



## Materials Inspection Report

<b>1. Licensee/Location Inspected:</b>  U.S. Environmental Protection Agency Great Lakes Toxicology and Ecology Division 6201 Congdon Blvd. Duluth, MN 55804  <b>Report Number(s)</b> 2023001	<b>2. NRC/Regional Office</b>  Region III U. S. Nuclear Regulatory Commission 2443 Warrenville Road, Suite 210 Lisle, IL 60532-4352
--	--

<b>3. Docket Number(s)</b> 030-05046	<b>4. License Number(s)</b> 22-13390-01	<b>5. Date(s) of Inspection</b> March 23, 2023
---	--	---

**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	Jason Draper, Health Physicist	Jason D. Draper <small>Digitally signed by Jason D. Draper Date: 2023.04.14 09:11:59 -05'00'</small>
BRANCH CHIEF	Rhex Edwards	 <small>Digitally signed by Rhex A. Edwards Date: 2023.04.20 07:51:53 -05'00'</small>



### Materials Inspection Record

1. Licensee Name: U.S. EPA - Great Lakes Toxicology	2. Docket Number(s): 030-05046	3. License Number(s) 22-13390-01
--	-----------------------------------	-------------------------------------

4. Report Number(s): 2023001	5. Date(s) of Inspection: March 23, 2023
---------------------------------	---

6. Inspector(s): Jason Draper	7. Program Code(s): 03620	8. Priority: 5	9. Inspection Guidance Used: IP 87141
----------------------------------	------------------------------	-------------------	--

10. Licensee Contact Name(s): Eric Mead, RSO	11. Licensee E-mail Address: mead.eric@epa.gov	12. Licensee Telephone Number(s): 218-529-5017
---	---	---

13. Inspection Type: <input type="checkbox"/> Initial <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 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): 03/23/2028 <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 - 6201 Congdon Blvd, Duluth, Minnesota

17. Scope and Observations:

This was an inspection of a federal government research facility authorized to use H-3, C-14, and I-125 for research and development uses at its facility in Duluth, Minnesota. At the time of the inspection, the licensee had six authorized uses who used microcurie quantities of H-3 and C-14 as needed for in vitro metabolism studies using tissue from trout, rats, and frogs, but hadn't used any material since June 2022. The licensee had not used or possessed I-125 since 2015. The licensee also possessed generally-licensed devices including two Ni-63 electron capture devices installed in gas chromatographs as well as multiple liquid scintillation counters. The licensee disposed of its waste via decay-in-storage (I-125 only) or by transfer to a licensed waste processor. The licensee's radiation safety committee met quarterly, and members of the RSC performed annual radiation safety program audits.

During the inspection, the inspector toured the licensee's material storage and use areas to verify radioactive material was stored in a secure location and took radiation surveys to verify appropriate postings. Since the licensee was not using radioactive material at the time of the inspection, the inspector interviewed two authorized users with regard to material handling practices, inventory tracking, contamination control, survey procedures, and waste disposal. The inspector also interviewed the RSO regarding material receipt procedures, waste shipment procedures, leak tests and contamination survey procedures, instrument calibration, and training. The inspector also reviewed a selection of records including ECD leak tests results, survey records, training records, and radiation safety audit records.

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

Signature and Date - Branch Chief

Digitally signed by Rhex A. Edwards  
Date: 2023.04.20 07:51:17 -05'00'

**From:** [Jason Draper](#)  
**To:** [Mead, Eric](#)  
**Subject:** NRC 591M - U.S. EPA - Great Lakes  
**Date:** Thursday, April 20, 2023 8:02:00 AM  
**Attachments:** [NRC 591M - U.S. EPA jd\\_RAE.pdf](#)

---

Eric,

As was discussed following your inspection, attached is the inspection report for the routine NRC inspection that I performed at your facility in Duluth, Minnesota, on March 23, 2023. Please review and keep this document for your records. There is no response required, though I would appreciate an email confirming that you have received the document. Let me know if you have any questions.

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.

Jason Draper

Health Physicist (Inspector)

NRC / Region III / DRSS / MIB

(630) 829-9839

[jason.draper@nrc.gov](mailto:jason.draper@nrc.gov)