

FEB 5 1991

MEMORANDUM FOR: Robert M. Bernero, Director  
Office of Nuclear Material Safety  
and Safeguards

FROM: Richard E. Cunningham, Director  
Division of Industrial and  
Medical Nuclear Safety

SUBJECT: ACTION PLANS FOR NUCLEAR FUEL SERVICES, INC. (NFS)  
AND SEQUOYAH FUELS CORPORATION (SFC)

As you requested following the Senior Management Meeting, my staff has prepared the enclosed Action Plans for the subject facilities. These Plans identify NRC and licensee actions completed or to be taken for each facility. The NFS Plan addresses license renewal and nuclear criticality safety improvement issues. The SFC Plan addresses license renewal, environmental assessment and protection, and management appraisal issues. Additional actions which may divert the licensees' resources to other projects are included in the Plans.

~~Original~~ Signed By:

Richard E. Cunningham, Director  
Division of Industrial and  
Medical Nuclear Safety

Enclosures:

1. Action Plan - Nuclear Fuel Services, Inc.
2. Action Plan - Sequoyah Fuels Corporation

cc: Stewart D. Ebnetter  
Regional Administrator, RII

Robert Martin  
Regional Administrator, RIV

Distribution w/encls.

<u>Dockets 70-143</u>	<u>PDR</u>	<u>LPDR</u>	<u>NRC File Center</u>
40-8027	IMUF R/F	IMSB R/F	NMSS R/F
IMNS Central File	VLTharpe(3)	MHorn	GBidinger
GSjoblom	Region IV	MVasquez, RIV	Region II
CBassett, RII	SPennington	RWilson	

OFC:IMUF: IMUF: IMUF: IMUF: IMSB: DD/IMNS: D/IMNS:  
 mh-----  
 NAME:SPennington: MHorn: VLTharpe: GHBidinger: Chaughney: GSjoblom: RCunningham:  
 DATE:1/30/91: 1/30/91:1/30/91: 1/30/91: 1/31/91: 2/4/91: 2/5/91:

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ACTION PLAN - NUCLEAR FUEL SERVICES, INC. (NFS)

<u>ACTION</u>	<u>RESPONSIBLE GROUP</u>	<u>START DATE</u>	<u>DUE DATE</u>	<u>COMPLETION DATE</u>
<u>I. PROJECT MANAGEMENT</u>				
A. Part-time Resident Inspector	RII	3/89	One week/month	Ongoing
B. Full-time Resident Inspector	RII/NMSS	1/17/91	5/91	
C. Decommissioning Projects Management Meeting	NFS, IMNS, RII, State of Tennessee	3/18/88	Quarterly	Ongoing
D. Nuclear Criticality Safety Assessment	IMNS, RII	7/9/90	_____	9/14/90
E. Technical review meeting of NCS PIP*	IMNS, RII	3/91	Quarterly	Ongoing
F. Review/comment on Final NCS Analysis Report	IMNS, RII	9/29/95	2/28/96	
G. Issue Renewed License	IMNS	1/23/84	10/1/91	
<u>II. LICENSE RENEWAL</u>				
A. Revised Application	NFS	_____	_____	8/15/89
B. Review/Comment on Revised Application	IMNS, RII	_____	_____	7/5/90

\*Nuclear Criticality Safety Performance Improvement Program

<u>ACTION</u>	<u>RESPONSIBLE GROUP</u>	<u>START DATE</u>	<u>DUE DATE</u>	<u>COMPLETION DATE</u>
C. Supplement to Revised Application				
1. Organization, radiation safety, and environmental protection	NFS	_____	_____	10/15/90
2. Nuclear criticality safety	NFS	7/5/90	4/30/91	
D. Environmental assessment	IMNS	10/15/90	5/15/91	
E. Safety evaluation report	IMNS	10/15/90	8/15/91	
F. Incorporate commitment for NCS PIP into renewed license	IMNS	8/22/90	8/15/91	
<u>III. DECOMMISSIONING ACTIVITIES</u>				
A. Approve plan for plutonium facilities and contractor, EcoTeck, Inc. (NFS Subsidiary)	NRC	_____	_____	6/20/89
B. Decontaminate and decommission (D&D) plutonium facilities	NFS	9/12/90	6/10/92	
C. Approve release of facilities	IMNS, RII	_____	9/1/92	

