



**KERR-McGEE CORPORATION**

KERR-McGEE CENTER • OKLAHOMA CITY, OKLAHOMA 73125

August 15, 1988

ROBERT P. LUKE

VICE PRESIDENT

Mr. Leland C. Rouse, Chief  
U.S. Nuclear Regulatory Commission  
Uranium Fuel Licensing Branch  
Division of Fuel Cycle & Material Safety  
Office of Nuclear Material Safety & Safeguards  
Washington, D.C. 20555

Re: License SUB-1010; Docket 40-8027  
Transfer of Control of Licensee and Amendment to License

Dear Mr. Rouse:

Kerr-McGee Corporation ("Kerr-McGee") has entered into an agreement to sell, subject to NRC approval, the outstanding capital stock of Sequoyah Fuels Corporation ("Sequoyah") to Sequoyah Holding Corporation ("Holding").

This will confirm that Kerr-McGee supports the application ("Application") being filed with NRC by Holding for approval of the transfer of control of Sequoyah as Licensee under License SUB-1010 and consents to the amendment of such License as set forth in the Application. Kerr-McGee understands that the amendment deleting the final paragraph of Section 7.5 of the License will operate to release Kerr-McGee from the guarantees it gave in the October 26, 1978 letter described in that paragraph.

KERR-McGEE CORPORATION

By

Robert P. Luke  
Vice President

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Exhibit No. 2

## CHAPTER 1. STANDARD CONDITIONS AND SPECIAL AUTHORIZATIONS

### 1.1 Name

Sequoyah Fuels Corporation 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. The principal office of Sequoyah Fuels Corporation is located at Sequoyah Facility, I-40 and Highway 10, Gore, Oklahoma 74435.

### 1.2 Location

The Sequoyah Fuels Corporation, Sequoyah Facility is located 2-1/2 miles southeast of Gore, Oklahoma, on State Highway 10 south of U.S. Highway 64, and north of Interstate Highway 40. This location is approximately 150 miles east of Oklahoma City, Oklahoma and 40 miles west of Fort Smith, Arkansas.

### 1.3 License Number

The Sequoyah Facility is currently operating under Nuclear Regulatory Commission Source Material License Number SUB-1010. The initial License was granted on February 20, 1970 and was renewed on October 7, 1977.

### 1.4 Possession Limits

The maximum amount of Natural or Depleted Uranium that the Licensee is allowed to possess at any one time shall be 20 million MTU.

### 1.5 Location Where Material Will be Used

Licensed material shall be used at the Sequoyah Fuels Corporation Uranium Conversion Plant at the Sequoyah Facility.

## 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 Vice President, Human Resources.

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 Manager, Licensing, Safety and Nuclear Compliance, shall be 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. The Corporate Manager, Licensing, Safety and Nuclear Compliance shall be the primary corporate contact with the Nuclear Regulatory Commission and other federal and state agencies responsible for licensing radioactive materials. All significant actions with regulatory agencies shall be subject to the approval of the responsible organizational unit head of Sequoyah Fuels Corporation and/or General Atomics.

The Radiation Safety Officer shall be responsible for the facility's radiation health and safety activities which includes:

- o 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,
- o Establishing and maintaining systems for recording facility radiation survey and exposure data,
- o Coordinating on-site contacts with representatives of federal and state agencies responsible for regulating radioactive materials and advising the Corporate Manager, Licensing Safety and Nuclear Compliance, of the results of the on-site contacts,
- o Identifying and proposing new and revised radiation health and safety standards and procedures as needed, and
- o Notifying the Corporate Manager, Health Physics immediately of any radiation related incident or emergency situation involving radioactive materials.

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

The Corporate Manager, 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 Manager, 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 Sequoyah Fuels General Manager with copies to the responsible

organizational unit head, the Corporate Manager, Health Physics and the Corporate Vice President, Human Resources. Information copies shall be furnished to other corporate executives as appropriate.

In the event of a radiation-related incident or emergency situation, the Corporate Manager, Health Physics, the Corporate Manager, Industrial Safety and the Radiation Safety Officer shall conduct or have conducted a thorough investigation and prepare a special incident report which will be distributed to the appropriate individuals.

## 2.2 Organizational Responsibilities and Authority

The organization for Sequoyah Fuels Corporation is described below and depicted in Figure 2-1:

The Sequoyah Fuels General Manager shall be responsible for all nuclear manufacturing activities including technical service activities. He specifically oversees the operations, modifications, process and equipment criteria, and standards of the health and safety program. He shall be responsible for the safe, efficient operation and for the control of all materials at the Sequoyah Facility. He specifically approves Operating Procedures, Plant Modifications and Processes, Equipment Criteria and other general and administrative matters. He reports to the President, Sequoyah Fuels Corporation.

The Corporate Manager, Licensing, Safety and Nuclear Compliance who reports to the Corporate Vice President, Human Resources, shall be responsible for obtaining and maintaining Federal and State licenses and permits; for the general liaison with the regulatory agencies of the federal, state and local governments and for coordinating with operating facility managers in matters concerning health, safety and environmental requirements. He shall also 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 Sequoyah Fuels General Manager, with copies to the President, Sequoyah Fuels Corporation, the Corporate Manager, Health Physics and the Corporate Vice President, Human Resources.

The Corporate Manager, Health Physics who reports to the Corporate Manager, 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 Manager, Licensing, Safety and Nuclear Compliance and the Chairman of the ALARA Committee.

The Manager, Quality Assurance, who reports to the Sequoyah Fuels General Manager, shall be responsible for the development of a Facility Quality Assurance Plan and implementing procedures to assure that all operations and safety related activities are performed in accordance with facility procedures. This shall include pertinent requirements for all activities affecting the safety-related functions of structures, systems and components including assurance that design, procurement, fabrication, handling, shipping, storing, cleaning, erecting, installing, inspecting, testing, operating, maintaining, repairing and modifying requirements are done according to specification or instruction. The program shall provide assurance that indoctrination and training of personnel performing activities affecting quality, as necessary to assure that suitable proficiency is achieved and maintained, is

done. Although the individual reports to the Sequoyah Fuels General Manager, he shall have organizational freedom with direct access to the President, Sequoyah Fuels Corporation.

The Manager, Health, Safety and Environment, who reports to the Sequoyah Fuels General Manager, shall be responsible for developing programs and procedures in the functional areas of safety, industrial hygiene, health physics and environmental oversight that comply with federal and state regulations and license conditions. This include such programs as (a) the effluent monitoring program, (b) the bioassay program, (c) the health and safety training programs, (d) the program for the surveillance of all plant activities in the areas of industrial safety, industrial hygiene and health physics, (e) environmental monitoring and (f) maintaining all radiation exposure and other health and safety records required by General Atomics, Sequoyah Fuels Corporation and by regulating agencies. He and the Manager, Administration and Services, 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. As the Contingency Plan Coordinator for Sequoyah Fuels, he shall be responsible for the development and implementation of the Facility Contingency Plan and the Contingency Plan Implementing Procedures, which includes the off-site Emergency Response Plan and Procedures. He works with the Manager, Procedures and Training to ensure that all facility employees and members of response organizations receive initial and continuing training.

The Manager, Health Physics and Industrial Hygiene shall be the Sequoyah Facility Radiation Safety Officer (RSO). He reports to the Manager, Health, Safety, and Environment and shall be responsible for the implementation of the industrial hygiene and health physics program including the effluent monitoring program, the radiological environmental monitoring program, the respiratory protection program and the program for surveillance of all plant activities in the

areas of industrial hygiene and health physics. He is responsible for the facility's security force. He will also assist the Corporate Manager, Health Physics in establishing radiation health and safety standards and procedures and in coordinating them with managers and executives directly affected.

He also assists the Manager, Health, Safety, and Environment in carrying out his assigned duties. He provides direct supervision of the Health and Safety Technicians.

The Environmental Engineer, who reports to the Manager, Health, Safety, and Environment shall be responsible for developing programs and procedures to comply with all non-radiological environmental monitoring requirements, required by federal and state agencies. This includes the maintenance of environmental records required by General Atomics, Sequoyah Fuels Corporation and by regulatory agencies.

The Manager of Operations, who reports to the Sequoyah Fuels General Manager shall be responsible for all operational activities at the Sequoyah Facility. 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 Manager of Facility Engineering, reporting to the Sequoyah Fuels General Manager shall provide and supervise engineering services to safely, efficiently and economically convert yellowcake to UF<sub>6</sub> through process and design modification and process evaluations.

