

February 23, 2011

Mr. Arthur J. Palmer, CHP/PMP
Director, Health Physics & Radiological Engineering
EnergySolutions, Inc.
1009 Commerce Park Drive, Suite 100
Oak Ridge, TN 37830

SUBJECT: NRC INSPECTION REPORT NOS. 030-22060/10-02(DNMS)
ENERGYSOLUTIONS; 040-06264/10-01(DNMS) FORMER MICHIGAN
CHEMICAL COMPANY - BRECKENRIDGE DISPOSAL SITE,
BRECKENRIDGE, MI

Dear Mr. Palmer:

On January 13, 2011, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection of decommissioning activities performed by EnergySolutions at the former Michigan Chemical Company's Breckenridge Disposal Site (also known as NWI Breckenridge), located near Breckenridge, Michigan. Between May 19, 2010, and January 13, 2011, twenty individual on-site inspections were conducted. The purpose of these inspections was to determine whether decommissioning activities were conducted safely and in accordance with NRC requirements. At the conclusion of the inspection on January 13, 2011, the NRC inspectors discussed the results with members of your staff.

This inspection examined decommissioning activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. Within these areas, the inspection included an examination of decommissioning documentation and representative records, observations of activities, and interviews with personnel. In addition, the NRC performed confirmatory and independent radiological surveys in the site excavation area identified as Survey Unit 3.

Based on the results of this inspection, the NRC did not identify any violations.

It was also noted, during EnergySolutions' site excavation activities, buried non-radiological chemicals were unearthed at the Breckenridge Disposal site. The safe storage and security of these chemicals during the excavation activities were coordinated with chemical safety professionals from the State of Michigan. The NRC will continue to work with you and your staff, the Trustee, and the State of Michigan to assure the appropriate regulatory oversight regarding the disposition of these non-radiological items.

In accordance with Title 10 of the Code of Federal Regulations (CFR) 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Document Access and Management system (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

A. Palmer

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We will gladly discuss any questions you have concerning this inspection.

Sincerely,

/RA/

Christine A. Lipa, Chief
Materials Control, ISFSI, and
Decommissioning Branch

Docket Nos. 030-22060, 040-06264 (Terminated)
License Nos. 06-20775-01, SMB-00833 (Terminated)

Enclosure:
Inspection Report 030-22060/10-02(DNMS),
040-06264/10-01(DNMS)

cc w/encl: R. Skowronek, State of Michigan, DEQ
S. Cornelius, State of Michigan, DEQ
J. Keon, Pine River Superfund Citizen Task Force
M. Borrello, Pine River Superfund Citizen Task Force
D. Long, Bethany Township Supervisor
T. O'Neill, Foley & Lardner LLP
J. Steinberg, The Custodial Trust

A. Palmer

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U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Docket Nos.: 030-22060,
040-06264 (Terminated)

License Nos.: 06-20775-01,
SMB-00833 (Terminated)

Report Nos.: 030-22060/10-02(DNMS),
040-06264/10-01(DNMS)

Licensee (Contractor): EnergySolutions

Non-Licensee: Former Michigan Chemical Company
(Terminated License and Docket Nos.)

Location: Breckenridge Disposal Site
4490 East Madison Road
Breckenridge, MI

Inspection Dates: May 19, June 3, 10, 18 and 25, July 1, 10,
21 and 30, August 6 and 18, September 15
and 28, October 6, 14 and 20, November
17, and December 15, 2010, and on
January 13, 2011 (In-Process inspections)

November 2-4, 2010 (Confirmatory
Surveys)

Inspectors: W. Snell, Senior Health Physicist
M. McCann, Senior Health Physicist
E. Bonano, Health Physicist
L. Rodriguez, Reactor Engineer

Approved by: Christine A. Lipa, Chief
Materials Control, ISFSI, and
Decommissioning Branch
Division of Nuclear Materials Safety

