August 18, 1995

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	
SEQUOYAH FUELS CORPORATION GENERAL ATOMICS	)	Docket No. 40-8027-EA
(Gore, Oklahoma Site Decontamination and Decommissioning Funding)	)	Source Material License No. SUB-1010

NRC STAFF'S THIRD SET OF INTERROGATORIES TO GENERAL ATOMICS

Pursuant to 10 C.F.R. §§ 2.740b and 2.741, the NRC Staff (Staff) hereby serves its Third Set of Interrogatories to General Atomics. All responses to this discovery request shall be in accordance with the above-referenced provisions of the Commission's rules of practice, and all other applicable provisions. Responses shall be supplemented in accordance with 10 C.F.R. § 2.740(e). Each interrogatory shall be answered separately and fully, in writing and under oath or affirmation, and shall include all pertinent information available to General Atomics, its subsidiaries (including, but not limited to, Sequoyah Holding Corporation, Sequoyah Fuels International Corporation, and Sequoyah Fuels Corporation), divisions, and operating units, and its officers, directors,

agents, representatives, and employees. Answers to the following interrogatories shall be served within fourteen days of service of this discovery request.

INTERROGATORIES

INTERROGATORY 1

NRC Inspection Report No. 40-8027/92-16, for the inspection conducted of the Sequoyah Fuels facility on June 25 to July 2, 1992, states that "[o]n June 28, 1992, the inspector met with two General Atomics (GA) personnel, the Director of QA and the Director of Manufacturing and Product Support. They informed the inspector that the GA Board of Directors had recently approved expenditures for an Engineering Upgrade Program."

a. Did the Board of Directors of General Atomics approve the above-referenced expenditures for the subject Engineering Upgrade Program at the Sequoyah Fuels facility?

b. Was approval required by the General Atomics Board of Directors before such expenditures could be made for the above-referenced Engineering Upgrade Program? If so, please describe in detail why such approval was required.

c. Were such expenditures ever made? If so, in what amount? If so, by whom? With respect to any person or entity identified by the foregoing, was such person or entity reimbursed for the expenditures? If so, state all persons or entities who directly or indirectly provided any such reimbursement.

INTERROGATORY 2

With respect to the following positions:

Corporate Vice President of Human Resources of General Atomics

Corporate Director, Licensing, Safety and Nuclear Compliance of General Atomics

Corporate Manager, Health Physics of General Atomics

Corporate Manager of Industrial Safety of General Atomics

as referenced in the license issued to Sequoyah Fuels Corporation (SFC) by the NRC, No. SUB-1010,

a. please name the individual(s) who served in such positions from January 1989 through October 15, 1993;

b. please state whether such individuals fulfilled all of the duties and responsibilities as described in the SFC license;

c. if one or more individuals did not, please describe which duties and responsibilities were not fulfilled, name the responsible person, and explain why such duties and responsibilities were not fulfilled;

d. please describe whether the individuals named in response to Interrogatory 2.a. above were compensated for their work in connection with the SFC license, and if so, who compensated them;

e. please describe why each position was created, describe why each position was to be filled by General Atomics personnel, and name each individual known to responsible for creating each such position.

INTERROGATORY 3

With respect to the following individuals:

James Edwards
Brenda Dawson
Reau Graves, Jr.
John E. Jones
Max Kemp
Anthony Navarra
Richard Dean
Michael Dunlap
Frank Warner

a. for any services performed on behalf of SFC, please describe briefly such services;

b. please describe if the performance of such services were evaluated, and if so, how they were evaluated and by whom;

c. state whether these individuals were compensated for the performance of such services; and

d. state the person or entity directly compensating them.

e. If the foregoing person or entity identified in response to Interrogatory 3.d. was reimbursed by another person or entity for the compensation paid, please describe who so provided the reimbursement.

Respectfully submitted,

Steven R. Hom
Catherine L. Marco
Counsel for NRC Staff

Dated at Rockville, Maryland
this 18th day of August 1995