



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION I  
2100 RENAISSANCE BOULEVARD, SUITE 100  
KING OF PRUSSIA, PA 19406-2713

May 31, 2018

Buddy Stemple, Plant Manager  
Constellium Rolled Products  
Ravenswood, LLC  
P.O.Box 68  
Ravenswood, WV 26161-0068

SUBJECT: CONSTELLIUM ROLLED PRODUCTS RAVENSWOOD - NRC INSPECTION  
NO. 03007657/2018001 AND NOTICE OF VIOLATION

Dear Mr. Stemple:

This letter refers to the inspection conducted on April 3, 2018, and continuing in-office review of information provided by Zachary Bennett of your staff by email dated May 16, 2018. This inspection was performed to examine activities conducted under your license as they relate to public health and safety, and to confirm compliance with the Commission's rules and regulations and with the conditions of your license. Within these areas, the inspection consisted of selected examination of procedures and representative records, observations of activities, and interviews with personnel. An exit meeting telecom was held on May 30, 2018, with Zachary Bennett of your staff.

Based on the results of this inspection, the NRC has determined that one Severity Level IV violation of NRC requirements occurred. The violations were evaluated in accordance with the NRC Enforcement Policy. The current Enforcement Policy is included on the NRC's Web site at <https://www.nrc.gov/about-nrc/regulatory/enforcement/enforce-pol.html>. The violation is cited in the enclosed Notice of Violation (Notice) because the violation was identified by the NRC.

The NRC has concluded that information regarding: (1) the reason for the violation; (2) the corrective actions that have been taken and the results achieved; and (3) the date when full compliance was achieved is already adequately addressed on the docket. Leak test samples were collected on April 13, 2018, and analyzed on May 2, 2018. In addition, a recurring, scheduled task was created in the plant maintenance planning system to prevent recurrence of missed leak tests in the future. Therefore, 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 choose to provide additional information, you should follow the instructions specified in the enclosed Notice.

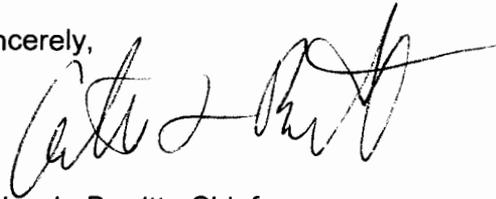
In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and your response, if you choose to provide one, will be made available electronically for public inspection in the NRC Public Document Room or from the NRC document system (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>. To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the Public without redaction.

Current NRC regulations and guidance are included on the NRC's Web Site at [www.nrc.gov](http://www.nrc.gov); select **Nuclear Materials; Med, Ind, & Academic Uses**; then **Regulations, Guidance and Communications**. The current Enforcement Policy is included on the NRC's Web Site at [www.nrc.gov](http://www.nrc.gov); select **About NRC, Organizations & Functions; Office of Enforcement; Enforcement documents**; then **Enforcement Policy (Under 'Related Information')**. You may also obtain these documents by contacting the Government Printing Office (GPO) toll-free at 1-866-512-1800. The GPO is open from 8:00 a.m. to 5:30 p.m. EST, Monday through Friday (except Federal holidays).

If you have any questions regarding this matter, please contact Todd Jackson of my staff at 610-337-5308 or via electronic mail at [Todd.Jackson@nrc.gov](mailto:Todd.Jackson@nrc.gov).

Thank you for your cooperation.

Sincerely,



Arthur L. Burritt, Chief  
Commercial, Industrial, R&D  
and Academic Branch  
Division of Nuclear Materials Safety  
Region I

Docket No. 03007657  
License No. 47-14123-01

Enclosure:  
Notice of Violation

cc w/Encl: Zachary Bennett, Radiation Safety Officer  
Thomas Slone, Director, EHS & Security  
State of West Virginia

Current NRC regulations and guidance are included on the NRC's Web Site at [www.nrc.gov](http://www.nrc.gov); select **Nuclear Materials; Med, Ind, & Academic Uses**; then **Regulations, Guidance and Communications**. The current Enforcement Policy is included on the NRC's Web Site at [www.nrc.gov](http://www.nrc.gov); select **About NRC, Organizations & Functions; Office of Enforcement; Enforcement documents**; then **Enforcement Policy (Under 'Related Information')**. You may also obtain these documents by contacting the Government Printing Office (GPO) toll-free at 1-866-512-1800. The GPO is open from 8:00 a.m. to 5:30 p.m. EST, Monday through Friday (except Federal holidays).

If you have any questions regarding this matter, please contact Todd Jackson of my staff at 610-337-5308 or via electronic mail at [Todd.Jackson@nrc.gov](mailto:Todd.Jackson@nrc.gov).

Thank you for your cooperation.