Enclosure

EXECUTIVE SUMMARY

Michigan Chemical Company's Breckenridge Disposal Site NRC Inspection Reports 030-22060/10-02(DNMS), 040-06264/10-01(DNMS)

This decommissioning inspection included an independent confirmatory survey of Survey Unit 3, and nineteen individual in-process inspector reviews of EnergySolutions' (the licensee) decommissioning activities, who is an NRC licensed decommissioning contractor. The inspection was conducted by regional inspectors from May 19, 2010 to January 13, 2011. The licensee is under contract to a Federal Court appointed Trustee for the clean-up of the former Michigan Chemical Company's Breckenridge Disposal Site. During the inspection period approximately 4,110 cubic yards of contaminated soil was excavated from the site and transported to Clive, Utah for disposal. Additionally, during the excavation activities the licensee also exhumed non-radiological chemical wastes. While some of this waste was mixed in with the radiological contaminated soil that was sent to Utah for disposal, the separable chemical waste, which included over 450 intact laboratory bottles, was being stored onsite until disposal arrangements are made by the Trustee and the State of Michigan.

During the inspection the licensee was conducting routine decommissioning activities. These activities consisted of excavating contaminated soil and placing it into large polypropylene bags, transporting the bags to a railhead, and shipping the waste to Utah for disposal. The project's decommissioning schedule was significantly delayed initially due to rain at the beginning of the project, and later due to the identification of a larger volume of contaminated soil greater than original projections, and the unexpected identification of buried chemical waste.

Based on the licensee's survey and sampling activities conducted to date, it is believed that excavating and transporting for disposal of the buried radiological waste was complete. However, the licensee must complete additional surveys and sampling to ensure completion, followed by backfilling of the excavated areas. During the last onsite inspection, the licensee was in the process of demobilizing for the winter, with plans to remobilize in April or May to complete the decommissioning activities.

Site Decommissioning

The licensee appropriately followed the Remedial Work Plan and Project Health & Safety Plan for the excavation and transport of radiological contaminated soils. The site was adequately controlled and posted, radiological material was properly handled, stored and transported, personnel wore appropriate protective clothing, proper health and safety practices were adhered to, and acceptable radiation detection equipment was employed. (Section 2.0)

NRC Closeout Survey Results

The inspectors concluded that the licensee's final status survey report for Survey Unit 3 was sufficient to demonstrate compliance with NRC approved unrestricted use limits. The inspectors also concluded that the radiological condition of Survey Unit 3 was consistent with the licensee's NRC approved Work Plan. (Section 3.0)

Report Details¹

1.0 Background

The Michigan Chemical Company (MCC) operated a rare earth processing plant from 1967 through 1970 at St. Louis, Michigan, where the use of licensable materials was authorized until April 1971 when License No. SMB-0833 was terminated. Between 1967 and 1970, MCC used a small rural plot of land about 4 miles east of St. Louis, in Bethany Township, Michigan for the disposal of process wastes. The property (referred to as the Breckenridge Disposal Site) is a narrow triangular shaped parcel of land of approximately 1.25 acres. The buried waste material was a solid waste byproduct, known as filter cake, which originated from the former licensee's rare-earth metal (yttrium) extraction process. Disposal records reported that the filter cake was typically a dense, clay-like material that contained elevated levels of naturally occurring uranium and thorium. MCC began operations in 1936 and continued as a subsidiary of Velsicol Chemical Corporation from 1963 until 1978 before being purchased by the Fruit of the Loom Corporation in 1986. The Fruit of the Loom Corporation declared bankruptcy in 1999 and a bankruptcy settlement was reached in 2002. As part of the bankruptcy settlement, a Custodial Trust was established to provide funding for the remediation of the Breckenridge Disposal Site.

A partial remediation of the site was conducted in 2004. During that remediation effort the surface cover soils were found contaminated and additional trenches of the waste were discovered. As a result of the discovery of an unexpected increase in the waste volume, it was determined that the Custodial Trust had insufficient funds to complete the remediation and the operation was shut down until additional funding could be obtained through the bankruptcy court. In 2007 the NRC was informed that the Custodial Trust had been given additional funding. In early 2010, following the NRC's approval, the Trustee signed a contract with EnergySolutions to complete the decommissioning of the Breckenridge Disposal Site.