The Area Managers, who report to the Manager of Operations, shall be responsible for planning and coordinating the safe and efficient operation of their assigned areas. They also provide technical direction to Area Superintendents and Shift Supervisors

and shall perform short and long range planning involving the overall operation of the assigned production area.

The Manager of DUF<sub>4</sub> and Process Engineering, who reports to the Manager of Operations, is accountable for all process parameters, operating procedures and control room operation training. He has direct responsibility for the operation of the DUF<sub>4</sub> facility. He also provides technical direction to the Area Superintendent and the Shift Supervisor assigned to the DUF<sub>4</sub> facility.

The Area Superintendent, who reports to the Manager, DUF<sub>4</sub> and Process Engineering, shall be responsible for coordinating activities within the assigned production area. He assists the Manager in short and long range planning involving the overall operation of the assigned areas.

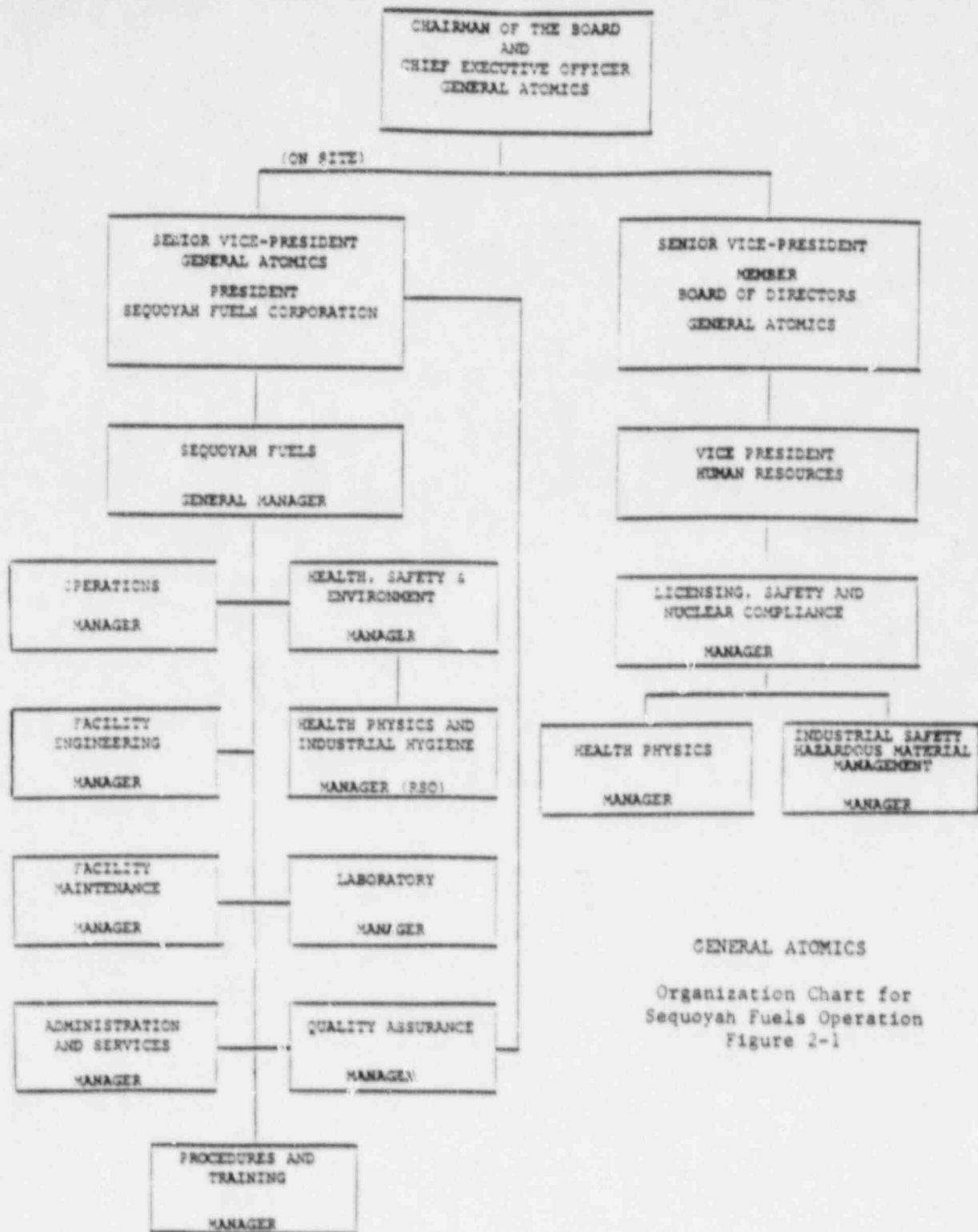
The Manager of Administration and Services, who reports to the Sequoyah Fuels General Manager, shall be responsible for providing the necessary administrative services to support the safe and efficient operation of the facility. This responsibility includes such programs as labor relations, nuclear material accountability procurement and material control. He and the Manager, Health, Safety, and Environment, 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 Manager of Facility Maintenance, who reports to the Sequoyah Fuels General Manager, shall be responsible for all maintenance and surveillance activities at the Sequoyah Facility. Required maintenance and surveillance procedures which specify maintenance related activities within the requirements of approved health and safety standards and regulations shall be prepared and maintained under his direction.

The Manager, Facility Laboratory, who reports to the Sequoyah Fuels General Manager, shall be responsible for the operation of the facility's radiological/non-radiological analytical laboratory. Required analytical and calibration procedures shall be prepared and maintained under his direction.

The Shift Supervisors, who report to the Area Manager or the Area Superintendent, DUF<sub>4</sub> shall be responsible for directing the activities of operators and for assuring that all operating procedures are followed in the performance of the production activities.

The Manager of Procedures and Training who reports to the Sequoyah Fuels General Manager, shall be responsible for managing the facility's procedures system and training program. In addition, he will manage the community relations program.



GENERAL ATOMICS  
Organization Chart for  
Sequoyah Fuels Operation  
Figure 2-1

### 2.3 Safety Review

The independent overview functions carried out under the Corporate Vice President, Human Resources 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 Fuels 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.

#### 2.4 Approval Authority for Personnel Selection

The Sequoyah Fuels General Manager shall approve personnel selection for safety related Sequoyah Fuels staff positions described in Section 2.2 of this license.

#### 2.5 Personnel Education and Experience Requirements

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

The Corporate Vice President of Human Resources must have a minimum of five years of nuclear industry management experience of a high level general management nature.

The Corporate Manager, Health Physics 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/she shall have demonstrated his/her proficiency in managing a radiological health and safety program.

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

The Sequoyah Fuels General Manager shall hold a degree in science or engineering and have at least 5 years of supervisory or management experience, with at least 2 years management experience in chemical or nuclear materials manufacturing facilities. The individual shall have demonstrated through progressively more responsible management positions the ability to manage complex technical and administrative programs similar to those found in a

chemical processing plant or other type nuclear fuel cycle facilities.

The Manager, Health, Safety, and Environment shall hold a degree in science or engineering and have at least 5 years experience in areas such as environmental and radiation monitoring, radiation protection, health physics, emergency preparedness and regulatory compliance programs. He shall have demonstrated a proficiency to conduct specified radiation and health safety programs.

The Manager, Health Physics and Industrial Hygiene shall hold a degree in science or engineering and have at least 3 years experience in radiation monitoring and personnel exposure evaluation or shall have a high school diploma with 7 years of managerial and technical experience in radiation monitoring and personnel exposure evaluation. He shall have demonstrated proficiency to : 1) conduct specified radiation safety programs, 2) recognize potential radiation safety problem areas in the operation, and 3) advise operation supervision on radiation protection matters. He shall be capable of directing the surveillance activities of Health and Safety Technicians.

The Environmental Engineer shall hold a degree in science or engineering or have a high school diploma with 4 years of technical experience. The individual shall have demonstrated proficiency to: 1) formulate and conduct specified non-radiological environmental monitoring programs and 2) recognize potential environmental problem areas.

The Manager of Facility Engineering shall hold a degree in science or engineering with 5 years experience in chemical or nuclear materials processing, or chemical materials handling. The individual shall have 3 years experience in a supervisory position.

The Manager of Operations shall hold a degree in science or engineering with 5 years experience in the operation of a chemical or nuclear materials processing plant with at least 3 years of management experience. He shall have demonstrated proficiency in identifying process changes which require health physics and safety analysis.

