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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

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Administrative Judge James P. Gleason
Presiding Officer
Atomic Safety and Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Administrative Judge Jerry R. Kline
Special Assistant
Atomic Safety and Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

In the Matter of
SEQUOYAH FUELS CORPORATION
Docket No. 40-8027-MLA-3

Dear Administrative Judges Gleason and Kline:

Pursuant to 10 C.F.R. § 2.1231(c), the NRC Staff hereby submits the enclosed document, identified below, to supplement the hearing file in connection with the above-referenced matter.

1. Letter from J. Ellis to R. Bernero (Nov. 23, 1994), with attachments

The hearing file is also being updated in the docket and in the NRC Public Document Room and the Local Public Document Room at the Sallisaw City Library, Sallisaw, Oklahoma by transmittal of a copy of this letter and the enclosure.

Sincerely,

Steven R. Hom
Counsel for NRC Staff

cc w/encls: Office of the Secretary,
Docketing and Services Branch
NRC Public Document Room
Local Public Document Room

cc w/o encls: M. Axelrad
D. Curren
L. Hughes
J. Wilcoxon

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November 23, 1994

Certified Mail
Return Receipt Requested

Mr. Robert M. Bernero, Director
Office of Nuclear Material Safety
and Safeguards
U.S. NUCLEAR REGULATORY COMMISSION
Washington, D.C. 20555

RE: License SUB-1010; Docket No. 40-8027
Revision to Amendment Application - Organization

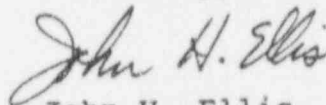
Dear Mr. Bernero:

By letter dated May 6, 1994, Sequoyah Fuels Corporation (SFC) submitted an application to amend License SUB-1010 reflecting administrative organizational changes at SFC. On October 20, 1994, SFC received comments from the NRC regarding the proposed amendment.

Attachments to this letter include responses to the NRC comments, a revised application for amendment, and a revised summary of changes. The revised application includes revisions made in response to the NRC comments as well as a few clarifying revisions to the application, as described in the summary of changes.

Please find attached revised pages to Chapters 2, 3, 5, 6, 9, and 11 of License SUB-1010, which incorporate the changes described above. Please note that the revisions to the May 6, 1994 application are marked with a double line in the margin. Should you have any questions concerning this request, please contact me at 918/489-3390 or Bill Reid at 918/489-3203.

Sincerely,



John H. Ellis
President

Attachments

xc: Joseph Callan, Region IV
Service List in Docket No. 40-8027-MLA-3

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RESPONSES TO COMMENTS ON
PROPOSED LICENSE AMENDMENT
FOR SFC ORGANIZATION

SECTION 2.2

1. Two new management positions (Manager, Licensing and Manager, Health and Safety) are identified. The senior official(s) to whom these managers report should be identified.

RESPONSE:

SFC concurs with this comment, and the appropriate revisions have been made to this section.

2. The second paragraph of the Director, Regulatory Affairs, appears to identify new responsibilities of this position and should be so indicated.

RESPONSE:

SFC concurs with this comment, and a revision bar has been added to reflect this change.

3. The position of Manager, Operations, that had responsibility for procedures, has been abolished. It is not clear who is now responsible for maintaining facility procedures. This responsibility should be clarified.

RESPONSE:

SFC does not concur with this comment. The responsibility for establishing and maintaining facility procedures has been assigned to the President, SFC in Section 2.7.1.

4. The position of Manager, Waste and By-Product Management that was responsible for the fertilizer program has been abolished. It is not clear who is now responsible for the fertilizer program. This responsibility should be clarified.

RESPONSE:

SFC concurs with this comment. The proposed amendment has been revised to reflect that the Director, Decontamination and Decommissioning Projects has the responsibility for the fertilizer program.

SECTION 2.5

5. Several technical functions that reported to the former VP, Technical Services now report to the Executive VP and Controller. While there are education and experience requirements for the former VP, Technical Services, there are no such requirements for the Executive VP and Controller. This new position should have education and experience requirements comparable to those of senior managers previously responsible for the technical functions now under the new position.

RESPONSE:

SFC does not concur with this comment, but is revising the application to reflect that the Director, D&D Projects reports to the President, SFC for technical and safety-related activities. The Executive Vice President and Controller, as a function of his overall corporate responsibilities has financial and administrative oversight of all SFC functions.

6. The Director, Regulatory Affairs should have experience in chemical or fuel cycle processing and/or chemical or fuel cycle facility decommissioning.

RESPONSE:

SFC does not concur with this comment. The qualification requirements for the position of Director, Regulatory Affairs include 5 years experience either in a chemical processing or nuclear facility, 3 years of management experience in programs having QA responsibility, and demonstration, through progressively more responsible management positions, of the ability to manage technical and administrative programs similar to those found in a chemical processing plant or other type of nuclear fuel cycle facility. An individual who satisfies these requirements will be fully capable of discharging the responsibilities of this position. There is no reason why the necessary experience should have to be obtained in chemical or fuel cycle processing or decommissioning, and could not be obtained at another nuclear facility, such as a nuclear reactor. Particularly in view of the applicability at all licensed nuclear facilities of regulatory requirements relating to radiation protection, personnel health and safety and environmental releases, Sequoyah Fuels Corporation should not be foreclosed from employing a highly qualified individual for this position just because his specific experience was not at a fuel cycle facility.

7. The Director D&D Projects should have D&D experience in a chemical or fuel cycle facility.

RESPONSE:

SFC concurs with this comment to the extent that the Director D&D Projects should have D&D experience. The experience requirements for this position have been revised to reflect that the experience requirements for this individual should include one (1) year D&D experience at a chemical processing or nuclear facility.

D&D experience at any nuclear facility would be useful and need not be limited to a "fuel cycle facility." Sequoyah Fuels Corporation should not be foreclosed from employing a highly qualified individual for this position just because his D&D experience was not at a fuel cycle facility.

SECTION 2.6.2

8. It appears that the former position of Chemical Operator has been replaced by D&D Technician. This paragraph should reflect the actual title(s) of the individuals involved.

RESPONSE:

SFC concurs with this comment. The section has been revised to reflect the current titles of D&D Technician and the current training program requirements.

Section 2.6.4

9. Is the term "Department" an accurate description of the organization component responsible for training? If not, the proper term should be used.

RESPONSE:

The term "Department" is the proper term in the context used in this section. The "cognizant Department Manager" is responsible for the approval of the training material and revisions thereto. The cognizant departments are assisted by the Technical Training Coordinator, as needed, in the presentation of the training.

SECTION 2.7.5

10. The Technical Support Department is not identified on the organization chart submitted with this request (Figs 2-1 and 11-1). Because it is assigned a safety related function, it should be identified along with the reporting chain.

RESPONSE:

SFC does not fully concur with this since the Manager, Project Technical Support and his reporting chain are shown on Figures 2-1

and 11-1, as submitted on May 6, 1994. However, the functions of the Manager, Project Technical Support are part of the responsibilities of the Decontamination and Decommissioning Division. Accordingly, Sections 2.7.4 and 2.7.5 and Figures 2-1 and 11-1 have been revised to eliminate references to the Technical Support Department or Manager, Technical Support.

SECTION 3.2.2

11. The quarterly audits should be performed by Corporate H. personnel in order to assure total independence of this function. Wording of this section should be clear on this point.

RESPONSE:

SFC concurs with this comment to the extent that the audit function should be independent. We believe that this function should be performed by Corporate (GA) personnel, or another independent organization under the direction of the Corporate Manager, Health Physics. The section has been revised to reflect this requirement.

SECTION 5.1

The current license refers to "The New Sequoyah Fuels Corporation"; this should be corrected to reflect the current legal name of the operating company.

RESPONSE:

SFC concurs with this comment and the section has been revised.

SUMMARY OF CHANGES

1. Health and Safety responsibilities previously assigned to the Manager, Licensing and Health Physics have been assigned to the Manager, Health and Safety. Regulatory and licensing responsibilities have been assigned to the Manager, Nuclear Licensing.
2. References to the Corporate Vice President, Human Resources have been deleted. Regulatory and health physics responsibilities have been assigned to the Corporate Director, Licensing, Safety, and Nuclear Compliance, who reports to the Corporate Vice President, General Counsel, and Secretary.
3. References to the Vice President, Technical Services have been deleted. Responsibilities have been assigned to the Director, Regulatory Affairs.
4. References to the Vice President, Operations have been deleted. Administrative and technical oversight responsibilities have been assigned to the President, SFC. Operational responsibilities have been assigned to the Director, D&D Projects.
5. References to the Manager, Operations have been deleted. Responsibilities have been assigned to the Director, D&D Projects.
6. References to the Senior Vice President have been deleted and responsibilities assigned to the President, SFC.
7. References to the Vice President and Controller or the Controller have been changed to Executive Vice President and Controller.
8. References to the Manager, Engineering Support have been deleted. Responsibilities have been assigned to the Director, D&D Projects.
9. References to the Operations Department Supervisor and to the Operations Supervisor have been changed to the Project Supervisor.
10. References to the Maintenance Supervisor have been changed to the Lead Worker.
11. References to the Shift Supervisor have been changed to the Project Supervisor.
12. References to the Manager, Maintenance have been changed to the Director, D&D Projects.

13. The activities of the Process Laboratory and Environmental Laboratory have been combined and references to Process and/or Environmental Laboratory have been changed to Laboratory.
14. References to the Human Resources Department have been changed to the Licensing, Safety, and Nuclear Compliance Department
15. Section 9.1 has been updated to reflect the current Board of Directors and the officers of the parent company who currently serve on the Board of Directors.
16. Section 11.3 has been updated to reflect the titles of the members of the Plant Review Committee.
17. Section 11.6 has been updated to reflect current resumes' of key individuals assigned specific responsibilities in the License.
18. In Sections 2.2 and 2.6.3 references to the Emergency Plan have been changed to the Contingency Plan.
19. References to the position of Manager, Laboratory Support have been removed from the License.

CHAPTER 2. GENERAL ORGANIZATIONAL AND ADMINISTRATIVE REQUIREMENTS

2.1 Licensee's Policy

The Corporate Manager, Health Physics shall be responsible for establishing corporate radiation health and safety standards and procedures, and coordinating them with managers and executives directly affected. Corporate radiation health and safety standards and procedures shall require the approval of the Corporate Director, Licensing, Safety, and Nuclear Compliance.

