

SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION

1. LICENSEE/LOCATION INSPECTED: BASF Corporation 1609 Biddle Avenue Wyandotte, MI 48192 REPORT NUMBER(S) 2015-001	2. NRC/REGIONAL OFFICE Region III U. S. Nuclear Regulatory Commission 2443 Warrenville Road, Suite 210 Lisle, IL 60532-4352
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3. DOCKET NUMBER(S) 030-04787	4. LICENSE NUMBER(S) 21-00627-02	5. DATE(S) OF INSPECTION NOVEMBER 17 TH , 2015
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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:

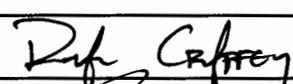
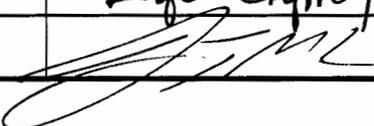
- 1. Based on the inspection findings, no violations were identified.
- 2. Previous violation(s) closed.
- 3. The violation(s), specifically described to you by the inspector as non-cited violations, are not being cited because they were self-identified, non-repetitive, and corrective action was or is being taken, and the remaining criteria in the NRC Enforcement Policy, 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		11/17/15
BRANCH CHIEF	Aaron McCraw		11/25/15

Docket File Information

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6. INSPECTION PROCEDURES USED 87124	7. INSPECTION FOCUS AREAS All
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SUPPLEMENTAL INSPECTION INFORMATION

1. PROGRAM CODE(S) 03120	2. PRIORITY 5	3. LICENSEE CONTACT Derek Hetes - RSO	4. TELEPHONE NUMBER (734) 324-6729
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Main Office Inspection Next Inspection Date: 11/17/2020

Field Office Inspection _____

Temporary Job Site Inspection _____

PROGRAM SCOPE

This was an unannounced routine inspection of a chemical manufacturing plant authorized to use byproduct material for level measurements at its facilities in Wyandotte, Michigan. The licensee possessed a variety of nuclear gauges containing Co-60 and Cs-137 sealed sources on process lines at two facilities on-site, and stored several unused gauges in a secure location. The licensee had purchased these gauges along with others in 2008 as it was constructing a new facility on-site. However, design changes to the facility and the process lines inside obviated the need for some gauges at the time of construction. The licensee has since installed one of the unused gauges, but is considering the disposal of those remaining in storage, as they contain Co-60 will soon reach the end of their useful life of about 10 years. The licensee's RSO was a member of the company's environmental health and safety (EHS) staff, and was accompanied in his oversight of the radiation safety program by another individual from the EHS department.

PERFORMANCE OBSERVATIONS

The inspector toured the facilities in Wyandotte where gauges were located to evaluate the licensee's measures for materials security, hazard communication, and exposure control. The inspector conducted independent surveys in accessible areas around a selection of the licensee's gauges, and found that all readings were below regulatory limits to members of the public. The inspector interviewed several members of the licensee's staff to discuss gauge maintenance including leak testing and shutter checks, lock-out procedures, and emergency response procedures. Through these discussions the inspector found the licensee's staff to be knowledgeable of radiation protection principles and regulatory requirements.

The inspector also reviewed a selection of relevant records, including preventative maintenance documentation of semi-annual shutter checks and area surveys, triennial leak test results, documentation of initial mounting surveys, and annual reviews of the content and implementation of the radiation safety program.

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