2.0 Decommissioning Inspection Procedure for Materials Licensees (IP 87104)

a. Inspection Scope

The inspectors performed periodic site visits throughout the inspection period to assess ongoing decommissioning activities; verified the licensee was following the approved work plan CS-OP-PN-042, "Remedial Work Plan, Waste Excavation and Site Restoration for the Breckenridge Disposal Site", Revision 0, dated 1/27/2010 (see ADAMS ML100280031), and the health and safety plan CS-SH-PN-031, "Breckenridge Disposal Site Remediation Project Health & Safety Plan," Revision 0, dated 10/27/2009 (see ADAMS ML110320283); and verified that appropriate health physics practices were being followed. The inspectors conducted on-site visits on May 19, June 3, 10, 18 and 25, July 1, 10, 21 and 30, August 6 and 18, September 15 and 28, October 6, 14 and 20, November 17, and December 15, 2010, and on January 13, 2011.

¹A list of acronyms used and all documents reviewed in these "Details" are provided at the end of the report.

The inspectors observed remediation activities in process and verified that, site access was being controlled, workers wore appropriate protective clothing, and radioactive materials were being stored and handled appropriately; postings and labeling were appropriate; radiological instrumentation was being calibrated and source-checked and was acceptable for the work being conducted; and good health and safety practices were being followed.

b. Observations and Findings

The licensee began mobilizing in April 2010. Contaminated soil was removed and loaded into large polypropylene bags. The bags were constructed with an inner waterproof and zippered liner and an outer covering, able to hold 4.5 to 5 cubic yards of soil, and had a weight capacity of about 13,000 pounds. The waste was transported to a rail spur located in Hemlock, Michigan; about 18 miles from the site, by flatbed truck and then loaded onto rail cars for shipment to the EnergySolutions waste disposal site in Clive, Utah. The decommissioning project was expected to take approximately two months to complete.

The licensee divided the 1.25 acre Breckenridge site into three different areas; Survey Units (SU) 1, 2 and 3. SU-3 was approximately the southern third of the site (1,642 m²) and was the furthest from Madison road, while SU-2 was approximately the middle third of the site (1,644 m²). SU-2 and SU-3 were known to contain buried radiological waste. The northern third of the site, SU-1 (1,999 m²), was closest to the road and based on historical records and previous characterizations was not expected to contain any buried radiological waste.

The licensee conducted surveys of the surfaces in SU-2 and SU-3 using sodium iodide (NaI) detectors. Based on the survey results, clean soil was placed in a pile in SU-1 for future use as backfill while contaminated soil was placed in the large polypropylene bags for disposal. In accordance with the approved work plan, some minimally contaminated soil could be used as backfill to a depth of two feet in excavated trenches, as long as it had a cover of at least 1.5 meters of clean soil. Bags containing soil that fit this criterion were set aside for future consideration as backfill.

As a result of some limited characterization activities conducted in the 1980s, contaminated soil had been spread on the surface of the ground as well as dispersed through some of the soils above and adjacent to the trenches. To ensure all contaminated soil was removed, the contractor excavated soil in 6 to 12 inch lifts following each surface survey. Once the surface survey determined there was no additional contamination, no further excavation was conducted in that particular location. As excavation proceeded, the licensee eventually identified the individual trenches where the waste had been buried. Based on measured contamination levels as well as the color and hardness of the soil, the trenches were readily identifiable. The licensee continued this process for SU-2 and SU-3 until both areas were remediated. The licensee determined the radiological content of the bags based on survey measurements performed on all four sides and the top and bottom. Using an algorithm based on the Microshield computer program, each bag surface survey results were converted to an average picocurie per gram (pCi/g) concentration. These values were compared with in-situ soil samples collected during excavation activities to verify the adequacy of the calculations. Each bag was also individually weighed so that the total curie content of each bag could be estimated prior to transport to the rail spur for

shipment. Each bag was reweighed at the rail spur to obtain a more accurate weight for the official weight prior to shipping the bags to Utah.

