UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-8064

OCT 9 1992

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

Sequoyah Fuels Corporation
(Subsidiary of General Atomics)
ATTN: James J. Sheppard, President
P.O. Box 610
Gore, Oklahoma 74435

Gentlemen:

SUBJECT: RESPONSE TO NRC INSPECTION REPORT NO. 40-8027/92-16

This refers to your September 4, 1992, response to the Notice of Violation (Notice) included with the NRC Inspection Report No. 40-8027/92-16 both dated August 5, 1992. We found your reply to the violations adequately responsive to our concerns, and we have no further questions at this time.

Your reply to Violation B.2 (a procedure violation involving a failure to ensure pre-job and periodic surveys associated with constructing the administrative building parking lot) did not discuss the fact that SFC had indications prior to commencing the work that contaminated soil might be encountered. These indications included mention of contaminated soil in the Facility Environmental Investigation and contaminated soil identified during prior excavations in the area. While your corrective actions appear to address the specifics of the violation, we encourage you to review available information prior to future work associated with soils to prevent future violations.

In your reply to Violation B.3 (a failure to follow the Hazardous Work Permit [HWP] procedure), you described reasons for the violation and corrective actions without first completing your internal root cause analysis. Further, we noted that the root cause analysis was expected to be complete by September 30, 1992, some 3 months after the incident. Since the event occurred on June 24, 1992, the possibility seems real that important details may have been forgotten prior to completing the internal investigation. Also, in this case the internal investigation could have been hindered by the fact that the contract H&S technician involved is no longer employed at SFC. We accept your reply to the violation and will review your root cause analysis during a future inspection.

We will review the implementation of your corrective actions for all violations during a future inspection to determine whether full compliance has been achieved and will be maintained. No further response is required.

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We will review the implementation of your corrective actions for all violations during a future inspection to determine whether full compliance has been achieved and will be maintained. No further response is required.

Should you have any questions concerning this letter we will be pleased to discuss them with you.

Sincerely,

L. J. Callan, Director
Division of Radiation Safety
and Safeguards

cc:
Oklahoma Radiation Control Program Director

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bcc:
DMB - Original (IE-07)
JLMilhoan
LJCallan
JPJaudon
MRodriguez, OC/LFDCB (4503)
CLCain
GMVasquez
LLKasner
NMIS
MIS System
RIV Files (1)
RSTS Operator
REHall, URFO
JTGreeves, IMNS/NMSS (6 H3)
JWNHickey, IMNS/NMSS (6 H3)
MTokar, IMNS/NMSS (6 H3)
MLHorn, IMNS/NMSS (6 H3)
SLUttal, OGC (15 B18)
JGoldberg, OGC (15 B18)
JGilliland
TRCombs, OCA (17 A3)
JLieberman, OE (7 H5)
GFSanborn

RIV:NMIS:clc	C:NMIS	D:DRS		
GMVasquez	CLCain	LJCallan		
10/6/92	10/6/92	10/9/92		

bcc:
DMB - Original (IE-07)
JLMilhoan
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JWNHickey, IMNS/NMSS (6 H3)
MTokar, IMNS/NMSS (6 H3)
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SLUttal, OGC (15 B18)
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JLieberman, OE (7 H5)
GFSanborn

RIV:NMIS:clc	C:NMIS	D:DRSS		
GMVasquez	CLCain	LJCallan		
10/4/92	10/6/92	10/9/92		

SEQUOYAH FUELS
A GENERAL ATOMICS COMPANY

RE: 92250-N

September 4, 1992

AIRBORNE EXPRESS

Mr. James L. Milhoan
Regional Administrator
Region IV
U.S. NUCLEAR REGULATORY COMMISSION
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

RE: License No. SUB-1010; Docket No. 40-8027
Response to Notice of Violation
NRC Inspection Report No. 40-8027/92-16

Dear Mr. Milhoan:

Pursuant to the provisions of 10 CFR 2.201, enclosed is Sequoyah Fuels Corporation's responses to four violations cited by the Notice of Violation transmitted with NRC Inspection Report No. 40-8027/92-16 dated August 5, 1992.

Please contact me if there is any additional information that we can provide regarding this subject.