<u>ACTION</u>	<u>RESPONSIBLE GROUP</u>	<u>START DATE</u>	<u>DUE DATE</u>	<u>COMPLETION DATE</u>
D. Review/Comment on plan for retention ponds	IMNS, LLWM	_____	_____	11/9/90
E. Revise plan for ponds	NFS	11/9/90	_____	
F. Approve plan for ponds	IMNS, LLWM	_____	4/1/91	
G. D&D retention ponds	NFS	_____	12/1/92	
H. Approve release of ponds	IMNS, LLWM	_____	3/1/93	
IV. <u>NEW HIGH-ENRICHED SCRAP RECOVERY FACILITY</u>				
A. Decontaminate proposed construction site	NFS	1990	1991	
B. Confirmatory survey	RII, ORAU	1991	1991	
C. Construct facility and test Equipment	NFS	1991	1993	
D. Submit amendment application	NFS	Mid-1991	_____	
V. <u>NUCLEAR CRITICALITY SAFETY PIP</u>				
A. Submit NCS PIP	NFS	_____	_____	8/22/90
B. Review/Comment on PIP	IMNS, RII	_____	_____	8/28/90

<u>ACTION</u>	<u>RESPONSIBLE GROUP</u>	<u>START DATE</u>	<u>DUE DATE</u>	<u>COMPLETION DATE</u>
C. PIP Schedule				
1. Operational Enhancements	NFS	6/22/90	12/31/93	
a) Color Code/Label Piping	NFS	11/12/90	12/31/92	
b) Control Systems for Unfavorable Geometry Containers	NFS	11/30/90	12/31/91	
c) Improve Station Limit Cards	NFS	7/23/90	11/27/91	
d) P&IDs and Flow Diagrams	NFS	11/12/90	12/31/93	
e) Reduce 11-liter Cylinder Usage	NFS	6/22/90	5/31/91	
f) In-line SNM Detectors	NFS	8/23/90	7/1/91	
g) Delta-P Detectors on Heat Exchangers	NFS	6/3/91	2/25/92	
2. Nuclear Criticality Safety (NCS) Analysis	NFS	8/6/90	9/29/95	
a) Initial Double Contingency Review				
Unfavorable Geometry Containers	NFS	_____	_____	9/28/90

<u>ACTION</u>	<u>RESPONSIBLE GROUP</u>	<u>START DATE</u>	<u>DUE DATE</u>	<u>COMPLETION DATE</u>
Review High-enriched Scrap Recovery Facility (200 complex)	NFS	_____	_____	11/1/90
Review Product Area (300 complex)	NFS	8/6/90	2/1/91	
Review Laboratory, and Buildings 301 and 111	NFS	3/4/91	11/4/91	
b) Special Unfavorable Geometry Review				
List NCS Controls in 200 complex	NFS	_____	_____	12/17/90
List NCS controls in 300 complex	NFS	12/17/90	2/1/91	
c) Second Double Contingency Review (DCR)				
Unfavorable Geometry Containers	NFS	12/18/90	6/28/91	
HAZOP/DCR other stations	NFS	7/1/91	12/30/93	
d) Probabilistic Risk Assessment	NFS	12/7/90	12/30/94	

<u>ACTION</u>	<u>RESPONSIBLE GROUP</u>	<u>START DATE</u>	<u>DUE DATE</u>	<u>COMPLETION DATE</u>
e) Final NCS Analysis Report and Supporting Files	NFS	8/6/90	9/29/95	
3. Upgrade NCS Analytical Capability	NFS	1/15/90	5/9/91	
4. Audits and Inspections				
a) NFS Appraisal Program	NFS	4/17/90	8/30/91	
b) NCS Audit/ Inspection Procedure	NFS	_____	_____	8/9/90
c) Independent NCS Appraisal				
NCS Appraisal Report	NFS	_____	_____	11/13/90
Review Report Recommendations	NFS	11/13/90	2/28/91	
Incorporate Items in PIP	NFS	2/28/91	3/27/91	
5. Training	NFS	5/11/90	11/27/91	
6. Increase NCS Staffing	NFS	_____	_____	12/10/90
7. Upgrade Criticality Detectors	NFS	7/11/90	12/11/91	

