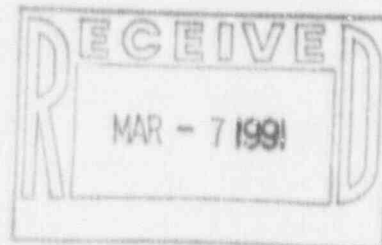




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March 5, 1991
SFC-5074-PLG-27

Mr. Reau Graves, Jr.
Sequoyah Fuels Corporation
P.O. Box 610
Gore, OK 74435

Dear Mr. Graves:

INDEPENDENT OVERSIGHT PROGRAM (IOP) REPORT
FOR WEEK ENDING MARCH 3, 1991

Enclosed is one copy of the IOP weekly report for week ending March 3, 1991. This report, and the daily reports attached to it, were prepared by members of the Sequoyah Oversight Team (SOT) identified on the daily reports. The weekly report summarizes observations, concerns, and resolutions of prior concerns for the last 7 days. It has been reviewed with you as indicated by the signature of you or your designee on the weekly report.

During this week, we continued to observe that communication of safety concerns to management was performed in a timely and responsive manner. In addition, the plant operations and maintenance activities have responded readily to observations on housekeeping and related safety concerns.

The problems of maintaining current procedures and procedural violations continue to be of concern to the SO and the SFC quality assurance engineer and to the NRC inspectors as well. As you noted in the NRC exit interview on March 1, 1991, this is an area requiring added management attention. We are encouraged by the efforts of the Sequoyah Facility quality assurance engineer in tracking the status of procedures and believe that this activity, as well as that of the SOT members, will be very useful to Sequoyah management in its efforts to rectify this concern.

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Certified By

Carol A. Dube

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Mr. Reau Graves, Jr.
Sequoyah Fuels Corporation

March 5, 1991
Page 2

On March 1, 1991, we also met with the Sequoyah quality assurance engineer and discussed his plans and activities. While this was only a brief meeting, we concluded that he is making good progress toward being prepared to assume the responsibilities of the oversight activities.

Please call me if you have any questions regarding these reports.

Very truly yours,

W.C. Gekler

Willard C. Gekler

Enclosures

cc: Robert D. Marlin, Region IV Administrator

WEEK STARTING: February 25, 1991 ENDING: March 3, 1991
Sheet 1 of 4

SOT MEMBER: G.G. YOUNG, J.J. Donovan

KEY OBSERVATIONS:

- ① Sample results for deposits in the sewage discharge line indicate a high concentration of Uranium (~13.4%). SFC plans to address this finding by changing the laundry discharge location from the sewer line to the raffinate treatment clarifier ponds. The problem is not an environmental discharge violation, it is an ALARA issue.
- ② The QA engineer has been finding many of the same concerns as the SOT. These parallel findings are being coordinated better now to improve the efficiency of both efforts.
- ③ Weekly operation's department meetings appear to be creating a much improved atmosphere of communication within that department.

NEW CONCERNS:
NO.

- ① Several problems with procedures were identified during this period. The problems included procedures referring to equipment or activities that are no longer in service or practice, responsibilities not clearly assigned or assigned to the wrong department, and practices being performed that are not addressed by procedures. Many of these problems are being found by NRC Inspectors, QA Inspectors, or SOT members when they should have been found and corrected by the "owners" of the procedures.

RESOLUTION OF PRIOR CONCERNS:
NO.

REVIEW COMPLETED:

SFC: Rean Grane Jr DATE: 3-3-91
SOT MEMBER: JJ Donovan DATE: 3 March 1991

SEQUOYAH OVERSIGHT TEAM WEEKLY REPORT
INDEPENDENT OVERSIGHT PROGRAM

IOP-2

WEEK STARTING: February 25, 1991 ENDING: March 3, 1991

Sheet 2 of 4

SOT MEMBER: G.G. YOUNG, J.J. DONOVAN

KEY OBSERVATIONS:

- ④ Cleanliness Tour by SOT Representatives and the QA Engineer with Operations and Maintenance Manager and Supervisors on 2/26 resulted in some positive results in certain areas of the MPB. Some routine housekeeping tours by operations and maintenance personnel as a team were discussed and should be initiated.
- ⑤ Several examples of procedure violations were identified this week by SOT members, NRC Inspector Pete Garcia, and others. A concern that procedures are not receiving adequate attention/priority regarding updates, process changes, or strict adherence was identified.

NEW CONCERNS:

NO.

RESOLUTION OF PRIOR CONCERNS:

NO.