Sincerely,

*IRA*

Arthur L. Burritt, Chief  
 Commercial, Industrial, R&D  
 and Academic Branch  
 Division of Nuclear Materials Safety  
 Region I

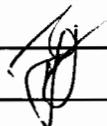
Docket No. 03007657  
 License No. 47-14123-01

Enclosure:  
 Notice of Violation

cc w/Encl: Zachary Bennett, Radiation Safety Officer  
 Thomas Slone, Director, EHS & Security  
 State of West Virginia

DOCUMENT NAME:[G:\WordDocs\Current\Insp Letter\L47-14123-01.2018001.docx  
**SUNSI Review Complete: Todd Jackson**

After declaring this document "An Official Agency Record" it **will** be released to the Public.  
 To receive a copy of this document, indicate in the box: "C" = Copy w/o attach/encl "E" = Copy w/ attach/encl "N" = No copy

OFFICE	RI:DNMS		Y	RI:DNMS				
NAME	TJackson			ABurritt	<i>AB</i>			
DATE	5/30/18				<i>5/31/18</i>			

OFFICIAL RECORD COPY

## NOTICE OF VIOLATION

Constellium Rolled Products  
Ravenswood, LLC  
Ravenswood, WV

Docket No. 03007657  
License No. 47-14123-01

During an NRC inspection conducted onsite April 3, 2018, at your Ravenswood, WV, facility one violation of NRC requirements was identified. In accordance with the NRC Enforcement Policy, the violation is listed below:

Condition 14.A of NRC License 47-14123-01 requires that sealed sources shall be tested for leakage and/or contamination at intervals not to exceed the intervals specified in the certificate of registration issued by the US Nuclear Regulatory Commission (NRC) under 10 CFR 32.210 or under equivalent regulations of an Agreement State. The Sealed Source and Device Registrations for the installed devices listed in License Condition 9 specify leak test frequencies of six months.

Contrary to the above requirement, the installed sealed sources were not tested for leakage or contamination at intervals not to exceed the six month interval specified in the certificates of registration issued by the USNRC under 10 CFR 32.210 or under equivalent regulations of an Agreement State. Specifically, as of the onsite inspection on April 3, 2018, the most recent leak test of installed devices had been performed on July 13, 2017, more than nine months previous.

The licensee stated that scheduling the leak tests was at the discretion of the Radiation Safety Officer and was also dependent on the operating status of the production line on which the device is installed. The periodic leak test/operational check of the gauges was not included in the work planning system used to schedule routine preventive and other maintenance tasks at the plant, which the licensee acknowledged would be appropriate in order to coordinate the various operational constraints upon which performing leak tests depended. As a result, leak tests were performed at inconsistent intervals, and most recently had exceeded the required six month frequency.

The licensee completed the leak tests with receipt of vendor analytical results performed on May 2, 2018, and provided these results to the inspector via email dated May 16, 2018. Results of the leak tests were satisfactory, indicating no contamination. In order to assure that future operational checks and leak tests are performed at six-month intervals as required, the licensee created Constellium ATI Ravenswood plant Work Order number 283826 and scheduled the activity to occur in April and October of each year. This action is intended to assure that the violation does not recur.

The immediate action taken to perform the leak tests is complete and the additional corrective actions taken to prevent recurrence are expected to resolve the cause of the identified violation. The licensee's corrective actions taken in response to the violation will be reviewed during a future inspection of the NRC licensed program.

This is a Severity Level IV violation (Enforcement Policy Section 6.7).

The NRC has concluded that information regarding the reason for the violation, the corrective actions taken and planned to correct the violation and prevent recurrence and the date when full compliance will be achieved is already adequately addressed on the docket. However, you are required to submit a written statement or explanation pursuant to 10 CFR 2.201 if the description therein does not accurately reflect your corrective actions or your position. In that case, or if you choose to respond, clearly mark your response as a "Reply to a Notice of Violation," and send it to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region I, within 30 days of the date of the letter transmitting this Notice of Violation (Notice).

If you contest this enforcement action, you should also provide a copy of your response to the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001. Under the authority of Section 182 of the Act, 42 U.S.C. 2232, any response which contests an enforcement action shall be submitted under oath or affirmation.

Your response, if you provide one, will be placed in the NRC Public Document Room (PDR) and on the NRC Web site. To the extent possible, it should, therefore, not include any personal privacy, proprietary, or safeguards information so that it can be made publically available without redaction. However, if you find it necessary to include such information, you should clearly indicate the specific information that you desire not to be placed in the PDR, and provide the legal basis to support your request for withholding the information from the public.

In accordance with 10 CFR 19.11, you may be required to post this Notice within two working days of receipt.

Dated This 31<sup>st</sup> day of May 2018