SAFETY EVALUATION REPORT
AMENDMENT OF LICENSE PURSUANT TO APPROVAL
OF RECLAMATION PLAN FOR THE SEQUOYAH FUELS CORPORATION SITE
GORE, OKLAHOMA

Docket No.: 40-8027

License No.: SUB-1010

Facility: Sequoyah Facility

Technical Reviewer: Ken Kalman, MDB

Project Manager: Ken Kalman, MDB

1.0 Summary and Conclusions

By letter dated July 22, 2008, Sequoyah Fuels Corporation (SFC) submitted a request for the U.S. Nuclear Regulatory Commission (NRC) to amend License SUB-1010 for the SFC Facility in Gore, Oklahoma. The purpose of the request is to eliminate redundancy or conflict between the current requirements of the license and the Reclamation Plan (RP), which the NRC approved in April 2009. In addition, by letter dated September 24, 2009, SFC submitted a request to amend License SUB-1010 to enable SFC to make certain changes without NRC approval. This request was subsequently revised by letters dated March 25, 2010 and October 4, 2010.

The NRC staff reviewed SFC's submittals and has determined that, for the reasons indicated below, the proposed revisions are protective of health and safety, and meet the requirements of Title 10, Section 20.1101, "Radiation Protection Programs," Of the *Code of Federal Regulations* (10 CFR 20.1101). The recommended revision to License SUB-1010 is discussed at the end of this Safety Evaluation Report. This licensing action belongs to a category of actions that are eligible for categorical exclusion under 10 CFR Part 51.22(c)(11). Under 10 CFR Part 51.22(c)(11) no further environmental review is required for the proposed action if: 1) there is no significant change in the types or significant increase in the amounts of any effluents that may be released offsite; 2) there is no significant increase in individual or cumulative occupational radiation exposure; 3) there is no significant construction impact; and 4) there is no significant increase in the potential for or consequences from radiological accidents.

As previously noted the purpose of this amendment is to eliminate redundancy and conflict between requirements of a license for actions that have already been approved. The staff determined that the proposed action does not change any of the decommissioning activities at the site and therefore meets the conditions for categorical exclusion and that no further environmental review is required.

2.0 Background

SFC holds Materials License SUB-1010 for its facility in Gore, Oklahoma. The facility originally operated as a uranium conversion facility, but has not operated since 1993. SFC submitted

decommissioning plans for the site in 1998 and 1999.[1] The decommissioning plan proposed using an onsite, above-grade disposal cell for the permanent disposal of waste. The plan proposed restricted release of the site in accordance with 10 CFR 20.1403, "Criteria for License Termination under Restricted Conditions," (known as the license termination rule). However, restricted release requires the commitment of a responsible party to act as a custodian of the site. SFC was not able to obtain a commitment from an acceptable responsible party, although it has discussed this possibility with the U.S. Department of Energy (DOE).[2] In January 2001, SFC requested a determination by the NRC as to whether waste from the solvent extraction portion of the uranium hexafluoride (UF_6) conversion process could be classified as byproduct material, defined in Section 11e.(2) of the Atomic Energy Act of 1954, as amended. Section 11e.(2) byproduct material sites must be remediated in accordance with Appendix A, "Criteria Relating to the Operation of Uranium Mills and the Disposition of Tailings or Wastes Produced by the Extraction or Concentration of Source Material from Ores Processed Primarily for Their Source Material Content," to 10 CFR Part 40, "Domestic Licensing of Source Material." Additionally, sites remediated in accordance with Appendix A that contain 11e.(2) byproduct material above specified concentrations must be transferred to a Government custodian for perpetual custodial care. The custodian can be the State where the 11e.(2) site is located, but if the State declines, DOE must accept the site and become the custodian because of the presence of the 11e.(2) material.

On July 25, 2002, in Staff Requirements Memorandum (SRM) SECY-02-0095, "Applicability of Section 11e.(2) of the Atomic Energy Act to Material at the Sequoyah Fuels Corporation Uranium Conversion Facility," the Commission determined that most of the waste material at the site can be classified as 11e.(2) byproduct material. On September 30, 2002, SFC requested an amendment to its license to allow it to possess 11e.(2) byproduct material. On December 11, 2002, the NRC amended the license to allow possession of 11e.(2) byproduct material and included several conditions necessitated by the change to an 11e.(2) site. One of those conditions (License Condition 48) obviated the need for a decommissioning plan by requiring SFC to submit a site RP to the NRC by March 15, 2003. SFC submitted its RP by letter dated January 28, 2003. The RP has been revised by submittals dated February 27, 2004, July 30, 2004 and January 31, 2006. All revisions were incorporated in a final RP dated January 4, 2008.

