

SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION

<p>1. LICENSEE/LOCATION INSPECTED:</p> <p>Richardson Electronics, Ltd. P.O. Box 393 LaFox, IL 60147</p> <p>REPORT NUMBER(S) 2021001</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>040-38372</p>	<p>4. LICENSE NUMBER(S)</p> <p>12-35163-01E</p>	<p>5. DATE(S) OF INSPECTION</p> <p>5/27/21 with in-office review through 7/15/21</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)

Contrary to 10 CFR 40.53(c), from 2017 through January 31, 2021, the licensee failed to file annual reports with the NRC's Office of Nuclear Material Safety and Safeguards for products transferred to other persons for use as products exempt from NRC regulations or indicating that no products were transferred during the reporting periods. As corrective actions, the licensee submitted their reports for the missed years on June 9, 2021, and created an electronic calendar reminder to prevent untimely submissions in the future. This is a Severity Level IV violation.

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	Mars Castaneda	<i>Mars Castaneda</i>	7/16/21
NRC INSPECTOR	Jason D. Draper, Health Physicist	Jason D. Draper Digitally signed by Jason D. Draper Date: 2021.07.15 13:29:25 -05'00'	
BRANCH CHIEF	Michael A. Kunowski	Michael A. Kunowski Digitally signed by Michael A. Kunowski Date: 2021.07.15 13:35:25 -05'00'	



Materials Inspection Record

1. Licensee Name: Richardson Electronics, Ltd.		2. Docket Number(s): 040-38372		3. License Number(s) 12-35163-01E	
4. Report Number(s): 2021001			5. Date(s) of Inspection: May 27, 2021, with in-office review through July 15, 2021		
6. Inspector(s): Jason Draper		7. Program Code(s): 11240	8. Priority: 5	9. Inspection Guidance Used: IP 87128	
10. Licensee Contact Name(s): Narciso Castaneda, Facilities Manager		11. Licensee E-mail Address: ncastaneda@rell.com		12. Licensee Telephone Number(s): 630-208-2276	
13. Inspection Type: <input checked="" type="checkbox"/> Routine <input checked="" type="checkbox"/> Announced <input type="checkbox"/> Non-Routine <input type="checkbox"/> Unannounced		14. Locations Inspected: <input checked="" type="checkbox"/> Main Office <input type="checkbox"/> Field Office <input type="checkbox"/> Temporary Job Site <input type="checkbox"/> Remote		15. Next Inspection Date (MM/DD/YYYY): 05/27/2026 <input checked="" type="checkbox"/> Normal <input type="checkbox"/> Extended <input type="checkbox"/> Reduced <input type="checkbox"/> No change	

16. Scope and Observations:

This was an announced, routine inspection of a electronics manufacturer, authorized by the NRC to distribute vacuum tubes containing thorium as products exempt from NRC regulations from their facility located in LaFox, Illinois. The licensee manufactured two models of these vacuum tubes on-site, and distributed them to one domestic customer. At the time of the inspection, the licensee possessed four finished vacuum tubes (Model 577W). The licensee had last manufactured these vacuum tubes in March 2017 and had last distributed them in October 2019.

Due to the Covid-19 public health emergency, the inspector contacted the licensee prior to the inspection to ensure an on-site inspection could be performed safely. During the inspection, the inspector was able to review a sample of the manufactured products to verify proper labeling. The inspector also interviewed a selection of licensee staff regarding the manufacture, handling, and distribution of the products.

Through the review of licensee records and interviews with the Facilities Manager, the inspector identified that the licensee had not submitted annual transfer reports for calendar years 2017-2020 as required by 10 CFR 40.53(c). In discussions with the Facilities Manager, the inspector determined that this was because the previous Facilities Manager who was responsible for the licensed activities left the company in 2017 and the regulatory responsibilities were not clearly communicated to the oncoming Facilities Manager. The licensee gathered the required information for these reports and submitted the past-due reports to the NRC on June 9, 2021. He also created an electronic reminder to ensure that future reports are submitted in a timely manner.

Additionally, through the course of the inspection, the inspector identified that the licensee did not possess a specific license from the State of Illinois for possession and use of source material, but the quantity of material possessed by the licensee appeared to exceed the quantity allowed under a general license with the State of Illinois. The inspector forwarded this information to the State of Illinois for their review.

One violation of NRC requirements was identified as a result of this inspection.