The Area Managers shall hold a degree in science or engineering with 3 years experience in chemical processing, process engineering, or project engineering and handling of uranium materials. They shall have demonstrated experience in a project, engineering, or managerial activity.

The Area Superintendent shall hold a degree in science or engineering or have a high school diploma with 5 years experience in a chemical processing plant and have a thorough knowledge of the development of operation procedures.

The Shift Supervisors shall hold a degree in science or engineering or have a high school diploma with 5 years experience in a chemical processing plant. The individual shall be thoroughly familiar with the uranium production activities and have a thorough knowledge of the approved operating procedures.

The Manager, DUF, and Process Engineering shall hold a degree in science or engineering with 3 years experience in chemical processing, process engineering, or project engineering and handling of uranium materials. He shall have demonstrated experience in a project, engineering or managerial activity.

The Manager, Administration and Services shall hold a degree in science or business administration and have at least 3 years experience in various administrative functions such as labor relations, procurement, computer services and training. He shall have demonstrated proficiency in directing administrative activities

in those functional areas.

The Manager, Facility Maintenance shall hold a degree in science or engineering with 5 years experience in maintenance/operation of a chemical or nuclear materials processing plant with at least 3 years of management experience. He shall have demonstrated proficiency in identifying maintenance and surveillance activities which require health physics and safety analysis.

The Manager, Sequoyah Fuels Facility Laboratory shall hold a degree in science with 5 years experience in the analytical laboratory including radiochemistry and quality control techniques. The individual shall have experience in a supervisory position.

The Manager, Quality Assurance shall hold a degree in science or engineering with 5 years experience in a chemical or nuclear materials processing plant with 3 years of management experience in programs having quality assurance responsibilities.

The Manager, Procedures and Training shall hold a degree in science or business administration and have at least 3 years experience in procedure development, training and computer services. He shall have demonstrated proficiency in directing activities in those functional areas.

The Corporate Manager, 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 and procedures and regulations.

## 2.6 Training

The training program shall be designed specifically to train operating, maintenance, and administrative personnel in the safe and efficient operation of the Sequoyah Facility.

All personnel, including contract personnel, shall receive appropriate training prior to working with material authorized by this license. In addition, Sequoyah Fuels operating employees receive training in the satisfactory performance of all phases of their job through two important elements; classroom training and on-the-job training. SFC's certification program documents satisfactory completion of the training requirements for each individual. Satisfactory completion of training shall be documented and recorded in the employee training file.

Each employee shall sign a statement indicating the receipt of training and committing to following corporate policy and procedures. Supervisory personnel shall document that all employees under their supervision are aware of and understand changes made in procedures affecting the performance of their job function.

General employee training shall consist of comprehensive classroom lectures and demonstrations for all new hires. Topics covered in the basic instruction shall include: (1) Chemistry and Physics, (2) Plant Operations Overview, (3) Health Physics, (4) Safety and Hazard Communication, (5) Respiratory Protection, and (6) Emergency and General Procedures.

During general employee training, the importance of work rules pertaining to radiation, chemical and industrial safety shall be stressed to the employee. The Employee Safety Handbook shall be reviewed with all personnel as part of training for radiation safety, protective equipment and emergency procedures. The basic training program shall emphasize the need for strict adherence to

procedures, regulatory requirements and license conditions.

Specific process operations training shall consist of classroom lectures and demonstrations developed as component process module within the facility operating areas. Lesson plans for these areas shall be based primarily on the plant operating procedures which detail safe and efficient operation of the process and the equipment. Records of attendance and test result for classroom work shall be maintained in the facility training files. Certification to perform a specific job function shall require successful completion of the module, including testing and on-the-job training before the employee shall be permitted to do the job unsupervised or without a sponsor.

On-the-job training shall follow successful completion of classroom training for newly assigned personnel. Shift Supervisors shall direct the process walk-throughs and document an individual's successful completion in his training file.

Monthly safety meetings shall be conducted by the Shift Supervisor and Health and Safety personnel to enhance awareness of facility safety and procedural matters. The Sequoyah Fuels General Manager shall recommend selected topics to be discussed in addition to material normally covered at these meetings.

Annual refresher training for all employees shall be administered through the Training Department and shall include such subjects as general plant processes, chemistry, radiological safety, health physics, chemical hazards, and general facility procedures.

Prior to startup of new or significantly-modified process equipment, training in the new procedures and equipment shall be provided to all operators scheduled for shift coverage in the particular process module area.

Additionally, all employees shall receive annual instruction on the Contingency Plan. The extent of the training is dependent upon their job function and attendant emergency response responsibilities.

## 2.7 Conduct of Operations

### 2.7.1 Operating Procedures

It shall be the responsibility of the Sequoyah Fuels General Manager 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, Safety and Environment and approved by the Sequoyah Fuels General Manager and appropriate training conducted and documented prior to the implementation of the procedure. Temporary changes shall not be made to procedures without the review and written approval of the Sequoyah Fuels General Manager or his designate. Procedures shall be reviewed and revised as necessary at least every 18 months or whenever necessary to reflect changes in the facility operation. 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 procedures.

### 2.7.2 Document Control

A document control system shall be established and maintained to assure that the procedure copies in use are the latest revision. A sanction statement regarding the serious nature of failure to follow the procedures shall be included in the General Procedure - Sequoyah Operating Procedures Systems 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 for license compliance by the Corporate Manager, Licensing, Safety, and Nuclear Compliance and the Manager, Health, Safety and Environment. The standards shall be reviewed for operability by the Sequoyah Fuels General Manager. 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 prepared by the Manager, Facility Engineering and shall be approved by the Sequoyah Fuels General Manager, the Manager, Quality Assurance, and the Manager of Operations. The Corporate Manager, Licensing, Safety and Nuclear Compliance and the Corporate Manager, Health Physics shall review major process and equipment changes. Major changes to process operations and to equipment design shall be reviewed for operability and approved by the Sequoyah Fuels General Manager and/or the President, Sequoyah Fuels Corporation.

Modifications or changes to process operations or equipment that normally occur during operations shall be prepared by the Manager, Facility Engineering; reviewed by the Manager, Health, Safety and Environment, the RSO and the Manager, Quality Assurance; and approved by the Sequoyah Fuels General Manager. All experimental and developmental work to be performed at the Sequoyah Facility shall be approved by the Sequoyah Fuels General Manager prior to its initiation.

#### 2.7.5 Maintenance Work

All maintenance work shall be performed in accordance with the Maintenance Work Order Procedure. The Maintenance Work Order Procedure defines two categories of Maintenance Work Orders; 1) repair work orders and 2) modification work. Actual work orders shall be issued only by the Maintenance Department using numbered work orders. Operations department 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 operation supervisor shall prepare a Hazardous Work Permit in accordance with established procedure. The maintenance supervisor 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 operations 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, a Safety Review and Acceptance Team, designated by the Manager, Health, Safety and Environment, shall review the completed work in accordance with the established Design Change Authorization procedure. The Safety Review and Acceptance team shall sign the "New and Altered Equipment Inspection" form indicating that the work has been completed in an acceptable manner. For work orders involving modifications, covered by the Design Change Authorization Procedure, a copy of the completed work order will be forwarded to Facility Engineering 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 in no case shall the surveillance frequency exceed once every 12 months.

## 2.8 Audits and Inspections

The Manager, Health Physics and Industrial Hygiene 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 Sequoyah Fuels General Manager with copies to the Manager, Health, Safety and Environment.

The Corporate Manager, 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 Compliance Specialists trained in basic radiation protection and knowledgeable about federal and state regulations, corporate policies and facility procedures. At the conclusion of the audit, the Compliance Specialist shall conduct an exit interview with the Sequoyah Fuels General Manager, or his designate 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 Manager, Licensing, Safety and Nuclear Compliance to the Sequoyah Fuels General Manager. Copies of the report shall be furnished to the Corporate Manager, Health Physics and the President of Sequoyah Fuels Corporation. In responding to the report, the

Sequoyah Fuels General Manager shall give the status of corrective action that has been taken and provide a schedule for additional action which will be taken. The Compliance Specialist shall conduct an immediate follow-up review to ensure corrective action is being taken.

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 Sequoyah Fuels General Manager. Audit findings shall be documented with copies of the report forwarded to the Sequoyah Fuels General Manager and the President Sequoyah Fuels Corporation. Copies of the audit shall also be provided to the facility managers who have responsibility for the area audited. The Sequoyah Fuels General Manager 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.