The Corporate Manager, Health Physics shall publish and maintain the Corporate Radiation Health and Safety Manual. This manual shall contain corporate radiation health and safety standards and procedures, and radiation exposure limits for all employees and other persons (e.g., visitors, contractors, etc.) potentially subject to such exposure from company operations.

The Corporate Director, Licensing, Safety, and Nuclear Compliance (LS & NC) is functionally responsible for obtaining and maintaining federal and state licenses and permits required for possessing and processing radioactive materials for all operational units of General Atomics with the exception of Sequoyah Fuels Corporation. The Corporate Director, LS & NC may provide counsel to SFC in matters relating to licensing and permits.

The Director, Regulatory Affairs shall be the primary contact with the Nuclear Regulatory Commission and other federal and state agencies.

All significant actions with regulatory agencies shall be subject to the approval of the Director, Regulatory Affairs, or the President, SFC.

The Manager, Health and Safety shall be responsible for the facility's radiation health and safety activities which includes:

- Initiating and directing programs to ensure compliance with all applicable provisions of corporate radiation health and safety standards and procedures, federal and state regulations and license conditions,
- Establishing and maintaining systems for recording facility radiation survey and exposure data,
- Coordinating on-site contacts with representatives of federal and state agencies responsible for regulating radioactive materials and advising the Director, Regulatory Affairs and the Corporate Director, Licensing, Safety, and Nuclear Compliance, of the results of the on-site contacts.

- Identifying and proposing new and revised radiation health and safety standards and procedures as needed, and
- Notifying the Corporate Manager, Health Physics of radiation related incidents or emergency situations involving radioactive materials.

The Corporate Manager, Health Physics shall be responsible for ensuring the qualifications of the Manager, Health and Safety to perform these duties and shall assist and advise him on matters involving radiation exposure and related subjects.

The Corporate Director, Licensing, Safety, and Nuclear Compliance shall review the radiation health and safety practices of Sequoyah Fuels Corporation. This review is to ensure compliance with the current company radiation health and safety standards and procedures, applicable federal and state regulations, and license conditions. The Corporate Director, Licensing, Safety, and Nuclear Compliance, shall document and submit the results of each review and any recommendations for new or revised standards and procedures to the President, SFC, and the Director, Regulatory Affairs, with copies to the Corporate Manager, Health Physics and the Corporate Vice President, General Counsel and Secretary. Information copies shall be furnished to other corporate executives as appropriate.

In the event of a radiation-related incident or emergency situation, the Manager, Health and Safety shall conduct or have conducted a thorough investigation, including preparation of an incident report which will be distributed to the appropriate individuals.

2.2 Organizational Responsibilities and Authority

The organization for Sequoyah Fuels Corporation and its corporate oversight is described below and depicted in Figure 2-1.

The President, Sequoyah Fuels Corporation shall have overall responsibility for the safe operation of the Sequoyah Facility. Additional responsibility has been assigned to the Executive Vice President and Controller, the Director, Regulatory Affairs, and the Director, Decontamination and Decommissioning Projects for various functions as described in this license.

Operating procedures, which specify operating steps within the requirements of the approved health and safety standards and process and equipment criteria, shall be prepared and maintained under his direction.

The Corporate Director, Licensing, Safety, and Nuclear Compliance who reports to the Corporate Vice President, General Counsel and Secretary, shall be responsible for directing quarterly

audits at the Sequoyah Facility to evaluate and verify compliance with the applicable federal and state regulations, NRC license conditions, permits, corporate policies, adherence to facility procedures, and Contingency Plan and Implementing Procedures and operational matters. The results of each review and any recommendations for new or revised standards and procedures shall be submitted to the Director, Regulatory Affairs, with copies to the President, SFC, the Corporate Manager, Health Physics and the Corporate Vice President, General Counsel and Secretary.

The Corporate Manager, Health Physics who reports to the Corporate Director, Licensing, Safety, and Nuclear Compliance, shall be responsible for the preparation of detailed corporate standards dealing with the control of radiation, spread of radioactive contamination and the monitoring of personnel and nuclear facilities. He is responsible for auditing procedures and plant operations in the health physics area. He reports his findings and recommendations for program improvements to the Corporate Director, Licensing, Safety, and Nuclear Compliance and the ALARA Committee.

The Director, Regulatory Affairs, who reports to the President, SFC for technical and safety-related activities, specifically oversees the health and safety programs, the environmental compliance programs, the laboratory, the quality assurance program, and the licensing program. He is responsible for the development and implementation of a Facility Quality Assurance Plan to assure that all operations and safety related activities are performed in accordance with facility procedures. He is also responsible for maintaining the company's NRC licenses and preparing correspondence and reports submitted to NRC. He advises management on nuclear regulatory issues and provides regulatory compliance oversight in environmental compliance and other regulatory areas.

He serves as the Contingency Plan Coordinator and is responsible for the implementation of the Contingency Plan and Contingency Plan Implementing Procedures. He works with the Technical Training Coordinator to ensure that all facility employees and members of the response organizations receive initial and continuing training.

The Manager, Nuclear Licensing, who reports to the Director, Regulatory Affairs, shall be responsible for maintaining the company's NRC licenses and preparing correspondence and reports submitted to NRC, oversees compliance with NRC regulations and license conditions, provides technical support for various regulatory activities and assists other departments in implementing new regulatory requirements.

The Manager, Health and Safety, who reports to the Director, Regulatory Affairs, shall be responsible for developing and implementing programs, procedures and guidance in the functional area of health physics. He shall be responsible for the effluent

monitoring program, training program, the respiratory protection program, the bioassay program, the health physics and safety programs, and the program for surveillance of all plant activities related to these areas. He shall be responsible for maintaining all radiation exposure and other health and safety records required by General Atomics, Sequoyah Fuels Corporation and by regulatory agencies. He shall assist the Corporate Manager, Health Physics in establishing radiation health and safety standards and procedures and in coordinating them with the managers and executives directly affected.

The Manager, Environmental, who reports to the Director, Regulatory Affairs, shall be responsible for developing and implementing programs and procedures to comply with all environmental monitoring requirements required by federal and state agencies. This includes the maintenance of environmental records required by Sequoyah Fuels Corporation and by regulatory agencies.

The Manager, Quality Assurance reports to the Director, Regulatory Affairs. He shall be responsible for implementing the Facility Quality Assurance Program. This includes assuring safe and efficient operation of the Sequoyah Facility. He shall also audit and provide oversight of safety related activities, systems, and components, as well as regulatory requirements and commitments.

The Technical Training Coordinator who reports to the Manager, Health and Safety, shall be responsible for managing the facility's training program. This individual and the cognizant Department Manager, or their designated representatives, shall certify that each employee's on-the-job training and module certification has been adequate and that the employee is competent and qualified to perform his or her responsibilities.

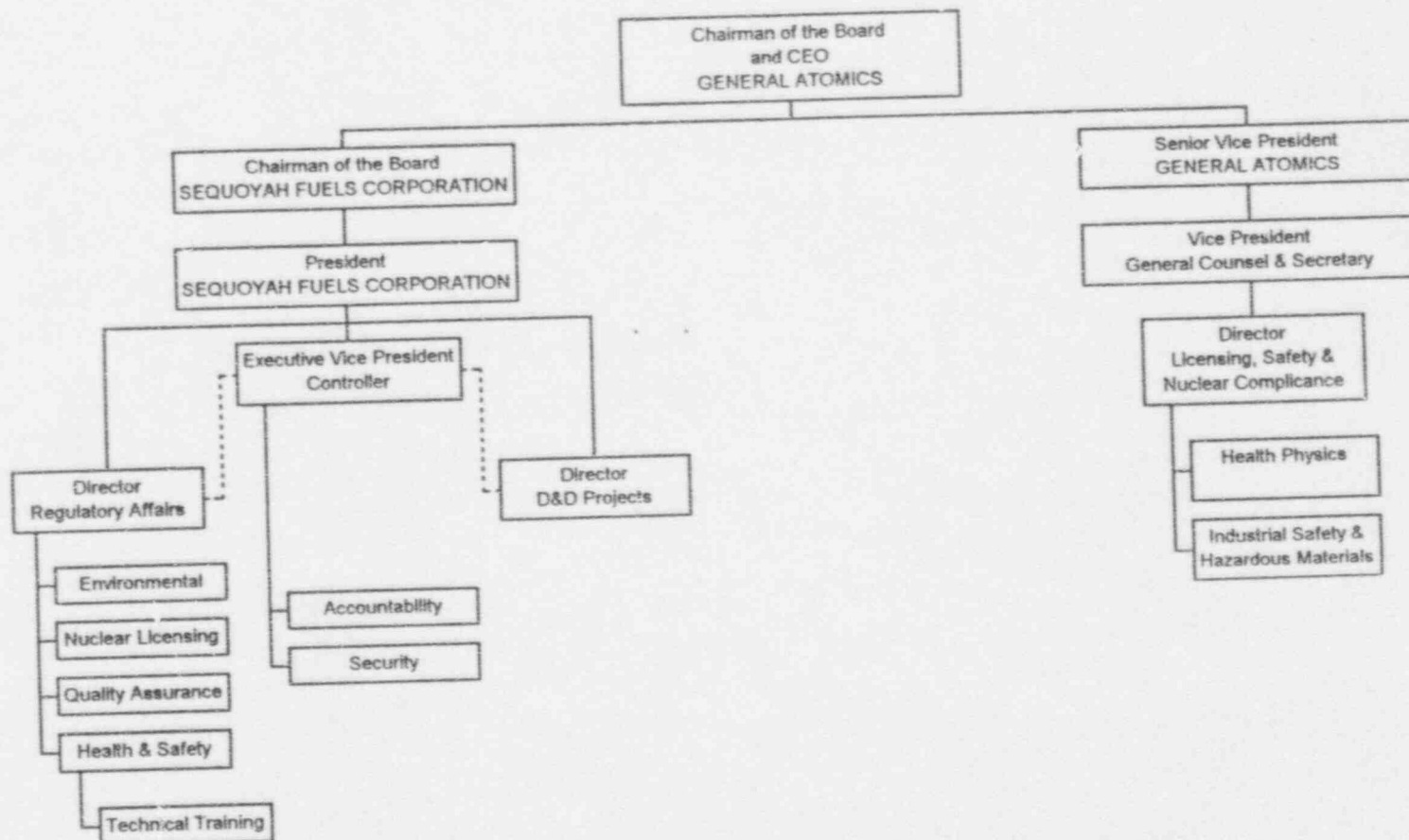
The Director, Decontamination and Decommissioning Projects reports to the President, SFC for technical and safety-related activities. He shall be responsible for the operation of facility equipment and systems, implementation and oversight of decontamination and decommissioning projects, and related activities including waste management and fertilizer distribution programs. In addition, he shall be responsible for providing engineering support for the facility.

