



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION III  
2443 WARRENVILLE ROAD, SUITE 210  
LISLE, ILLINOIS 60532-4352

August 12, 2020

Mr. Robert Cole  
Environmental Project Manager  
Dana Incorporated  
2100 West State Boulevard  
Fort Wayne, IN 46808

SUBJECT: IR 99990003/2020002(DNMS) – DANA INCORPORATED – Special Inspection  
Report Letter

Dear Mr. Cole:

Between April 30, 2019, and August 4, 2020, an inspector from the U.S. Nuclear Regulatory Commission (NRC) conducted an in-office review of the circumstances surrounding the acquisition by a Fort Wayne scrap metal company, OmniSource Corporation (OmniSource), of an exit sign containing radioactive material (radioactive hydrogen gas, tritium (H-3)) that the manufacturer's records indicated was sold to your company in 1987. Possession, use, and transfer of this type of exit sign is subject to a general license in the NRC's regulations in Title 10 of the *Code of Federal Regulations* (10 CFR) Part 31, specifically 10 CFR 31.5.

The NRC received information from Isolite Corporation (Isolite) that the sign, based on its serial number, had been sold to Dana Corporation, through an intermediary supplier, sometime around October 1987. Isolite handles certain activities associated with Safety Light Corporation, the now out-of-business company that manufactured the sign. In May 2019, you were contacted by telephone by the inspector, Mr. Dennis O'Dowd, and after a series of discussions, you agreed that Dana Incorporated (Dana Corp) would retrieve the sign from OmniSource, which was done later that month. Mr. O'Dowd's continued review of this matter included an assessment of Dana Corp's Environmental Health and Safety Office efforts to locate information regarding this device, including whether the exit sign had been located in a particular warehouse building once owned by Dana Corp, and determining whether or not the device was transferred to a company known as Press-Seal, the company that purchased the building from Dana Corporation in the early 2000s. Mr. O'Dowd conducted a final exit meeting by telephone with you on August 4, 2020, to discuss the results of his review.

During this in-office review, the NRC staff examined activities conducted under your general license at that time related to public health and safety. Additionally, the staff examined your compliance with the Commission's rules and regulations. The in-office review consisted of interviews with personnel and examination of information provided by you to the NRC.

Based on the results of the in-office review and the information that was provided by you and your staff, as well as other sources of information that was gathered and reviewed during the in-office review, no violations were identified during this review.

In discussions with the Radiation Safety Officer (RSO) at Isolite, Mr. O'Dowd determined that almost all records from Safety Light Corporation, which ceased operations in the mid-2000s, had been destroyed; however, the RSO was able to locate limited information regarding this particular device, manufactured in 1987, based on its serial number. The RSO stated further that all records of any transfers and returns, however, were destroyed.

In addition, discussions with employees at OmniSource indicate that it was not clear how the sign came into the possession of OmniSource. Discussions with the Safety Manager of Press-Seal, the company which acquired the building from Dana Corp that was thought to be the location where the exit sign would have likely been located during that time, indicated no knowledge of an exit sign at that location, and had no records of possessing a tritium exit sign. In addition, as part of their corrective actions, Dana Corp conducted an extensive check of their facilities in Fort Wayne, Indiana, as well as their other facilities, including their headquarters in Ohio, and did not identify any other tritium exit signs.

The NRC considers this matter to be of very low safety significance because of: (1) the nature of the material involved (H-3), and the fact that the tritium has undergone nearly three half-lives, decaying to almost 2 curies, from its original quantity of 15; (2) in June 2020, the exit sign was transferred to an authorized recipient (i.e., an authorized radioactive waste site); (3) there is no means to determine whether Dana Corp had inadvertently transferred the exit sign to Press-Seal as neither company has any records going back to the time the building thought to house the exit sign was transferred. Dana Corp stated that their records are culled after seven years, and Press-Seal stated that their records are likewise not retained after several years; and (4) individuals at OmniSource could not identify the individual(s) who apparently had acquired the exit sign sometime during the early 2000s and ultimately passed the exit sign to OmniSource for handling.

Because the NRC has not been able to make any further determination regarding the exit sign, we consider this case to be closed at this time. As such, the NRC has suspended its review of the matter because it could not reach a conclusion following a reasonable period of review commensurate with the very low safety significance of any potential violation. Please note that this matter may be reviewed again in the future if the NRC receives new information regarding this matter.

You are not required to respond to this letter unless the description herein does not accurately reflect your corrective actions or your position. In that case, or if you choose to provide additional information, you should follow the instructions specified in the enclosed Notice. In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response, if you choose to provide one, 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.

R. Cole

3

Please feel free to contact Mr. O'Dowd if you have any questions regarding this inspection. Mr. O'Dowd can be reached at 630-829-9573.

Sincerely,

Michael A. Kunowski

Digitally signed by Michael A.  
Kunowski  
Date: 2020.08.12 07:01:53 -05'00'

Michael A. Kunowski, Chief  
Materials Inspection Branch  
Division of Nuclear Materials Safety

Docket No. 999-90003

cc: State of Indiana

Letter to Robert Cole from Michael Kunowski dated August 12, 2020

SUBJECT: IR 99990003/2020002(DNMS) – DANA Incorporated – Special Inspection Report Letter

DISTRIBUTION:

Jack Giessner  
Kenneth O'Brien  
David Pelton  
Christine Lipa  
Dave Alley  
Patricia Silva  
Jamnes Cameron  
Paul Pelke  
MIB Inspectors

**ADAMS Accession Number: ML20225A166**

OFFICE	RIII DNMS	C	RIII DNMS	C	RIII		RIII	
NAME	DO'Dowd:brt DOD		MKunowski					
DATE	08/06/20		08/12/20					

**OFFICIAL RECORD COPY**