## 2.9 Investigations and Reporting of Non-Normal Occurrences

The Sequoyah Facility shall provide an "Incident Report" systems. 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 Physics and Industrial Hygiene and is directed to the supervisor whose personnel were potentially exposed and then forwarded to the Sequoyah Fuels General Manager. The supervisor shall sign the report including any pertinent observations as to the correction of the condition to avoid future incidents. The report shall then be distributed to the Manager of Operations, the Sequoyah Fuels General Manager, Corporate Manager, Health, Physics and the

Corporate Manager, 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 in 10 C. Part 20 shall be reported promptly to the Corporate Manager, Licensing, Safety and Nuclear Compliance and reported to the NRC as required by Sequoyah Operating Procedure - Reporting Requirements and Federal regulations. Subsequently, the matter shall be investigated by a manager and RSO 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 referenced 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 employee training files. Facility audit results by both the Corporate staff and the Quality Assurance Manager 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.

### 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 Physics and Industrial Hygiene 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 Shift Supervisor shall be responsible for determining when an HWP is required and for issuing it. A health and safety technician 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 Human Resources Department of General Atomics, and personnel from Sequoyah Fuels Corporation. The membership includes the Corporate Manager, Health Physics and the Corporate Manager, Licensing, Safety and Nuclear Compliance. Sequoyah Fuels Corporation membership includes the Sequoyah Fuels General Manager, the RSO and the Managers of Operations; Facility Maintenance; Facility Engineering;

and Health, Safety and Environment. The Corporate Manager, Health, Physics shall serve as the Chairman of the ALARA Committee.

Quarterly ALARA audits shall be performed by the Corporate 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."

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 Concept, 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 Committee and forwarded to the President, Sequoyah Fuels Corporation. The Sequoyah Fuels General Manager shall respond in writing to the recommendations in the annual ALARA report.

### 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.

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 sample 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 uranium MPC which is  $5.0 \times 10^{-12}$  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. A report of the investigation shall be prepared and forwarded to the Sequoyah Fuels General Manager 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 and metal and plastic piping, is being disposed of as generated. Solid wastes generated at the facility are either prepared for reprocessing or uranium at a mill, decontaminated and released for use or scrap, and compacted or incinerated to reduce the volume for disposal at

a licensed off-site low level waste disposal site. The wastes now stored at the site or generated in the future will be disposed of during the facility operating lifetime and at the time of facility decommissioning will have all been shipped off site.

#### 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 Physics and Industrial Hygiene (RSO), shall be responsible for monitoring and sampling requirements.
2. Manager, Operations, shall be responsible for proper procedural control of effluent streams.
3. Manager, Sequoyah Fuels Laboratory, shall be responsible for necessary analytical response for early detection of problem areas.

## 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 products and other high technology products.

Sequoyah Fuels Corporation is a wholly owned subsidiary of Sequoyah Holding Corporation which is 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 conversion 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:

|                  |           |                                       |     |
|------------------|-----------|---------------------------------------|-----|
| Peau Graves, Jr. | Gore      | President, Sequoyah Fuels Corporation | USA |
| James R. Edwards | San Diego | Secretary                             | USA |

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

|                  |           |   |     |
|------------------|-----------|---|-----|
| Reau Graves, Jr. | Gore      | Senior Vice President                                 | USA |
| John E. Jones    | San Diego | Senior Vice President                                 | USA |
| James R. Edwards | San Diego | Vice President, General Counsel and Secretary         | USA |
| Brenda B. Dawson | San Diego | Assistant Secretary and Coordinator of Legal Services | USA |

## 9.2 Financial Qualification

The Sequoyah Fuels Corporation 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 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 by the Manager Health Physics and Industrial Hygiene (RSO), to ensure that applicable license requirements and safety considerations have been evaluated.

2. Responsibility for Requesting Safety Analysis. The Sequoyah Fuels General Manager 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 Corporate Manager, Licensing, Safety and Nuclear Compliance.

3. Analysis. The applicant documents the comprehensive evaluation of the proposed change, including potential accidents that may affect radiation and nuclear criticality 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 by the Sequoyah Fuels General Manager for operability and approved by the President, Sequoyah Fuels Corporation as required by Corporate Policy.

Modifications or changes to process operations or equipment that normally occur during operations shall be prepared by the Manager, Facility Engineering; reviewed by the Manager, Quality Assurance, and approved by the Sequoyah Fuels General Manager. All experimental and developmental work to be performed at Sequoyah Facility shall be approved by the Sequoyah Fuels General Manager prior to its initiation.

Process and equipment design, which generally delineate the process and prescribe critical parameters, are reviewed as appropriate by the Corporate Manager, Licensing, Safety and Nuclear Compliance and the Corporate Manager, Health Physics. The review is documented.

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

6. Verification. Prior to use, an inspection is made of approved and implemented changes by the Manager of Operations and the Manager of Health Physics and Industrial Hygiene (RSO).

7. Records. Sufficiently detailed records to permit independent review of the analysis and approval are maintained for at least 6 months after termination of the operations to which they apply.

A liquid waste stream is generated by the hydrofluoric acid scrubber. This fluoride waste stream is combined with acid spilled in the HF vaporizer room sump and laboratory wastes. The combined stream is treated with lime which neutralizes acids and precipitates fluorides as calcium fluoride.

The alkaline sludge is permitted to settle in a retention basin. The flow is treated with sulfuric acid to adjust the pH and precipitate excess calcium. It is then permitted to clarify. The clarified treated waste overflows and is combined with other process affluent and the sewage lagoon overflow. A concrete stilling basin at the point of combination allows mixing of the flow with sanitary and domestic waste liquids and controlled release through a flume so that the rate of discharge can be measured. Discharge flows to the unnamed headwaters of the Robert S. Kerr Reservoir through a natural watercourse.

The waste stream from the solvent extraction system, known as raffinate, is primarily a solution of ammonium nitrate, nitric acid, metallic salts and minute quantities of uranium and the radioactive daughter products of normal uranium decay. This stream is combined with spent sodium hydroxide from the solvent treatment and miscellaneous digester scrubber systems, waste sodium carbonate solutions and with any recovered weak acids.

The raffinate waste stream (Dwg. 290-M-1005) is then treated by reacting the raw raffinate with gaseous ammonia to neutralize the free nitric acid and precipitate metal ions as hydroxides or hydrated oxides. Removal of residual uranium and thorium is accomplished in this neutralization step. After settling the precipitate in one of the clarifier basins, the resultant supernatant solution contains from 100 to 200 pCi/l of Ra-226 compared to an initial concentration of approximately 3000 pCi/l Ra-226. This radium bearing solution is then treated with a soluble barium compound to precipitate a barium-radium complex and produce a

clear liquid containing less than 3 pCi/l of Ra-226. This clear liquid is then stored in surface impoundments prior to utilization as fertilizer on General Atomics-owned land or disposal by deep well injection.

