey to demonstrate compliance with NRC unrestricted use dose limits in 10 CFR 20.1402
<u>Closed</u> None		
<u>Discussed</u> None		