

SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION

1. LICENSEE/LOCATION INSPECTED: Cleveland-Cliffs Kote L.P. 30755 Edison Rd. New Carlisle, IN 46552 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) 030-37052	4. LICENSE NUMBER(S) 13-32600-01	5. DATE(S) OF INSPECTION October 25, 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 <small>Digitally signed by Zahid M. Sulaiman Date: 2021.11.08 15:40:06 -06'00'</small>	
BRANCH CHIEF	Michael Kunowski, Chief, MIB	Michael A. Kunowski <small>Digitally signed by Michael A. Kunowski Date: 2021.11.10 12:10:06 -06'00'</small>	



Materials Inspection Record

1. Licensee Name: Cleveland-Cliffs Kote L.P.		2. Docket Number(s): 030-37052		3. License Number(s) 13-32600-01	
4. Report Number(s): 2021001			5. Date(s) of Inspection: October 25, 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): John Franiak - RSO		11. Licensee E-mail Address: John.franiak@clevelandcliffs.com		12. Licensee Telephone Number(s): (574) 654-1243	
13. Inspection Type: <input checked="" type="checkbox"/> Routine <input type="checkbox"/> Non-Routine <input type="checkbox"/> Initial <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): 10/25/2026 <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 steel mill located in New Carlisle, Indiana, authorized to possess americium-241 sealed sources in Data Measurement Corporation fixed nuclear gauges. The licensee possessed three specifically-licensed fixed gauges (Amersham Corporation, Model AMC-30) to measure steel thickness. The licensee also possessed total of 13 generally-licensed fixed gauges (8 Lockheed Martin, Model 5310; 4 DMC, Model AMC-19; 1 TN Tech acid density gauge) for thickness measurement. The licensee hired a service provider who performed the shutter checks, leak tests, maintenance and repairs, and other source related services.

PERFORMANCE OBSERVATIONS

This inspection consisted of a tour of the facilities, interview with select licensee personnel, a review of select records, an observation of security of the materials, and independent measurements. The inspector toured the plant where the three specifically-licensed gauges were located to evaluate the licensee's measures for materials security, hazard communication, and exposure control. The inspector interviewed licensee's staff about the leak test, shutter check, lock-out procedures, gauge maintenance, 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 reviewed a selection of relevant records, including master inventory, semi-annual shutter checks and area surveys, leak test results, initial and annual training, and annual program audits. The inspector performed independent radiation measurements and found no exposures distinguishable from background.

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