Sincerely,

James J. Sheppard
President

JJS/SMA:lh

Enclosure

xc: NRC Document Control Desk

9209150284
IE35

92-127

HIGHWAY 10 & I-40 PO BOX 610, GORE, OKLAHOMA 74435 (918) 489-5511 FAX: (918) 489-2291

SEQUOYAH FUELS CORPORATION'S

REPLY TO A NOTICE OF VIOLATION

NRC Inspection Report No. 40-8027/92-16

Statement of Violation:

A. 10 CFR 20.207(a) requires that licensed materials stored in an unrestricted area be secured from unauthorized removal from the place of storage.

License Condition 9 authorizes use of licensed material in accordance with the statements, representations, and conditions contained in Chapters 1 through 8 of the license renewal application dated August 23, 1985, as supplemented. Section 3.3.4.7 of the application requires, in part, that items and equipment released from the facility for unrestricted use meet the release criteria and conditions specified in NRC's "Guidelines for Decontamination of Facilities and Equipment Prior to Release for Unrestricted Use or Termination of Licenses for Byproduct, Source, or Special Nuclear Material."

These guidelines limit maximum acceptable fixed surface alpha contamination of natural uranium to 15,000 dpm/100 cm^2, and removable alpha contamination of natural uranium to 1,000 dpm/100 cm^2. Further, footnote F of the Guidelines states that the average and maximum radiation levels associated with surface contamination resulting from beta-gamma emitters should not exceed 0.2 mrad/hr at 1 centimeter and 1.0 mrad/hr, respectively, measured through not more than 7 milligrams per square centimeter of total absorber.

Contrary to the above, on June 27, 1992, SFC discovered contaminated metal scraps in an unrestricted area that were not secured from unauthorized removal from the place of storage. Specifically, contaminated metal scraps were discovered in a dumpster in an unrestricted area, with maximum fixed surface contamination levels of 280,000 dpm/cm^2 of alpha activity, maximum removable alpha contamination of 12,000 dpm/cm^2, and beta-gamma dose rates of 45 mrad/hr.

This is a repeat violation.

SFC Response:

Sequoyah Fuels Corporation (SFC) admits this violation.

Reason for the violation:

On June 27, 1992, Health and Safety personnel performed a spot check of a dumpster located just outside the restricted area fence northeast of the DUF4 plant, and discovered contaminated scrap metal. Some of the scrap metal contained contamination levels above SFC facility limits. The containers containing the contaminated metal were relocated to the restricted area for additional surveys and disposition. The on-site NRC inspector was notified and the incident was included in SFC's 5-day report. SFC was cited by the NRC for a violation of 10 CFR 20.207(a) which requires that licensed materials stored in an unrestricted area be secured from unauthorized removal from the place of storage. During this period, a program was ongoing to systematically survey the unrestricted areas for contaminated items. On June 30, 1992, an additional contaminated article was discovered in a dumpster located east of the DUF4 plant.

A root cause analysis was initiated by SFC following the June 27th incident to determine the causes for the breaches in controls established for the disposition of contaminated materials from the restricted area. The underlying cause for the materials with contamination levels above facility limits being in the unrestricted areas was concluded to be insufficient authority and controls by the Health and Safety department over access points to the restricted areas to assure that only acceptable materials were released even though Health and Safety was assigned responsibility for verifying the acceptability of materials for release. At the time of this incident, any department could obtain a key to a restricted area gate lock.

The corrective steps taken and the results achieved:

Temporary Operating Procedure (TOP) 92-303 was prepared to implement changes to Facility Operating Procedure G-111, "Access to Restricted Areas and Controlled Access Areas". The procedure revisions establish the necessary controls for Health and Safety to regulate the movement of materials through access points for Restricted Area #1 except through the Change Rooms or the motor operated truck gate.

TOP 92-303 specifies that "Only Health and Safety personnel may check out keys from Security personnel for access through Restricted Area #1 gates." Also, "Health & Safety will be present at all times when personnel, material, or equipment exits Restricted Area #1 other than through the Change Rooms". Additional steps to G-111 regulate the release and movement of acceptable materials from a buffer zone in the restricted area to the disposal dumpster in the unrestricted area.