As of the end of the inspection period, the licensee had shipped 54 rail cars of contaminated soil to Utah, which totaled about 4,110 yd³. This compares to the initial estimates in the Work Plan of the slit trench waste maximum volume of 579 yd³ (plus any additional soil mixed in as part of the excavation process). Twenty-seven bags of waste (about 110 yd³) remained onsite to be used as backfill. Approximately 900 yd³ of clean soil was also placed in SU-1 to be used as backfill. SU-2 and SU-3 will not be backfilled until the NRC has approved the final status surveys for these areas.

During the January 13, 2011 inspection, the contractor was in the process of demobilizing from the site. Except for 27 bags of soil to be used for backfill, all contaminated waste was shipped off site. The property was surrounded by a chain link fence with a locked gate. The fence has appropriate radiological postings.

During the excavation process three significant issues arose that caused extensive delays in the project. The first was rainwater; during the early stages of the remediation a significant amount of rain fell, leaving the site periodically inundated with standing water. The licensee was not allowed to remove and release this water due to a lack of necessary State permits. Due to the saturated soil, operations of the excavator and end loader were impaired at times due to mud. The licensee pumped water from some of the trenches to other areas onsite, but it was of limited success as the water tended to return to the low areas. Several tanks were brought in to hold water in some situations. These tanks were eventually drained back onto the site property after verifying the water was not contaminated.

The project was also delayed due to the unexpected increase in volume of the waste. Additional trenches were identified that had not been found during previous remediation or characterization activities. Additionally, a significant amount of surface contamination existed that added a considerable volume of soil being removed for disposal.

The third significant delay in the project was the unearthing of chemical waste. The appropriate excavation, handling and storage of this waste had to be coordinated with the State of Michigan, the Trustee and the NRC. This waste was found in various trenches and in barrels as well as over 450 separate glass laboratory bottles. Most of the chemical waste was non-radiological. However, where the chemicals and radiological waste were mixed within the soil due to either container deterioration, inadvertent crushing during burial, or inadvertent breakage during excavation, the chemical waste was shipped to Utah along with the radiological waste. The acceptability of this was reviewed and approved by the State of Michigan prior to the waste disposal. The chemical waste that was excavated intact in bottles or other containers was stored onsite until the Trustee coordinated its removal with the appropriate State regulatory oversight.

During all work activities the contractor controlled site access with a single gate that was kept locked when the site was unattended. Personnel wore coveralls, booties and gloves when entering the site to minimize the potential for spreading contamination. All soil bags were surveyed for contamination on their exterior surfaces prior to being removed from the site. The area between the gate and the flatbed truck where the end loader moved to load the bags for transport to the rail spur was continually monitored for

radiological contamination. During work activities, air monitoring equipment was used to alert personnel if airborne contamination was present; although, airborne contamination was never an issue during the excavation process. Exposure rates throughout the site were also observed to be minimal during work activities. Radiological detection instrumentation was found to be calibrated as required and daily source checks performed appropriately.

c. Conclusions

The contractor appropriately followed the Remedial Work Plan and Project Health & Safety Plan for the excavation and transport of radiological contaminated soils. The site was adequately controlled and posted, radiological material was properly handled, stored and transported, personnel wore appropriate protective clothing, proper health and safety practices were adhered to, and acceptable radiation detection equipment was employed.