REVIEW COMPLETED:

SFC:

Ream Graves Jr

DATE:

3-3-91

SOT MEMBER:

J.J. Donovan

DATE:

5 March 1991

SEQUOYAH OVERSIGHT TEAM WEEKLY REPORT
INDEPENDENT OVERSIGHT PROGRAM

IOP-2

WEEK STARTING: February 25, 1991 ENDING: March 3, 1991

Sheet 3 of 4

SOT MEMBER: G.G. YOUNG, J.J. DONOVAN

KEY OBSERVATIONS:

- ⑥ Communication with NRC was prompt this week, even when the phone call regarded issues that were not "officially" reportable. The high uranium content finding in the sewer line was part of the ongoing environmental investigation, but was reported promptly to Region II with a preliminary assessment of possible corrective action. The NaHS spill on 3/1/91 was reported by phone shortly after the Unusual Event was closed. Communication of "events" or incidents of high Uranium in samples that may impact the environment are being promptly reported to SFC management who are promptly reporting to NRC Region II personnel.

NEW CONCERNS:

NO.

RESOLUTION OF PRIOR CONCERNS:

NO.

REVIEW COMPLETED:

SFC:

Rean Graves Jr.

DATE:

3-3-91

SOT MEMBER:

J.J. Donavan

DATE:

3 March 1991

SEQUOYAH OVERSIGHT TEAM WEEKLY REPORT
INDEPENDENT OVERSIGHT PROGRAM

IOP-2

WEEK STARTING: February 25, 1991 ENDING: March 3, 1991Sheet 4 of 4

SOT MEMBER:

J J Donovan

KEY OBSERVATIONS:

① Worked quiet, but on several control room visits noticed poor radio communications of frequent reports necessary & not always understood.

NEW CONCERNS:

NO.

RESOLUTION OF PRIOR CONCERNS:

NO.

REVIEW COMPLETED:

SFC:

Rean Grant

DATE:

3-3-91

SOT MEMBER:

J J Donovan

DATE:

3 March 1991

INDEPENDENT OVERSIGHT PROGRAM

DATE: February 25, 1991Sheet 1 of SOT MEMBER: FARRY G. YOUNGSOT LOG BOOK PAGE(S): 152, 153, 154, 155

OVERSIGHT TIME PERIOD

START TIME: 0720COMPLETION TIME:

ACTIVITIES, AREAS, PROCEDURES OBSERVED:

- ① Prepared SOT weekly report for 2/18-24/91 and submitted it to SFC + PLG.
- ② Investigated responsibility for keeping raffinate sludge from becoming airborne per procedure N-290-11.
- ③ Reviewed QA Audit Report for January 1991.
- ④ Discussed Shift rotation schedule concerns with Tommy Johns + Joe Bohannon.
- ⑤ Discussed recent finding of 13.4% U in the material deposited on the sewage discharge tile piping and sat-in on discussions regarding corrective action and notification made to NRC Region IV (Bill Fisher).
- ⑥ Met Pete Garcia, NRC inspector, who will be here this week.

OBSERVATIONS:

- ① Although procedure N-290-11 does not specify who is responsible for keeping raffinate sludge from becoming airborne, SFC personnel are aware and there was no finding of a lack of accountability.
- ② The QA Engineer had already identified concerns about procedures referencing out-of-service equipment (i.e. HF Condenser) i. Dec. 1990 and again in Jan. 1991. The SOT finding on 2/10/91 was after corrective action had already been started. The SOT and QA Engineer functions are clearly on parallel paths and are becoming more complementary, even though in this case they were duplicative.

CONCERNS: No new concerns

- ③ Sample results of deposits in the sewage discharge line indicated 13.4% U. This resulted in SFC management discussing corrective actions, verbally notifying NRC, and making plans for further investigation. The finding is not reportable and the final discharge from SFC property is well below release limits. However, ALARA principles are being applied to minimize any releases.

ACTION ITEMS:

ITEM

ASSIGNEE

ACTION DATE

Follow-up on sewage piping contamination and corrective action plans.

G. Young

2/26-28/91

SEQUOYAH OVERSIGHT TEAM DAILY REPORT
INDEPENDENT OVERSIGHT PROGRAM

IOP-1

DATE: February 26, 1991Sheet 1 of 1SOT MEMBER: Garry G. YoungSOT LOG BOOK PAGE(S): 155, 156, 157, 158

OVERSIGHT TIME PERIOD

START TIME: 0830COMPLETION TIME: 1810

ACTIVITIES, AREAS, PROCEDURES OBSERVED:

- ① Toured areas in MPB previously noted as having housekeeping problems with Dick Parker, Larry Tharp, Don Robertson, Ron Van Natta, Joe Bohannon, & Don Lathan.
- ② Reviewed documentation on NOx Roadway Sample incident of 1/4/91.
- ③ Followed up on Pond 4 Refillate Sludge cleanup effort.
- ④ Attended weekly operations meeting conducted by Dick Parker.
- ⑤ Met with Mike Nichols, Tommy John, & Dick Parker on various issues related to previous incidents or areas of concern.