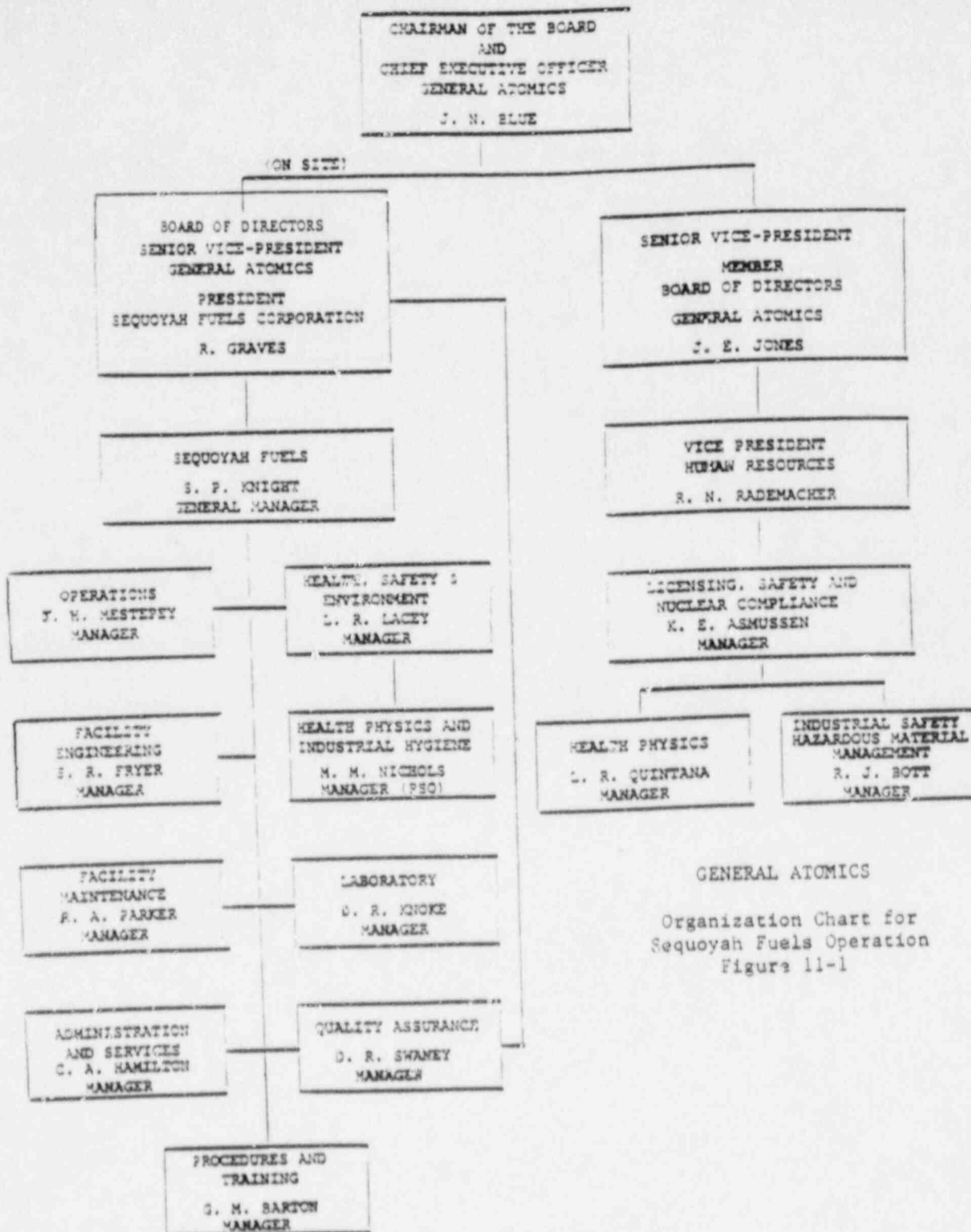
## Chapter 11. Organizational and Personnel

### 11.1 Unit Functions

The Sequoyah Fuels General Manager is responsible for the safe and efficient operation and for the control of all material at the Sequoyah Facility. The Sequoyah Fuels General Manager reports to the President of Sequoyah Fuels Corporation.

The facility organization consists of eight specific departments, each headed up by a Manager who reports to the Sequoyah Fuels General Manager (Figure 11-1).

1. The Health, Safety and Environment Department develops programs and procedures in the functional areas of health physics, industrial hygiene, industrial safety and environmental. The department is also responsible for the development and implementation of the Facility Contingency Plan and implementing procedures which includes the Offsite Emergency Response Plan and Procedures. The department conducts inspection and audits of all radiological health and safety aspects of facility activities.
2. The Operations Department accomplishes safe and efficient operation of process and equipment for the production of uranium hexafluoride and all associated systems.
3. The Facility Maintenance Department performs the installation, modification, repairs, replacement, preventative and routine maintenance and/or testing of all equipment and facilities necessary for safe and economic production of uranium hexafluoride.



4. The Facility Engineering Department provides engineering services required to accomplish routine process engineering including process evaluation and design modifications for safe operation of the facility.
5. The Administration and Services Department provides all necessary administrative services to support the safe and efficient operation including labor relations, materials control, procurement, and nuclear material accountability.
6. The Sequoyah Fuels Facility Laboratory performs all necessary analytical services for facility process control, radiological and environmental control and specification control on product material.
7. The Quality Assurance Department assures those who are accountable for operating, maintaining and controlling plant activities carry out their assigned functions in accordance with corporate standards, NRC license conditions, applicable state and federal regulations and accepted engineering and industry standards.
8. The Procedures and Training Department manages procedure development and administers the facility's training and community relations programs.

#### 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 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 the 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 problems 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.

Organizational responsibilities specific to the Sequoyah Facility are established to give full weight to these two premises.

The radiation protection control programs for the safe handling and process of the source materials and the control of all activities, personnel and equipment are the responsibility of the Sequoyah Fuels General Manager.

The Manager, Health, Safety and Environment, reporting to the Sequoyah Fuels General Manager develops programs and procedures in the functional areas of industrial safety, industrial hygiene, health physics, radiation protection, environmental monitoring,

onsite emergency preparedness and offsite emergency response.

The Manager, Health Physics and Industrial Hygiene (RSO), reporting to the Manager, Health, Safety and Environment implements programs in plant radiation protection, industrial hygiene, effluent and environmental monitoring and surveillance of plant activities and environmental impact and conducts inspections of health and safety and industrial hygiene aspects of plant activities.

The Corporate Manager, Health Physics is responsible for preparation of detailed standards dealing with prevention of the spread of contamination, control of radiation, monitoring of personnel and facilities, and performing independent audits of operations in the health physics areas. He reports to the Corporate Manager, Licensing, Safety and Nuclear Compliance.

All activities involving uranium are conducted in accordance with written and approved health and safety standards. These standards specify the rules, principles and measures used at Sequoyah Fuels for the radiological safety programs. The health and safety standards are prepared by the Corporate Manager, Health Physics. They are reviewed for license compliance by the Corporate Manager, Licensing, Safety and Nuclear Compliance and reviewed and approved by the Sequoyah Fuels General Manager for operability. Changes to the health and safety standards follow the same administrative review and approval system as original standards.

### 11.3 Functions of Key Personnel

Process and equipment design criteria, which generally delineate the process and prescribe critical parameters are prepared under the directions of the Manager, Facility Engineering. They are reviewed as appropriate by the RSO, and the Corporate Manager, Health Physics and reviewed and approved by the Sequoyah Fuels General Manager.

The Sequoyah Fuels General Manager or his designate will approve in writing, modifications to facility procedures and instructions within the scope of the installed equipment.

Experimental and development work performed at Sequoyah Fuels is described in writing by the Manager, reviewed by the RSO, with final approval by the Sequoyah Fuels General Manager.

In addition to the above reviews, the Sequoyah Fuels General Manager may request review assistance from engineering units of various General Atomics divisions for specific engineering requirements and from the Corporate Manager, Licensing, Safety and Nuclear Compliance for administering independent audit activities and liaison with the regulatory agencies of the local, state, and federal governments.

Written procedures, which specify operating steps within process and equipment criteria and the health and safety standards, are approved by the Sequoyah Fuels General Manager.

The Operations Manager has the responsibility for formulating, developing and maintaining the detailed operating procedures based on approved criteria and standards. The operating procedures are reviewed by the RSO and approved by the Sequoyah Fuels General Manager.

Changes to the operating procedures which are within the approved criteria and standards follow the same administrative review and approval system as original procedures.

Independent audits through the Corporate Manager, Health Physics are conducted to assure compliance with license conditions and process equipment criteria standards.

The Manager, Quality Assurance conducts independent audits to ensure plant activities are in compliance with operating procedures, license conditions, applicable federal and state regulations and industry standards.

The Corporate Manager, Licensing, Safety and Nuclear Compliance is responsible for determining when operational changes fall outside the scope of the license or if such changes require appropriate license amendments.

#### 11.4 Education and Experience of Key Personnel

Rodney N. Rademacher, Vice President, Human Resources,  
General Atomics

##### Education

BA Industrial Psychology, San Diego State University, 1962.

Graduate Studies, San Diego State University.

Graduate Studies, University of Colorado, Colorado Springs.

##### Experience

1974- Vice President, Human Resources, General Atomics. Employed by General Atomics (GA) since early 1974 in various management capacities. As Director of Human Resources, performed in essentially the same capacity. Responsible for designing, developing and directing corporate human resource programs, policies and procedures so as to effectively support the company's overall business objective. Functions as chief advisor on the personnel implications of company

problems, business procedures and other management actions. The Security Force Department was added to his responsibilities in August 1985 and the Licensing and Nuclear Compliance Department in March of 1986, giving him a very broad understanding of the company's people, programs and business needs and requirements. He is intimately familiar with his organization's operations, requirements and applicable NRC and other government requirements. Because of his strong human resources and safety orientation, he has developed an influential, positive working relationship with most GA managers and employees.

