NRC FORM 591M PART 1
(07-2012)
10 CFR 2.201

U.S. NUCLEAR REGULATORY COMMISSION

SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION

1. LICENSEE/LOCATION INSPECTED:	2. NRC/REGIONAL OFFICE
Cammenga and Associates, Inc. 2011 Bailey Street Dearborn, MI 48124 REPORT NUMBER(S) 2013-001 and 2013-001	Region III U. S. Nuclear Regulatory Commission 2443 Warrenville Road, Suite 210 Lisle, IL 60532-4352

3. DOCKET NUMBER(S)	4. LICENSE NUMBER(S)	5. DATE(S) OF INSPECTION
030-330009 and 030-33020	21-26460-01 and 21-26460-02E	8/15/2013

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 violations(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, 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 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	DATE
LICENSEE'S REPRESENTATIVE			
NRC INSPECTOR	Ryan Craffey	Ryan Craffey	8/26/13
BRANCH CHIEF	Aaron McCraw		8/26/13

NRC FORM 591M PART 3
(07-2012)
10 CFR 2.201

U.S. NUCLEAR REGULATORY COMMISSION

Docket File Information

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6. INSPECTION PROCEDURES USED	7. INSPECTION FOCUS AREAS
87125	All

SUPPLEMENTAL INSPECTION INFORMATION

1. PROGRAM CODE(S)	2. PRIORITY	3. LICENSEE CONTACT	4. TELEPHONE NUMBER
03214 and 03254	5	Deborah Spyker - RSO	(616) 392-7999

✓ Main Office Inspection — Next Inspection Date: August 2018

Field Office Inspection

Temporary Job Site Inspection

PROGRAM SCOPE

This licensee is an instrument manufacturer authorized by its NRC byproduct materials licenses to produce and distribute compasses and knives containing luminous sealed sources of tritium (hydrogen-3) in exempt quantities from its facility in Dearborn, Michigan. The licensee receives its sealed sources from a supplier in Switzerland, then distributes around 80,000 to 90,000 tritium-bearing compasses annually to the military and to other domestic and international customers. The licensee has not yet begun distribution of any tritium-bearing knives, but intends to do so in the near future. The licensee performs monthly inventories of vials in storage and of all finished products, then reconciles them against semiannual inventories of all sealed sources. Staff are monitored for intake of tritium by means of monthly in-vitro bioassay. The radiation safety program is audited annually by the licensee's financial controller.

PERFORMANCE OBSERVATIONS

The inspector toured the facility and found the tritium vial storage area adequately posted and secured. The inspector observed several technicians using licensed material as they assembled compass components. Interviews with one of these technicians revealed an adequate level of understanding of radiation protection principles and licensee procedures. The RSO demonstrated package receipt and shipping procedures, diffusion (leak) testing of the incoming sealed sources, area contamination surveys, waste handling, and liquid scintillation counter use. The inspector discussed with the RSO procedures for inventory control, broken vial response, used compass recycling and in-vitro bioassay. The inspector also verified that the tritium-bearing watches currently for sale by the licensee (but not authorized on its license) were assembled and originally distributed by another company.

The inspector reviewed a selection of licensee records, including monthly sanitary sewer release calculations, periodic reports of transfer as required by 10 CFR 32.25(c), monthly and semiannual inventories, shipping records to demonstrate compliance with NRC export requirements, bioassay measurements, area survey results, training records, and annual program audits.

No violations of NRC requirements were identified as a result of this inspection.