The NRC staff reviewed SFC's RP and documented its findings in an Environmental Impact Statement (NUREG-1888) dated May 2008 and a Safety Evaluation Report dated April 2009. The NRC staff approved the RP by letter dated April 20, 2009 (License Amendment Number 33).

By letter dated July 22, 2008, SFC submitted a request for the NRC to amend License SUB-1010 for the Sequoyah Facility in Gore, Oklahoma. As stated in the request, the proposed revisions are necessary to eliminate redundancy or conflict between the current requirements of

---

[1] SFC submitted a decommissioning plan which the NRC rejected on February 11, 1999, because it failed to meet the minimum criteria for technical review. The NRC accepted the second decommissioning plan for review on May 20, 1999; however, the review was put on hold pending resolution of the request for Section 11e.(2) classification of the material.

[2] In accordance with Section 151(b) of the Nuclear Waste Policy Act of 1982, DOE has the authority to accept sites with radioactive material in the form of low-level waste for long-term custodial care but is not required to do so.

the license and the RP, or are administrative revisions needed to reflect current conditions at the site.

3.0 Technical Evaluation

This section discusses the NRC staff's review of the licensee's proposed revisions. SFC's proposed revisions identified parts of the license and the chapters of the attachment to the license that had been superseded by events or were needed to reflect current conditions.

1. License Condition 47 required the licensee to submit a groundwater corrective action plan (GWCAP). SFC initially submitted its GWCAP by letter dated June 16, 2003, from John H. Ellis, President, Sequoyah Fuels Corporation to Susan Frant, Chief Fuel Cycle Facilities Branch, Division of Fuel Cycle Safety and Safeguards, NMSS, U.S. NRC. By letter dated August 18, 2010, SFC submitted its Final Groundwater Corrective Action Plan to the NRC. The NRC approved the GWCAP by letter dated September 29, 2010. Therefore, the NRC staff has determined that License Condition 47 should be deleted.

2. License Condition 48 required the submittal of an RP. SFC submitted its RP by letter dated January 28, 2003, from John H. Ellis, President, Sequoyah Fuels Corporation to Daniel M. Gillen, Chief Fuel Cycle Facilities Branch, Division of Fuel Cycle Safety and Safeguards, NMSS, U.S. NRC. The RP has since been updated by subsequent submissions and was approved by the NRC by letter dated April 20, 2009. Therefore, the NRC staff has determined that License Condition 48 should be deleted.

3. SFC identified a typographical error in License Condition 49.B in regard to the groundwater protection standard for molybdenum. Originally, the groundwater protection standard for molybdenum was erroneously stated as 0.0012 milligrams per liter (mg/l). The correct concentration value, 0.012 mg/l, is found in the Sequoyah Facility Groundwater Monitoring Plan, February 2005, Table 6, which was approved by the NRC on August 22, 2005. The NRC staff agrees that the current license contains a typographical error which needs to be corrected. Accordingly, the NRC staff has determined that License Condition 49.B should be modified to state the groundwater protection standard for molybdenum is 0.012 mg/l.

4. SFC identified certain terms included in Section 1.6 (Definitions) of License Renewal Application Chapter 1 (Standard Conditions and Special Authorizations), that are not used in Chapters 1 through 7 of the current License Renewal Application and proposed their deletion. The NRC staff confirmed that aside from their inclusion in the definitions section, these terms are not currently used in the License Renewal Application and should be deleted.

5-10. SFC identified a need for revisions of titles and position descriptions throughout Chapter 2 (General Organizational and Administrative Requirements) of the current License Renewal Application to reflect actual functions within the organization such as the organizational structure, duties and responsibilities within the organization. The NRC staff reviewed the proposed revisions, the organizational chart, and the description of these positions as described in SFC's RP and determined that that these revisions should be made to reflect the current organizational and administrative requirements.

11. SFC noted that the scope and content of Chapter 3, “Radiation Protection”, is now encompassed by the radiation safety program described in its approved RP. The NRC reviewed Chapter 3 and determined that it pertains to the operation of the facility whereas the RP includes a radiation safety program applicable to decommissioning and reclamation activities. This topic is also comprehensively addressed by License Conditions 9.4, 24, 42, and 43. As operations have ceased and the RP is being implemented, the NRC staff has determined that it is appropriate to delete the text of the existing Chapter 3 from the license and replace it with a reference to the radiation protection program detailed in the RP.