1973-1974 Director of Employee Relations for GETZ Brothers & Company, Inc.

1968-1973 Manager of Corporate Employment and EEO for Colorado Interstate Corporation

1957-1968 Personnel Generalist for SDG&E

1955-1956 U.S. Marine Corps Reserves.

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Dr. Keith E. Asmussen, Manager, 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, he 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 FSV 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.

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Laure 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.

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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 environmental regulations.

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

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

## Experience

1973 - General Atomics.

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

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Scott P. Knight, General Manager, Sequoyah Fuels Corporation

Education

BS Engineering, U.S. Military Academy

JD, DePaul University College of Law

MBA Operations and Financial Management, University of Chicago

Radiation Protection Program, Harvard University School of Public Health.

Continuing education in chemical operations through American Institute of Chemical Engineers Courses.

Experience

1983- General Manager, Sequoyah Fuels Corporation.

1986-1988 Manager, Administration and Services, Sequoyah Fuels Corporation.

Chairman, Plant Operations Review Committee.

Acting Facility Manager during absences of the General Manager, Sequoyah Facility.

1986 Manager, Operations Analysis, Kerr-McGee Corporation.

1984-1985 Graduate studies at University of Chicago;  
President of not-for-profit corporation.

1970-1983      Served as commissioned officer in the United States Army.

Managed military operational organizations, from forty to 1,250 persons in size, which employed heavy equipment and sophisticated systems to accomplish varied combat, security and training missions worldwide.

Management Analyst. Developed an automated inventory control system for the Army Medical Center, San Francisco, California.

Managed the Operations division at the U.S. Army Armor School.

Legal Counsel. Senior prosecutor for U.S. forces stationed along East German border; managing attorney trial defense and legal assistance centers.

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Lee R. Lacey, Manager, Health, Safety, and Environment,  
Sequoiah Fuels Corporation

Education

MS Human Resources Development, Oklahoma State University.

BS Engineering Technology, Oklahoma State University.

AS Bee County College.

U.S. Navy Electronics Technician Class "A" School, Basic  
Nuclear Power School.

Nuclear Power Training Unit (prototype training)

Submarine School.

## Experience

- 1986-           Manager, Health, Safety, and Environment, Sequoyah Fuels Corporation. Department Manager for the Health, Safety, and Environment Department at Sequoyah Fuels. Responsible for oversight of the following facility programs: health physics, industrial safety, environmental, industrial hygiene, and occupational health. Serves as the facility Contingency Plan Coordinator. Directly supervises the Facility Radiation Safety Officer.
- 1985-1986       Manager, Training Services, Quadrex Corporation, Tulsa, Oklahoma. Managed Quadrex's training services business. Served as a consultant in the areas of nuclear training, health physics, emergency preparedness, and regulatory compliance.
- 1983-1985       Manager of Projects, Quadrex Corporation. Managed training and field services projects for Quadrex's Tulsa Regional Office. Served as a consultant in the areas of nuclear training and emergency preparedness.
- 1981-1983       Manager, Radiological Training and Services, Quadrex Corporation. Managed the radiological training, health physics consulting, and emergency preparedness business for Quadrex's Tulsa Regional Office. Served as a consultant in the area of

radiological training, regulatory compliance, and emergency preparedness.

1980-1981 Senior Health Physics Engineer, Quadrex Corporation. Staff consultant in the areas of health, physics and emergency preparedness.

1980 Reactor Health Physics Inspector, U.S. Nuclear Regulatory Commission, Region IV, Atlanta, Georgia.

1977-1980 Staff Health Physicist, Duke Power Company, Charlotte, North Carolina. Served on corporate health physics staff. Areas of responsibility related: radiation exposure control, ALARA, respiratory protection, environmental radiation.

1974-1977 Administrator - Recruiter, U.S. Naval Reserve.

1966-1973 Nuclear Reactor Operator/Electronics Technician, U.S. Navy

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Michael M. Nichols, Manager, Health, Physics and Industrial Hygiene (Radiation Safety Officer), Sequoyah Fuels Corporation

Education

BS Engineering Technology (Health Physics), Oklahoma State University

Certification - Hazards Control Manager, Master Level

Experience

2/88- Manager, Health Physics and Industrial Hygiene (RSO), Sequoyah Fuels Corporation.

1985-1988 Superintendent of Plant Support, (Radiation Protection Manager) Wolf Creek Power Station, Wolf Creek Nuclear Operating Corporation. Responsible for Fire Protection, Radiation Protection and Emergency Planning. Responsible for the management, direction, and supervision of a department of 175 personnel. Interfaced with FEMA, NRC, EPA and other State and Local Regulatory agencies in areas of compliance, inspection and joint training. During plant start-up: responsible for installation, testing and modification of radioactive and chemical systems.

1979-1985 Radiation protection Manager, Wolf Creek Nuclear Operating Corporation. Responsible for development of programs and procedures to assure compliance with regulatory requirements. Radiation Protection, Emergency Planning, internal and external dosimetry, nuclear plant start-up and power ascension and industrial and chemical safety. Developed site specific Health Physics Program description for Wolf Creek final Safety Analysis Report. Responsible for the development and implementation of the Emergency Plan. Directed development of Technician and Engineer Training Program as well as plan wide radiation worker, GET,

safety/chemical safety and respiratory protection and Emergency Plan Training.

- 1973-1979 Supervisor, Radiological and Industrial Hygiene Program Development, Arkansas Nuclear One, Arkansas Power and Light Co. Responsible for Radiological and Industrial Hygiene Program development and implementation including regulatory interface, equipment calibration for fixed and portable instrumentation and associated training. Developed procedures for analyses of secondary and primary chemistry samples; performed chemical and radiochemical analyses of various samples; developed and implemented various procedures including instrument calibration, system start-up and repair.
- 1972-1973 Technician, Enrico Fermi Nuclear Power Plant, Detroit Edison Company. Supervision of personnel during start-up efforts, defueling, and decommissioning Fermi I-LMFBR; supervised activities during fuel and major component removal.
- 1971-1972 Laboratory Technician, Enrico Fermi Nuclear Power Plant, Detroit Edison Company. Part-time chemistry and radiological technician activities and analyses while attending Oklahoma State University.
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David R. Swaney, Manager, Quality Assurance, Sequoyah Fuels Corporation

Education

BS Chemistry, Antioch College

Certified - American Chemical Society

Experience

4/86- Manager, Quality Assurance, Sequoyah Fuels Corporation.

1969-1986 Manager, Facility Laboratory, Sequoyah Facility, Sequoyah Fuels Corporation.

1966-1969 Supervisor, Department of Chemical Control, Mallinckrodt, Inc, St. Louis, Missouri.

1961-1966 Supervisor, Analytical Department, Uranium Division, Mallinckrodt Chemical, Weldon Spring Missouri.

1958-1961 Staff Assistant, Analytical Department, Uranium Division, Mallinckrodt Chemical, Weldon Spring, Missouri.

1957-1953 Supervisor, Analytical Department, Uranium Division, Mallinckrodt Chemical, Weldon Spring, Missouri.

1953-1957 Chemist, Department of Chemical Control, Destrehan Facility, Mallinckrodt Chemical, St. Louis, Missouri.

1951-1953 Chemist, Department of Chemical Control, Mallinckrodt Chemical, St. Louis, Missouri.

Don R. Knoke, Manager, Sequoyah Fuels Laboratory

Education

BS Chemistry, West Virginia University

Experience

5/86-           Manager, Facility Laboratory, Sequoyah Fuels Corporation.

1986-           Senior Analytical Chemist, Sequoyah Facility, Sequoyah Fuels Corporation.

1969-1986       Supervisor, Laboratory Instruments, Sequoyah Facility, Kerr-McGee Corporation.

1968-1969       Chemist, Method Development, Sequoyah Facility, Kerr-McGee Corporation.

1966-1968       Chemist, Method Development, Amceel Plant, Celenase Fibers Company.

1957-1966       Chemist, Mallinckrodt Chemical Works, Uranium Division, Weldon Springs, Missouri.

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James H. Mestepey, Manager of Operations, Sequoyah Fuels Corporation

Education

BS General Science (Chemistry, Physics & Mathematics) Louisiana State University

Experience

7/87-           Manager of Operations, Sequoyah Fuels Corporation

4/87-7/87       Manager, Special Projects and Process Technology, Sequoyah Facility, Sequoyah Fuels Corporation.