The Executive Vice President and Controller, who reports to the President, SFC, shall be responsible for nuclear material accountability and the physical security of the facility. Additionally, he has financial and administrative oversight of all SFC functions.

SEQUOYAH FUELS CORPORATION

Organization Chart

Figure 2-1



License No.
Amend. No.

SUB-1010
Revision

Docket No. 40-8027
Date 11/23/94

Page
I. 2-5

2.3 Safety Review

The independent overview functions carried out under the Corporate Director, Licensing, Safety, and Nuclear Compliance through his staff shall be as follows:

1. To establish the corporate criteria and standards for contamination control and radiation protection for manufacturing processes and equipment.
2. To establish the corporate standards for procedures to be followed by operations management in assuring that processes and equipment are operating in a way to prevent spread of contamination and radiation exposure.
3. To make periodic routine and non-routine inspections against the criteria, standards and procedures of the program.
4. To maintain technical liaison with regulatory agencies, of local, state, and federal government.
5. To offer expert professional advice and counsel to Corporate and Sequoyah Facility Management in health and safety matters.
6. To procure, as required, special audit services, inspections or calculational capability for problems from qualified consultants or other divisions of General Atomics when it appears that an adequate solution definition exceeds the capability of the staff.

The Sequoyah Facility Plant Review Committee is composed of senior facility managers having key roles in ensuring that facility operations are conducted safely and in compliance with regulatory requirements. The Committee is responsible for reviewing and approving new and revised operating procedures; determining training requirements prior to implementing new or revised procedures; and reviewing revisions to the Decontamination and Decommissioning Technician qualification and certification system.

2.4 Approval Authority for Personnel Selection

The President, SFC, shall approve personnel selection for safety related Sequoyah Facility staff positions described in Section 2.5 of this license.

2.5 Personnel Education and Experience Requirements

The education, training, and experience requirements for all safety-related management and staff positions shall be as follows:

The President, SFC shall hold a degree in science or engineering and shall have a minimum of 15 years experience, at least 5 years of which shall be at a chemical processing or nuclear facility.

The Corporate Vice President, General Counsel and Secretary of General Atomics shall have a minimum of five years of nuclear industry management experience of high level general management nature.

The Corporate Director, Licensing, Safety, and Nuclear Compliance of General Atomics shall hold a degree in science or engineering and shall have at least 5 years experience in matters related to radiation protection. The individual shall be thoroughly familiar with NRC license requirements, NRC, and EPA regulations and regulations of other agencies having oversight responsibilities for activities conducted at the Sequoyah Facility. He shall be capable of providing authoritative advice and counsel in matters related to NRC licensing, regulations and procedures.

The Corporate Manager, Health Physics of General Atomics shall hold a degree in the physical sciences, biological sciences, or other related fields with a minimum of two years experience in appropriate phases of nuclear health physics and the evaluation of potential radiological hazards. He will have demonstrated his proficiency in managing a radiological health and safety program.

The Corporate Manager of Industrial Safety of General Atomics shall hold a degree in science or engineering with a minimum of two years applicable work experience. He shall have demonstrated experience in managing or implementing fire, safety, and health programs.

The Director, Regulatory Affairs shall hold a degree in science or engineering with 5 years experience in a chemical processing or nuclear facility, and 3 years of management experience in programs having quality assurance responsibilities. The individual shall have demonstrated through progressively more responsible management positions the ability to manage technical and administrative programs similar to those found in a chemical processing plant or other type nuclear fuel cycle facility.

The Manager, Nuclear Licensing shall hold a degree in science or engineering and have at least 5 years experience in areas such as radiation protection, operations, emergency preparedness and regulatory compliance at a nuclear facility.

The Manager, Health and Safety shall hold a degree in science or engineering and have at least 5 years experience in areas such as radiation protection, radiation monitoring, health physics, emergency preparedness and personnel exposure evaluation. He shall have demonstrated a proficiency to conduct specified radiation safety programs, recognize potential radiation safety problem areas in operations and advise operation supervision on radiation protection matters. He shall be capable of directing the surveillance activities of the Health and Safety Technicians.

The Manager, Environmental shall hold a degree in science or engineering with 2 years of technical experience. The individual shall have demonstrated proficiency to formulate and conduct specified non-radiological environmental monitoring programs and to recognize potential environmental problem areas.

The Manager, Quality Assurance shall hold a degree in science or engineering. This person shall have 3 or more years of experience in a chemical, nuclear, or manufacturing facility. The individual must possess a demonstrated proficiency in evaluating technical activities at such facilities.

The Director, Decontamination and Decommissioning Projects shall hold a degree in science or engineering and have at least 5 years of experience in a chemical processing or nuclear facility, including at least one year decontamination and decommissioning experience and at least two years supervisory or management experience. The individual shall have demonstrated through progressively more responsible positions the ability to manage complex technical and administrative programs similar to those found in a chemical processing plant or nuclear facility.

The Technical Training Coordinator shall hold a degree in science or business administration and have at least 3 years experience in training and development. He shall have demonstrated proficiency in directing activities in those functional areas.

2.6 Training

SFC is committed to a comprehensive training program to ensure that all employees receive the instruction necessary to be able to perform their jobs safely and efficiently. Components of the training program include:

2.6.1 General Employee Training

General Employee Training consists of classroom lectures and demonstrations for all new hires. Topics covered include radiation protection, emergency requirements, and procedures, as appropriate to the individual's position.

Each employee signs a statement committing to following corporate policy and procedures.

2.6.2 Decontamination and Decommissioning Technician Training and Qualification

Decontamination and Decommissioning Technician Training consists of classroom lectures and on-the-job training modules for specific functions. Before being permitted to perform the requirements without direct supervision, technicians are qualified based upon successful completion of required classroom and on-the-job training. The qualification system is promulgated in an operating procedure which is reviewed and approved by the Plant Review Committee.

2.6.3 Retraining

Refresher training is conducted each calendar year for all employees whose normal duties expose them to licensed or hazardous materials, and includes such subjects as health physics, safety, hazard communications, specified procedures, and the Contingency Plan.

2.6.4 Development and Approval of Training Materials

Development and approval of training materials is conducted by the department under whose cognizance the subject matter falls. New training materials and revisions to existing training materials are approved by the cognizant Department Manager.

2.7 Conduct of Operations

2.7.1 Operating Procedures

It shall be the responsibility of the President, SFC, to see that written operating procedures are established, maintained and adhered to for all operations and safety-related activities involving source or hazardous materials. All operating procedures shall be reviewed by the Manager, Health and Safety, and approved by the President, SFC, and appropriate training conducted and documented prior to the implementation of the procedure. Temporary changes shall not be made to operating procedures without review by the procedure's proponent or his designee and written approval of the President, SFC, or his designee. All operating procedures shall be reviewed and revised whenever necessary to reflect changes in facility operations, but in no event, less than once every 24 months. The Sequoyah Operating Procedure System shall establish requirements for the development of new operating procedures,

revisions to existing operating procedures, the review and approval process, the level of training required, if any, and the degree of documentation necessary to demonstrate that the appropriate facility operating personnel are knowledgeable of new or revised operating procedures.

2.7.2 Document Control

A document control system shall be established and maintained to assure that the procedures in use are the latest revision. A sanction statement regarding the serious nature of failure to follow the procedures shall be included in the Sequoyah Operating Procedures System and emphasized in the employee training program.

2.7.3 Activities Involving Uranium

All activities involving uranium shall be conducted in accordance with approved radiation health and safety standards. The radiation health and safety standards shall be prepared by the Corporate Manager, Health Physics, and shall be reviewed by the Director, Regulatory Affairs. The standards shall be reviewed for operability by the Manager, Health and Safety, and the President, SFC, and approved by the Corporate Director, Licensing, Safety, and Nuclear Compliance. Changes to the health and safety standards shall follow the same administrative review and approval system as original standards.

2.7.4 Design Control

Process and equipment design, which delineate the process and prescribe critical design parameters, shall be reviewed by the Director, Decontamination and Decommissioning Projects, and the Manager, Health and Safety, and shall be approved by the President, SFC. Major changes to process operations and to equipment design shall be reviewed for operability and approved by the President, SFC.

Modifications or changes to process operations or equipment that normally occur during operations shall be authorized via an Engineering Change Notice (ECN). The ECN shall be reviewed by the Manager, Health and Safety, and the Director, Decontamination and Decommissioning Projects; and approved by the President, SFC. All experimental and developmental work to be performed at the Sequoyah Facility shall be approved by the President, SFC, prior to its initiation.

2.7.5 Maintenance Work

All maintenance work shall be performed in accordance with the Maintenance Work Order Procedure. Project supervisors shall determine if any planned maintenance work involves a potential release of radioactive material or potential exposure to radioactive material. If a determination is made that the work could involve uncontained uranium, the project supervisor shall prepare a Hazardous Work Permit in accordance with established procedure.

The lead worker shall inspect the repaired work and shall sign the work order indicating that the work has been completed and is acceptable. For work that could involve uncontained uranium, the project supervisor shall inspect the repair work prior to removal of protective devices and closing out the Hazardous Work Permit by signature.

At the completion of major modification work, the Plant Review Committee shall review the completed work in accordance with the established Engineering Change Notice Procedure. The Plant Review Committee shall document that the work has been completed in an acceptable manner. For work orders involving modifications authorized by an ECN, a copy of the completed work order will be forwarded to the Decontamination and Decommissioning Department for updating plant drawings.

A maintenance surveillance program shall be established for critical instrumentation, alarms and interlocks. The critical instruments, alarms and interlocks covered in the maintenance surveillance program shall be periodically checked and calibrated commensurate with the safety function but at least once every 12 months plus or minus 2 months.

2.8 Audits and Inspections

The Manager, Health and Safety, or his designee, shall conduct an inspection of all plant activities involving radioactive materials on a monthly basis in accordance with a written procedure. A written report documenting the inspection findings shall be made to the President, SFC, with a copy to the Director, Regulatory Affairs.

