

**SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION**

<p>1. LICENSEE/LOCATION INSPECTED:</p> <p>Eli Lilly and Company Lilly Corporate Center Indianapolis, Indiana 46285</p> <p>REPORT NUMBER(S) 03004330/2019001</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>03004330</p>	<p>4. LICENSE NUMBER(S)</p> <p>13-01133-02</p>	<p>5. DATE(S) OF INSPECTION</p> <p>March 20 and 21, 2019</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	Michael LaFranzo		3/28/19
BRANCH CHIEF	Michael Kunowski		4/8/19

**Docket File Information**  
**SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION**

1. LICENSEE/LOCATION INSPECTED:  Eli Lilly and Company Lilly Corporate Center Indianapolis, Indiana 46285  REPORT NUMBER(S) 03004330/2019001	2. NRC/REGIONAL OFFICE  Region III U. S. Nuclear Regulatory Commission 2443 Warrenville Road, Suite 210 Lisle, IL 60532-4352
--	---

3. DOCKET NUMBER(S)  03004330	4. LICENSE NUMBER(S)  13-01133-02	5. DATE(S) OF INSPECTION  March 20 and 21, 2019
-------------------------------------	---	---

6. INSPECTION PROCEDURES USED  87104	7. INSPECTION FOCUS AREAS  03.01-03.02
--	--

**SUPPLEMENTAL INSPECTION INFORMATION**

1. PROGRAM CODE(S)  3900	2. PRIORITY  5	3. LICENSEE CONTACT  Trenton Mays - RSO	4. TELEPHONE NUMBER  (317) 276-2747
--------------------------------	----------------------	---	---

Main Office Inspection                      Next Inspection Date:                      NA

Field Office Inspection \_\_\_\_\_

Temporary Job Site Inspection \_\_\_\_\_

**PROGRAM SCOPE**

This was an announced Decommissioning inspection of several rooms in Building 77 of the Lilly Corporate Center Complex (Eli Lilly). The radioactive material was used in several rooms, primarily C-14 but other nuclides such as H-3 and iodine were also used in smaller quantities. The licensee decided decommissioning characterization would be done by an authorized contractor, in this case Chase Environmental Group, Inc. (Chase) out of Kentucky (License No.: 201-605-15; Docket No.: 15000016) under reciprocity. The purpose of the decommissioning characterization was to properly identify the location and quantity of contamination to determine a future course of action to release the area for unrestricted use. Due to other licensed activities being performed in Building 77, the cessation of activities in these rooms is not considered decommissioning under the Decommissioning Timeliness Rule pursuant to 10 CFR 30.36. However, additional decommissioning work, if not specifically approved under the license, in areas where high radioactivity is found may require NRC approval via a licensing amendment.

The inspector also reviewed the licensee's Tritium exit sign generally licensed program as a result of a reported lost source (Event Number 53914; NMED Item Number: 190121).

**PERFORMANCE OBSERVATIONS:** The inspector interviewed numerous staff including the Radiation Safety Officer concerning the control of licensed material and to ensure the contractor; the inspector found the staff was adequately trained to ensure licensed material was properly controlled and that Chase contractor staff were appropriately supervised within the boundaries of the licensee's facility concerning the handling and control of licensed material. The inspector performed radiological surveys of the contaminated rooms and did not identify any unexpected radiation levels.

Concerning the lost Tritium exit sign, the licensee currently has an annual program to locate and identify tritium exit signs currently on site. The licensee is in the process of preparing and shall submit a 30 day pursuant to 10 CFR 20.2201. The inspector performed a limited inventory physical review and noted tritium exit signs were accounted for at the designated locations.