

October 10, 2012

Mr. Terry Alexander, Executive Director
Department of Occupation Safety
& Environmental Health
1239 Kipke Drive
University of Michigan
Ann Arbor, MI 48109-1010

SUBJECT: NRC INSPECTION REPORT 05000002/12001(DNMS) – FORD NUCLEAR
REACTOR

Dear Mr. Alexander:

On September 11, 2012, the U.S. Nuclear Regulatory Commission (NRC) completed inspection activities at the Ford Nuclear Reactor. The purpose of the inspection was to determine whether the decommissioning activities were conducted safely and in accordance with NRC requirements. Specifically, during an onsite inspection on September 10 – 11, 2012, the inspector evaluated decommissioning performance and performed independent radiation surveys. At the conclusion of the onsite inspection on September 11, 2012, the inspector discussed the inspection results with you and members of your staff.

This inspection consisted of an examination of decommissioning activities at the Ford Nuclear Reactor 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, and interviews with personnel.

Based on the results of this inspection, the NRC did not identify any violations.

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 and its enclosure 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>.

T. Alexander

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

Sincerely,

/RA/

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

Docket No. 050-00002

License No. R-28

Enclosure:

Inspection Report 05000002/12001(DNMS)

cc w/encl: S. L. Ceccio, University of Michigan
M. Driscoll, University of Michigan
K. Yale, State of Michigan

T. Alexander

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U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Docket No. 050-00002

License No. R-28

Report No. 05000002/12001(DNMS)

Licensee: University of Michigan

Facility: Ford Nuclear Reactor

Location: Ann Arbor, Michigan

Dates: September 10-11, 2012

Inspector: Jeremy Tapp, Health Physicist

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

Enclosure

EXECUTIVE SUMMARY

University of Michigan - Ford Nuclear Reactor NRC Inspection Report 05000002/12001(DNMS)

The University of Michigan Ford Nuclear Reactor (FNR) has completed all physical remediation work in the reactor building. The licensee is currently completing preparations for the performance of final status surveys to justify the building is suitable for unrestricted use. This routine decommissioning inspection included a review of the licensee's current performance related to decommissioning activities and independent radiation surveys.

Research and Test Reactor Decommissioning

- Inspector observations of the facility determined that facility radiological and industrial controls ensured worker safety and prevented loose radiological contamination in uncontrolled areas. (Section 1.1)
- The annual Report on Reactor Operations was completed as required and was comprehensive in content. Decommissioning Review Committee (DRC) meetings were conducted semi-annually with at least the required attendance, and discussed the current significant decommissioning and quality assurance activities. Both the independent audit on decommissioning performance and quality assurance and annual radiation safety program audit were comprehensive in nature and identified issues and improvements that were adequately corrected or implemented by the licensee. (Section 1.2)

Report Details

1.0 Research and Test Reactor Decommissioning (69013)

1.1 Health Physics

a. Inspection Scope

The inspector interviewed site personnel and performed a facility and site tour to observe field conditions. The inspector evaluated the site's material condition and housekeeping, area radiological conditions, and radiological access control and associated posting/labeling. Independent radiation measurements were made throughout the areas toured and compared to the licensee's postings. In addition, the inspector reviewed a sampling of routine dose rate and contamination smear survey records from 2012 to evaluate whether the licensee's radioactive material controls were adequate. Records were reviewed from January, May, June, August, and September 2012.

b. Observations and Findings

The inspector found that the facility was generally clean and free of debris and personnel hazards. Access control and postings were determined to be adequate for the radiological conditions of the facility. All dose rates on routine surveys were at or near background levels. All routine contamination smear survey results showed no discernable loose contamination in the building.

No findings of significance were identified.

c. Conclusions

Inspector observations of the facility determined that facility radiological and industrial controls ensured worker safety and prevented loose radiological contamination in uncontrolled areas.

1.2 Review and Audit

a. Inspection Scope

The inspector reviewed the licensee's annual Report on Reactor Operations to determine if it was completed as required by Technical Specifications. The inspector reviewed Decommissioning Review Committee (DRC) meeting minutes from the last meeting on March 30, 2012 to determine whether the committee performed its function as described in the Technical Specifications. The inspector also reviewed two audits: (1) an independent audit titled "Audit Checklist for April 13, 2012 Audit of University of Michigan's Ford Nuclear Reactor," dated April 23, 2012, which was required by Technical Specifications; and (2) the annual Radiation Safety Program review required by 10 CFR 20.1101(c). These were reviewed to determine the adequacy of their scope and evaluate the results and any subsequent actions taken by the licensee.

b. Observations and Findings

The inspector found the Report on Reactor Operations was completed as required by Technical Specifications and the content reflected current licensee activities and status. The DRC met semi-annually as required, and a quorum existed for the meeting reviewed. The inspector found the DRC reviewed, in part, current decommissioning activities and significant quality assurance activities including the approval of the independent auditor for the audit performed in April 2012.

The independent audit performed in April 2012 met the requirements of Technical Specification 6.3. The inspector noted that the scope of the audit was broad and contained enough detail in each area in order to ensure a comprehensive evaluation of many program areas. These include recent and future decommissioning work, quality assurance, radiation protection, environmental safety and health, and training. For issues found during the audit, appropriate corrective actions were taken to prevent recurrence. The inspector also found that the 2011 annual Radiation Safety Program review, performed on March 5-6, 2012, was comprehensive in nature with an adequate scope that covered all relevant aspects of the licensee's 10 CFR Part 20 radiation protection program. Any issues identified were also adequately corrected to prevent recurrence.

No findings of significance were identified.

c. Conclusions

The annual Report on Reactor Operations was completed as required and was comprehensive in content. DRC meetings were conducted semi-annually with at least the required attendance, and discussed the current significant decommissioning and quality assurance activities. Both the independent audit on decommissioning performance and quality assurance and annual radiation safety program audit were comprehensive in nature and identified issues and improvements that were adequately corrected or implemented by the licensee.

2.0 Violation 05000002/11-01-01 Failed to perform independent monitoring or audits (Closed)

The inspector followed up on a violation cited in a previous inspection, documented in Inspection Report 050-00002/11-001, dated October 24, 2011. The licensee had failed to either independently monitor or audit both decommissioning operations and quality assurance from 2009 until 2011, which was a violation of Technical Specification 6.3. The inspectors reviewed the licensee's corrective actions implemented in response to the violation, including the licensee's formal written response to the violation, dated November 21, 2011, and an independent audit document titled "Audit Checklist for April 13, 2012 Audit of University of Michigan's Ford Nuclear Reactor," dated April 23, 2012. The audit reviewed was performed by an independent individual not associated with the FNR with relevant experience, it was comprehensive in nature, and included both current decommissioning operations and quality assurance. In addition, the licensee is adequately tracking the requirement to perform an independent audit in 2013 in case the license has not been terminated by that time. The licensee's corrective actions appeared to be adequate to prevent recurrence of this violation. This item is closed.

3.0 Exit Meeting Summary

The inspector presented the inspection results to licensee management at the conclusion of the onsite inspection on September 11, 2012. The licensee acknowledged the results presented and did not identify any of the documents reviewed by the inspectors as proprietary.

ATTACHMENT: SUPPLEMENTAL INFORMATION