3.0 Closeout Inspection and Surveys (IP 83890)

a. Inspection Scope

The inspectors reviewed the licensee's final status survey (FSS) activities for Survey Unit 3 (SU-3). The inspectors interviewed licensee personnel regarding the recording of FSS data, chain-of-custody for soil samples, laboratory analytical procedures, Quality Assurance and compliance with data quality objectives, survey techniques, and observed and evaluated the licensee's staff use of survey meters and performance of FSS measurements. The inspectors evaluated the licensee's FSS to verify that the licensee was implementing their FSS in accordance with MARSSIM as stated in the Work Plan. During the observation of licensee staff measurements, the NRC inspectors performed side-by-side measurements using NRC calibrated instruments.

On November 2 through 4, 2010, the NRC inspectors performed an independent confirmatory radiological survey of Survey Unit-3 (SU-3) and the clean dirt pile in Survey Unit-1 (SU-1) that was staged on-site to be used for backfill. The inspectors surveyed a licensee selected unaffected off-site area to determine background radiation levels and collected two background surface soil samples (NRC Sample IDs: B-10-1-01 and B-10-1-02). The inspectors collected two biased surface soil samples (NRC Sample IDs: B-10-1-09 and B-10-1-10), five randomly selected sub-surface (trench) soil samples (NRC Sample IDs: B-10-1-03 through 07), and one randomly selected surface soil sample (NRC Sample ID: B-10-1-11) from licensee sample locations in SU-3. The inspectors also collected one random surface soil sample (NRC Sample ID: B-10-1-08) from the clean dirt pile in SU-1. The NRC's contract laboratory, Oak Ridge Institute for Science and Education (ORISE) analyzed the samples for the isotopes of concern (thorium_{Natural}, uranium_{Natural}, and radium-226) at the Breckenridge site.

The NRC inspectors also performed a walk-over survey of SU-3 to map the direct radiation levels of the Survey Unit's surface soils, and to determine the direct radiation level at each location where a soil sample was collected. The inspectors used a calibrated radiation survey instrument that was coupled to a Global Positioning System (GPS) Unit. The NRC's GPS maps were compared against the licensee's FSS GPS maps.

The inspectors used the following instrumentation to conduct the surveys: 1) a Ludlum Model 2241-3, Serial Number: 264470, survey meter with a Ludlum Model 44-10 "2x2" Sodium Iodide detector, and 2) a Ludlum Model 2241-2, Serial Number: 131397, survey meter with a Ludlum Model 44-10 "2x2" Sodium Iodide detector, attached to a GPS Unit, Trimble Geo XT, Serial Number: 4926416097.

b. Observations and Findings

The licensee selected an unaffected off-site area on the north side of Madison Road northeast of the site for determining background radiation levels. The inspectors' walk-over surveys identified background radiation levels to be approximately 5,000 to 8,000 counts per minute (cpm). Inspectors' on-site surveys identified background levels of approximately 7,000 to 10,000 cpm, which was determined to be in close agreement with the licensee's measurements. The licensee's instrumentation and procedures were consistent with the NRC approved work plan.

The NRC inspectors' confirmatory direct radiation walk-over survey coverage encompassed fifty to one hundred percent of exposed surface soil in SU-3, including trenches, and the clean dirt pile in SU-1. The inspectors noted that the licensee's Work Plan limited radiation levels to 18,000 cpm for soils from surface to a depth of 5 feet, and to 30,000 cpm for soils more than 5 feet below the site surface. Levels measured above these limits required further soil removal to meet site release criteria specified in the Work Plan.

In SU-3, average radiation levels varied between background and the licensee's maximum radiation release limit of 18,000 cpm, for soils from surface to a depth of five feet. In areas 5 feet or greater below the site surface soils (including trenches), the inspectors measured radiation levels between background and the licensee's maximum radiation release limit of 30,000 cpm. The radiation levels measured on the clean dirt pile in SU-1 varied between background and the licensee's surface release limit of 18,000 cpm. The inspectors identified three small areas in SU-3 with elevated direct radiation levels above the surface and sub-surface release criteria, which were remediated immediately by the licensee. The inspectors' direct radiation survey measurements performed in SU-3 and on the clean dirt pile were consistent with the licensee's survey meter measurements.

