



Materials Inspection Report

1. Licensee/Location Inspected: Plastatech Engineering, Ltd. 725 Morley Drive Saginaw, MI 48601 Report Number(s) 2022-001	2. NRC/Regional Office Region III U. S. Nuclear Regulatory Commission 2443 Warrenville Road, Suite 210 Lisle, IL 60532-4352	
3. Docket Number(s) 030-34117	4. License Number(s) 21-26714-01	5. Date(s) of Inspection 03/22/22; exit 12/08/22

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. During this inspection, certain of your activities, as described below and/or attached, were in violation of NRC requirements, and were assessed at Severity Level IV, in accordance with the NRC Enforcement Policy.
 - A. 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, corrective action was or is being taken, and the remaining criteria in the NRC Enforcement Policy were satisfied.
 (Non-cited violation(s) was/were discussed involving the following requirement(s))
 - B. The following violation(s) is/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 AND DATE
LICENSEE'S REPRESENTATIVE		
NRC INSPECTOR	Ryan Craffey	 <small>Digitally signed by Ryan J. Craffey Date: 2022.12.16 14:31:19 -05'00'</small>
BRANCH CHIEF	Rhex Edwards	 <small>Digitally signed by Rhex A. Edwards Date: 2022.12.21 10:56:27 -06'00'</small>



Materials Inspection Record

1. Licensee Name: Plastatech Engineering, Ltd.		2. Docket Number(s): 030-34117		3. License Number(s) 21-26714-01	
4. Report Number(s): 2022-001			5. Date(s) of Inspection: 03/22/22; in-office review through 12/07/22; exit 12/08/22		
6. Inspector(s): Ryan Craffey		7. Program Code(s): 03120	8. Priority: 5	9. Inspection Guidance Used: IP 87124	
10. Licensee Contact Name(s): Michael Matthews - RSO Justin Evans - Safety Manager		11. Licensee E-mail Address: mmatthew@duro-last.com jevans@duro-last.com		12. Licensee Telephone Number(s): 989-758-1053 N/A	
13. Inspection Type: <input checked="" type="checkbox"/> Routine <input type="checkbox"/> Announced <input type="checkbox"/> Non-Routine <input checked="" type="checkbox"/> Unannounced		14. Locations Inspected: <input type="checkbox"/> Hybrid <input type="checkbox"/> Field Office <input checked="" type="checkbox"/> Main Office <input type="checkbox"/> Remote <input type="checkbox"/> Temporary Job Site		15. Next Inspection Date (MM/DD/YYYY): 03/22/2027 <input checked="" type="checkbox"/> Normal <input type="checkbox"/> Extended <input type="checkbox"/> Reduced <input type="checkbox"/> No change	
16. Location(s) Inspected List: Main Office - 725 Morley Drive, Saginaw, MI Building 825 and 831					
17. Scope and Observations: Plastatech Engineering was a vinyl roofing and geomembrane manufacturer authorized to possess fixed gauges for thickness measurements on production lines at two facilities on the campus of its parent company (Duro-Last) in Saginaw, Michigan. At the time of the inspection, the licensee had two Thermo EGS Gauging TFC-190 beta transmission gauges containing Sr-90 and one Betacontrol of America MK 1.0 beta transmission gauge containing Kr-85. The manufacturers of these devices performed semiannual routine maintenance and non-routine maintenance as needed. The inspector toured the production facility in Saginaw. All areas were adequately posted, and all licensed material was adequately secured. The inspector performed independent surveys in the vicinity of all three devices. Readings were consistent with the radiation profiles in the applicable SSDR safety evaluations (NR-8327-D-801-B and MA-1287-D-107-B) and were well below regulatory limits to members of the public. Licensee personnel demonstrated the operation of the Betacontrol shutter, which functioned as intended as confirmed by independent surveys. The inspector discussed radiation safety awareness and safe use of these devices with the line operators and found them aware of the radiation hazards present as well as methods to minimize them. The inspector reviewed a selection of maintenance records which included inventories and shutter checks of its devices. However, the licensee was initially unable to locate and provide records of the Sr-90 sources having been leak tested at the required frequency. During a period of in-office review extended by untimely responses to the inspector's reminders and requests for information, the licensee provided results of leak tests performed by the manufacturer, but only those performed on September 28, 2022. The inspector eventually contacted the manufacturer directly, who provided results of additional tests performed on October 6, 2020, April 13, 2021, and April 12, 2022. No documentation was found of any leak tests having been performed between April 2021 and April 2022, although a maintenance log entry of a visit by the manufacturer in October 2021 was noted. This was considered a minor violation of LC 13, as there was minimal safety significance to missing the test or failing to retain a record of it, since all tests before and after were confirmed by the inspector to have been negative for leakage					

Materials Inspection Record (Continued)

and/or contamination. As corrective action, the licensee's RSO assumed responsibility for scheduling and overseeing manufacturer visits from the maintenance department and confirmed that leak tests of the Sr-90 sources would be required during each visit and a record of the results obtained thereafter.

The licensee was previously cited in IR 03034117/2016001(DNMS) for a similar violation of LC 13. The inspector reviewed the licensee's corrective actions, and confirmed that it continued to maintain a contract with the manufacturer to perform routine maintenance. However, since the inspector identified an additional example of the licensee's failure to comply with this license condition, the previous violation remains open for review during a future routine inspection.

Signature and Date - Branch Chief



Digitally signed by Rhex A. Edwards
Date: 2022.12.21 10:55:53 -06'00'