

**SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION**

1. LICENSEE/LOCATION INSPECTED:

The Dow Chemical Company  
1803 Building  
Midland, MI 48674

REPORT NUMBER(S) 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)

030-04783

4. LICENSE NUMBER(S)

21-00265-06

5. DATE(S) OF INSPECTION

4/2/19

**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:

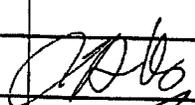
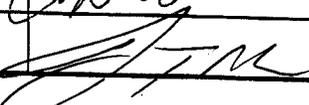
- 1. Based on the inspection findings, no violations were identified.
- 2. Previous violation(s) closed.
- 3. The violation(s), specifically described to you by the inspector as non-cited violations, are not being cited because they were self-identified, non-repetitive, and corrective action was or is 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             | Luis Nieves Folch |   | 4/2/19  |
| BRANCH CHIEF              | Aaron T. McCraw   |  | 4/30/19 |



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|   |   |   |  |
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| 3. DOCKET NUMBER(S)<br><br>030-04783  | 4. LICENSE NUMBER(S)<br><br>21-00265-06 | 5. DATE(S) OF INSPECTION<br><br>April 2, 2019   |  |

(Continued)

**PERFORMANCE OBSERVATIONS**

The inspector toured numerous areas of the company's Michigan Division in Midland to evaluate the licensee's measures for materials security, hazard communication, and exposure control. The inspector toured several production units to evaluate the condition of approximately ten percent of in-use gauges. The inspector conducted independent surveys in the vicinity of these gauges, and discussed the implementation of licensee procedures for leak tests, shutter checks, gauge lock-out and non-routine maintenance with licensee personnel. The inspector toured the gauge storage facility, where 141 gauges all Cs-137 were labeled and packaged, ready for disposal. The inspector verified that all the labels and paper work appeared to be in order. The licensee personnel demonstrated the collection of leak tests and shutter mechanism checks.

The inspector also toured the incinerator facility and reviewed the incineration process for radioactive waste. The inspector then toured several research laboratories and conducted independent surveys. The licensee's staff demonstrated implementation of licensee procedures for unsealed material receipt, accountability and use, safe handling procedures, waste handling, and spill response. The inspector reviewed a selection sealed source leak tests and inventories, gauge shutter checks and surveys, personnel dosimetry, RSC meeting minutes, internal and external program audits, and authorized user training documentation.

No violations were identified as a result of this inspection.