



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

June 20, 2018

MEMORANDUM TO: Stephen S. Koenick, Chief
Materials Decommissioning Branch
Division of Decommissioning, Uranium Recovery,
and Waste Programs
Office of Nuclear Material Safety
and Safeguards

FROM: Jeffrey A. Whited, Project Manager */RA/*
Materials Decommissioning Branch
Division of Decommissioning, Uranium Recovery,
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Office of Nuclear Material Safety
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SUBJECT: NON-MILITARY RADIUM PROGRAM-SUNDOG
ELECTRONICS, INC.

The purpose of this memorandum is to outline the U.S. Nuclear Regulatory Commission (NRC) staff's decision behind closing the work on Docket Number 03039082 associated with the Sundog Electronics, Inc. Non-Military Radium site at 806 Willow Run Airport, Ypsilanti Charter Township, Michigan.

Based on the information provided to the NRC staff by the State of Michigan, the site in question was previously Sundog Electronics Incorporated (Sundog), a provider of aviation repair services in a rented space within Hangar 1 of the Willow Run Airport. Information provided by the State of Michigan¹ indicated that State Inspectors found three radioactive gauges in the hangar. No action was anticipated for disposal of the gauges.

Following receipt of this information from the State of Michigan, the NRC contracted with Oak Ridge Associated Universities (ORAU) to compile a Site Summary Report for this site, which is attached to this memorandum. In the Site Summary Report, ORAU determined that the property is still owned by the Willow Run Airport, which rented space in the hangar to Sundog. A review of previous Google images indicate that the site and building do not appear to have undergone any significant configuration changes since 2002.

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¹ Agencywide Documents Access and Management System (ADAMS) Accession No. ML16288A777.

Because the building is still in a condition similar to when it was rented by Sundog, and due to the information provided by the State of Michigan, ORAU determined that the site was a Tier 1 site² at which Radium-226 was confirmed to previously be present and site access is not controlled.

However, because the State of Michigan only found three gauges and no contamination, the NRC staff has determined that it is unnecessary to contact the current site owner regarding the historic use of the site or to request access to the property to perform an initial site visit. Neither NRC staff nor the State of Michigan is aware of any subsequent acquisition of radium-containing items by Sundog prior to the dissolution of the company in 2011. And given that Sundog occupied a rented space that has since been leased by other entities, it is unlikely that any radium-containing items remained following dissolution of the company.

DOCKET NO.: 03039082

Enclosure
Sundog Electronic, Inc. Site Summary Report

² The site prioritization, or "Tiers," is based on the criteria provided in the attachment to this memorandum.

SUBJECT: NON-MILITARY RADIUM PROGRAM-SUNDOG
ELECTRONICS, INC., DATED JUNE 20, 2018

DISTRIBUTION:

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DUWP r/f
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***via e-mail**

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Sundog Electronics, Inc.: Site Summary

**Prepared by
Oak Ridge Associated Universities
Under NRC Contract Number HQ-50-17-A-0001**

March 23, 2018

**Prepared for
U.S. Nuclear Regulatory Commission**

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Sundog Electronics, Inc.: Site Summary

The following information was extracted from public records.

Addresses

Address 1: 806 Willow Run Airport, Ypsilanti Charter Township, Michigan 48198

Address 2: 806 Kirk Profit Drive, Ypsilanti Charter Township, Michigan 48198

Address 1 is listed as the address for Sundog Electronics, Inc. on various websites such as manta.com and businessfinder.com.

When searching for 806 Willow Run Airport, Address 2 is identified instead by Google Maps. It is assumed that the two addresses are the same location.

Site Description/History

Sundog Electronics, Inc. (Sundog) was a provider of aviation repair services starting on May 29, 1980, in a rented space within Hanger 1 of the Willow Run Airport. The company owner was George E. Adamski. Hanger 1 has a total area of approximately 160,749 square feet (Daftlogic 2017) and is pictured in Figure 1. The exact location of the Sundog business within Hanger 1 is unknown. A 1992 survey by the State of Michigan identified three radioactive gauges in Hanger 1 (NRC 2017).

The company dissolved in July 2011 for unknown reasons, and the current location of materials associated with Sundog's previous activities is unknown. A review of available Google Earth images, dating back to 2002, indicates that the site and building do not appear to have undergone any significant configuration changes in the past 15 years. The building that Sundog previously rented is currently owned by the Wayne County Airport Authority. The oldest available aerial image is presented in Figure 2.

