



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, ILLINOIS 60532-4352

July 11, 2019

Mr. Donovan Larkin, Radiation Safety Officer
Great Lakes Engineering Group, LLC
934 Clark Street
Lansing, MI 48906

SUBJECT: NRC ROUTINE INSPECTION REPORT NO. 03038043/2019001(DNMS) AND
NOTICE OF VIOLATION – GREAT LAKES ENGINEERING GROUP, LLC

Dear Mr. Larkin:

On April 12, 2019, an inspector from the U.S. Nuclear Regulatory Commission (NRC) conducted a routine inspection at your Lansing, Michigan facility, with continued in-office review through June 19, 2019. The purpose of the inspection was to review activities performed under your NRC license to ensure that activities were being performed in accordance with NRC requirements. The in-office review included interviews of licensee staff who was not available at the time of the onsite inspection, as well as a review of additional records. Mr. Jason Draper of my staff conducted a final exit meeting by telephone with you on June 19, 2019, to discuss the inspection findings.

During this inspection, the NRC staff examined activities conducted under your license related to public health and safety. Additionally, the staff examined your compliance with the Commission's rules and regulations as well as 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.

Based on the results of this inspection, the NRC has determined that two Severity Level IV violations 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 website at <http://www.nrc.gov/about-nrc/regulatory/enforcement/enforce-pol.html>. The first violation concerned the licensee's failure to conduct a physical inventory every 6 months to account for all devices received and possessed under the license, as required by License Condition 15 of NRC Radioactive Materials License No. 21-32749-01. The second violation concerned the licensee's failure to conduct periodic reviews of the content and implementation of the licensee's radiation protection program at least annually, as required by Title 10 of the *Code of Federal Regulations* (CFR) 20.1101(c). The violations are cited in the enclosed Notice of Violation (Notice). The NRC is citing the violations in the enclosed Notice because the inspector identified the violations.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. The guidance in NRC Information Notice 96-28, "Suggested Guidance Relating to Development and Implementation of Corrective

Action,” may be useful in preparing your response. You can find the Information Notice on the NRC website at: <http://www.nrc.gov/reading-rm/doc-collections/gen-comm/info-notices/1996/in96028.html>. The NRC will use your response, in part, to determine whether further enforcement action is necessary to ensure compliance with regulatory requirements.

In accordance with 10 CFR 2.390 of the NRC’s “Rules of Practice,” a copy of this letter, its enclosure, and your response, will be made available electronically for public inspection in the NRC’s Public Document Room or from the NRC’s Agencywide Documents Access and Management System (ADAMS), accessible from the NRC’s website 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 publicly available without redaction.

Please feel free to contact Mr. Draper if you have any questions regarding this inspection. Mr. Draper can be reached at 630-829-9839.

Sincerely,

/RA/

Aaron T. McCraw, Chief
Materials Inspection Branch
Division of Nuclear Materials Safety

Docket No. 030-38043
License No. 21-32749-01

Enclosure:
Notice of Violation

cc w/encl: State of Michigan

Letter to D. Larkin from A. McCraw, dated July 11, 2019.

SUBJECT: NRC ROUTINE INSPECTION REPORT NO. 03038043/2019001(DNMS) AND
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DISTRIBUTION w/encl:

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OFFICIAL RECORD COPY

NOTICE OF VIOLATION

Great Lakes Engineering Group, LLC
Lansing, Michigan

License No. 21-32749-01
Docket No. 030-38043

During a U.S. Nuclear Regulatory Commission (NRC) inspection conducted on April 12, 2019, with continued in-office review through June 19, 2019, two violations of NRC requirements were identified. In accordance with the NRC Enforcement Policy, the violations are listed below:

- A. License Condition 15 of NRC License 21-32749-01 states, in part, that the licensee shall conduct a physical inventory every 6 months to account for all devices received and possessed under the license.

Contrary to the above, between July 27, 2015, and September 12, 2018, the licensee failed to perform a physical inventory of the devices possessed under its license.

This is a Severity Level IV violation (Section 6.3)

- B. Title 10 of the *Code of Federal Regulations* (CFR) 20.1101(c) requires that licensees periodically (at least annually) review the radiation protection program content and implementation.

Contrary to the above, between April 8, 2015, and May 31, 2019, the licensee failed to periodically (at least annually) review the radiation protection program content and implementation.

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

Pursuant to the provisions of 10 CFR 2.201, Great Lakes Engineering Group, LLC is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001, with a copy to the Regional Administrator, Region III, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include: (1) the reason for the violation, or, if contested, the basis for disputing the violation or its severity level, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken, and (4) the date when full compliance was or will be achieved. Your response may reference or include previously docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

If you contest this enforcement action, you should also provide a copy of your response, with the basis for your denial, to the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001.

Your response will be made available electronically for public inspection in the NRC's Public Document Room or from the NRC's Agencywide Documents Access and Management System

Enclosure

(ADAMS), accessible from the NRC's website 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 publicly available without redaction.

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

Dated this 11th day of July, 2019.