12. Chapter 4 refers to Nuclear Criticality Safety. SFC proposed deleting this chapter stating this topic is not applicable to the decommissioning or reclamation at the site. The NRC staff reviewed this proposed revision and noted that in order for criticality to occur in a geologic environment, uranium must be sufficiently concentrated and have a minimum U^{235} enrichment of 1.64%[3,4]. Because the uranium at the site is widely disseminated in sludges, soils and other materials, and it is natural uranium (0.71% ^{235}U), hence not enriched, criticality could not occur within the engineered disposal cell or anywhere else at the SFC site. In addition, the site is licensed only for possession of source material and there are no plans for possessing materials enriched in U^{235}. Given the specific characteristics of this site as enumerated above, the NRC has determined that criticality is no longer an issue at the site and this topic is not applicable. Therefore, Chapter 4 may be deleted.

13. SFC noted that the scope and context of Chapter 5 “Environmental Protection”, Section 5.1.2 (Airborne Effluents) was originally established and maintained with respect to operation of the facility, and since ceasing operations, there has not been a point source effluent to air. Therefore, Section 5.1.2 could be eliminated. However, the licensee also proposed inserting the third paragraph from Section 5.1.2 into Section 5.2.2 (Air Sampling) in order for the license to retain an action level for the fenceline air monitors.

    The NRC staff reviewed the proposed revisions and has determined that the RP does not include activities that would create a point source effluent to air. Therefore, the staff agrees that Section 5.1.2 should be deleted. However, environmental monitoring will continue to be conducted during reclamation activities and in order for the license to retain the action level for the fenceline air monitors the third paragraph from Section 5.1.2 should be retained and inserted into Section 5.2.2.

14. SFC identified a need to revise Chapter 5 (Environmental Protection), Section 5.1.4 (Compliance Responsibility) to reflect personnel descriptions of Section 2.2 (Organizational Responsibilities and Authority). The NRC staff reviewed this proposal

---

[3] S.R. Naudet, 1978, “Etude Parametrique De La Criticite Des Reacteurs Naturels,” IAEA-TC-119/22, Natural Fission Reactors, Proceedings of the Technical Committee on Natural Fission Reactors, Paris, France, International Atomic Energy Agency, Vienna, Austria.

[4] L.E. Toran, *et al.*, June, 1997, “The Potential for Criticality Following Disposal of Uranium at Low-Level Waste Disposal Facilities,” NUREG/CR-6505, U.S. Nuclear Regulatory Commission.

and determined that these revisions are necessary for the continuity of the license document.

15. SFC identified a need to delete text from Chapter 5 (Environmental Protection), Section 5.2.1 (Liquid Environmental Samples) and add a statement referencing the Sequoyah Facility Groundwater Monitoring Plan (GMP). The staff reviewed this proposal and determined that the GMP, which was approved by NRC, includes most of the surface water and all of the groundwater monitoring requirements described in Chapter 5, Section 5.2.1, the Combination Stream notwithstanding. The surface water locations not included in the GMP are retained in Table 5-2 (Environmental Monitoring Schedule). The monitoring requirements for the Combination Stream are described in the license Chapter 5, Section 5.1 (Liquid Effluent). Therefore, the NRC staff agrees that this revision should be made to eliminate redundancy with the GMP.

16. SFC identified a need to change Section 5.2.2 (Air Sampling) to retain the action level for fenceline air monitors which were deleted from Section 5.1.2 (Airborne Effluents). As noted in Revision 13 above, NRC staff agrees with the proposal to delete Section 5.1.2 and to insert the third paragraph from that section into Section 5.2.2 for the license to retain an action level for the fenceline air monitors.

17. SFC identified a need to revise Section 5.2.3 (Non-Radiological Monitoring) to reference the GMP. The NRC staff reviewed this proposed revision and determined that Section 5.2.3 only covers non-radiological groundwater monitoring. However, the NRC staff also determined that Sequoyah's GMP encompasses all of the groundwater monitoring requirements (radiological and non-radiological) described in Chapter 5 (Environmental Protection), Table 5.2 (Environmental Monitoring Schedule). The NRC staff agrees that this change should be made to implement the GMP.