The Corporate Director, Licensing, Safety, and Nuclear Compliance, shall ensure that quarterly audits are conducted at the Sequoyah Facility to evaluate and verify compliance with applicable federal and state regulations, NRC license conditions, permits, corporate policies and facility procedures in accordance with a written plan. The audits shall apply to major areas such as operations and safety-related activities involving radioactive materials, radiation protection, health physics, industrial safety, environmental control and emergency response programs. The audits

shall be conducted by qualified personnel trained in basic radiation protection and knowledgeable about federal and state regulations, corporate policies and facility procedures. At the conclusion of the audit, the auditor shall conduct an exit interview with the Director, Regulatory Affairs, or his designee, and apprise him of any significant findings and the need for any immediate corrective actions. A formal report of findings, observations, and recommendations shall be prepared and submitted by the Corporate Director, Licensing, Safety, and Nuclear Compliance to the Director, Regulatory Affairs. Copies of the report shall be furnished to the Corporate Manager, Health Physics and the President, SFC. In responding to the report, the manager of the area affected shall give the status of corrective action that has been taken and provide a schedule for additional action which will be taken. The auditor shall conduct a follow-up review to ensure corrective action is being taken in a timely manner.

The Manager, Quality Assurance shall conduct periodic audits, at least once every 12 months, of operations and safety-related activities in accordance with the QA Plan and Procedures. The audits shall be conducted to verify compliance with corporate policies, procedures, license conditions and federal regulations. A report of the areas audited shall be made quarterly to the President, SFC. Audit findings shall be documented with copies of the report forwarded to the Director, Regulatory Affairs and the President, Sequoyah Fuels Corporation. The President, SFC shall be responsible for assuring that audit findings are addressed in a timely manner. Follow-up action, including reaudit of deficient areas, shall be taken where indicated.

An independent audit of the SFC QA program shall be conducted annually.

2.9 Investigation and Reporting of Non-Normal Occurrences

The Sequoyah Facility shall establish an "Incident Report" system. An incident report shall be made for each release of material resulting in gross airborne alpha activity in excess of 3 MPC based on uranium. This incident report shall be initiated by the Manager, Health and Safety and is directed to the supervisor whose personnel were potentially exposed and then forwarded to the President, SFC. The supervisor shall sign the report including any pertinent observations as to the correction of the condition to avoid further incidents. The report shall then be distributed to the Director, Regulatory Affairs, the Director, Decontamination and Decommissioning Projects, the Corporate Manager, Health Physics, and the Corporate Director, Licensing, Safety, and Nuclear Compliance. These reports form a basis for the quarterly ALARA review and include a dose assessment based upon the occupancy conditions and protective equipment used at the time of the incident.

Releases of radioactive material to the environment exceeding established release reporting criteria given in 10 CFR Part 20 shall be reported promptly to the Manager, Health and Safety, and the Corporate Director, Licensing, Safety, and Nuclear Compliance and reported to the NRC as required by Sequoyah Operating Procedures and Federal regulations. Subsequently, the matter shall be investigated by a designated manager and the Manager, Health and Safety at the Sequoyah Facility and a written report submitted as required.

Chemical releases to the environment exceeding State or EPA limits shall be reported as appropriate in accordance with the above reference procedures and regulations.

2.10 Records

All plant and personnel health physics data and reports shall be recorded and filed in accordance with applicable regulations. Timely trend analyses and reports shall be made at monthly intervals to plant management. The records of surveys and personnel exposure records are retained and reports are made in accordance with applicable regulations.

All required plant training activities shall be documented in the facility training files. Facility audit results by both the Corporate Director, Licensing, Safety, and Nuclear Compliance, or his designee, and the Manager, Quality Assurance, or his designee, shall be maintained in accordance with the Quality Assurance Plan and Implementing Procedures and Corporate Policies.

All documentation, records and tests required as a part of this License shall be maintained for a minimum of 5 years, or longer if applicable regulations so require.

1. Each area is posted with a sign bearing the radiation caution symbol and the words:

**Caution
Airborne Radioactivity Area**

For the Sequoyah Facility the following four areas have been designated as Airborne Radioactivity Areas: (1) Ash Grinding Enclosure, (2) Ash Receiving Enclosure, (3) De-Smoke House Enclosure, and (4) Redrum Enclosure. These areas and others, as required, are posted in accordance with 10 CFR Part 20.203 (d)(2).

3.1.9 "Radioactive Material(s) Area" means:

Any area or room in which source material is used or stored in any amount exceeding one hundred times the quantity specified in 10 CFR Part 20, Appendix C. Areas meeting this requirement are posted with a sign bearing the radiation symbol and the words:

**Caution
Radioactive Material(s)**

in accordance with the requirements of 10 CFR Part 20.203(e)(2).

3.1.10 "Posting Exception" means:

An exception to the posting requirements of 20.203(e)(2) shall be made for areas and rooms within the plant. All entrances to restricted areas shall be conspicuously posted with a sign having the words "Caution - Any area or room within this plant may contain radioactive material."

3.2 Special Administrative Requirements

Special administrative requirements include the use of Hazardous Work Permits, and a special management committee dedicated to the pursuit of ALARA objectives.

3.2.1 Hazardous Work Permit Program

Hazardous Work Permits (HWP's) shall be authorizations from appropriate facility officials to perform specific tasks which have the potential for increasing the risk of personal exposure to radiation or radioactive materials. The Manager, Health and Safety shall be responsible for establishing a procedure which describes the HWP Program. The procedure shall be reviewed and approved in accordance with the criteria noted in Section 2.7.1. HWP's shall be

issued for all operations associated with licensed material which are not covered by established procedures. In accordance with Sequoyah Facility Operating Procedure - Hazardous Work Permits, the Project Supervisor shall be responsible for determining when an HWP is required and for issuing it. The Health and Safety Technicians shall provide appropriate clothing and equipment requirements. At the completion of the work the HWP shall be released in accordance with the requirements noted in the referenced procedure.

3.2.2 ALARA Committee

An ALARA Committee shall be established for the Sequoyah Facility. The Committee shall be comprised of personnel from the Licensing, Safety, and Nuclear Compliance Department of General Atomics, and personnel from Sequoyah Fuels Corporation. The General Atomics membership includes the Corporate Manager, Health Physics and the Corporate Director, Licensing, Safety and Nuclear Compliance. Sequoyah Fuels Corporation membership includes the President, SFC, the Director, Regulatory Affairs, the Manager, Nuclear Licensing, the Manager, Health and Safety, and the Director, Decontamination and Decommissioning Projects. The Corporate Manager, Health Physics shall serve as the Chairman of the ALARA Committee.

Quarterly ALARA audits shall be directed by the Corporate (GA) Manager, Health Physics resulting in a report to the Committee consisting of a review of trend and cause analysis of radiological exposure conditions within the facility, employee exposures, and progress of administrative and engineering controls needed to assure that exposures to personnel and release to the environment are maintained "as low as is reasonably achievable" (ALARA). The audit shall be conducted by Corporate (GA) Health Physics personnel or by another independent company.

The ALARA Committee shall meet at least annually to evaluate the quarterly trend and cause analysis. The ALARA Committee shall also review exposure and effluent release data to determine (1) if there are any upward trends developing in personnel exposures for identifiable categories of workers, types of operations, or effluent releases, (2) if exposure and release might be lowered in accordance with the ALARA objectives, and (3) if equipment for effluent control is being properly used, maintained, and inspected. From this review the Committee may recommend additional investigations be conducted and revise equipment and/or procedures to improve ALARA performance. A report documenting the results of the annual meeting shall be prepared by the Chairman of the ALARA Committee and forwarded to the President, Sequoyah Fuels Corporation. The Manager, Health and Safety shall respond in writing to the recommendations in the annual ALARA report to the Chairman of the ALARA Committee.

3.3 Technical Requirements

Technical requirements to minimize exposures to radiation and radioactive materials shall include access controls, ventilation controls, monitoring for release of radionuclides, and monitoring for external and internal exposure.

3.3.1 Access Control

3.3.1.1 Protected Area

The Sequoyah Facility is protected by a physical barrier (8 foot fence) and an electronic security system. If the electronic security system is inoperable for more than 16 hours compensatory measures shall be implemented in accordance with established security instructions to provide increased surveillance of the Protected Area. Compensatory measures shall remain in effect until the electronic security system is returned to an operable status.

Access to all areas shall normally be through the South entrance which is provided with a Guard House. Where alternate access points are used, special security measures will be implemented to maintain access control. Employees shall be issued identification badges which are issued as they enter and returned as they leave the site. Visitors shall be issued badges by the watchman as they enter the facility and are normally escorted while on the premises.

3.3.1.2 Restricted Areas

Figure 3-1 identifies Restricted Areas 1, 2, 3, 4, and 5 on a plan view of the site. Restricted Areas are protected by a "physical barrier" (fence) with a gate(s) which is normally locked. The keys for these locks shall be under the control of the Manager, Health and Safety or his designee (normally security personnel). The President, SFC, can authorize the distribution of keys to the various Restricted Areas to other individuals based on operations needs. A second set of keys for all locks shall be kept by security personnel at the South Guard House.

Personnel access to Restricted Area 1 shall normally be through the change room. When exiting Restricted Area 1, each person shall again pass through the change room. Washing and showering facilities are provided. All employees who normally work within Restricted Area 1 and change clothing shall shower at the end of the work day or shift or when leaving the site. All individuals leaving the Restricted Area shall monitor exposed skin and personal clothing to the levels listed in

Section 3.3.4.7 of this Chapter before exiting to the Unrestricted Area. Individuals with contamination of the skin or personal clothing in excess of the levels specified in Section 3.3.4.7 shall not exit the Restricted Area without specific approval of the Manager, Health and Safety, or his designated representative.

Exceptions to the above requirement shall be an individual(s) who is making a delivery within Restricted Area 1 and who meets the following criteria:

- a) An onsite time of short duration (normally less than 2 hours) and
- b) Does not enter a Radiation Area or come in contact with radioactive materials.

Access to Restricted Area 1 for the purpose of making a delivery shall be through the motor operated truck gate which is under the control of the Manager, Health and Safety, or his designee. All individuals making deliveries or pickups in Restricted Area 1 shall wear smocks, shoe covers, a hard hat and safety glasses. Prior to exiting Restricted Area 1, Health and Safety Technicians shall monitor individuals and vehicles to levels listed in Section 3.3.4.7 of this Chapter.

Security personnel may use any of the Restricted Area access gates. If they leave their vehicle they shall wear shoe covers. Security personnel shall monitor themselves and vehicles when exiting the Restricted Area in accordance with established procedure.

Equipment and special activities may require area access through other Restricted Area 1 gates. If this becomes necessary, all individuals involved shall follow the same access and exit requirements as delivery personnel in accordance with established procedures.