1985-1987 Senior Project Manager, New York State Energy  
Research and Development Authority, West Valley,  
New York.

1984-1985 Manager, Special Nuclear Studies, Allied  
Corporation, Barnwell, South Carolina.

1979-1983 Manager, Plant Engineering and Maintenance,  
Allied-General Nuclear Services, Barnwell, South  
Carolina.

1977-1979 Manager, Design Engineering, Allied-General Nuclear  
Services, Barnwell, South Carolina.

1973-1977 Superintendent, UF6 Facility, Allied-General  
Nuclear Services, Barnwell, South Carolina

1971-1973 Technical Superintendent, Allied Corporation,  
Metropolis, Illinois.

1968-1971 Technical Supervisor, Allied Corporation,  
Metropolis, Illinois.

1966-1968 Process Engineer, Baton Rouge, Louisiana.

1957-1966 Baton Rouge Development Laboratory, Allied  
Corporation, Baton Rouge, Louisiana.

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Sam R. Fryer, Manager, Facility Engineering, Sequoyah Fuels  
Corporation

Education

BS Chemical Engineering, Massachusetts Institute of Technology.  
MBA Marketing Concentrate, Harvard Business School.  
Registered Professional Engineer in Oklahoma.

### Experience

8/86- Manager, Facility Engineering, Sequoyah Fuels Corporation.

1985-1986 Director, Technology and Engineering, Sequoyah Fuels Corporation.

1980-1985 Manager, Planning and Analysis, Roy M. Huffington, Inc., Houston, Texas

1977-1980 Manager, Planning, Cities Service Company, Tulsa, Oklahoma.

1966-1977 Manager of Chemicals Getty/Skelly Oil Co. Other positions during this period included Development Engineer, Vice President and Director Chemland Corp. (subsidiary), Vice President and Director Hawkeye Chemical Co. (subsidiary), Director Yong-Nam Chemical Co. (subsidiary).

1964-1966 Attended Harvard MBA program.

1960-1964 Development Engineer, Dow Chemical Co.

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R.A. Parker, Manager, Facility Maintenance, Sequoyah Fuels Corporation

### Education

BS Electrical Engineering, Western Michigan University.

### Experience

6/86- Manager, Facility Maintenance, Sequoyah Fuels Corporation.

1982-1986 Superintendent Prep Plant, Ferr-McGee Coal Corporation, Clovis Point Mine.

1980-1982 Senior Construction Engineer, Kerr-McGee Coal Corporation, Jacobs Ranch and Clovis Point Mines.

1979-1980 Construction Engineer, Kerr-McGee Coal Corporation, Jacobs Ranch and Clovis Point Mines.

1978-1979 Development and Implementation of Preventative Maintenance Program, Atlantic Richfield Company, Black Thunder Mine.

1976-1978 Development and Implementation of Preventative Maintenance Programs, Eveleth Mines, Thunderbird Mines.

1975-1976 Electrical Engineer, Hibbing Taconite Company, Hibbing, Minnesota.

1972-1975 Instructor, Michigan Technological University, Houghton, Michigan.

1969-1972 Electrical Engineer, Consumers Power Company, Jackson, Michigan.

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Charlotte A. Hamilton, Manager, Administration and Services,  
Sequoyah Fuels Corporation

Education

BA Business Administration/Business Education, Oklahoma City  
University

JD Oklahoma City University School of Law

Experience

6/88- Manager, Administration and Services, Sequoyah  
Fuels Corporation.

1/87-6/88     Manager, Industrial Relations, Sequoyah Facility,  
Sequoyah Fuels Corporation.

1981-1986     Services Manager, Clovis Point Mine, Kerr-McGee  
Coal Corporation.

1979-1981     Administrative/Personnel Supervisor, Clovis Point  
Mine, Kerr-McGee Coal Corporation.

1978-1979     Administrative/Personnel Supervisor, Jacobs Ranch  
Mine, Kerr-McGee Corporation.

1976-1978     Human Resources Intern - Management Rotation  
Program, Kerr-McGee Corporation.

1969-1976     Kerr-McGee Corporation. Various positions in  
retail Oil and Gas Marketing and the Nuclear  
Corporation.

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Glenn M. Barton, Manager, Procedures/Training and Community  
Relations

Education

BA Business, Oklahoma City University

MA Human Relations

Experience

6/88-             Manager, Procedures/Training and Community  
Relations, Sequoyah Facility, Sequoyah Fuels  
Corporation

1986-6/88       Manager, Procedures and Training, Sequoyah  
Facility, Sequoyah Fuels Corporation

1985-1986     Manager, Employee Relations, U.S. Onshore Division  
                 of Oil and Gas Division

1981-1985     Manager, Training and Personnel Services,  
                 Kerr-McGee Corporation

1979-1981     Administrator, Employee Relations, Kerr-McGee  
                 Corporation

1975-1979     Employee Relations Specialist, Kerr-McGee  
                 Corporation

1974-1975     Senior Job Analyst, Kerr-McGee Corporation

1972-1974     Senior Administrative Analyst, Kerr-McGee  
                 Corporation

1967-1972     Systems Analyst, Kerr-McGee Corporation

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Carolyn L. Couch, Environmental Engineer, Sequoyah Fuels  
Corporation

Education

BS Biology (Minor in Chemistry), East Central University  
Ada, Oklahoma.

Experience

2/85-           Environmental Engineer, Sequoyah Fuels Corporation.

1979-1985     Associate Engineer, Sequoyah Facility, Kerr-McGee  
Corporation.

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Kenneth G. Simeroth, Senior Health and Safety Technician

Education

Diploma, Porum High School, Porum, Oklahoma.

AA Northeastern State, Tahlequah, Oklahoma (Major Arts and Physics).

Certificate, Chemical Operator School, Gore, Oklahoma.

Radiological Technologist Course, Rockwell International.

Experience

1970-            Senior Health and Safety Technician, [Sequoyah Facility], Sequoyah Fuels Corporation, [Kerr-McGee Corporation]

1970            Chemical Operator, Sequoyah Facility, Kerr-McGee Corporation.

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David H. Nieto, Health and Safety Technician

Education

Diploma, Chickasha High School, Chickasha, Oklahoma

Associate Degree, Nuclear Radiation Technology, Oklahoma State University

Experience

12/75-            Health and Safety Technician (formerly called HP Technician), [Sequoyah Facility], Sequoyah Fuels Corporation, [Kerr-McGee Corporation]

1968-1973        Health Physics Technician, Newport News Shipbuilding and Dry Dock Company, Newport News, Virginia.

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Ricky L. Callahan, Health and Safety Technician, Sequoyah Fuels Corporation

Education

Diploma, Sallisaw High School, Sallisaw, Oklahoma.

Radiological Technologist Course, Rockwell International.

Radiation Technologist Training, Sparks Hospital, Fort Smith, Arkansas.

Experience

1/83- Health and Safety Technician, Sequoyah Facility,  
Sequoyah Fuels Corporation.

1982-1983 Parts Manager, Sallisaw Ford Company, Sallisaw,  
Oklahoma.

1978-1982 Parts Salesman, Sallisaw Auto Parts, Sallisaw,  
Oklahoma.

1978-1978 X-ray Technician, Sparks Medical Center, Fort  
Smith, Arkansas.

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Ly's A. Henry, Health and Safety Technician, Sequoyah Fuels Corporation

Education

Diploma, Capital High School, Oklahoma City, Oklahoma.

2 years - Oklahoma City University.

Chemical Operators School, Kerr-McGee Corporation.

Certified - Multi-Media First Aid Instructor, American Red Cross.

### Experience

8/86- Health and Safety Technician, Sequoyah Fuels Corporation.

1973-1986 Process Coordinator, W.R. Grace and Company, South Gate, California.

1970-1973 Health and Safety Technician, Sequoyah Facility, Kerr-McGee Corporation.

1970 Chemical Operator, Sequoyah Facility, Kerr-McGee Corporation.

1969-1970 Engineering Aid and Draftsman, Coburn Manufacturing, Muskogee, Oklahoma.

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Jeffrey G. Stemmer, Health and Safety Technician, Sequoyah Fuels Corporation

### Education

Diploma - Sumter High School, Sumter, South Carolina.

Nuclear Power School, Orlando, Florida.

Nuclear Training Prototype Unit.

Engineering Laboratory Technician School.

Physical Science Technician School.

