

SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION

1. LICENSEE/LOCATION INSPECTED: BASF Corporation 1609 Biddle Avenue Wyandotte, MI 48192 REPORT NUMBER(S) 2021001		2. NRC/REGIONAL OFFICE Region III U. S. Nuclear Regulatory Commission 2443 Warrenville Road, Suite 210 Lisle, IL 60532-4352	
3. DOCKET NUMBER(S) 030-04787		4. LICENSE NUMBER(S) 21-00627-02	5. DATE(S) OF INSPECTION September 23, 2021

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	Zahid Sulaiman, Health Physicist	Zahid M. Sulaiman	Digitally signed by Zahid M. Sulaiman Date: 2021.10.14 11:08:50 -05'00'
BRANCH CHIEF	Michael Kunowski, Chief, MIB	Michael A. Kunowski	Digitally signed by Michael A. Kunowski Date: 2021.10.18 06:59:38 -05'00'



Materials Inspection Record

1. Licensee Name: BASF Corporation		2. Docket Number(s): 030-04787		3. License Number(s) 21-00627-02	
4. Report Number(s): 2021001			5. Date(s) of Inspection: September 23, 2021		
6. Inspector(s): Zahid Sulaiman, Health Physicist		7. Program Code(s): 03120	8. Priority: 5	9. Inspection Guidance Used: 87124	
10. Licensee Contact Name(s): Derek J. Hetes, RSO		11. Licensee E-mail Address: Derek.hetes@basf.com		12. Licensee Telephone Number(s): (734)-324-5282	
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): 09/23/2026 <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 unannounced routine inspection of a chemical manufacturing plant authorized to use byproduct material for level measurements at its facilities in Wyandotte, Michigan. The licensee possessed total of 23 fixed nuclear gauges (4 Kay-Ray, Model-7062B; 4 Thermo Fisher, Model-5205A; 5 Berthold Technologies, Model-LB 300LP; 10 Berthold Technologies, Model-LB 300L) containing Co-60 and Cs-137 sealed sources located on process lines at two facilities (Resin Plant and Chemical Engineering Building) on-site. The licensee is planning to remove and dispose a fixed gauge (Kay-Ray, Model-7062B) located in the Chemical Engineering building which is not in operation since 2018. The licensee also possessed total of 15 generally licensed devices (4 ECDs containing Ni-63; 3 portable detectors, Model-RAID-52 containing Ni-63; and 8 Tritium Exit signs). The licensee had 19 authorized users who performed the shutter check, lock-out procedures, and radiation monitoring. The licensee's RSO was a member of the company's environmental health and safety (EHS) staff.

PERFORMANCE OBSERVATIONS

This inspection was consisted of tour of the facilities, interview with select licensee personnel, a review of select records, and an observation of security of the materials. The inspector toured the facilities in Wyandotte, Michigan where gauges were located to evaluate the licensee's measures for materials security, hazard communication, and exposure control. The inspector interviewed several members of the licensee's staff to discuss gauge maintenance including leak testing and shutter checks, lock-out procedures, and emergency response procedures. Through these discussions the inspector found the licensee's staff to be knowledgeable of radiation protection principles and regulatory requirements.

The inspector also reviewed a selection of relevant records, including master inventories, preventative maintenance documentation of semiannual shutter checks and area surveys, triennial leak test results, training records, instrument calibration, and annual program audits and reviews of the content and implementation of the radiation safety program.

No violations of NRC requirements were identified as a result of this inspection.