



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION III
2443 WARRENVILLE RD. SUITE 210
LISLE, IL 60532-4352

March 9, 2017

Mr. Darrell Williams,
Inorganic Group Leader / RSO
NSF International
789 North Dixboro Road
Ann Arbor, MI 48113

SUBJECT: PERIODIC TELEPHONE INTERVIEW AND NRC ROUTINE INSPECTION
REPORT NO. 03038362/2017001(DNMS) – NSF INTERNATIONAL

Dear Mr. Williams:

On February 21, 2017, an inspector from the U.S. Nuclear Regulatory Commission (NRC) conducted a periodic telephone interview with you. The purpose of the interview was to examine activities performed under your NRC license as they relate to radiation safety and to compliance with NRC rules and regulations and with the conditions of your license. As a result of this examination of licensed activities, the inspector noted one item of regulatory concern regarding the conduct of area surveys, which you had originally identified in November 2016 during an internal audit of your radiation safety program.

Following the interview, the inspector conducted additional in-office review of the circumstances surrounding this concern. The inspector examined the information you provided during the interview as well as the documentation you subsequently provided via email.

Based on the results of this in-office review, the NRC has determined that a violation of NRC requirements occurred. The violation concerned the failure to conduct area and personnel surveys following the use of stock solutions of unsealed radioactive material, as required by Condition 15.A of NRC Materials License No. 21-15209-02.

The violation was evaluated in accordance with the NRC Enforcement Policy, which can be found on the NRC's website at <http://www.nrc.gov/about-nrc/regulatory/enforcement/enforce-pol.html>. The NRC determined that the violation met the criteria from Section 2.3.2.b of the Policy to be considered a Noncited Violation (NCV), because: (1) you identified the violation; (2) you corrected the violation within a reasonable period of time; (3) and the violation was not considered to be repetitive or willful. Therefore, as a credit to your radiation safety program in identifying and correcting issues in a timely fashion, the NRC will not issue a Notice of Violation on this matter.

The inspector agreed with your assessment that the root cause of the violation was a lack of awareness of procedural requirements. As corrective actions to restore compliance and to address the potential for recurrence, you performed and documented a root cause analysis of the issue, and retrained the analysts who used the stock solutions as part of their assigned duties.

The NRC has concluded that information regarding the reason for the violation, the corrective actions taken to correct the violation and prevent recurrence, and the date when full compliance was achieved is already adequately addressed on the docket in this letter. Therefore, you are not required to respond to this letter unless the description herein does not accurately reflect your corrective actions or your position. In that case, or if you choose to provide additional information, you should follow the instructions specified in the enclosed Notice.

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, its enclosure, and your response, if you choose to provide one, will be made available electronically for public inspection in the NRC's Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC's website at <http://www.nrc.gov/reading-rm/adams.html>. To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be made publicly available without redaction.

Please feel free to contact Mr. Ryan Craffey of my staff if you have any questions regarding this inspection. Mr. Craffey can be reached at 630-829-9655.

Sincerely,

/RA/

Aaron T. McCraw, Chief
Materials Inspection Branch
Division of Nuclear Materials Safety

Docket No. 030-38362
License No. 21-15209-02

cc: State of Michigan

D. Williams

3

Letter to Mr. Darrell Williams from Aaron McCraw, dated March 9, 2017

SUBJECT: PERIODIC TELEPHONE INTERVIEW AND NRC ROUTINE INSPECTION
REPORT NO. 03038362/2017001(DNMS) – NSF INTERNATIONAL

DISTRIBUTION:

Darrell Roberts
John Giessner
Christine Lipa
Richard Skokowski
Carole Ariano
Paul Pelke
MIB Inspectors

ADAMS Accession Number: ML17068A390

OFFICE	RIII-DNMS		RIII-DNMS					
NAME	RCraffey:cl		AMcCraw					
DATE	3/8/2017		3/9/2017					

OFFICIAL RECORD COPY