18. SFC identified a need to revise Chapter 5 (Environmental Protection), Table 5-2 (Environmental Monitoring Schedule), to delete locations that are included in its GMP. The licensee noted that the GMP includes most of the surface water and all of the groundwater monitoring requirements described in the license in Chapter 5, Table 5.2. The licensee also noted that Sample Location 2205 "Farm Pond – East" and Sample Location 2209 "Salt Branch" are not included in the GMP. These two sample locations were deleted from Table 5-2 because sample results have consistently been at the detection limit. The licensee stated that there are no pathways under current conditions or those of decommissioning and reclamation that would reasonably be expected to impact these surface waters, and continued sampling does not provide any useful information. The NRC staff reviewed this proposed revision and has determined that those locations in Table 5-2 that are included in the GMP should be deleted from Table 5-2 to eliminate redundancy between the License Application and the GMP. Additionally, given the history of Sampling Locations 2205 and 2209, the NRC staff has determined that Locations 2205 and 2209 may be deleted.

19. SFC noted that Chapter 6 (Special Process Commitments) is no longer applicable as production activities ceased in 1992 and proposed that this chapter be deleted. The NRC staff agrees that this chapter pertained to production activities which are no longer

being conducted and, now that the site is undergoing reclamation, Chapter 6 should be deleted to ensure the continuity of the license document.

20. SFC proposed that Chapter 7 (Decommissioning Plan) be deleted as the scope and content of Chapter 7 is wholly superseded by the RP. This topic is also addressed by License Condition 9.3. The NRC staff determined that Chapter 7 is superseded by the Reclamation Plan and that Chapter 7 should be deleted to ensure continuity of the license document.

21. By letters dated September 24, 2009, March 25, 2010, and October 4**,** 2010, SFC requested the addition of a license condition that would enable it to make certain changes without NRC approval. The NRC staff reviewed the proposed license condition and determined that it was comparable to license conditions that are in other NRC licenses for similar sites, and could be implemented without being detrimental to the safety of the facility or the public. Two of the key elements of this condition is for the licensee to have a committee in place that is comprised of qualified individuals to review the proposed changes against the requirements of this license condition to determine that the proposed changes can be made without NRC approval, and for the licensee to document these changes in an annual report to the NRC.

In other NRC licenses, this committee is comprised of one member with expertise in management (e.g., Plant Manager) who is responsible for financial approval for changes; one member with expertise in operations and/or construction who has responsibility for implementing any operational changes; and one member, such as the radiation safety officer (RSO) or equivalent, with the responsibility of assuring changes conform to radiation safety and environmental requirements.

However, SFC proposed a modification to this structure. SFC would use its Plant Review Committee (PRC) to review the proposed changes. The PRC will be comprised of a Director, Decommissioning Projects with expertise in management who will be responsible for financial approval for changes. The Director, Decommissioning Projects will also have expertise in operations and/or construction and will be responsible for implementing any operational changes. A second member (e.g., Manager, Health and Safety, or equivalent) will have the responsibility of assuring changes conform to radiation safety and environmental requirements. A third member (e.g. Director of Regulatory Affairs) will be responsible for ensuring compliance with regulations and license requirements.

The NRC staff reviewed this proposal and found it to be acceptable, given SFC's organizational structure, and in accord with the license conditions provided for other licensees. In addition, the NRC staff reviewed the experience and qualifications required for these positions as described in SFC's RP and found them to be acceptable in providing qualified personnel to comprise the PRC.

22. As previously noted, SFC proposed revisions to Chapters 1-7 of the License Renewal Application. The NRC staff determined that Chapters 1-7 are referenced in License Condition 9.1 which will have to be revised to reflect the incorporation of these revisions.

4.0 Recommended License Amendments

As discussed in Section 3.0 (Technical Evaluation), the NRC staff has reviewed the licensee's proposed revisions and determined that all are necessary to eliminate redundancy or conflict between the current requirements of the license and the Reclamation Plan. The staff therefore recommends amending the license as noted in SFC's July 22, 2008, submittal. The revisions will be made as follows:

1. License Condition 47 – Delete.

2. License Condition 48 – Delete.

3. License Condition 49.B. - Change molybdenum = 0.0012 mg/l to molybdenum = 0.012 mg/l to correct a typographical error.

