



GM Global Research and Development

September 26, 2019

U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001
Attn: Document Control Desk

Re: License #21-00016-04, Response to issued level IV violation.

Dear Sir or Madam:

During the decommissioning inspection conducted on July 25, 2019, an inspector determined that General Motors LLC ("GM") had failed to notify the NRC within 24 months after the cessation of principle activities at one of its licensed sites. A violation of 10CFR Part 30.36(d).

This violation occurred during the cessation of activities from one licensed site. A third party, Radiation Safety and Control Services (RSCS), was hired to decommission the designated facility and dispose of any sources and contaminated materials. The entire process was expected to be completed in 12-18 months, with the final status survey (FSS) being submitted to the NRC within the 24-month required timeframe.

Issues unrelated to the decommissioning efforts resulted in the final steps in the process delayed beyond the 24- month requirement. When this was realized, a notification of intent to decommission was written and submitted to NRC region III. The letter arrived 32 months after principle activities had ceased at the designated site.

The letter prompted a decommissioning inspection, during which the violation was noted. The inspector requested written documentation of the timeline of decommissioning activities performed at the site and was submitted to the NRC regional branch (see attachment).

To avoid a similar occurrence in the future, the GM decommissioning plan was rewritten to include submission of a notification of intent to decommission immediately after principle activities have ceased at a specific facility and prior to commencing decommissioning activities. This activity has already been performed, and the decommissioning plan has been updated. Additionally, a comprehensive report is being drafted, covering all the details and steps taken to decommission a facility, and will be circulated to the radiation safety committee.

Sincerely,



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- 2013 – GM announces an expansion of the Pontiac test facility, which would include a new radiometric laboratory, replacing the current Warren facility.
- May, 2015 – During the regular license renewal, GM amends NRC license No. 21-00016-04 to incorporate the new Pontiac radiometric laboratory.
- December, 2015 – Radiation Safety and Control Services (RSCS) submits a proposal for decommissioning the Warren radiometric laboratory.
- February, 2016 – GM hires Ideal Contracting as the contractor to oversee decommissioning efforts and provide technical assistance to the sub-contractor, RSCS.
- March, 2016 – RSCS conducts a site walkdown and records review of the Warren radiometric laboratory in preparation for decommissioning activities.
- July, 2016 – RSCS returns to the Warren radiometric laboratory to conduct a full laboratory isotopic characterization and identify source material for disposal.
- September, 2016 – Analytical survey results from TestAmerica reveal contamination in the sludge at the bottom of the water sump, waste oil and coolant drums.
- **October, 2016** – Research activities cease at the Warren radiometric laboratory, and all pertinent equipment is moved to the new Pontiac facility.
- December, 2016 – RSCS segregates all materials within the radiometric laboratory into contaminated and non-impacted for appropriate disposal. Chase Environmental packages contaminated materials and sealed sources into 55-gallon drums for rad disposal. The bulk of the sealed sources and non-mixed waste from the Warren laboratory are removed.
- January, 2017 – The GM remediation team assumes control over decommissioning activities, as the entire building (not just the radiometric laboratory) will be decommissioned and closed, and replaces Ideal with GHD as the contractor for all decommissioning activities.
- June 2017 – GM contacts the NRC regarding the possibility of a second RSO to oversee the decommissioning efforts. The NRC responds that the only path to a second RSO would be to apply for a second license, but a licensee can have as many assistant RSOs as we would like. GM pursues this path to train additional personnel to serve as assistant RSOs for the Warren facility.
- December, 2017 – International Radiation Safety Consulting Inc. (IRSC) arrives on site to provide radiation safety officer training to assistant RSOs.
- February, 2018 – Water has been turned off to the radiometric laboratory and all drain lines (from non-radiometric laboratories) have been rerouted to prevent water accumulating in the retention tanks.
- March, April and June, 2018 – Bionomics removes the remaining contaminated materials. The only remaining areas of concerns are the sump, separatory tanks, beneath the dynamometer bedplate, and the coolant drum (mixed waste).
- May 2018 – The NRC requests an updated license decommissioning plan, and GM sends the appropriate plan to the NRC for approval.
- January, 2019 – SC&A submits proposal for final decommissioning activities, and is chosen to replace RSCS for final decommissioning activities and final status survey.
- **June, 2019** – SC&A encourages GM to submit a formal letter of decommissioning to the NRC and suggests we request a meeting with the NRC prior to continuing decommissioning activities.
- July 2019 – NRC conducts a decommissioning inspection of the Warren radiometric laboratory.

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