Employees entering Restricted Area 1 shall be required to wear coveralls, process area safety shoes or shoe covers, hard hats, and safety glasses. Administrative and supervisory employees and visitors shall be required to wear smocks, shoe covers or process area safety shoes, hard hats, and safety glasses. Shoe covers or process area safety shoes and smocks shall not be required when entering Restricted Areas 2, 3, 4, or 5, if a current contamination survey shows an activity level of 500 dpm/100 cm² or less using an alpha survey meter.

Employees wearing process area safety shoes shall put on shoe covers before entering a Controlled Access Area as defined in Section 3.1.5 of this Chapter and shall remove them before leaving the designated area. Other employees and visitors

shall put on shoe covers when entering Restricted Area 1 through the Change Room and shall change shoe covers when leaving a Controlled Access Area.

3.3.2 Ventilation Requirements

3.3.2.1 Plant Ventilation

Containment systems (except for pressure vessels) in the facility such as equipment enclosures, tank covers, and powder bins shall be designed to operate under negative pressure to prevent the release of radioactive materials which could become airborne. The ventilation air flow shall be from areas of lesser potential for contamination to areas of greater potential. Additional engineering controls shall be provided, such as shrouds and hoods, which operate at minimum face velocities of 100 LFM to transport dust from potential leakage points to air cleaning systems. Monthly surveys shall be conducted by Health and Safety Technicians to determine the velocity of airflow at the entrance of all hoods or other exhausted enclosures and closed capture points. The results of these surveys shall be documented in a report to the Manager, Health and Safety. If the measured face velocity of hoods and enclosures is less than 100 LFM a respirator shall be used. Building ventilation shall be provided to maintain breathing air at levels "as low as is reasonably achievable" by attaining a minimum of ten air changes per hour in the process areas.

3.3.2.2 Plant Effluents

Exhaust stacks discharging licensed material (greater than 10 g-U(Nat)/month) shall be continuously sampled. Stack sampler filters shall be collected daily and measured for gross alpha activity. The main stack shall be sampled continuously and analyzed for gross alpha activity on a daily basis. If the main stack sampler or other exhaust stack samplers are expected to be inoperable for 24 hours or more, boundary air samples shall be collected every eight hours and analyzed for gross alpha activity until the affected sampler(s) is returned to an operable status. If the boundary line air samples exceed 1 MPC of the radionuclide shown in Table II, Column 1, Appendix B of 10 CFR Part 20, all airborne effluent points shall be immediately investigated to locate the source and appropriate control actions taken. If any operating or process system discharging airborne effluent to the unrestricted area is shut down for maintenance or system modification or is not being operated, continuous samples need not be taken on that system during the shutdown period.

Differential pressure gauges shall be used to monitor the airflow in Main Plant Dust Collector. The differential pressures shall be recorded daily.

3.3.3 Instrumentation (Survey, Counting)

Instrumentation shall be provided to determine potential personnel exposure to airborne radioactivity concentrations and surface contamination. The radiation survey instruments shall be calibrated at least every six months and following any change which may affect the accuracy of the instrument.

3.3.3.1 Radiation Exposure Instruments

Ion chamber dose rate instruments (0-5R/hr) and GM survey meters (0-70,000 cpm) shall be used for measuring dose rates. The instruments shall be calibrated using a gamma source traceable to NIST. Calibration shall be performed when new, after any repair or major adjustment, and at least each six months thereafter.

3.3.3.2 Airborne Radioactivity

The air sampling system is described in Section 3.3.4.2. The filters from these samplers are counted using a gas proportional counting system. A certified alpha calibration source shall be used to calibrate the counter each day before counting the air samples.

3.3.3.3 Surface Contamination

Surface contamination shall be measured and reported as total dpm/100 cm². A rate meter and an alpha probe shall be used for personnel monitoring. A portable alpha survey meter or tool monitor shall be used for surveys to release items for unrestricted use. Tool monitors and Personnel Contamination Monitors (PCM) are exempt from reporting contamination in units of dpm/100 cm².

Smearable or removable surface contamination samples shall be collected on filter paper and counted using a portable alpha survey instrument. Results of the smear sample counting shall be reported as dpm/100 cm² of surface sampled. Alpha detectors and instruments shall be calibrated with a standard Pu-239 reference source and/or a Thorium-230 source.

3.3.4 Internal and External Exposure

Performance requirements for the administrative controls and engineered systems shall be provided to protect operating personnel from excessive internal and external exposure.

3.3.4.1 Ventilation

Ventilation is discussed in 3.3.2.

3.3.4.2 Air Sampling and Analysis

Air sampling shall be performed throughout the process area. Air sampling shall be performed continuously through sampler filter heads connected to a central vacuum pump. Each fixed air sampler shall have a nominal flow rate of at least 1 CFM. The air flow shall be tested weekly at each sampling head by calibrated rotometers. Flow adjustment corrections shall be made by health and safety personnel as needed. Filters shall be collected periodically in accordance with approved procedures and analyzed to evaluate airborne radioactivity levels.

Permanently mounted air sampling equipment shall be evaluated at least once a year or whenever a major operation change is made to ensure optimal location for leak detection and trend analysis.

MPC-hour exposure records shall be kept for all persons working in the plant who might potentially be exposed to more than 10 MPC hours per 40 hour work week. A facility action level (FAL) of 20 MPC hours in any 40-hour work-week not to exceed seven consecutive days shall require an investigation and correction of the cause of the exposure.

If general breathing air concentration, when averaged over an eight hour work shift, exceeds the FAL of 0.5 MPC the Manager, Health and Safety, or his designee shall attempt to determine the cause of the elevated airborne activity and notify facility management in accordance with established procedures.

If general breathing air concentration, except for confined areas designated as respiratory protection areas, such as tents or enclosures, exceeds a FAL of 3 MPC the Manager, Health and Safety shall undertake an investigation as to the cause and notify facility management as to the appropriateness of the corrective action in accordance with established procedures.

CHAPTER 5. ENVIRONMENTAL PROTECTION

5.1 Effluent Control Systems

The NRC staff has calculated the average annual dose to the nearest resident using current average source terms and has used this information to set action levels for the facility. It was shown from the staff dose calculations that the liquid effluent from this facility is not a significant pathway to man. Therefore, the staff has applied an action level based solely on the quarterly release of airborne effluents as follows: "if the radioactivity in the plant gaseous effluents exceeds 30,000 uCi per calendar quarter, the licensee shall, within 30 days, prepare and submit to the Commission a report which identifies the cause for exceeding the limit and the corrective actions to be taken by the licensee to reduce release rates." If the parameters important to a dose assessment change, a report shall be submitted within 30 days which describes the changes in parameters and includes an estimate of the resultant change in dose commitment.

Sequoyah Facility shall conduct a dose assessment for the nearest resident on a quarterly basis using site-specific information and methodology in Appendix A of the NRC Environmental Assessment (NUREG-1157). If the quarterly dose commitment to a maximally-exposed individual in the general public exceeds 6.25 mrem for any organ, a report shall be submitted to the Commission within 30 days of the determination of the quarterly dose. In the event that the calculated dose to any member of the public in any consecutive 12-month period is about to exceed the limits specified in 40 CFR 190.10, Sequoyah Fuels Corporation shall take immediate steps to reduce emissions so as to comply with 40 CFR 190.10. As provided in 40 CFR 190.11, the licensee may petition the Nuclear Regulatory Commission for a variance from the requirements of 40 CFR 190.10. If a petition for a variance is anticipated, the licensee shall submit the request at least 90 days prior to exceeding the limits specified in 40 CFR 190.10.

5.1.1 Liquid Effluent

Discharge of liquid process effluents to the unrestricted area is through the "combination stream," and NPDES Permit No. OK0000191 limits the maximum discharge quantities. The combined effluent stream, consisting of the fluoride treatment effluent, the sanitary waste water treatment system discharge, the overflow from the recirculating cooling water system, and the excess plant intake water, shall be sampled continuously at the point where it leaves the immediate plant area south of the port access road. (See Drawing 110-C-1020 Rev. 3, page 5-2.1). Daily grab samples shall be analyzed for temperature, pH, uranium, nitrate and fluoride for purposes of control. Monthly composite samples shall be analyzed

for uranium, thorium-230, nitrate and fluoride. The samples shall also be analyzed quarterly for radium-226. The action levels for pollutants are established by the NPDES Permit limits. When these levels are exceeded, inspection of the four upstream systems shall be made to determine the cause of the problem. In addition, grab samples from these streams shall be taken individually and analyses shall be performed to pinpoint possible sources of contamination in the event of a high combination sample. A calibrated flume shall be used to determine the volume of the combination stream discharge. The liquid effluent shall be discharged to the head waters of the Robert S. Kerr Reservoir.

5.1.2 Airborne Effluents

Trace quantities of uranium are routinely released from the facility through the main stack, the laboratory hood exhausts, the process building exhaust air vents, hydrogen fluoride off gas scrubber exhaust, dust collector exhaust and powered roof hatch exhausts. All exhaust stacks suspected of releasing licensed material (greater than 10g-U(Nat)/ month) shall be sampled and analyzed in accordance with the conditions set forth in Section 3.3.2.2.

The results of these analyses shall be reported to facility management on a daily basis during the normal work week (Monday through Friday). Results of samples collected and analyzed over the weekend shall be reported the following Monday. Samples collected and analyzed on holidays shall be reported the following day or the beginning of the next work week. The results shall be used in preparing the monthly uranium loss report and the semi-annual report of discharge to the NRC. Gross alpha activity from these release points are expressed in terms of natural uranium MPC which is 5.0×10^{-12} uci/ml or depleted uranium MPC which is 3.0×10^{-12} uci/ml. After accounting for dispersion, an action level of 0.5 MPC is established at the facility. When this action level is approached, specific area investigations shall be initiated to determine the major cause of the increase in the sample content. A central vacuum system is used as the vacuum source for most routine stack samples. Steam ejectors are used in some cases where this vacuum source is not present. Flow rate checks shall be performed weekly to assure accurate air sample evaluation on all routine stack air samples.

If the radioactivity at the plant fence boundary exceeds 1.0 MPC in a 24 hour period, an investigation shall be undertaken to determine the cause of the elevated release and corrective action shall be done to reduce the release in accordance with Section 3.3.2.2. A report of the investigation shall be prepared and forwarded to the President, SFC with an information copy to the Chairman, ALARA Committee.