4. License Chapter 1, Section 1.6 Definitions – Delete definitions for the following terms that are not used in license application chapters 1 through 7.

    a. CWE
    b. Depleted UF_4 (DUF_4)
    c. Depleted UF_6 (DUF_6)
    d. Fluorination ash
    e. GM
    f. Normal Work Day
    g. SX
    h. UNH

5. License Chapter 2, Section 2.2 – Revise titles and position descriptions to reflect planned and actual condition.

6. License Chapter 2, Section 2.3 – Revision to reflect changes in organization titles.

7. License Chapter 2, Section 2.5 – Revision to reflect personnel descriptions of Section 2.2.

8. License Chapter 2, Section 2.6.2 – Revision to reflect personnel descriptions of Section 2.2.

9. License Chapter 2, Section 2.7.4 – Revision to reflect personnel descriptions of Section 2.2.

10. License Chapter 2, Section 2.9 – Revision to reflect typographical error and personnel descriptions of Section 2.2.

11. License Chapter 3 – Delete content and replace with reference to the radiation safety program described in the Sequoyah Facility Reclamation Plan.

12. License Chapter 4 – Delete content of Chapter 4 as criticality is no longer an issue.

13. License Chapter 5, Section 5.1.2 – Delete content and add statement to indicate current condition. Move the third paragraph to Section 5.2.2.

14. License Chapter 5, Section 5.1.4 – Revision to reflect personnel descriptions of Section 2.2.

15. License Chapter 5, Section 5.2.1 – Delete content and add statement referencing the GMP.

16. License Chapter 5, Section 5.2.2 – Insert third paragraph from Section 5.1.2 to retain an action level for the fenceline air monitors.

17. License Chapter 5, Section 5.2.3 – Incorporate reference to the Groundwater Monitoring Plan.

18. License Chapter 5, Table 5-2 – Delete locations that are included in the Groundwater Monitoring Plan.

19. License Chapter 6 – Delete content as Special Process Commitments are not applicable in decommissioning/reclamation.

20. License Chapter 7 – Delete content and replace with reference to the Sequoyah Facility Reclamation Plan.

21. Add License Condition Number 54 as follows:

Change, Test and Experiment License Condition

a. The licensee may, without obtaining a license amendment pursuant to 10 CFR 40.44, and subject to conditions specified in paragraph (b) of this condition:

   i) make changes in the facility as described in the license application (as updated);

   ii) make changes in the procedures as described in the license application (as updated); and

iii) conduct test or experiments not described in the license application (as updated).

b. The licensee shall obtain a license amendment pursuant to 10 CFR 40.44 prior to implementing a proposed change, test or experiment if the change, test, or experiment would:

i) result in more than a minimal increase in the frequency of occurrence of an accident previously evaluated in the license application (as updated);

ii) result in more than a minimal increase in the likelihood of occurrence of a malfunction of a facility structure, equipment, or monitoring system (SEMS) important to safety previously evaluated in the license application (as updated);

iii) result in more than a minimal increase in the consequences of an accident previously evaluated in the license application (as updated);

iv) result in more than a minimal increase in the consequences of a malfunction of an SEMS previously evaluated in the license application (as updated);

v) create a possibility for an accident of a different type than any previously evaluated in the license application (as updated);

vi) create a possibility for a malfunction of an SEMS with a different result than previously evaluated in the license application (as updated);

vii) result in a departure from the method of evaluation described in the license application (as updated) used in establishing the final safety evaluation report (FSER) or the environmental assessment (EA) or technical evaluation reports (TERs) or other analyses and evaluations for license amendments.

viii) for purposes of this paragraph as applied to this license, SEMS means any SEMS which has been referenced in a staff SER, TER, EA, or environmental impact statement (EIS) and supplements and amendments thereof.

c. Additionally the licensee must obtain a license amendment for any change, test, or experiment unless the change, test, or experiment is consistent with the NRC conclusions, or the basis of, or analysis leading to, the conclusions of actions, designs, or design configurations analyzed and selected in the site or facility Safety Evaluation Report, TER, and EIS or EA. This would include all supplements and amendments, and TERs, EAs, EISs issued with amendments to this license.

