



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION III  
2443 WARRENVILLE ROAD, SUITE 210  
LISLE, ILLINOIS 60532-4352

May 16, 2018

EA-18-048  
EN 53298  
NMED No. 180165 (Closed)

Mr. Thomas C. Schmidt  
Plant Director, Grand Rapids Operations  
GM Components Holding, LLC  
2100 Burlingame Avenue, S.W.  
Grand Rapids, MI 49509

SUBJECT: NRC ROUTINE INSPECTION REPORT NO. 99990003/2018002 (DNMS) –  
GM COMPONENTS HOLDING, LLC)

Dear Mr. Schmidt:

Between March 30, 2018, and May 3, 2018, an inspector from the U.S. Nuclear Regulatory Commission (NRC) conducted an in-office review of the circumstances surrounding the improper disposal of a generally licensed tritium (H-3) exit sign at your Grand Rapids location. The NRC initiated this review after GM Components Holding, LLC, contacted the NRC Operations Center on March 29, 2018, to report the loss of the H-3 sign, and followed that phone notification with a written report on April 16, 2018. An electronic copy of the written report can be found in the NRC's Agencywide Documents Access and Management System (ADAMS) under Accession Number ML18123A223. Mr. Jason Draper of my staff presented the findings of this review to you via telephone on May 4, 2018.

During this in-office review, the NRC staff examined activities conducted under your general license related to public health and safety. Additionally, the staff examined your compliance with the Commission's rules and regulations. The in-office review consisted of interviews with personnel and examination of information provided by you to the NRC.

Based on the results of the in-office review and the information you provided, the NRC has determined that a Severity Level IV violation of NRC requirements occurred. The violation was evaluated in accordance with the NRC Enforcement Policy. The current Enforcement Policy is included on the NRC's website at <http://www.nrc.gov/about-nrc/regulatory/enforcement/enforce-pol.html>. The violation concerned the failure to properly dispose or transfer radioactive material from the generally licensed device, as required by Title 10 of the *Code of Federal Regulations (CFR)* 31.5(c)(8)(i). In your written report, you determined that the root cause of the violation was the lack of knowledge of the individual who disposed of the sign in the normal trash. You identified the violation and its root cause in a timely fashion and took immediate corrective action to verify the status of your remaining H-3 signs and reinforce your procedures in place to ensure proper handling of the signs with your employees. Additionally, you indicated that you plan to remove and properly transfer or dispose of your remaining generally licensed H-3 exit signs by the end of the calendar year.

Because you identified the violation and took timely and effective corrective actions and because the violation was neither willful on the part of a licensee employee nor repetitive, this violation is being treated as a Noncited Violation (NCV), consistent with Section 2.3.2.b of the Enforcement Policy. 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 contest this action, you should provide your response, with the basis for your denial, to the Regional Administrator, U.S. Nuclear Regulatory Commission, Region III, 2443 Warrenville Road, Suite 210, Lisle, IL 60532-4352.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter will be 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>.

Please feel free to contact Mr. Draper if you have any questions regarding this correspondence. Mr. Draper can be reached at 630-829-9839.

Sincerely,

*/RA/*

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

Docket No. 999-90003  
License No. General License

cc: State of Michigan

Letter to Mr. Thomas C. Schmidt from Aaron T. McCraw, dated May 16, 2018

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**ADAMS Accession Number: ML18136A813**

OFFICE	RIII-DNMS		RIII-EICS		RIII-DNMS		
NAME	JDraper:cl		RSkokowski JHeller for		AMcCraw		
DATE	5/14/2018		5/14/2018		5/16/2018		

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