TOP 92-303 was approved July 20, 1992.

The corrective steps that will be taken to avoid future violations:

SFC has developed a Secured Area Upgrade Action Plan to address the control of secured areas and to limit the access of unauthorized personnel to these areas. The Secured Area Upgrade Action Plan provides for the installation of color coded locks and keys, and identifies responsibilities for granting access to the secured areas and for maintaining logs of the issuance of keys for the locks on secured area access points. Personnel authorized to log out a key to the restricted areas will be only those specified in writing by the Manager of Health and Safety or his designee. The Upgrade Action Plan will be fully implemented by October 31, 1992.

Date when full compliance will be achieved:

SFC achieved compliance with 10 CFR 20.207(a) on June 30, 1992, when the contaminated materials were moved back inside the restricted area.

Statement of Violation:

B. License Condition 9 authorizes use of licensed material in accordance with the statements, representations, and conditions contained in Chapters 1 through 8 of the license renewal application dated August 23, 1985, as supplemented. Section 2.2 of the license renewal application, states, in part, that the Manager, Health and Safety (H&S), shall be responsible for developing and implementing programs, procedures, and guidance in the functional area of health physics.

1. Section 4.2.1 of Procedure G-111, "Access to Restricted Areas and Controlled Access Areas," requires that all gates providing access to the restricted area shall be kept locked except during each entry and exit process, or when an individual is posted at the gate for the purpose of providing positive access control.

   Contrary to the above, on June 30, 1992, an SFC manager discovered that an unrestricted area gate was unlocked and no individual had been posted at the gate for the purpose of providing positive access control.

SFC Response:

Sequoyah Fuels Corporation (SFC) admits this violation.

Reason for the violation:

In violation of Section 4.2.1 of Procedure G-111, on June 30, 1992, a gate providing access to the Restricted area was discovered to be unlocked and no individual was posted at the gate to provide positive access control. Earlier on the day of the violation, SFC personnel had transported materials through the gate and the individual responsible for access control thought that the gate was relocked. The pad lock appeared to be locked, however, when a SFC manager pulled on the lock, it was discovered that it was not secured.

The corrective steps taken and the results achieved:

The lock was immediately secured. Discussions about contaminated items in clean scrap dumpsters and the security of the restricted area were conducted during the weekly H&S technician meeting on July 1, 1992. Minutes of their weekly meetings are required reading for all technicians.

Security personnel hand check the restricted area gates to verify that the locks are secured. In the past this directive was

verbally transmitted to the security personnel but is now a written requirement.

The corrective steps that will be taken to avoid future violations:

This violation did not result from a failure to follow any procedures nor from a lack of knowledge by the technician regarding his duties and activities, but from the failure to verify a common routine action. The cautions to the technicians to pay particular attention to the security of the restricted area and to be alert to any signs where this security may be lacking or in question should be sufficient to minimize the potential for further violations of this type.

Our investigation of this incident did, however, identify potential weaknesses in our lock and key control process which are being addressed to tighten the issuance of keys and restrict the authority to provide access to certain areas. A Secured Area Upgrade Action Plan has been developed to address the control of secured areas and to limit the access of unauthorized personnel to these areas. The Action Plan will be fully implemented by October 31, 1992.

Date when full compliance will be achieved:

SFC was in full compliance with Section 4.2.1 of Procedure G-111 on June 30, 1992, when the lock was secured by the SFC manager.

Statement of Violation:

B. License Condition 9 authorizes use of licensed material in accordance with the statements, representations, and conditions contained in Chapters 1 through 8 of the license renewal application dated August 23, 1985, as supplemented. Section 2.2 of the license renewal application, states, in part, that the Manager, Health and Safety (H&S), shall be responsible for developing and implementing programs, procedures, and guidance in the functional area of health physics.

2. Section 4.1 of Procedure G-194, "Excavation, Trenching, and Well Drilling," states, in part, that an individual be assigned to constantly monitor the restrictions and work conditions set forth in the excavation, trenching, or well drilling permit. The appropriate permit dated May 21, 1992, and issued for the new administrative building parking lot, required pre-job surveys and periodic surveys by the Health and Safety department.

