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SEQUOYAH FUELS CORPORATION

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RETURN ORIGINAL TO PDR, HQ.

December 1, 1986

Mr. Edward F. Hawkins, Chief
Licensing Branch 1
Uranium Recovery Field Office
Region IV
Box 25325
Denver, Colorado 80225



RE: NOTICE OF VIOLATION

Docket No. 40-8768; License No. SUA-1387

NRC INSPECTION REPORT 40-8763/86-01, November 7, 1986

Dear Mr. Hawkins:

Sequoyah Fuels Corporation (SFC) provides herein a response to NRC's Notice of Violation dated November 7, 1986. The Notice requires a written response from SFC within thirty (30) days for each alleged violation which includes: 1) the reason for the violation, if admitted, 2) corrective steps that have been taken and the results achieved, 3) corrective steps that will be taken to avoid further violations and 4) the date when full compliance will be achieved.

Each alleged violation is restated below and SFC's response is provided in accordance with the guidance and format stated in the notice.

- A. "License Condition No. 18 of Source Material License SUA-1387 requires in part that the licensee utilize continuous breathing zone monitoring during nonroutine maintenance involving exposure of workers to airborne particulates of uranium and its daughters."

"Contrary to the above, employees were assigned maintenance tasks in the yellowcake areas without utilizing continuous breathing zone monitoring."

SFC Response: Sequoyah Fuels Corporation (SFC) denies this alleged violation. Facility personnel evaluated the work to be performed and specified the appropriate monitoring requirements on the special work permit (SWP). The radiation safety technician (RST) did not include in the SWP a requirement for the use of continuous breathing zone monitoring because the nonroutine maintenance activity did not involve exposure of workers to airborne particulates of uranium and daughter products. The radiation safety officer (RSO) visited the facility on November 18, 1986, and upon a review of the situation and records with the RST, concurred with the evaluation and the RST's decision to not require continuous breathing zone monitoring during the activity of concern.

This alleged violation relates to work performed under facility SWP Number 154, authorizing the installation of a hypalon liner on the floor of the yellowcake

DESIGNATED ORIGINAL

FEE NOT REQUIRED

Add Info
87-159Certified By Mary E. Wood

A SUBSIDIARY OF KERR-MCGEE CORPORATION

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press area. The floor had been washed with an acid solution and rinsed with water prior to gluing the hypalon to the floor. The yellowcake filter press was not opened or in use during this work activity.

Air sampling results for samples collected in the filter press area during the period November, 1985 through October, 1986 were reviewed. The sample results are summarized in Table 1 and reflect the average, standard deviation and maximum values obtained when the filter press is loaded and unloaded. Unloading of the filter involves removal of the yellowcake from the filter assembly and manually placing the material into drums.

The results in Table 1 clearly show that when the press is closed, as was the case when the hypalon liner was being glued to the floor, the airborne concentrations average less than one percent (1%) of the maximum permissible concentration (MPC). The RST is very familiar with this operation and when preparing the special work permit for the hypalon installation reasonably concluded that continuous breathing zone monitoring was not required.

The purpose of an SWP is to alert workers to the radiation conditions in the area, the monitoring requirements for the task and any special considerations. We believe that the facility use of special work permits has been consistent with these purposes and in compliance with Condition 18 of the license. Maintenance tasks performed in the yellowcake area, or any other location at the facility, where the potential for exposure to airborne concentrations exists, will require air monitoring during the work activity.

- B. "License Condition No. 60 of Source Material License SUA-1387 requires in part that individuals performing inspections of the solution evaporation ponds have training in proper inspection techniques."

"Contrary to the above, the licensee could not produce documentation of such training."

SFC Response: SFC admits that documentation of training for individuals performing the pond inspections could not be produced. The individuals performing this inspection function were trained in the proper inspection techniques but documentation of this training was not available. A response is therefore provided below for this citation in accordance with the format specified by NRC.

1. Facility personnel did not realize that documentation of training for inspectors was required since the daily inspection log documents the findings of each inspection. Completion of the inspection sheet demonstrates that the inspection was performed by individuals knowledgeable of the requirements.
2. SFC has retrained all personnel who perform this inspection function and documented this training through a form which is signed by each individual receiving the training.

3. All individuals who perform this inspection function will receive documented training in the proper inspection technique.
 4. Full compliance with this item was attained on October 30, 1986. The NRC inspectors were informed of this retraining during the close-out meeting.
- C. "10 CFR Part 20.203(e)(2) requires that each area or room that contains any radioactive material in an amount exceeding ten (10) times the quantity specified in Appendix C shall be posted with the words, 'CAUTION, RADIOACTIVE MATERIALS.'"

"Contrary to the above, the licensee failed to post the solution evaporation ponds."

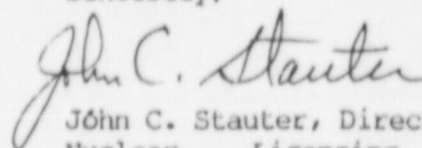
SFC Response: SFC denies this violation. The facility was in full compliance with Condition 30 of the license which states:

"The Licensee is hereby exempted from the requirements of Section 20.203 (e)(2) of 10 CFR 20 for posting areas within the facility, provided that all entrances to the facility are conspicuously posted in accordance with Section 20.203 (e)(2) and with the words, 'CAUTION - ANY AREA OR ROOM WITHIN THIS FACILITY MAY CONTAIN RADIOACTIVE MATERIAL.'"

Each entrance to the facility was properly posted with the required signs. In addition, the process area and yellowcake storage areas were also posted with "CAUTION - RADIOACTIVE MATERIALS" and "CAUTION - RADIATION AREA" signs. The NRC inspectors recommended that the evaporation pond area also be posted. Although not required to do so by the license, facility personnel posted the evaporation ponds with "CAUTION - RADIOACTIVE MATERIALS" signs while the NRC inspectors were at the facility on October 28-30, 1986. SFC commits to maintain posting of this area.

If you have any questions concerning this response, please contact me at your earliest convenience.

Sincerely,



John C. Stauter, Director
Nuclear Licensing &
Regulation

JCS:ms

Attachment: Table 1

TABLE 1
 Air Sample Summery
 Yellocake Filter Press Area
 November, 1985 - October, 1986

<u>Operational Mode</u>	<u>Number of Samples Collected</u>	<u>Fraction of MPC</u>		
		<u>Average for Area</u>	<u>Standard Deviation</u>	<u>Maximum Value</u>
Loading Press	347	0.008	0.0016	0.12
Unloading Press	166	0.32	0.35	2.0