



KERR-McGEE NUCLEAR CORPORATION

KERR-McGEE CENTER • OKLAHOMA CITY, OKLAHOMA 73125

July 13, 1979

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Glen D. Brown, Chief
Fuel Facility & Material Safety Branch
Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76012

RE: License No. SUB-1010
Docket No. 40-8027

Dear Mr. Brown:

Your letter of June 25, 1979 included a notice of violation and requested a reply stating the corrective action we are taking to avoid further non-compliance. The infraction cited and our reply follows:

Contrary to 10 CFR 20.103(c), use of respiratory protective equipment was not in accord with Regulatory Guide 8.15, "Acceptable Programs for Respiratory Protection" in that a half-mask respirator was used with head straps over the hard hat which prevented straps from lying in their normal position next to the head as required by Section 13.5 of NUREG-0041, which is referenced in Section C.8.n of Regulatory Guide 8.15.

The infraction occurred in the sampling plant where half-masks may be used as a precautionary measure. All employees who use the half-mask respirator and their supervisors have been re-instructed to wear the respirator head straps in the proper position. Frequent audits (almost daily) by operations managers and health-safety personnel during the past two weeks have not resulted in a report of another similar infraction. Continued auditing and re-instruction will be done as necessary.

Engineering ALARA activities are also to be applied to the sampling plant. A study will begin to determine if additional ventilation control equipment is needed or if better utilization of the current equipment can be accomplished. The yellowcake confinement equipment is also being studied. These studies should ultimately result in a working environment where the precautionary use of respiratory protective equipment is not needed. Once this objective is

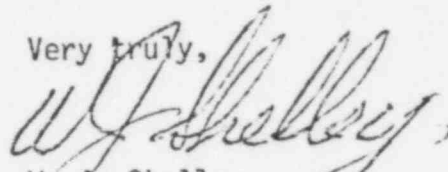
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Mr. Glen D. Brown
July 13, 1979
Page 2

accomplished, the use of the half-mask respirator will be restricted for emergency-escape only. These engineering studies will be completed during the last half-year of 1979.

Very truly,



W. J. Shelley
ALARA Committee Chairman
Direction of Regulation
and Control

WJS/hw

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