

SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION

<p>1. LICENSEE/LOCATION INSPECTED:</p> <p>University of Detroit Mercy 4001 West McNichols Road Detroit, MI</p> <p>REPORT NUMBER(S) 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>030-14288</p>	<p>4. LICENSE NUMBER(S)</p> <p>21-00241-09</p>	<p>6. DATE(S) OF INSPECTION</p> <p>4/20/18, with in-office review through 5/21/18</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)

Condition 11.B. of Amendment No. 11 of the U. S. Nuclear Regulatory Commission License Number 21-00241-09 states, "The Radiation Safety Officer (RSO) for this license is Michael Gleason, Ph.D."

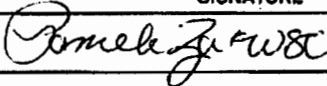
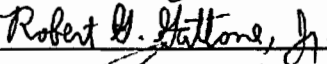
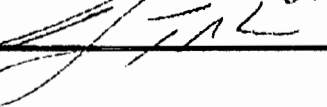
Contrary to the above, the individual named as the RSO stopped being the RSO on August 18, 2017, and nobody served as the licensee's RSO as of April 20, 2018.

This is a Severity Level IV violation (Section 6.3.d.).

The root cause of the violation was licensee oversight regarding replacement of the RSO named on the license.

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	PAULINA ZARNOVA		5/29/18
NRC INSPECTOR	Robert G. Gattone, Jr.		5/21/18
BRANCH CHIEF	Aaron T. McCraw		5/25/18

SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION

1. LICENSEE/LOCATION INSPECTED: University of Detroit Mercy 4001 West McNichols Road Detroit, MI REPORT NUMBER(S) 2018001		2. NRC/REGIONAL OFFICE Region III U. S. Nuclear Regulatory Commission 2443 Warrenville Road, Suite 210 Lisle, IL 60532-4352	
3. DOCKET NUMBER(S) 030-14288		4. LICENSE NUMBER(S) 21-00241-09	5. DATE(S) OF INSPECTION 4/20/18, with in-office review through 5/21/18

(Continued)

The licensee determined that it will initiate the process of terminating its license.

Title 10 of the Code of Federal Regulations (10 CFR) 30.36(d) requires, in part, that licensees provide notification to the NRC in writing within 60 days of any of the following occurrences:

- (1) The license has expired,
- (2) The licensee has decided to permanently cease principal activities at the entire site or in any separate building or outdoor area that contains residual radioactivity such that the building or outdoor area is unsuitable for release in accordance with NRC requirements,
- (3) No principal activities under the license have been conducted for a period of 24 months, or
- (4) No principal activities have been conducted for a period of 24 months in any separate building or outdoor area that contains residual radioactivity such that the building or outdoor area is unsuitable for release in accordance with NRC requirements.

Contrary to the above, as of April 20, 2018, no principal activities under the license had been conducted for a period of approximately 36 months, and the licensee failed to notify the NRC in writing within 60 days of this occurrence.

This is a Severity Level IV violation (Section 6.9.d.).

The root cause of the violation was that the licensee was unaware of the requirement.

As corrective action, the licensee committed to provide the written notification as required. In addition, the licensee determined that it will initiate the process of terminating its license.

Docket File Information

SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION

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3. DOCKET NUMBER(S) 030-14288	4. LICENSE NUMBER(S) 21-00241-09	5. DATE(S) OF INSPECTION 4/20/18, with in-office review through 5/21/18
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6. INSPECTION PROCEDURES USED 87126	7. INSPECTION FOCUS AREAS 02.01, 02.02, 02.03, 02.05, 02.06, and 02.07
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SUPPLEMENTAL INSPECTION INFORMATION

1. PROGRAM CODE(S) 03620	2. PRIORITY 5	3. LICENSEE CONTACT Pamela Zarkowski, Provost	4. TELEPHONE NUMBER (313) 993-1585
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Main Office Inspection Next Inspection Date: 04/20/2023

Field Office Inspection _____

Temporary Job Site Inspection _____

PROGRAM SCOPE

The licensee was a small academic research and development program with authorization for low millicuries of carbon-14 and hydrogen-3, and 500 microcuries of phosphorus-32 for animal studies and teaching of students. During the onsite inspection, the licensee possessed 2.25 millicuries of hydrogen-3, and 0.05 millicuries of carbon-14. Since the last inspection, an authorized user only used hydrogen-3 to conduct auto radiographs for enzyme research and development. No principal activities were conducted since approximately 3 years ago as of the onsite inspection. There were no animal studies since the last inspection. The licensee had no sealed sources containing licensed material. The licensee did not transport licensed material on public highways.

The inspector: (1) observed that licensed material was secured as required; (2) noted that the licensee did not conduct human use or field studies since the last inspection; (3) noted that there was no loss, theft, fire, or flood involving licensed material since the last inspection; (4) noted that the licensee committed to dispose of its licensed material by way of sanitary sewer release in accordance with 10 CFR 20.2003; (5) used an NRC-owned, calibrated survey instrument affixed to a pancake probe to conduct an independent ambient exposure rate survey to detect carbon-14 in the lab and storage areas and the results were indistinguishable from low background; (6) requested the authorized user to conduct wipe surveys for hydrogen-3 contamination in the lab and storage areas; however, the licensee did not have any liquid scintillation fluid, so the wipe survey could not be done; (7) noted that the authorized user attended the students while conducting principal activities; (8) noted that the students wore gloves and labcoats and they were briefed about radiation safety prior to handling the licensed material; (9) noted that absorbent pads were used to contain potential spills, (10) noted that there was no food or drink in the lab; (11) noted that there were no spills of licensed material; and (12) noted that the licensee conducted wipe surveys of selected surfaces to identify potential licensed material contamination.

Two violations of NRC requirements were identified during this inspection and are documented in Parts 1 and 2.

Note: The next inspection date stated above was provided in the event that the licensee wants to keep the license.