

SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION

<p>1. LICENSEE/LOCATION INSPECTED:</p> <p>Cammenga & Associates, LLC 2011 Bailey Street Dearborn, MI 48124</p> <p>REPORT NUMBER(S) 2018001/2018001</p>	<p>2. NRC/REGIONAL OFFICE</p> <p>Region III U. S. Nuclear Regulatory Commission 2443 Warrenville Road, Suite 210 Lisle, IL 60532-4352</p>	
<p>3. DOCKET NUMBER(S)</p> <p>030-33009/030-38679</p>	<p>4. LICENSE NUMBER(S)</p> <p>21-26460-01/21-26460-03E</p>	<p>5. DATE(S) OF INSPECTION</p> <p>March 23 - April 18, 2018</p>

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:

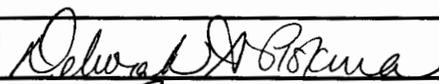
- 1. Based on the inspection findings, no violations were identified.
- 2. Previous violation(s) closed.
- 3. The violation(s), specifically described to you by the inspector as non-cited violations, are not being cited because they were self-identified, non-repetitive, and corrective action was or is 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	Deborah A. Piskura, Senior Health Physicist		4/19/18
BRANCH CHIEF	Aaron T. McCraw, Chief, MIB		4/17/18

Docket File Information

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6. INSPECTION PROCEDURES USED 87128	7. INSPECTION FOCUS AREAS 03.01 - 03.07
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SUPPLEMENTAL INSPECTION INFORMATION

1. PROGRAM CODE(S) 03214/03254	2. PRIORITY 5	3. LICENSEE CONTACT Debbi Spykerman, RSO	4. TELEPHONE NUMBER (313) 914-7160
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Main Office Inspection Next Inspection Date: April 18, 2023

Field Office Inspection _____

Temporary Job Site Inspection _____

PROGRAM SCOPE

This was a routine, unannounced inspection of a small company authorized to manufacture and distribute four models of exempt self-luminous devices (compasses and knives) containing H-3 (tritium). All licensed material was contained in sealed glass ampules, obtained from MB microtech-ag, Switzerland. The device designs and models were referenced in the attachments to the licensee's NRC Sealed Source and Device Registration Certificate. Six individuals were authorized to handle byproduct material. Product assembly was performed by 7 individuals. The assembly was performed at a dedicated bench stations in the "assembly area." After QA testing and validation, the devices were packaged and shipped to the customer. The licensee manufactured and distributed 90,000 - 100,000 devices annually to domestic and international customers.

This inspection consisted of interviews with licensee personnel; observations of product assembly, labeling, packaging and storage; a review of select records including periodic distribution reports and spill/survey reports; and a tour of the laboratory and storage areas.

No violations of NRC requirements were identified during this inspection. This inspection included in office review through April 18, 2018, of information not available during the on-site inspection and follow up discussions with the RSO who was unavailable during the on-site inspection. This inspection included a review of the licensee's corrective actions for a violation of 10 CFR 30.3/ License Conditions 4 and 9 identified during the initial inspection of the -03E license. The -03E license was issued to replace the expired -02E license where the licensee failed to file a timely renewal request and distributed product without a valid "E" distribution license. The licensee's corrective actions included: (1) halting distribution activities until the issuance of the new -03E license and (2) filing an application for a new "E" license. The inspector verified that the corrective actions were taken and that there was no recurrence of the violation; the previous violation involving 10 CFR 30.3 and License Conditions 4 and 9 is considered closed.