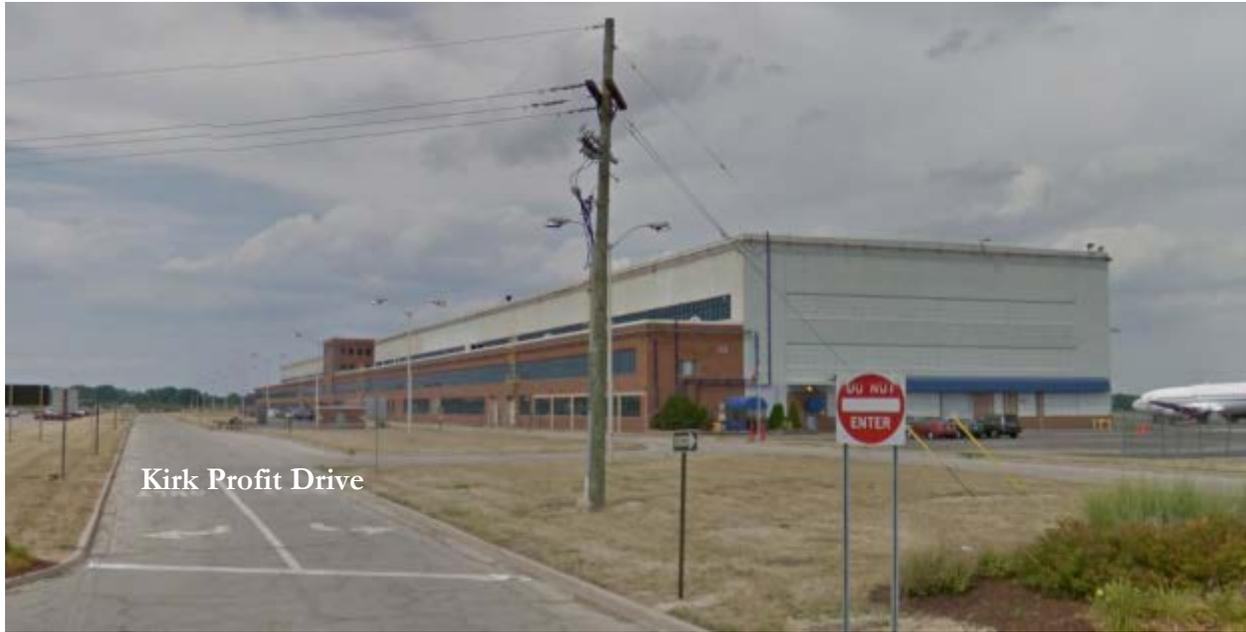


Figure 1. Street View of Hanger 1 in August of 2016 (Google Maps 2017)



Figure 2. Aerial View of Hanger 1 in 2002 (Google Earth Pro 2017)

Information Regarding Radium Sources/Contamination at the Site

In July of 1992, the State of Michigan conducted an investigation and found three radioactive gauges in the Hanger 1 area rented by Sundog. These devices were functional and utilized in testing equipment with no anticipated plans for disposal at that time (NRC 2017). It is not known if the State's survey included an evaluation of surface contamination, or whether it was a gamma-only survey. There is no information as to whether or not the survey included any outside areas.

Summary of Current Radium Levels:

As of August 2017, it is not known if radium sources and/or radium contamination are present at the site.

Location and Population Near the Site

The Township of Ypsilanti is located in Washtenaw County. According to the 2010 U.S. Census, the population of Ypsilanti charter township was 53,362; the 2016 population estimate for the township was 54,875 (United States Census Bureau 2017). The size and location of the office space previously occupied by Sundog within Hanger 1 is unknown. However, as of 2003, Sundog was one of twenty tenants occupying Hanger 1 (Reynolds, Smith and Hills Inc. 2017). Figure 3 shows the location of the facility within the local community.



Figure 3. Aerial View of Hanger 1 in 2017 (Google Earth Pro 2017)

Current State/other Federal Involvement

An extensive internet search of public records did not reveal any information concerning recent State and/or Federal involvement with properties previously occupied by Sundog. The 1992 investigation conducted by the State of Michigan provides the only record of a possible connection between radium and previous Sundog activities via the identification of “3 radioactive gauges” (NRC 2017). However, no disposal records could be found.

Current Access and Activities at the Site

Sundog dissolved in July of 2011 and no longer occupies the 806 Willow Run Airport property. As of the date of this report, the current Resident Agent is an individual. Current occupancy/use of Hanger 1 is unknown.

The current owner of the space rented by Sundog in Hanger 1 (and all Willow Run Airport property) is the Wayne County Airport Authority located at 1 Detroit Metro Airport, Detroit, MI 48242.

Existing Engineering and Administrative Controls

No engineering or administrative controls are known to exist at this location.

Prioritization Ranking

NRC assigns a prioritization ranking for each site based on two factors. The first factor relates to whether or not the historical record confirms the presence of radium and there is no documentation that the radium contamination was previously remediated. The second factor considers the potential for human exposure. Based on these factors, the site is assigned Tier 1, 2, 3, or 4 using the following criteria:

- Tier 1 = the historical record confirms the presence of radium, the building or adjacent lands are occupied or frequented by visitors, and site access is not controlled.
- Tier 2 = the historical record confirms the presence of radium, the building or adjacent lands are not occupied or frequented by visitors, and site access is weakly controlled.
- Tier 3 = the historical record confirms the presence of radium, the building or adjacent lands are not occupied or frequented by visitors, and site access is strongly controlled.
- Tier 4 = the presence of radium is suspected but not confirmed by the historical record.

Radioactive gauges were previously found at the site based on the 1992 survey. However, the occupancy and site access controls are currently unknown. Based on this information, the area previously occupied by Sundog is classified as Tier 1.

References

Daftlogic 2017. <https://www.daftlogic.com/projects-google-maps-area-calculator-tool.htm>, accessed August 2017.

Google Earth Pro 2017. Software Version 7.3.0.3830 (32-bit), accessed August 2017.

Google Maps 2017. <https://www.google.com/maps/>, accessed August 2017.

Reynolds, Smith and Hills Inc. 2017. *Master Plan Update Willow Run Airport*, prepared for Wayne County Airport Authority.

http://www.metroairport.com/portals/0/pdf/Willow_Run_Master_Plan_Update_Report.pdf, accessed August 2017.

NRC 2017. *Letters from the State of Michigan re: Non-Military Radium Program*, prepared by the State of Michigan under Cooperative Agreement with the Nuclear Regulatory Commission, Regional Offices and the Office of Nuclear Materials Safety and Safeguards. July 7, 2017. (Agencywide Documents Access and Management System [ADAMS] Accession No. ML16288A777).

United States Census Bureau 2017.

<https://www.census.gov/quickfacts/fact/chart/ypsilantichartertownshipwashtenawcountymichigan,ypsilantcitymichigan/>, accessed August 2017.