5.1.3 Contaminated Equipment and Materials Disposal

Contaminated equipment and materials, such as burnable waste, empty sample bottles, insulating materials, process sludges, metal and plastic piping, are currently being accumulated and stored above ground and are being reprocessed, decontaminated, compacted or permanently disposed in commercially operated low-level radioactive waste sites in accordance with the Comprehensive Radiological Solid Waste Management Plan, dated November 13, 1986, which is hereby incorporated directly by reference. Additionally, those contaminated wastes resulting from the operation of the UF₆ Reduction Plant will be handled in a similar manner as described in the comprehensive Plan.

5.1.4 Compliance Responsibility

The positions having responsibility for effluent control and monitoring to ensure compliance with all applicable standards, rules, and license conditions shall be as follows:

1. Manager, Health and Safety, shall be responsible for monitoring and sampling requirements.
2. Director, Decontamination and Decommissioning Projects, shall be responsible for proper procedural control of effluent streams.
3. Manager, Environmental, shall be responsible for necessary analytical response for early detection of problem areas.

5.2 Environmental Monitoring

Sequoyah Facility shall use the quality assurance guidance outlined in Regulatory Guide 4.16, "Monitoring and Reporting Radioactivity In Releases of Radioactive Materials In Liquid and Gaseous Effluents from Nuclear Fuel Processing and Fabrication Plants and Uranium Hexafluoride Production Plants," and those sections of Regulatory Guide 4.15, "Quality Assurance for Radiological Monitoring Programs (Normal Operations) - Effluent Streams and the Environment," which apply to a uranium conversion facility.

All analysis shall be subject to the detection limits and action levels specified in Table 5-1. If the action level is exceeded, Sequoyah Facility shall investigate and take proper mitigating measures if necessary.

10. The entire safety interlock system (Q circuit) in the fluorine production system shall be maintained fully operational. The process instrumentation, alarms, and interlocks shall be tested monthly and calibrated each calendar year. The periodic checks incorporate simulation of malfunctions at various points in the system whereby functional reliability can be determined and established.
11. The main plant and the sampling plant dust collection systems shall be operable when the respective areas are in operation except for short outages (less than 2 hours) required for normal preventive maintenance.
12. No UF₆ cylinders shall be heated in steam chests and/or autoclaves unless the over-pressure sensor/steam interlock shutoff system is operable.
13. Process procedures shall be used only after they have been reviewed, approved and training completed. Should process events require use of a one time emergency procedure, it shall be implemented in compliance with SFC's procedure G-002, "Temporary Operating Procedures."
14. The UF₆ cylinder loading scales shall be checked for accuracy using two test weight cylinders after any scale maintenance or cleaning or whenever a weight discrepancy is suspected. A weight calibration shall be done monthly.
15. In the case of deviation from expected weights of one of the two scales, loading station and cylinder cart, the accountability scale shall be used for backup until the suspect scale has been repaired and recalibrated.
16. If the weight of UF₆ in a 30-inch or 48-inch diameter cylinder exceeds by more than 100 pounds and 500 pounds respectively the maximum net shipping weight noted in Table I below and as specified in ORO-651, "Uranium Hexafluoride: Handling Procedures and Container Description," Revision 5, September 1987, heating of the cylinder in either a steam chest or an autoclave shall not be allowed without specific procedures approved by the President, SFC. The Licensee shall notify NRC of any cylinder filled in excess of these weights and planned remedial action. Heating of other cylinder types containing UF₆ in excess of ORO-651 limits shall not be permitted without special procedures approved by the President, SFC.

CHAPTER 9. OVERVIEW OF OPERATION

9.1 Corporate Information

General Atomics is a corporation that engages in commercial research and development in the areas of nuclear energy, defense and other high technology products.

Sequoyah Fuels Corporation is a wholly-owned subsidiary of Sequoyah Fuels International Corporation, which is a wholly-owned subsidiary of Sequoyah Holding Corporation, which is a wholly-owned subsidiary of General Atomics, which is a wholly-owned subsidiary of General Atomic Technologies Corporation. General Atomic Technologies Corporation is controlled by James N. Blue, a United States citizen. Sequoyah Fuels Corporation is responsible for the operation of the Sequoyah Facility at Gore, Oklahoma and sales of nuclear materials and services produced by this facility.

Sequoyah Fuels Corporation is incorporated in the state of Delaware. The names, addresses and citizenship of the principal officers are:

| | | | |
|------------------|---------------|---|-----|
| Reau Graves, Jr. | Medina, TN | Chairman of the Board and Chief Executive Officer | USA |
| James R. Edwards | San Diego, CA | Secretary, Board of Directors | USA |
| John H. Ellis | Gore, OK | President, Sequoyah Fuels Corporation | USA |
| Reginald B. Cook | Gore, OK | Executive Vice President and Controller | USA |

Parent company officers serving on the Board of Directors of the Sequoyah Fuels Corporation are:

| | | | |
|------------------|---------------|------------------------------------|-----|
| Max D. Kemp | San Diego, CA | President, Chief Financial Officer | USA |
| James R. Edwards | San Diego, CA | Secretary | USA |
| Paul Bissonnette | Poway, CA | Director | USA |

9.2 Financial Qualification

The Sequoyah Fuels Corporation is a wholly-owned subsidiary of Sequoyah Fuels International Corporation, which is a wholly-owned subsidiary of Sequoyah Holding Corporation, which is a wholly-owned subsidiary of General Atomics, which is a wholly-owned subsidiary of General Atomic Technologies Corporation. General Atomic Technologies Corporation is controlled by James N. Blue, a United States citizen. There is no control of Sequoyah Fuels Corporation by any alien, foreign corporation or foreign government through stock ownership, membership on the Board of Directors, or stock ownership in General Atomics, or its holding company, General Atomic Technologies Corporation.

9.8 Changes in Procedures, Facilities and Equipment

Administrative controls ensure that, prior to the start of any new activity (or change in an existing activity) involving licensed material, an independent safety review of the proposed activity is performed and documented. Changes in plants and facilities involved in licensed activities that involve ground breaking require prior NRC approval. The administrative procedure includes the following steps:

1. Assurance of Safety Review. Any proposed change in manufacturing procedures or processing equipment is reviewed in accordance with the requirement set forth in Section 2.7.4 of this license to ensure that applicable license requirements and safety considerations have been evaluated.
2. Responsibility for Requesting Safety Analysis. The President, SFC is responsible for selecting the proper administrative procedure to make changes in process, equipment, or procedures, (e.g., (a) a revised or new radiation safety plan, or safety analysis, (b) submittal to a safety review committee, or (c) an NRC license amendment. These actions shall be coordinated through the Manager, Health and Safety.
3. Analysis. The applicant documents the comprehensive evaluation of the proposed change, including potential accidents that may affect radiation and safety.
4. Review. Various management positions are responsible for review and approval prior to effecting changes in procedures, facilities or equipment. The reviews are documented as required.

Major changes to process operations and to equipment design shall be reviewed and approved in accordance with the requirements set forth in Section 2.7.4 of this license.

Modifications or changes to process operations or equipment that normally occur during operations shall be prepared and reviewed in accordance with the requirements set forth in Section 2.7.4 of this license. All experimental and developmental work to be performed at Sequoyah Facility shall be reviewed and approved in accordance with the requirements set forth in Section 2.7.4 of this license prior to its initiation.

Process and equipment design, which generally delineate the process and prescribe critical parameters, are reviewed in accordance with the requirements set forth in Section 2.7.4 of this license.

5. Approval. Implementation of the proposed change takes place only after final approval in writing by the approval authority.

CHAPTER 11. ORGANIZATION AND PERSONNEL

11.1 Unit Functions

The President, Sequoyah Fuels Corporation shall have overall responsibility for the safe operation of the Sequoyah Facility. Additional responsibility has been assigned to the Executive Vice President and Controller, the Director, Regulatory Affairs, and the Director, Decontamination and Decommissioning Projects for various functions as described in Chapter 2.0 of the license.

The facility organization consists of a number of departments, which report to a Director, Vice President or the President, SFC, as shown in Figure 11-1. The functional responsibilities of the various departments are described in Chapter 2.0.

11.2 Organizational Procedures

In view of the company's basic concern for the well-being and protection of its employees and for the health and safety of the public, and in the discharge of its responsibilities under public laws and regulations, a stringent and effective program is maintained for the control of radiation and contamination hazards. To conduct the program, organizational components are established to provide not only for strong facility management in radiation safety but also for independent development of process and equipment criteria and health and safety standards, and audit thereof, under conditions which minimize the length of reporting lines and maximize the effectiveness of management control.