OBSERVATIONS:

- ① Operations and maintenance personnel were very cooperative in supporting the cleanliness tour. Several good suggestions for correcting the housekeeping problems were identified and discussed. It now remains to be seen if those ideas and plans are implemented.
- ② NRC Audit Report dated 2/21/91 has been reported in the local news with a very negative message about the Sequoyah Facility.
- ③ Several people have pointed out false statements in the 2/21/91 NRC report that were incorrectly attributed to statements made by them. There appears to be discrepancies between what the NRC reports as information given by SFC personnel and the information that SFC personnel indicate they actual gave to NRC.

CONCERNS: No new concerns

- ④ Dick Parker's weekly meeting with Operation's personnel appears to be an excellent communication tool for his department. It appears that periodic presentations (e.g., quarterly or monthly) to such gatherings by Jim Mestepay, Lee Lacy, Beau Graves, etc., would further improve the communication link between management and workers.

ACTION ITEMS:

ITEM

ASSIGNEE

ACTION DATE

No new action items

SEQUOYAH OVERSIGHT TEAM DAILY REPORT
INDEPENDENT OVERSIGHT PROGRAM

IOP-1

DATE: February 27, 1991

Sheet 1 of 1

NOT MEMBER: GARRY G. YOUNG

SOT LOG BOOK PAGE(S): 158, 159, 160, 161

OVSIGHT TIME PERIOD

START TIME: 0915

COMPLETION TIME: 1745

ACTIVITIES, AREAS, PROCEDURES OBSERVED:

- ① Followed up on contamination incident involving 2 contractors who were working near the #1 denitration equipment.
- ② Attended an RCRA Evaluation meeting conducted by RSA personnel to inform SFC of hazardous materials that may be subject to EPA requirements for RCRA wastes.
- ③ Followed up on contamination findings in slurry tank room, conveyor M-3343 UO₂ powder leaks, and yellowcake pad water runoff from dirt stored in the south west corner.

OBSERVATIONS:

- ① Contractor contamination involved contractor who didn't follow SFC procedures and got contamination on their pant legs. It appears the situation was handled quickly and correctly, and the involved parties were appropriately corrected.
 - ② RCRA evaluation meeting was a good example of communications involving several affected organizations at SFC. The supervisors, managers, and consultants were able to openly discuss this regulatory compliance issue and determine some prudent courses of action.
 - ③ Upon notification by me to appropriate operations personnel, leaks in the slurry tank room were cleaned and corrected, leaks in the M-3343 conveyor were cleaned and
- CONCERNS: No new concerns
- corrective action initiated, and the yellowcake pad concern was already being looked into by HSE.
- ④ The locking of the AR doors may have caused an operational concern related to prompt operator action when an off-gas compressor on the cleaning reactor cold trap trips. Further evaluation is needed to determine if this creates a safety problem that has not been adequately considered.

ACTION ITEMS:

ITEM

ASSIGNEE

ACTION DATE

Followup on need for operator action when an off-gas compressor trips and whether timely action is possible with locked AR doors.

G. Young

2/28/91

SEQUOYAH OVERSIGHT TEAM DAILY REPORT
INDEPENDENT OVERSIGHT PROGRAM

IOP-1

DATE: February 28, 1991
Sheet 1 of 1

SOT MEMBER: GARRY G. YOUNG SOT LOG BOOK PAGE(S): 161, 162, 163

OVERSIGHT TIME PERIOD

START TIME 0830 COMPLETION TIME: 1720

ACTIVITIES, AREAS, PROCEDURES OBSERVED:

- ① Followed up on 2/21/91 shipment of overweight UF_6 cylinder
- ② Followed up on operator action required for handling off-gas compressor trip (on cleanup reactor cold trap) and subsequent F_2 Tower pressurization.
- ③ Reviewed 2/21/91 ~~RSA~~ RSA report on the SX Building environmental investigation.
- ④ Met with Pete Garcia on NRC Inspection this week and SOT activities this week.
- ⑤ Reviewed operating procedure revision process and responsibilities for keeping operating procedures current.