The NRC GPS maps document the progress of the decommissioning project and the results of the inspectors' walk-over surveys, and documents the radiation levels before and after remediation were completed (see ADAMS ML110390693). The inspectors' review found the licensee's GPS maps to be consistent with NRC GPS results.

In a November 22, 2010, letter report (ADAMS ML103330479) from ORISE to the NRC, ORISE reported the results for 11 soil samples collected by the inspectors. The results for two background surface soil samples collected by the inspectors were found to be consistent with the licensee's laboratory analytical background soil sample results.

The Inspectors reviewed the results for five of the NRC soil samples (B-10-1-04, B-10-1-06, B-10-1-07, B-10-1-09 and B-10-1-10). These samples were indentified with elevated levels of uranium, thorium, and thorium-230. The thorium-230 in the radionuclide mix was unexpected, and had not been considered or expected in the licensee's original work plan as an isotope of concern. Therefore, the licensee re-evaluated its approved

work plan's Derived Concentration Guideline Limit (DCGL), gamma scan sensitivity, and gamma scan action levels and developed area factors to account for the thorium-230. The soil sample results for the remaining four samples collected by the inspectors were below the licensee's Work Plan approved DCGLs.

The inspectors reviewed an addendum to the work plan, CS-313111-001, "Re-Evaluation of Breckenridge DCGLs, Gamma Scan Sensitivity, and Gamma Scan Action Levels and Development of Area Factors," Revision 1, dated 1/19/2011 (see ADAMS ML110260149) and determined the document to be adequate and consistent with MARSSIM. The licensee re-surveyed SU-3 and remediated the site to the new DCGLs using the unity (sum of fraction) rule as stated in the submitted addendum. The inspectors also reviewed CS-313111-002, "Final Status Survey Report, Breckenridge Disposal Site, Survey Package – SU3," Revision 0, dated 1/26/2011 (see ADAMS ML110420028) and determined the document to be adequate and consistent with MARSSIM.

Side-by-side measurement comparisons with the licensee were adequate. The licensee's quality assurance program for the on-site laboratory and the data quality objectives for sample collection and analysis was adequate.

c. Conclusions

The inspectors concluded that the licensee's final status survey report for Survey Unit 3 was sufficient to demonstrate compliance with NRC approved unrestricted use limits. The inspectors also concluded that the radiological condition of Survey Unit 3 was consistent with the licensee's NRC approved Work Plan.

3.0 Exit Meetings

The inspector presented the inspection results to members of the licensee's staff at the conclusion of the onsite portion of the inspection on January 13, 2011. The inspectors confirmed that none of the potential report input discussed was considered proprietary.

ATTACHMENT: SUPPLEMENTAL INFORMATION

SUPPLEMENTAL INFORMATION

PARTIAL LIST OF PERSONS CONTACTED

- * G. Centolla, Project Manager
- * M. Carr, Project Health Physicist

- * Participated in the January 13, 2011, exit meeting.

LIST OF PROCEDURES USED

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| IP 83890 | Closeout Inspection and Survey |
| IP 87104 | Decommissioning Inspection Procedure for Materials Licensees |

LIST OF ACRONYMS USED

| | |
|---------|---|
| ADAMS | Agency Document and Management System |
| CFR | Code of Federal Regulations |
| CPM | Counts Per Minute |
| DCGL | Derived Concentration Guideline Level |
| DNMS | Division of Nuclear Materials Safety |
| FSS | Final Status Survey |
| FSSR | Final Status Survey Report |
| IP | Inspection Procedure |
| MARSSIM | Multi-Agency Radiation Survey and Site Investigation Manual |
| MCC | Michigan Chemical Company |
| NaI | Sodium Iodide |
| NRC | Nuclear Regulatory Commission |
| ORISE | Oak Ridge Institute for Science and Education |
| SU | Survey Unit |

LICENSEE DOCUMENTS REVIEWED

Documents reviewed during the inspection are listed in the body of the report.

ITEMS OPENED, CLOSED, AND DISCUSSED

None