

**SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION**

<p>1. LICENSEE/LOCATION INSPECTED:</p> <p>Dow AgroSciences 9330 Zionsville Road 306 Building, E2-1010 Indianapolis, IN 46268-1054</p> <p>REPORT NUMBER(S) 16-001</p>	<p>2. NRC/REGIONAL OFFICE</p> <p>Region III U. S. Nuclear Regulatory Commission 2443 Warrenville Rd, Suite 210 Lisle, IL 60532</p>
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<p>3. DOCKET NUMBER(S)</p> <p>030-32714</p>	<p>4. LICENSE NUMBER(S)</p> <p>13-26398-01</p>	<p>5. DATE(S) OF INSPECTION</p> <p>May 12, 2016</p>
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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	Zahid Sulaiman, Health Physicist	<i>Zahid Sulaiman</i>	5/12/16
BRANCH CHIEF	Aaron T. McCraw, Chief, MIB	<i>[Signature]</i>	5/26/16

**Docket File Information**

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6. INSPECTION PROCEDURES USED  87126	7. INSPECTION FOCUS AREAS  03.01-03.07
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**SUPPLEMENTAL INSPECTION INFORMATION**

1. PROGRAM CODE(S)  03610	2. PRIORITY  3	3. LICENSEE CONTACT  Roben Roberts Trout, RSO	4. TELEPHONE NUMBER  (317) 337-3435
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Main Office Inspection                      Next Inspection Date: 05/12/2019  
 Field Office Inspection \_\_\_\_\_  
 Temporary Job Site Inspection \_\_\_\_\_

**PROGRAM SCOPE**

This was a routine inspection of a broadscope research and development licensee located in Indianapolis, Indiana, with one field research station located in Fowler, Indiana. Radioactive materials have never been used at the field research station as of the inspection. The licensee had 32 active laboratories and 2 greenhouses at the main facility authorized to use radioactive materials. The licensee had 7 principal investigators and 80 research workers who were authorized to use the radioactive materials. The licensee decommissioned one research laboratory that used phosphorus-32 in December 2015.

**Performance Observations**

The inspection consisted of interviews with select licensee personnel; a review of select records; a tour of the facilities; and independent measurements. Interviews with staff from the environmental health and safety (EHS) office, radiation safety committee (RSC) chairperson, RSC management representative, research laboratory worker and through demonstrations indicated the licensee's staff to be knowledgeable of radiation protection principles and regulatory requirements. The inspector reviewed the radioactive materials inventory, distribution, and waste disposal tracking procedures. The inspector visited four different laboratories where radioactive materials are used and stored, and toured the waste disposal facility. Licensed material was observed to be adequately secured, labs authorized to use material have restricted access, proper "caution radioactive material" signs posted, and the room designated for decay in storage was locked. The inspector did not observe any use of radioactive materials at the time of inspection. The inspector had a loading dock staff demonstrate how to handle, survey, wipe test, and document a package upon receipt, with no issues noted.

Interviews with licensee staff indicates the staff had an adequate level of understanding when it came to tracking inventory, material handling techniques, waste disposal, area surveys, and spill procedures. The inspector reviewed the decay in storage and waste disposal records, with no findings. The RSC meets quarterly and approves authorized users at their meetings. Authorized users are required to complete several training sessions and pass an exam with a score of 90% or higher prior to approval. The inspector reviewed the RSC minutes, semi-annual program audits, authorized users initial and annual training program, inventory procedures, wipe tests, meter calibration, and disposal procedures, with no issues noted.

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(Continued)

The inspector reviewed dosimetry records for 2013, 2014, and 2015, indicating the maximum annual dose to be minimal detected - DDE and 190 mrem - SDE, and performed independent and confirmatory radiation measurements which indicated results consistent with the licensee's survey results and within regulatory limits.

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