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
Consumers Energy Laboratory Services 135 West Trail Street Jackson, MI 49201 REPORT NUMBER(S) 2017001	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
030-04868 / 030-14167	21-08606-03 / 21-18784-01	June 21-22, 2017

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	07/06/2017
BRANCH CHIEF	Aaron McCraw	AJ McC	07/07/2017

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
87121 / 87126	All

SUPPLEMENTAL INSPECTION INFORMATION

1. PROGRAM CODE(S)	2. PRIORITY	3. LICENSEE CONTACT	4. TELEPHONE NUMBER
03320 / 03123	1 / 5	John Merrill - RSO	(517) 788-7104

- [x] Main Office Inspection — Next Inspection Date: 06/21/2018
- [x] Field Office Inspection — 4141 East Wilder Road, Bay City, MI
- [x] Temporary Job Site Inspection — Sites in Shepherd and Mount Pleasant, MI

PROGRAM SCOPE

This was an announced routine inspection of a public utility authorized by an NRC materials license to use radioactive material for industrial radiography at facilities in Jackson, Bay City and West Olive, Michigan, and at temporary job sites in NRC jurisdiction. The utility also maintained a separate NRC materials license authorizing the use of radioactive material for sample analysis in gas chromatographs at the same facility in Jackson.

PERFORMANCE OBSERVATIONS: The inspector toured the facilities in Jackson and Bay City, and visited two temporary job sites to evaluate the licensee's measures for hazard communication and exposure control. While in Jackson, the inspector observed the receipt of a new radiography source and reviewed a selection of radiographer audits, personnel dosimetry reports, sealed source inventories and leak test results, and quarterly equipment maintenance records. The inspector also toured the laboratory where material used for gas chromatography was stored, discussed the security and maintenance of this material with an authorized user, and reviewed additional leak test results. At the temporary job sites, the inspector observed the conduct of radiographic operations and discussed the implementation of operating and emergency procedures with licensee personnel. The inspector conducted independent and confirmatory surveys in the vicinity of these operations, and found that the crews had established adequate barriers to limit exposure to members of the public below regulatory limits whenever radiographic operations were in progress. The inspector also noted that the crews maintained and properly utilized appropriate instrumentation and dosimetry, and followed physical presence requirements for radiography. Through these evaluations, observations and discussions, the inspector found licensee's staff at each location to be knowledgeable of radiation protection principles and regulatory requirements.

The inspector also verified the completion and assessed the effectiveness of corrective actions for a Severity Level III violation of 10 CFR 34.47(a) identified in IR 03004868/2016001(DNMS). The inspector verified that the licensee maintained a calibrated and operable supply of RA-500 ratemeters to supplement the use of DMC 2000S dosimeters, and noted that the crews inspected relied on their RA-500 as a ratemeter and their DMC2000S only as a dosimeter. The inspector identified no additional examples of this violation, and furthermore determined that the licensee had implemented adequate corrective actions as described in their response dated July 20, 2016. Therefore, this violation is closed. No other violations of NRC requirements were identified as a result of this inspection.