OBSERVATIONS:

- ① Shipment of overweight cylinder on 2/21/91 has resulted in corrective action that will ensure pre-1986 cylinders will not have this problem again. Post-1986 cylinders were already addressed by current practices that avoid this problem.
- ② Operations personnel are evaluating ways to relieve F_2 tower pressure on an off-gas compressor trip. The current practice of dropping an AR may not be appropriate and, due to the locked high radiation doors, may not be timely. There does not appear to be a documented procedure on how to deal with this operational occurrence, although a standard practice does seem to exist.

CONCERNS:

Several items related to operating procedures not being kept up-to-date with actual practice have been identified recently. It appears that this problem is due to insufficient attention/priority being placed on efforts to keep procedures current.

ACTION ITEMS:

ITEM	ASSIGNEE	ACTION DATE

BEQUOYAH OVERSIGHT TEAM DAILY REPORT
INDEPENDENT OVERSIGHT PROGRAM

IOP-1

DATE: March 1, 1991

Sheet 1 of 1

SOT MEMBER: GARRY YOUNG, Bill Gekler, Joseph Donovan SOT LOG BOOK PAGE(S): 164, 165, 166

OVERSIGHT TIME PERIOD

START TIME: 0800

COMPLETION TIME: 1725

ACTIVITIES, AREAS, PROCEDURES OBSERVED:

- ① Reviewed QA Audit Report for February 1991
- ② Followed up on procedure concerns
- ③ Dr. J. Donovan attended SFC training for unescorted access to the facility.
- ④ Attended NRC Exit Meeting conducted by Pete Garcia
- ⑤ Witnessed NaHS spill response and cleanup efforts
- ⑥ Bill Gekler + Garry Young met with Joe Bohannon on SOT activities and plans for future turnover of SOT functions to the QA Engineer.

OBSERVATIONS:

- ① Several more examples of operating procedures not being kept up-to-date with current practices were identified in the QA Audit Report reviews and NRC inspection results by Pete Garcia.
- ② A spill of NaHS occurred at ~ 1415 and was under control by ~ 1430. Response was quick, containment of spill was aggressively performed, and cleanup was performed by pumping into clean 55-gallon drums. Procedure N-340-12 indicates NaHS spill should be "washed down" but MSDS says to collect spill to prevent uncontrolled contact with acid and subsequent H_2S generation.

CONCERNS: No new concerns.

- ③ SFC Management is concerned that NRC inspectors, and others, are identifying procedure inadequacies that should have been found and corrected by the departments that control those procedures. It is not clear yet how this problem will be resolved by SFC personnel.

ACTION ITEMS:

ITEM

ASSIGNEE

ACTION DATE

Followup on root cause investigation of NaHS spill that occurred today. G. Young / J. Donovan Next Week.

SEQUOYAH OVERSIGHT TEAM DAILY REPORT
INDEPENDENT OVERSIGHT PROGRAM

IOP-1

DATE: March 2, 1991Sheet 1 of 1SOT MEMBER: Garry Young, Bill Gekler, Joseph Donovan SOT LOG BOOK PAGE(S): 166, 167

OVERSIGHT TIME PERIOD

START TIME: 0810COMPLETION TIME: 1705

ACTIVITIES, AREAS, PROCEDURES OBSERVED:

① Checked Control Room

② Facility Tour, over all of facility, with Young & Gekler, examined the NHTS spill area

③ Donovan/Young discussed NHTS spill, some follow up will be needed as handling of cleanup not clear

④ Met to discuss plans for next week - particularly state of decommissioning file and reported finds of large amounts of waste in ponds, grounds, etc.

OBSERVATIONS:

CONCERNS:

ACTION ITEMS:

ITEM

ASSIGNEE

ACTION DATE

ITEM	ASSIGNEE	ACTION DATE
① Recent Uranium Results to be followed up	Donovan	4-6 March 1991

SEQUOYAH OVERSIGHT TEAM DAILY REPORT
INDEPENDENT OVERSIGHT PROGRAM

IOP-1

DATE: 3 March 1991Sheet 1 of 1SOT MEMBER: J. Donovan SOT LOG BOOK PAGE(S): 167

OVERSIGHT TIME PERIOD

START TIME: 1000COMPLETION TIME: 16

ACTIVITIES, AREAS, PROCEDURES OBSERVED:

- ① Control room visits showed nominal condition plant operation.
- ② Studied process descriptions in license.
- ③ Reviewed procedures for next meeting.
- ④ Item ① serial section in heat the A line was down for lock up.
There seems to be a lot of problem of packing a screw system?

OBSERVATIONS:

CONCERNS:

ACTION ITEMS:

ITEM

ASSIGNEE

ACTION DATE