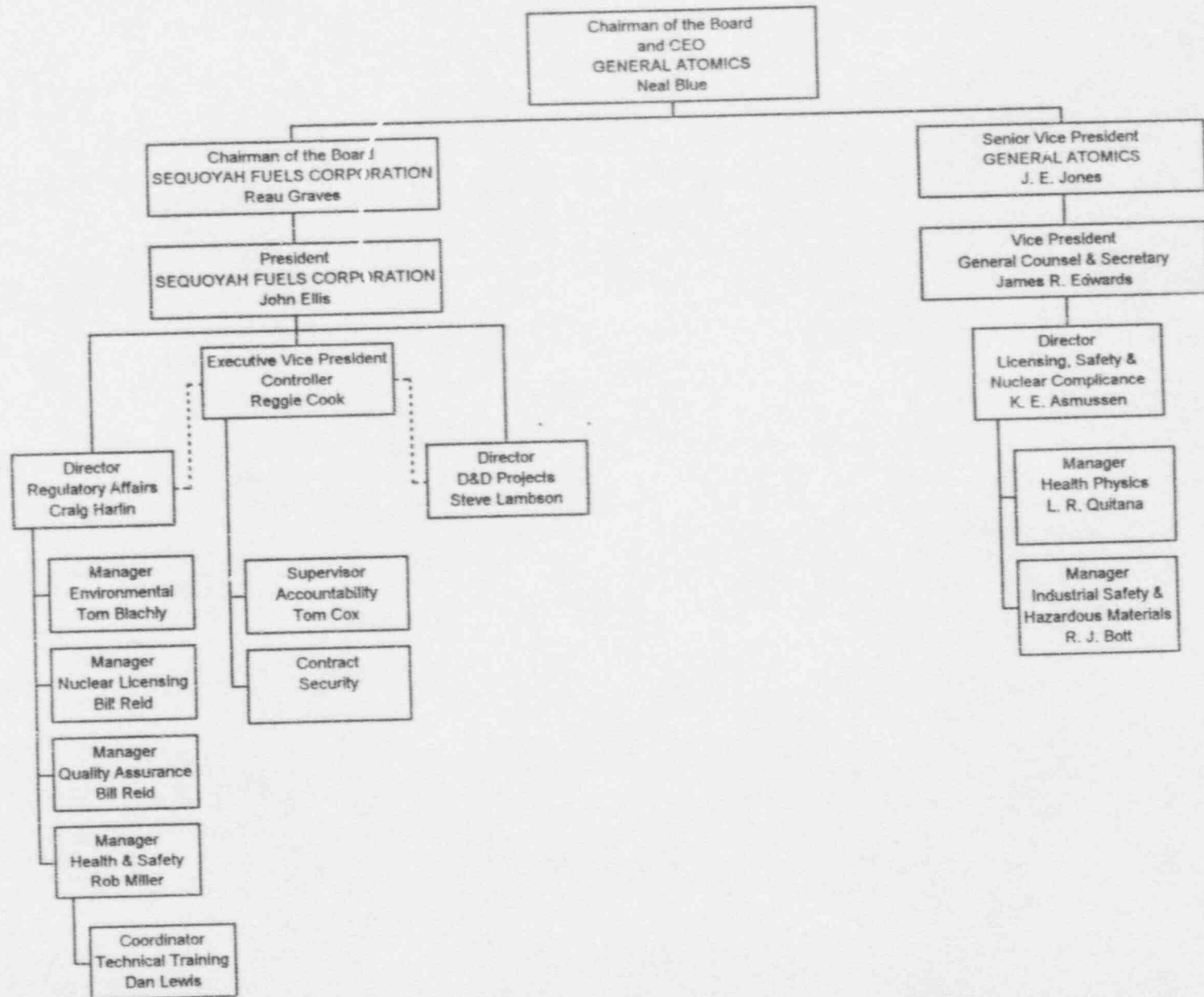
A basic premise of Sequoyah Fuels Corporation and General Atomics is that every individual has a personal responsibility for carrying out his assigned task in a manner which will not only achieve its operational objectives, but will do so without endangering the health and safety of that individual, his co-workers, or the public. It follows that every person in the chain of operational command has responsibility for health and safety matters for all operations under his control.

It is also a basic premise of Sequoyah Fuels Corporation and General Atomics that there be a strong independent overview of the activities of the line operations to assure, through a check and balance system, that health and safety matters have been adequately considered in the process selection and equipment design; that adequate procedures have been established to assure that the process and equipment are operating in a safe manner; and that personnel are adequately protected against radioactivity and radiation hazards.

SEQUOYAH FUELS CORPORATION

Organization Chart

Figure 11-1



Organizational responsibilities specific to the Sequoyah Facility are established to give full weight to these two premises. The organizational responsibilities are discussed in Chapter 2.0 of the license.

11.3 Plant Review Committee

The Sequoyah Facility Plant Review Committee includes senior facility managers having key roles in ensuring that the facility operations are conducted safely, efficiently, and in compliance with regulatory requirements. The Committee is responsible for:

- a. Reviewing and approving new and revised operating procedures;
- b. Determining the need for and the level of training to be conducted prior to implementing new or revised operating procedures, experiments, or tests;
- c. Determining whether reviewed activities are consistent with current license conditions or if a license amendment is required prior to implementation;
- d. Reviewing and approving the procedures for the D&D Technician qualification and certification system, and;
- e. Reviewing and commenting upon any matter presented to it by the President, SFC.

The Plant Review Committee is normally chaired by the President, SFC, or a designee. Other members of the Committee include: the Director, Decontamination and Decommissioning Projects, the Director, Regulatory Affairs, the Manager, Environmental, the Manager, Health and Safety, the Manager, Quality Assurance, and senior plant personnel with expertise in specific areas as appointed by the President, SFC. The Committee meets as necessary to conduct required business.

11.4 Training

SFC is committed to a comprehensive training program to ensure that all employees receive the instruction necessary to be able to perform their jobs safely and efficiently. The level of training is commensurate with the individual employee's duties and responsibilities, and with the potential hazards involved. Instruction is provided by individuals knowledgeable in the subject matter involved. Formal training is documented and records are maintained by the Technical Training Coordinator.

11.4.1 General Employee Training

General employee training consists of classroom lectures and demonstrations for all new hires. Topics covered include radiation protection, emergency requirements, and procedures, as appropriate to the individual's position. The training program emphasizes the need for strict adherence to operating procedures, regulatory requirements, and license conditions.

|| 11.4.2 Decontamination and Decommissioning Technician Training and Certification

|| Training for Decontamination and Decommissioning (D&D) Technicians consists of classroom lectures and demonstrations associated with specific projects. D&D Technicians are certified in a position based on successfully completing classroom training and demonstrating on-the-job proficiency.

|| The qualifications of candidates for certification in an area are reviewed by management and submitted for certification if appropriate. Certification is approved by the Technical Training Coordinator. The Certification System is promulgated by procedure which is approved by the Plant Review Committee. Certification is required prior to the D&D Technician being permitted to do the job without direct supervision.

11.4.3 Safety Meetings

Monthly safety meetings are conducted by supervision to enhance awareness of facility safety and procedural matters in accordance with established procedures.

11.4.4 Retraining

|| General employee refresher training is conducted each calendar year for all employees whose normal duties expose them to licensed or hazardous materials, and includes such subjects as general plant process, chemistry, health physics, safety, chemical hazards, designated procedures, and the Contingency Plan. D&D Technicians receive refresher training in an operating position each calendar year in order to maintain certification in that position for the ensuing year.

11.4.5 Development and Approval of Training Materials

Development and approval of training materials is the responsibility of the department under whose cognizance the subject matter falls. New training materials and revisions to existing

training materials are developed by individuals competent in the subject matter and approved by the cognizant Department Manager and by the Technical Training Coordinator. Examples of subject matter and approval authority are:

Approval

=====

Subject Matter

=====

Manager, Health and Safety

Health Physics
Hazard Communications
Safety
Respiratory Protection
Contingency Plan

Technical Training Coordinator

All Subjects

11.4.6 Training Records

Training records, including attendance and test results, where applicable, are maintained by the Technical Training Coordinator.

11.5 Functions of Key Personnel

The functions of key personnel both in General Atomics and Sequoyah Fuels Corporation are discussed in Chapter 2.0 of the license.

11.6 Education and Experience of Key Personnel

Dr. Keith E. Asmussen, Director Licensing, Safety and Nuclear Compliance, General Atomics

Education

Ph.D., Nuclear Engineering, Iowa State University of Science and Technology, 1969.

Graduate Study in Nuclear Engineering (1 year).

University of Arizona, 1967.

MS, Nuclear Engineering, Iowa State University, 1966.

BS, Engineering Operations (Industrial Engineering),
Iowa State University, 1965.

Registered Professional Engineer, Nuclear Engineering, California.
Member, San Diego Section American Nuclear Society.

Experience

General Atomics, San Diego, CA

Joined General Atomics (GA) Nuclear Analysis and Reactor Physics Department as a Senior Reactor Physicist in 1969. His initial responsibilities involved nuclear fuel management analyses and reactor physics calculations. In 1972 he was temporarily assigned to the Fuel Performance Branch where he was responsible for developing the reactor core thermal safety limit and other fuel related technical specifications for a large High Temperature Gas-cooled Reactor (HTGR).

In 1973, and again in 1976, he served as a site physicist at the Fort St. Vrain (FSV) HTGR. His responsibilities involved planning, coordinating and participating in the initial fuel loading, subcritical testing and monitoring, zero power physics testing and rise-to-power testing.

Beginning in 1974, he spent 18 months working in the HTGR physics group of Hochtemperatur Reaktor Bau (HRB) located in Mannheim, West Germany. At HRB he acted as GA liaison and consultant regarding HTGR core and fuel design.

In 1976, returned to GA's San Diego offices and became a section leader engaged in Lead Plant HTGR core physics design and nuclear analysis.

Late in 1977, he was given the special assignment of coordinator of all testing (in-pile and out-of-pile) related to resolving the FSV core temperature fluctuation problem.

In 1979, he became Manager, Fort St. Vrain Fuel Engineering where he was given the additional responsibility for directing all the technical analyses required to design, manufacture and license FSV reload segment fuel. Other responsibilities included fuel accountability, core reactivity monitoring and monitoring the performance of the core and fuel. He played a key role in developing revised Technical Specifications for the FSV reactor and obtaining NRC release for unrestricted Fuel Power operation. He worked intimately with Public Service Company of Colorado licensing personnel on a variety of issues involving personnel interaction with NRC staff. In 1983, he became Coordinator, Fort St. Vrain Core Activities. In this capacity his

technical responsibilities remained unchanged but he assumed responsibility as project manager of these and related tasks.

From 1979 to 1985, Dr. Asmussen served on GA's Fuel Material Review Board which reviews and dispositions nonconformance reports, waivers, etc., related to the FSVC Fuel Specifications.

In 1985, he became Manager of Licensing and Nuclear Material control. His areas of responsibility were broadened in 1986 when he became Manager, Licensing, Safety and Nuclear Compliance. In this capacity, he is responsible for administering GA's licenses, liaison with regulatory agencies and reviewing and approving all work involving radioactive material for compliance with applicable regulations and license conditions. In addition, he is responsible for the overall planning, coordination, and administration of GA's special nuclear material control, nuclear safety, health physics, and industrial safety.

Laura R. Quintana, Manager, Health Physics, General Atomics

Education

BS Biology, Chemistry, New Mexico Highlands University, 1976.
MS Applied Nuclear Science (Health Physics), Georgia Institute of Technology, 1979.

Experience

General Atomics, San Diego, CA

8/82- Manager, Health Physics. Assures compliance with 10 CFR Parts 19 and 20 as well as state and U.S. Nuclear Regulatory Commission license-imposed radiological safety requirements. Provides review and approval of radiological safety of activities involving special nuclear materials or other radioactive materials, monitors activities involving special nuclear or radioactive materials, personnel monitoring, dose rate measurement, radioactive material detection and assay, air and water sampling and environmental monitoring.

Provides radiological safety support in decontamination/ decommissioning of facilities, including low-level radioactive waste disposal. This involves the identification of radionuclides,

quantities and classifications as well as radiation and contamination measurements.

2/80-5/82

The Salk Institute, La Jolla, CA. Assistant Radiation Safety Officer and subsequently Radiation Safety Officer. Responsible for the radiation safety program and the radioactive material licensing of two affiliated companies, La Jolla Biological Associates and the Salk Institute Biotechnology Industrial Associates, Inc.

