

INSPECTION RECORD

Region: III **Inspection Report No.** 2017001

License No. 21-32800-01

Docket No. 030-38314

Licensee: Trinseo, LLC
1604 Building
South of the Intersection of
Washington Street and
E Lyon Road
Midland, Michigan 48674

Locations Inspected: Same as above

Licensee Contact: James Weldy, RSO **Telephone No.** 989-636-1440

Program Code: 03120 **Priority:** 5

Type of Inspection: ☐ Initial ☒ Routine ☐ Announced
 ☐ Special ☒ Unannounced

Last Inspection Date: 09/02/2011 **Date of This Inspection:** 3/20/2017, with in-office review through 4/04/2017

Next Inspection Date: 3/20/2022 ☒ Normal ☐ Reduced

Justification for reducing the routine inspection interval: N/A

Summary of Findings and Actions:

- ☐ No violations cited, clear U.S. Nuclear Regulatory Commission (NRC) Form 591 or regional letter issued
- ☐ Non-cited violations (NCVs)
- ☐ Violation(s), Form 591 issued
- ☒ Violation(s), regional letter issued
- ☐ Follow-up on previous violations

Inspector: Luis Nieves, Health Physicist

/RA/

Signature

Date 4/18/2017

Approved: Aaron T. McCraw, Chief, MIB

/RA/

Signature

Date 4/18/2017

PART I – LICENSE, INSPECTION, INCIDENT/EVENT AND ENFORCEMENT HISTORY

1. AMENDMENTS AND PROGRAM CHANGES SINCE LAST INSPECTION:

<u>AMENDMENT #</u>	<u>DATE</u>	<u>SUBJECT</u>
01	01/12/2015	Company name change.

2. INSPECTION AND ENFORCEMENT HISTORY:

The last inspection of this licensee was on 09/02/2011. No violations of NRC requirements were identified during the last inspection.

3. INCIDENT/EVENT HISTORY:

No open items or events since the last routine inspection.

PART II – INSPECTION DOCUMENTATION

1. ORGANIZATION AND SCOPE OF PROGRAM:

Trinseo, LLC (licensee) was a part of the Dow Chemical Company. The licensee was authorized to possess and use fixed gauges on their location for the production of plastics. Two individuals were involved with use and oversight of the devices including the RSO. The license was authorized by their NRC license to install and remove fixed gauges.

2. SCOPE OF INSPECTION:

Inspection Procedure(s) Used: 87124

Focus Areas Evaluated: All

The inspector toured the licensee's facility to review and evaluate the licensee's use of byproduct material, including measures for material security, hazard communication, and exposure control. Through interviews with the RSO and licensee personnel, the inspector found that the licensee's staff was knowledgeable and conscientious of radiation protection principles and licensee procedures for use and storage of RAM. The inspector also witnessed demonstrations by the staff of leak test collection, emergency response and lockout/ tagout procedure. The inspector reviewed a selection of licensee records for inventories, leak tests, shutter checks, and audits.

3. INDEPENDENT AND CONFIRMATORY MEASUREMENTS:

Using a Canberra UltraRadiac survey meter, serial No. 13000539, calibration date September 15, 2016, the inspector conducted independent surveys at each of the locations inspected. The inspector found no readings which would indicate residual contamination or exposures to members of the public in excess of regulatory limits.

4. VIOLATIONS, NCVs, AND OTHER SAFETY ISSUES:

During the inspection, the inspector identified two violations:

(1) Condition 15 of NRC Materials License 21-32800-01 states that the license shall conduct a physical inventory every 6 months.

Contrary to the above, from September 2, 2011 to March 20, 2017, the licensee failed to conduct a physical inventory every 6 months. Specifically, the license conducted their inventory annually, thereby exceeding the 6-month interval stipulated by their license. The cause of the violation was a lack of awareness of the terms and conditions of its license on the part of the licensee. As corrective action, the licensee has changed the frequency in their calendar to every 6 months.

(2) Condition 16.A of NRC Materials License 21-32800-01 states that the license shall test for the proper operation of the on-off mechanism (shutter) and indicator, if any, at intervals not to exceed 6 months.

Contrary to the above, from September 2, 2011 to March 20, 2017, the licensee failed to test for the proper operation of the on-off mechanism (shutter) and indicator, if any, at intervals not to exceed 6 months. Specifically the license conducted their on-off mechanism tests annually, thereby exceeding the 6-month interval stipulated by their license. The cause of the violation was a lack of awareness of the terms and conditions of its license on the part of the licensee. As corrective action, the licensee has changed the frequency in their calendar to every 6 months.

5. PERSONNEL CONTACTED:

James Weldy – Site Radiation Safety Officer

Attended exit meeting on April 4, 2017.

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