

INSPECTION RECORD

Region: III

Inspection Report No. 2018001

License No. 21-24790-01

Docket No. 030-29503

Licensee: St. Clair County Road Commission  
21 Airport Drive  
St. Clair, MI 48079

Locations Inspected: 1) Location above  
2) Temporary job site at Lapeer Road & Allen Road, Kimball  
Township, Michigan

Licensee Contact: William Hazelton, RSO

Telephone No. (810) 388-4026

Program Code: 03121 Priority: 5

Type of Inspection: ( ) Initial (X) Routine ( ) Announced  
( ) Special (X) Unannounced

Last Inspection Date: 03/21/2013

Date of This Inspection: 07/13/2018, with continued  
in-office review through 9/10/2018

Next Inspection Date: 07/13/2023

(X) Normal ( ) Reduced

Summary of Findings and Actions:

- ( ) No violations cited, clear U.S. Nuclear Regulatory Commission (NRC) Form 591 or regional letter issued
- ( ) Non-cited violations (NCVs)
- ( ) Violation(s), Form 591 issued
- (X) Violation(s), regional letter issued
- ( ) Follow-up on previous violations

Inspector: Edward Harvey, Health Physicist

/RA/  
Signature

Date 9/18/2018

Approved: Aaron T. McCraw, Chief, MIB

/RA/  
Signature

Date 9/20/2018

## **PART I – LICENSE, INSPECTION, INCIDENT/EVENT AND ENFORCEMENT HISTORY**

### 1. AMENDMENTS AND PROGRAM CHANGES SINCE LAST INSPECTION:

<u>AMENDMENT #</u>	<u>DATE</u>	<u>SUBJECT</u>
6	09/07/2018	Named new individual as RSO.

### 2. INSPECTION AND ENFORCEMENT HISTORY:

The last routine inspection of this licensee was on March 21, 2013. One violation was identified involving the licensee's failure to secure portable gauges with at least two independent controls at their main office location, as required by Title 10 of the *Code of Federal Regulations* (10 CFR) 30.34(i). The inspector verified that corrective actions were implemented and that this violation had not recurred since the last inspection. Based on these observations, the violation is closed.

The previous routine inspection of this licensee was on August 7, 2008. No violations were identified during this inspection.

### 3. INCIDENT/EVENT HISTORY:

No open items or events since the last routine inspection.

## **PART II – INSPECTION DOCUMENTATION**

### 1. ORGANIZATION AND SCOPE OF PROGRAM:

St. Clair County Road Commission (licensee) is authorized under NRC Materials License No. 21-24790-01 to use byproduct material for measuring physical properties of materials with portable nuclear gauging devices. Licensed material is authorized to be used at the licensee's facility in St. Clair, Michigan, and at temporary job sites anywhere in the United States within areas of NRC jurisdiction. At the time of the inspection, the licensee possessed three Troxler Model 3400 Series portable gauges at its location in St. Clair and authorized five individuals to use the gauges.

### 2. SCOPE OF INSPECTION:

Inspection Procedure(s) Used: 87124

Focus Areas Evaluated: All

The inspector toured the licensee's main office and a temporary jobsite in Kimball Township, Michigan to evaluate the licensee's measures for material security, hazard communication and exposure control. Through interviews with the radiation safety officer and a gauge user, the inspector found that the licensee's staff was knowledgeable of radiation protection principles, emergency procedures, and licensee procedures for use and transportation of portable gauges.

The inspector reviewed a selection of licensee records for leak tests, utilization logs, shipping papers, training documentation, and dosimetry with no issues noted.

3. INDEPENDENT AND CONFIRMATORY MEASUREMENTS:

The inspector conducted independent surveys at each of the locations inspected. The inspector found no readings that would indicate residual contamination or exposures to members of the public in excess of regulatory limits.

4. VIOLATIONS, NCVs, AND OTHER SAFETY ISSUES:

On July 13, 2018, the inspector identified a violation of License Condition 12 of Amendment Number 5 to NRC License 21-24790-0 for the licensee's failure to have the individual named as Radiation Safety Officer (RSO) on their NRC license perform the duties and responsibilities of the RSO.

Specifically, upon arrival the licensee's facility in St. Clair, Michigan, licensee personnel informed the inspector that the previous RSO had retired in early 2014. Further discussion with the licensee indicated that a new individual had been appointed to carry out the duties and responsibilities of the RSO immediately following the previous RSO's retirement. The inspector verified that the newly appointed individual completed the necessary portable gauge training on July 3, 2013 and that there was no lapse in completion of the RSO duties as a result of the change.

The inspector determined that the root cause of the violation was management oversight in failing to file the necessary NRC license amendment request to have a new RSO named on the license when the previous RSO retired. As corrective action to restore compliance, the licensee filed for an amendment request to add the newly appointed RSO to their license on June 25, 2018. The NRC approved the amendment request on September 7, 2018. As corrective action to prevent recurrence, the licensee has committed to create and implement an internal policy to notify the NRC of any future RSO changes.

5. PERSONNEL CONTACTED:

Michael Clark, County Highway Engineer  
# William Hazelton, Director of Engineering, RSO

# Attended exit meeting on September 12, 2018.

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