ACTION PLAN - SEQUOYAH FUELS CORPORATION

<u>Action</u>	<u>Group Responsible</u>	<u>Date Due</u>	<u>Date Compt</u>
<u>I. Overall Project Management</u>			
A. Review Meeting	IMNS/RIV/LLWM/ SAIC	1/23-24/91	1/24/91
B. Status Meeting	IMNS/RIV/SFC/ LLWM/SAIC	1/30/91	
C. Quarterly Meeting*	IMNS/RIV/SFC/ LLWM/SAIC	4/91	
D. Quarterly Meeting*	IMNS/RIV/SFC/ LLWM/SAIC	7/91	
E. Quarterly Meeting*	IMNS/RIV/SFC/ LLWM/SAIC	10/91	
<u>II. Main Building Investigation</u>			
A. Submit Final Investigation Report	SFC	_____	12/18/90
B. Review Investigation Report	IMNS/RIV/SAIC	2/1/91	
C. Determine Immediate Corrective Action Needed	IMNS/LLWM/RIV	2/8/91	
D. Follow-up Investigation - Wells MW10, MW10A	SFC	2/28/91	
E. Determine Immediate Corrective Action Needed	IMNS/LLWM/RIV	3/30/90	

\*Subject to Supart L Hearing Requirements



<u>Action</u>	<u>Group Responsible</u>	<u>Date Due</u>	<u>Date Compt</u>
<u>III. SX Investigation</u>			
A. Submit Final Investigation Report	SFC	2/4/91	
B. Review Investigation Report	IMNS/RIV/SAIC/LLWM	3/4/91	
C. Determine Corrective Action Needed	IMNS/LLWM/RIV	3/11/91	
D. Surface Soil Follow-up Investigation Report	SFC	3/8/91	
<u>IV. Management Appraisal</u>			
A. Submit Appraisal plan	SFC	12/20/90	12/18/90
B. Approve Appraisal plan	RIV	1/15/91	1/14/91
C. Conduct Appraisal	M/P	1/91 - 6/91	
D. Submit Appraisal Report	M/P	7/91	
E. Submit SFC Response to Report	SFC	8/91	
F. NRC review of appraisal and SFC response	HQ/RIV	9/91	
<u>V. Environmental Investigation - Entire Site</u>			
A. Conduct Environmental Investigation	SFC	10/90 - 6/91	
B. Submit Investigation Report	SFC	7/15/91	
C. Review Investigation Report	IMNS/RIV/SAIC/ LLWM	8/15/91	

<u>Action</u>	<u>Group Responsible</u>	<u>Date Due</u>	<u>Date Compt</u>
VI. <u>Miscellaneous Items</u>			
A. Inspection of SFC Laboratory	RIV	1/18/91	1/18/91
B. Document Inspection of Lab Evaluation	RIV	2/18/91	
C. Split Sample Comparison	RIV	2/18/91	
VII. <u>OI Investigation</u>	OI		
VIII. <u>Renewal</u>			
A. Application For Renewal	SFC	8/31/90	8/29/90
B. Revise Environmental Report	SFC	10/91	
C. Revise renewal application - org,env	SFC	10/91	
D. Complete environmental review	SAIC/LLWM/IMNS	12/91	
E. Complete safety review	IMNS	1/92	
F. Issue renewed license	IMNS	1/92	
IX. <u>ASLB Renewal Hearing</u>			
A. Requested hearing	NACE, etc.	_____	9/28/90
B. Board Designated	ASLB	_____	10/30/90
C. ASLB Decision on granting hearing	ASLB	_____	1/24/90