

INSPECTION RECORD

Region: III

Inspection Report No. 2018001

License No. 13-13300-01

Docket No. 030-04411

Licensee: Taghleef Industries, Inc.
3600 East Head Avenue
Rosedale, IN 47874

Location Inspected: Same as above

Licensee Contact: Michael Michl, Radiation Safety Officer

Telephone No. 812-462-5275

Program Code: 03120 Priority: 5

Type of Inspection: () Initial (X) Routine () Announced
() Special (X) Unannounced

Last Inspection Date: August 27, 2013 Date of This Inspection: August 31, 2018

Next Inspection Date: August 31, 2023 (X) Normal () Reduced

Summary of Findings and Actions:

- () No violations cited, clear U.S. Nuclear Regulatory Commission (NRC) Form 591 or regional letter issued
- () Non-cited violations (NCVs)
- () Violation(s), Form 591 issued
- (X) Violation(s), regional letter issued
- () Follow-up on previous violations

Inspectors: Jason D. Draper, Health Physicist

/RA/
Signature

Date 10/05/2018

Ryan Craffey, Health Physicist

/RA/
Signature

Date 10/09/2018

Approved: Aaron T. McCraw, Chief, MIB

/RA/
Signature

Date 10/10/2018

PART I – LICENSE, INSPECTION, INCIDENT/EVENT AND ENFORCEMENT HISTORY

1. AMENDMENTS AND PROGRAM CHANGES SINCE LAST INSPECTION:

<u>AMENDMENT #</u>	<u>DATE</u>	<u>SUBJECT</u>
35	01/26/2015	Removed gauge model from license
34	12/13/2013	Corrected address and removed gauge model from license

2. INSPECTION AND ENFORCEMENT HISTORY:

The last inspection of this licensee was on August 27, 2013. No violations of NRC requirements were identified.

3. INCIDENT/EVENT HISTORY:

No open items or events since the last routine inspection.

PART II – INSPECTION DOCUMENTATION

1. ORGANIZATION AND SCOPE OF PROGRAM:

Taghleef Industries, Inc. is a plastic food container and label manufacturer with approximately 400 employees that is authorized under NRC Materials License No. 13-13300-01 to use fixed nuclear gauges to make thickness, level, and density measurements. Licensed material is authorized to be used at the licensee's facility in Rosedale, Indiana. At the time of the inspection, the licensee used nine Ohmart/VEGA Models SHD, SHRM-B, and SHGL source holders containing Cs-137, nine Honeywell Model 2201 source holders containing Kr-85 and Sr-90, and one Honeywell Model 4202 source holder containing Pr-147, which had been removed from service and was in storage.

2. SCOPE OF INSPECTION:

Inspection Procedure(s) Used: 87124

Focus Areas Evaluated: All

The inspectors toured the licensee's facility to evaluate the licensee's measures for material security, hazard communication and exposure control, and to verify the licensee's gauge inventory. The inspectors observed approximately 50 percent of the installed gauges, as well as the one gauge in storage.

Through interviews with the RSO and employees who work near the gauges, the inspectors found that the licensee's staff was knowledgeable and conscientious of radiation safety principles regarding the gauges. The inspectors also observed demonstrations of surveys performed using the licensee's meters.

The inspectors reviewed a selection of licensee records for inventories, leak tests, shutter checks, non-routine maintenance, transfer of material, and audits. The inspectors also reviewed the licensee's training materials and survey procedures.

3. INDEPENDENT AND CONFIRMATORY MEASUREMENTS:

Using a Canberra UltraRadic MRAD 213 survey meter, S/N 130000531, calibrated on April 24, 2018, the inspectors conducted independent surveys around the installed gauges and around the storage location. The inspectors found no readings which would indicate residual contamination or exposures to members of the public in excess of regulatory limits.

4. VIOLATIONS, NCVs, AND OTHER SAFETY ISSUES:

On August 31, 2018, the inspectors identified a violation of Condition 15 of the license for the licensee's removal of a Honeywell Model 4202 fixed nuclear gauge, containing approximately 807 millicuries of Promethium-147, from service on October 17, 2017. The Condition prohibits the licensee from performing this activity and requires the activity to be performed instead by persons specifically licensed by the NRC or an Agreement State to perform such service.

The licensee informed the inspectors that they misinterpreted the requirement to prohibit removal of the source from the source holder only. They also informed the inspectors that this was the only instance where the licensee removed a gauge from service, and that all other non-routine maintenance of nuclear gauges at the facility had been performed by persons specifically licensed to do so. The inspectors reviewed survey procedures and records which showed that the staff had verified that the shutter was closed, and surveys were performed prior to removing the gauge and moving it to storage. The inspectors also reviewed training records, which showed that the involved staff was trained in performing surveys and shutter checks.

Because violations involving the conduct of unauthorized activities can be considered for escalated enforcement, the inspectors presented this apparent violation at an enforcement panel. The panel agreed that based on the mitigating factors present, including the isolated nature of the activity, the design of the gauge, the licensee's training and procedures, and the adequacy of surveys and shutter checks performed at the time, the NRC concluded that escalated enforcement was not warranted.

As corrective action, the licensee stated that they will not be reinstalling the gauge, and that any gauge removal in the future will be performed by someone specifically licensed to do so.

5. PERSONNEL CONTACTED:

Michael Michl, Electrical Engineer (RSO)
Rob Slinker, Environmental, Health and Safety Manager

Attended exit meeting on September 24, 2018.

-END-