### Experience

5/87 Health and Safety Technician, Sequoyah Fuels Corporation.

4/87-5/87 Health Physics Technician, Nuclear Support Services, Inc., Hershey, PA.

6/86-4/87 Physical Science Technician, Charleston Naval  
Shipyard, Charleston, S.C.  
4/82-5/86 Machinist Mate/ELT, United States Navy.

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Gary B. Jackson, Area Manager, Sequoyah Fuels Corporation

Education

BS Industrial Technology, Northeastern State University,  
Oklahoma.

Experience

4/86- Area Manager, Sequoyah Fuels Corporation.  
1972-1986 Area Supervisor, Sequoyah Facility, Kerr-McGee  
Corporation.  
1969-1972 Shift Supervisor, Sequoyah Facility, Kerr-McGee  
Corporation.  
1964-1969 Processor, Monsanto Chemical Company.  
1962-1964 Chemical Operator, Goodyear Chemical Company.

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Michael R. Chilton, Manager of DUF<sub>4</sub> and Process Engineering,  
Sequoyah Fuels Corporation

Education

BS Chemical Engineering, University of Missouri.

Experience

1/88- Manager, DUF<sub>4</sub> and Process Engineering, Sequoyah  
Fuels Corporation.  
4/86-1/88 Area Manager, Sequoyah Facility, Sequoyah Fuels  
Corporation.

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1981-1986 Process Engineer, Sequoyah Facility, Sequoyah Fuels Corporation.  
1980-1981 Engineering Technician, Sequoyah Facility, Kerr-McGee Corporation.

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Larry A. Tharp, Area Manager, Sequoyah Fuels Corporation

Education

BSCHE Chemical Engineering, University of Tulsa

Experience

4/86- Area Manager, Sequoyah Fuels Corporation.  
1979-1986 Senior Process Engineer, Sequoyah Facility, Kerr-McGee Corporation.  
1964-1979 Area Supervisor, Production Department, Sequoyah Facility, Kerr-McGee Corporation.  
1963-1969 Technical Assistant to Superintendent, International Paper Company, Pine Bluff, Arkansas.

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Farrell Mathews, Area Superintendent, Sequoyah Fuels Corporation

Education

Diploma, Sapulpa High School.

Experience

4/86- Area Superintendent, Sequoyah Fuels Corporation.  
1970-1986 Area Supervisor, Sequoyah Facility, Kerr-McGee Corporation.  
1969-1970 Shift Supervisor, Sequoyah Facility, Kerr-McGee Corporation.

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John L. Swimmer, Shift Superintendent, Sequoyah Fuels Corporation

Education

Diploma, Vian High School, Vian Oklahoma.

Connors State College (30 hours).

Experience

1/88- Shift Supervisor, Sequoyah Fuels Corporation.  
11/86-1/88 Area Superintendent, Sequoyah Facility, Sequoyah Fuels Corporation.  
10/66-11/86 Shift Supervisor, Sequoyah Facility, Sequoyah Fuels Corporation, Kerr-McGee Corporation.

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Jerry Sam Gilbreath, Shift Supervisor, Sequoyah Fuels Corporation

Education

Diploma, Vian High School, Vian, Oklahoma.

Experience

11/86- Shift Supervisor, Sequoyah Fuels Corporation, Kerr-McGee Corporation.  
6/76-11/86 Assistant Control Room Operator, Sequoyah Facility, Sequoyah Fuels Corporation.  
11/71-6/78 Chemical Operator, Sequoyah Facility, Kerr-McGee Corporation.  
6/71-11/71 Chemical Operator Trainee, Sequoyah Facility, Sequoyah Fuels Corporation.

10/70-6/71 Laborer/Sampler, Sequoyah Facility, Sequoyah Fuels Corporation.

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Sammie N. Moore, Shift Supervisor, Sequoyah Fuels Corporation

Education

Diploma, High School Graduate, Ft. Gibson, Oklahoma.

Experience

1/71- Shift Supervisor, Sequoyah Fuels Corporation,  
Kerr-McGee Corporation.

1969-1970 Control Room Operator, Sequoyah Facility,  
Kerr-McGee Corporation.

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J.C. Brewer, Shift Supervisor, Sequoyah Fuels Corporation

Education

Diploma, Bokoshe High School.

Experience

1/72- Shift Supervisor, Sequoyah Fuels Corporation,  
Kerr-McGee Corporation.

1969-1972 Control Room Operator, Sequoyah Facility,  
Kerr-McGee Corporation

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Richard Hughes, Jr., Shift Supervisor, Sequoyah Fuels Corporation

Education

Diploma, Okay High School, Okay, Oklahoma.

Experience

4/86- Shift Supervisor, Sequoyah Facility, Sequoyah Fuels Corporation.

2/78-4/86 Assistant Shift Supervisor, Sequoyah Facility, Kerr-McGee Corporation.

1975-1978 Assistant Control Room Operator, Sequoyah Facility, Kerr-McGee Corporation.

1969-1975 Chemical Operator, Sequoyah Facility, Kerr-McGee Corporation.

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Jimmy D. Hummingbird: Shift Supervisor, Sequoyah Fuels Corporation

Education

Diploma, Stillwell High School, Stillwell, Oklahoma.

Experience

4/86- Shift Supervisor, Sequoyah Fuels Corporation.

1/79-4/86 Assistant Shift Supervisor, Sequoyah Facility, Kerr-McGee Corporation.

1970-1979 Control Room Operator, Sequoyah Facility, Kerr-McGee Corporation.

1969-1970 Chemical Operator, Sequoyah Facility, Kerr-McGee Corporation.

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Jerry D. Clapp, Shift Supervisor, Sequoyah Fuels Corporation

Education

Diploma, Hobbs High School, Hobbs, New Mexico.

Daily Computer Training.

Experience

11/86- Shift Supervisor, Sequoyah Fuels Corporation.  
1976-1986 Control Room Operator, Sequoyah Facility, Sequoyah Fuels Corporation.  
1969-1976 Chemical Operator, Sequoyah Facility, Sequoyah Fuels Corporation.

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D. K. Isham, Shift Supervisor, Sequoyah Fuels Corporation

Education

Diploma, Vian High School, Vian, Oklahoma.

Associate Degree-Connors State College, Warner, Oklahoma.

Additional College Courses - Westark Community College, Tulsa University.

Daily Computer Training.

Experience

11/86- Shift Supervisor, Sequoyah Fuels Corporation.  
1971-1978 Chemical and Relief Operator, Sequoyah Facility, Sequoyah Fuels Corporation.  
1970-1971 Assistant Control Room Operator, Sequoyah Facility, Sequoyah Fuels Corporation.  
1969-1970 Operator, Sequoyah Facility, Sequoyah Fuels Corporation.

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Barbara Sue Smith, Shift Supervisor, Sequoyah Fuels Corporation

Education

Diploma, Braggs High School, Braggs, Oklahoma.

College Training - 3 years - John F Kennedy College.

Experience

11/86- Shift Supervisor, Sequoyah Fuels Corporation.  
1977-1986 Chemical and Relief Operator, Sequoyah Facility,  
Sequoyah Fuels Corporation.  
1977 Labor, Sequoyah Facility, Sequoyah Fuels  
Corporation.

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Deborah Ann Emerson, Shift Supervisor, Sequoyah Fuels  
Corporation

Education

GED American Schools, Chicago, Illinois.

7/87- Shift Supervisor, Sequoyah Fuels Corporation.  
1977-1986 Chemical Operation, Sequoyah Facility, Kerr-McGee  
Corporation.  
1976-1977 Chemical Operator Trainee Sequoyah Facility,  
Kerr-McGee Corporation.  
1976 Laborer, Sequoyah Facility, Kerr-McGee Corporation.

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Samuel L. Casteel, Shift Supervisor, Sequoyah Fuels Corporation

Education

Diploma Vian High School, Vian, Oklahoma.

Experience

5/87- Shift Supervisor, Sequoyah Fuels Corporation.

2/79-5/87 Chemical Operator, Sequoyah Facility, Kerr-McGee  
Corporation.  
3/78-2/79 Chemical Operator Trainee, Kerr-McGee Corporation.  
2/78-3/78 Laborer, Sequoyah Facility, Kerr-McGee Corporation.

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FCUF ☒ PDR ☒

FCAF ☐ LPDR ☐

I & E REF. ☒

SAFEGUARDS ☐

FCTC ☐ OTHER ☐

DATE 9/22/88 INITIAL JS