6/76-9/78

Oak Ridge National Laboratory, Oak Ridge, TN. Initially assigned a research project for the Environmental Sciences Division. Subsequently, joined the Health Physics Division as a health physics technician.

Ronald J. Bott, Industrial Safety Engineer, General Atomics

Education

BS Mechanical Engineering, San Diego State University, 1970. Numerous special courses in industrial safety and materials engineering.

Licenses

Registered Safety Engineer, California #1593.

Qualifications

Ten (10) years experience in developing, implementing, and reviewing company safety, fire, and health programs. Broad working knowledge of federal and state occupational safety and health codes, hazard communication programs, and environment regulations.

Experienced in accident/incident investigations involving worker's compensation insurance and loss prevention programs.

Strong technical background in mechanical engineering and manufacturing processes, including experience with plastic processing and fabrication.

Experience

1973-

General Atomics.

License No. SUB-1010
Amend. No. Revision

Docket No. 40-8027
Date 01/27/93

Page
II. 11-8

1984-1988 Industrial Safety Engineer, General Atomics. Administer industrial safety at General Atomics, including accident statistics, hazardous work requests, safety committee development, worker's compensation reporting, year-end reporting, accident investigation of serious incidents, liaison with nuclear waste management, and coordination of industrial safety programs with Industrial Hygiene, Health Physics, Emergency Services, and Medical. Responsibilities include non-nuclear waste transportation projects and hazardous material management. Recent work as Hazardous Material/Hazardous Waste Manager includes fire department audits, team review by federal, state, and local agencies, and environment assessment by Chevron Corporation.

1982-1984 Senior Engineer, General Atomics. As Task Engineer, responsible for development, fabrication, and installation of large electrical coils (18 feet in diameter) and patch board systems. Basic design of electrical coils including drawings and specifications (stress, electrical, cooling), design procurement and installation of a complete coil winding facility (water heating systems, vacuum systems, winding tables, sand blasting, insulation wrapping, special power tools, copper handling solvent cleaning). Complete fabrication of coils and vacuum potting in epoxy matrix. Electrical testing (high voltage, high current).

1979-1982 Safety Engineer, General Atomics. Reviewed hazardous work requests and developed appropriate safety measures, including hazardous chemical waste, specific processes with potential safety considerations (i.e., cryogenic, explosive atmospheric, flammable liquids, industrial hygiene, hoisting/lifting.) Also conducted system safety analysis, safety inspections. Oversaw company safety procedures. Reviewed state codes and federal regulations. Responded to emergency response fires, industrial accidents, vehicle emergencies, and occupational illnesses and accidents.

1975-1979 Safety Chief, General Atomics. Developed, implemented, and maintained comprehensive accident prevention program involving line management. Implemented controls to eliminate or minimize potential hazards (laser, high voltage microwave radiation, industrial work practices). Responsible for training and indoctrination of 70-150 employees.

1973-1975

Mechanical Engineer, General Atomics. Supervised manufacturing of equipment for fusion research and development. Work included construction of large electrical coils, stainless steel cooling systems, ceramic insulations, high vacuum systems, and cryogenic supply systems. Assisted physics personnel in development of diagnostic systems and vendor liaison. Supervisor of machine shop, welding laboratory and sheet metal fabrication area.

Professional Associations

Member, American Society of Safety Engineers, Research and Development Section.

Member, Pacific Coast Electrical Association, Safety and Health Committee.

Member, Industrial Environmental Association, San Diego, CA.

John H. Ellis, President, Sequoyah Fuels Corporation

Education

BS Chemical Engineering, University of Washington, 1968

Experience

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|-------------|---|
| 06/93- | President, Sequoyah Fuels Corporation. |
| 01/93-06/93 | Vice President, Operations, Sequoyah Fuels Corporation. |
| 04/92-01/93 | Senior Vice President, Sequoyah Fuels Corporation. |
| 1991-4/92 | Division Manager, Radiochemical and Safety Analysis Division, and Project Manager for all Nuclear Spent Fuel Reprocessing Projects, Science Applications International Corporation. |
| 1990-1991 | Manager, Irradiated Fuels Disposition Program, Westinghouse Hanford Company. |
| 1987-1990 | PUREX/UF ₆ Process Operations Manager, Westinghouse Hanford Company. |
| 1984-1987 | PUREX Assistant Plant Manager, Rockwell Hanford Operations. |
| 1983-1984 | Founding partner, member, Board of Directors, and Vice President, Fuel Cycle Services, in engineering consulting firm, B. E. Incorporated. |

1973-1983 Allied-General Nuclear Services. Held the positions of Director of Operations, Manager, Nuclear Materials Control, Project Manager for Special R&D Programs, and Supervisor, Separations Production Engineering Department.

1968-1973 Process Control Engineer, Hanford PUREX Facility, Atlantic-Richfield Hanford Company.

Thomas R. Blachly, Jr., Manager, Environmental, Sequoyah Fuels Corporation

Education

B.S. Aquatic Biology, Oklahoma State University.
M.S. Environmental Engineering, Oklahoma State University, Stillwater, Oklahoma.

Experience

1/92- Manager, Environmental, Sequoyah Fuels Corporation.

6/91-1/92 Manager, Air and Wastewater Programs, Bentley Environmental Engineering, Inc., Oklahoma City, Oklahoma.

1988-6/91 Supervisor, Compliance and Enforcement Section, Water Quality Division, Oklahoma Water Resources Board, Oklahoma City, Oklahoma.

1982-1988 Senior Water Resources Engineer, Permitting Section, Water Quality Division, Oklahoma Water Resources Board, Oklahoma City, Oklahoma.

1978-1982 Environmental Engineer, Stuever & Associates, Consulting Engineers.

1976-1978 Graduate Research Assistant, Oklahoma State University.

Steven C. Lambson, Director, Decontamination and Decommissioning Project, Sequoyah Fuels Corporation

Education

BS Chemical Engineering, Rice University.

Experience

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| 02/94- | Director, Decontamination and Decommissioning Projects, Sequoyah Fuels Corporation. |
| 01/93-02/94 | Manager, Operations, Sequoyah Fuels Corporation. |
| 12/91-01/93 | Area Manager, DUF ₄ , Sequoyah Fuels Corporation. |
| 4/91-12/91 | Process Engineer, Sequoyah Fuels Corporation. |
| 1990-4/91 | Process Development Engineer, Westinghouse Idaho Nuclear Company, nuclear field experience. |
| 4/84-12/89 | Geophysicist, Western Geophysical Company, chemical field and project management experience. |

Reggie Cook, Executive Vice President and Controller, Sequoyah Fuels Corporation

Education

BBA, Accounting Major, University of Oklahoma.

Experience

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| 02/94- | Executive Vice President and Controller, Sequoyah Fuels Corporation. |
| 01/93-02/94 | Vice President and Controller, Sequoyah Fuels Corporation. |
| 11/88-01/93 | Controller, Sequoyah Fuels Corporation. |
| 1986-1988 | Group Supervisor, Coal/Uranium Accounting, Kerr-McGee Corporation. |
| 1981-1986 | Supervisor, Coal/Uranium Accounting, Kerr-McGee Corporation. |
| | Joint Venture Coordinator, Nuclear Accounting, Kerr-McGee Nuclear Corporation. (March-August 1981). |
| 1979-1981 | Assistant Supervisor, Retail Accounting, Kerr-McGee Corporation. |
| 1978-1979 | Refinery Accountant, Refining Accounting, Kerr-McGee Corporation |

1976-1978

TBA Inventory Control, Refining Accounting, Kerr-McGee Corporation.

Craig L. Harlin, Director, Regulatory Affairs, Sequoyah Fuels Corporation

Education

BS Radiation and Nuclear Technology, Oklahoma State University
Reactor Operator Training, North Carolina State University
B&W NSS Introduction to Systems Specific, Duke Power Company
Senior Reactor Operator Training, Duke Power Company
Core Damage Mitigation, Duke Power Company
Supervisory Development Program, Duke Power Company
Management Development Program, Duke Power Company
Health Physics Society, Member
Licensed Senior Reactor Operator, NRC License SO 20930

Experience

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|------------|--|
| 02/94- | Director, Regulatory Affairs, Sequoyah Fuels Corporation. |
| 7/92-02/94 | Manager, Licensing and Health Physics, Sequoyah Fuels Corporation. |
| 1991-1992 | Outage Manager, Duke Power Company. |
| 1989-1991 | SRO License Candidate, Duke Power Company. |
| 1986-1989 | Compliance Manager, Duke Power Company. |
| 1985-1986 | General Supervisor, Duke Power Company. |
| 1978-1985 | Junior Health Physicist, Associate Health Physicist, Health Physics Coordinator, Duke Power Company. |

Billy W. Reid, Manager, Nuclear Licensing, Quality Assurance, and Laboratory Support, Sequoyah Fuels Corporation

Education

BS Nuclear Engineering, University of Missouri - Rolla, 1977
U.S. Navy Electronics Technician School, 1969
U.S. Navy Nuclear Power School, Bainbridge, Maryland, 1970
U.S. Navy Prototype S5G, Idaho Falls, Idaho, 1970

License No. SUB-1010
Amend. No. Revision

Docket No. 40-8027
Date 11/23/94

Page
II. 11-13

Experience

02/94- Manager, Nuclear Licensing, Quality Assurance, and Laboratory Support, Sequoyah Fuels Corporation.

01/93-02/94 Manager, Quality Assurance and Laboratory Support, Sequoyah Fuels Corporation.

10/91-02/92 Licensing Engineer, Enercon Services, on contract to Sequoyah Fuels Corporation.

1986-1991 General Manager, S. Levy Incorporated, Midwest Office, Cedar Rapids, Iowa.

1981-1986 Licensing Engineer, S. Levy Incorporated, on contract to Iowa Electric Light and Power Company.

1978-1980 Licensing Engineer, Public Service Company of Oklahoma.

1968-1974 Reactor Operator and Instructor, U.S. Navy.

Robert H. Miller, Manager, Health and Safety, Sequoyah Fuels Corporation

Education

BS Environmental Science, University of Oklahoma
MS Health Physics, Northwestern University

Experience

10/93- Manager, Health and Safety, Sequoyah Fuels Corporation.

01/91-10/93 Nuclear Licensing Engineer, Sequoyah Fuels Corporation.

07/89-01/91 Laboratory Manager, Jacobs Engineering Group.

06/87-07/89 Health Physicist, Jacobs Engineering Group.

09/85-06/87 Health Physicist, Roy F. Weston, Inc.