Contrary to the above, in June 1992, an individual did not monitor restrictions and work conditions set forth in the excavation, trenching, or well drilling permit for the new administrative building parking lot dated May 21, 1992, on two occasions. Specifically, on June 24, a pre-job survey by the Health and Safety department was not performed prior to dirt moving activities (removing a sidewalk and excavating dirt). Also, in June 1992 dirt moving activities occurred with no pre-job survey and no periodic surveys south of the new outdoor water fountain.

SFC Response:

Sequoyah Fuels Corporation (SFC) admits this violation.

Reason for the violation:

On May 21, 1992, an "Excavation, Trenching, and Well Drilling" permit was issued for the new administrative building parking lot. The radiologically related requirements specified on the permit included a pre-job survey and periodic surveys by the H&S department. The permit was appropriately executed, including a discussion with the construction supervisor of the contracting company. The construction company maintained the permit in a storage trailer at the job site.

On June 24, 1992, the construction work was stopped by a H&S technician, who functions as the project supervisor for the unrestricted area survey program, when he observed a backhoe

operator removing a sidewalk that was part of the unrestricted area survey but known to be unsurveyed. A survey was performed and the area was found contaminated. The backhoe was surveyed and no contamination above SFC's release limits was indicated. The contractor's personnel working in the area were monitored by the Personnel Contamination Monitor (PCM) and no detectable contamination was indicated. The area was barricaded and posted as a temporary controlled access area.

Although the contractor's personnel signed the permit, it is not clear that they fully understood the terms and conditions of the permit or fully appreciated the potential hazards involved with the work. For instance, pre-job surveys and periodic surveys were perhaps not interpreted the same as SFC's interpretation.

Procedure G-194, Revision #1, "Excavation, Trenching, and Well Drilling", was vague in many areas and lacking in definitive detail. Section 4.1 stated, in part, "The requesting department will also assign a person whose job responsibilities shall include: 1. Constantly monitor the restrictions and work conditions set forth for the Excavation, Trenching or Well Drilling permit". Section 4.4 stated, "The Manager, Health, Safety and Environment, and the Manager of Environmental or his designee shall: 4. Make a daily inspection of the excavation". Revision #2 of G-194 is more explicit in the definition of responsibilities. No one is assigned to constantly monitor activities under revision #2 but the requesting department assigns a person to be cognizant of the activities and coordinate the required interface with other organizations. Revision #2 shifts the burden of daily inspections to the assigned Health and Safety Supervisor who notifies the Manager, Health and Safety or the Safety Engineer if any concerns are noted.

In summary, personnel error is the reason for the violation, however, no one individual can be identified as the single cause. Communication among the main groups involved in the project appears to have been inadequate. Upon discovery that work activities were being performed in violation of the procedural requirements, facility personnel acted promptly to shut down the job and take remedial action to place the area under appropriate control.

The corrective steps taken and the results achieved:

Deficiency Report (DR) 92-6-183 was prepared on June 25, 1992, identifying the removal of the sidewalk without a pre-job survey. The area was posted, and the site remediated to allow for continued work. Personnel working in the area were monitored to identify any contamination, and the backhoe was surveyed and released. No contamination of the personnel or backhoe had occurred.

DR 92-7-23 dated July 2, 1992, identified that conditions on the digging permit were not constantly monitored by the project supervisor, and a daily inspection was not made by the Manager, Health and Safety or his designee. Discussions of the requirements of the digging permit and the causes for the failure to appropriately survey the area were held between the project supervisor and the acting Manager, H&S.

Procedure G-194 has been revised to more clearly delineate the responsibilities and tasks of individuals involved with a digging permit.

The corrective steps that will be taken to avoid future violations:

G-194 will be revised by October 31, 1992 to require an expiration date or review and renewal date for the digging permit, and require posting of the permit in public view at the job site.

G-194 will be revised by October 31, 1992 to require a signature from each contractor indicating that he has been informed and understands each of the conditions and restrictions of the permit and what to do if they are not met.

