



December 7, 1989

**Certified Mail  
Return Receipt Requested**

Mr. A. Bill Beach, Director  
Division of Radiation Safety and Safeguards  
U.S. NUCLEAR REGULATORY COMMISSION  
Region IV  
611 Ryan Plaza Drive, Suite 1000  
Arlington, Texas 76011

RE: License SUB-1010; Docket No. 40-8027  
NRC Inspection Report 40-8027/89-04

Dear Mr. Beach:

Sequoyah Fuels Corporation (SFC) feels that a portion of Inspection Report 40-8027/89-04, which concerns the Unusual Event declared while your inspectors were onsite, should be clarified.

The Anhydrous Hydrogen Fluoride (AHF) Vaporizer System configured as it was on November 8 had a common emergency vent header for all three vaporizers. The system had a low pressure rupture disk, which released to the Hydrogen Fluoride (HF) Scrubber, and a high pressure rupture disk, which released to the stack. The low pressure rupture disk was intact after the release. It was apparently premature failure of the high pressure rupture disk that initiated the event. The emergency vent system on the vaporizer for fluorination activated, allowing HF fumes into the common vent header. A bleed valve on the vaporizer that was taken out of service for maintenance was open, allowing backflow of fumes into the vaporizer room.

To prevent recurrence of this type of incident, the following modifications have been made:

The common vent system has been eliminated. The fluorination vaporizer has a high and low pressure vent separate from the hydrofluorination vaporizer. New vent lines have been installed as necessary to the HF scrubber and the emergency vent line.

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The hydrofluorination vaporizer and the spare vaporizer have spectacle blinds after each pressure relief device. The spare vaporizer is blinded out of service.

Please contact Lee Lacey (918/489-3207) if you have any questions concerning this submittal.

Sincerely,



Scott P. Knight  
Vice President  
Administration

SPK:LRL:nv

xc: Oklahoma Radiation Control Program Director  
Chuck Robinson, NMSS  
J. Mestepey  
K. Asmussen, General Atomics  
NLEC File