d. The licensee's determinations concerning paragraphs (b) and (c) of this condition shall be made by a Plant Review Committee (PRC). The PRC shall consist of a minimum of three individuals. One member of the PRC shall have expertise in management (e.g., Director, Decommissioning Projects) and shall

be responsible for financial approval of changes. This member shall also have expertise in operations and/or construction and shall have responsibility for implementing any operational changes. One member shall be the Manager, Health and Safety or equivalent, with the responsibility of assuring changes conform to radiation safety and environmental requirements; and one member shall be responsible for ensuring compliance with regulations and license requirements (e.g., Director, Regulatory Affairs). Additional members, temporary or permanent, may be included in the PRC, as appropriate, to address technical aspects such as groundwater hydrology, surface-water hydrology, specific earth sciences, and other technical disciplines. Additional members, other than the three above-specified individuals, may be consultants.

e. The licensee shall maintain records of any changes made pursuant to this condition until license termination. These records shall include written safety and environmental evaluations made by the PRC that provide the basis for determining changes are in compliance with paragraph (b) of this condition. The licensee shall furnish, in an annual report to the NRC, a description of such changes, tests, or experiments, including a summary of the safety and environmental evaluation of each. In addition, the licensee shall annually submit to the NRC, changed pages, which shall include both a change indicator for the area changed, e.g., a bold line vertically drawn in the margin adjacent to the portion actually changed, and a page change identification (date of change or change number or both), to the operations plan and reclamation plan of the approved license application (as updated) to reflect changes made under this condition.

22. License Condition 9.1 shall be revised to reference License Amendment 35 reflecting approval of reclamation plan for SFC.

5.0 References

1. U.S. Nuclear Regulatory Commission, 2009, Letter to J. Ellis (SFC), “Approval of Reclamation Plan for Sequoyah Fuels Corporation Facility,” April 20, 2009 [Agencywide Documents Access and Management System (ADAMS) Accession No. ML090260354; ML090260348; ML090260323; ML090290426].

2. U.S. Nuclear Regulatory Commission, 2008, “Final Environmental Impact Statement for the Reclamation of the Sequoyah Fuels Corporation Site in Gore Oklahoma,” NUREG-1888, May 2008 [ADAMS Accession No. ML081300103].

3. Sequoyah Fuels Corporation, 2008, Letter to Ken Kalman (NRC), “Final Reclamation Plan,” June 25, 2008 [ADAMS Accession No. ML081960238].

4. Sequoyah Fuels Corporation, 2008, Letter to Ken Kalman (NRC), “Request for License Amendment Reflecting Approval of Reclamation Plan,” July 22, 2008 [ADAMS Accession No. ML082140870].

5. Sequoyah Fuels Corporation, 2009, Letter to Ken Kalman (NRC), “License Condition – Requirements for Plant Review Committee Approval of Changes,” September 24, 2009 [ADAMS Accession No. ML092730043].

6. Sequoyah Fuels Corporation, 2010, Letter to Ken Kalman (NRC), “Request for License Condition to Make Certain Changes Without NRC Approval,” March 25, 2010 [ADAMS Accession No. ML100950551].

7. Sequoyah Fuels Corporation, 2010, Letter to Ken Kalman (NRC), “Request for License Condition to Make Certain Changes Without NRC Approval,” October 4, 2010 [ADAMS Accession No. ML102790043].

8. Sequoyah Fuels Corporation, 2005, Letter to Myron Fliegel (NRC), “Update of Ground Water Monitoring Plan,” February 25, 2005 [ADAMS Accession No. ML050680228].

9. Sequoyah Fuels Corporation, 2010, Letter to Ken Kalman (NRC), “License Condition 47, Final Groundwater Corrective Action Plan (CAP),” August 18, 2010 [ADAMS Accession No. ML102380151].

10. Sequoyah Fuels Corporation, 2010, Letter to Susan Frant (NRC), “License Condition 47, Groundwater Corrective Action Plan Submittal,” June 16, 2003 [ADAMS Accession Nos. ML031710049; ML031710029; ML031710033; ML031710040; ML031710044; ML031710045].

11. U.S. Nuclear Regulatory Commission, 2010, “Safety Evaluation Report, Amendment of License Pursuant to Approval of Reclamation Plan for the Sequoyah Fuels Corporation Site, Gore, Oklahoma,” November 2010 [ADAMS Accession No. ML102770595].

12. U.S. Nuclear Regulatory Commission, 2005, Letter to J. Ellis (SFC) regarding “Amendment 31 – Sequoyah Fuels Corporation – Materials License No. SUB-1010 – Approval of Request to Authorize a Groundwater Compliance Monitoring Plan,” August 22, 2005 [ADAMS Accession No. ML052280139].