Indoctrination will be provided as needed for general contractors (electricians, plumbers, backhoe operators, telephone repairmen, etc.) that work in areas not expected to be contaminated that stresses potential hazards and what to do if something changes. Procedures will be revised to incorporate this by December 31, 1992.

Date when full compliance will be achieved:

SFC has been in compliance with G-194 since the surveys were performed following the work stoppage on June 24, 1992.

Statement of Violation:

B. License Condition 9 authorizes use of licensed material in accordance with the statements, representations, and conditions contained in Chapters 1 through 8 of the license renewal application dated August 23, 1985, as supplemented. Section 2.2 of the license renewal application, states, in part, that the Manager, Health and Safety (H&S), shall be responsible for developing and implementing programs, procedures, and guidance in the functional area of health physics.

3. Section 1.5.4.D of Procedure G-304, "Hazardous Work Permits," states, in part, that workers (performing the work described on a Hazardous Work Permit [HWP]) are responsible for performing the work in accordance with the HWP. Further, Section 3.6 of the same procedure states, in part, that work may not continue or resume if conditions have changed which could make the personnel protection equipment or clothing inadequate until the area has been verified or a new HWP is issued and approved.

Contrary to the above, on June 24, 1992, during work associated with HWP No. 3402, operations personnel did not perform work in accordance with the HWP when they resumed work without constant coverage by Health and Safety technicians. This HWP required Health and Safety staff presence at all times during the work. Further, the operators worked in an area where conditions had changed that made the personnel protection equipment or clothing inadequate.

SFC Response:

Sequoyah Fuels Corporation (SFC) admits this violation.

Reason for the violation:

On June 24, 1992, HWP No. 3402 was developed for the safety requirements associated with rodding out the No. 3 fluorination tower downcomer to the ash receiver enclosure. The HWP was prepared and approved by two supervisors on the day shift. The HWP specified protective clothing, supplied air respirators, air sampling through the use of lapel air samplers, contamination controls, and required constant coverage by a H&S technician. The work activities under HWP No. 3402 were accomplished during the evening shift, and several problems were noted. There were disagreements between the operators and technicians regarding safety requirements specified in the HWP and some of the requirements were relaxed by the H&S lead technician. Because

there was not a clear understanding among the operators and H&S technicians regarding the scope of job activities and work restrictions, certain changes were agreed to in order to accomplish the desired work activities. This incident pointed out the need for additional training on Procedure G-304, "Hazardous Work Permits", and additional guidance for more consistent practices in the field. A root cause analysis has been undertaken by QA to identify the underlying cause or causes for the failures to properly implement HWP 3402 or to establish effective communication and cooperation between departments.

The corrective steps taken and the results achieved:

Training on G-304 Rev. 13, was started on July 22, 1992, for Maintenance, Operations, and Health and Safety personnel. As the training sessions progressed the need for revisions to the procedure was identified. Temporary Operating Procedure (TOP) 92-353 was issued as an interim measure to implement changes to G-304, Rev. 13 to more clearly define responsibilities and requirements for initiating and implementing HWPs. TOP 92-353 was approved August 21, 1992.

A Hazardous Work Permit Guidance Document was issued August 31, 1992, as an aid in completing HWPs and to provide a consistent approach to application of health and safety requirements in the field. Training of H&S personnel was completed prior to the issuance of the guidance document.

The corrective steps that will be taken to avoid future violations:

The revised and new procedures provide greater clarification of responsibilities and requirements for the initiation and implementation of HWPs and should minimize any misunderstandings between H&S and other departments. In addition, the procedures and training should provide an increased understanding of each individual's responsibilities and actions regarding performance under HWPs.

When the root cause analysis (CAR # 92026) is completed, the recommended corrective actions will be evaluated for implementation as deemed appropriate. The root cause analysis is expected to be completed by September 30, 1992.

Date when full compliance will be achieved:

SFC has been in compliance since the TOP was issued on August 21, 1992.

DR 92-7-23 dated July 2, 1992, identified that conditions on the digging permit were not constantly monitored by the project supervisor, and a daily inspection was not made by the Manager, Health and Safety or his designee. Discussions of the requirements of the digging permit and the causes for the failure to appropriately survey the area were held between the project supervisor and the acting Manager, H&S.

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