

RETURN TO 396-SS

40-8027
PDR/LPDR

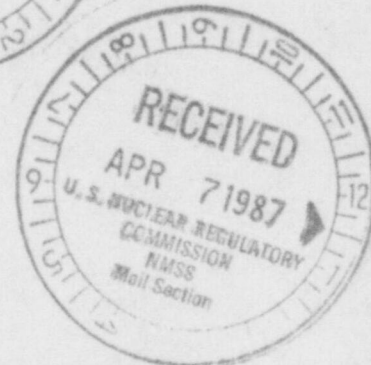
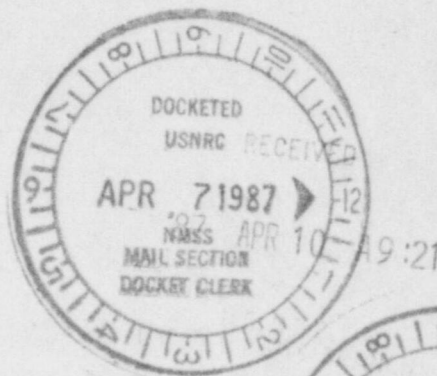
SEQUOYAH FUELS CORPORATION

RE: 8721

POST OFFICE BOX 25861 • OKLAHOMA CITY OKLAHOMA 73125

April 3, 1987

CERTIFIED MAIL - RETURN RECEIPT REQUESTED



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

Re: License SUB-1010; Docket No. 40-8027
Response to License Condition #22

Dear Mr. Rouse:

License Condition #22, as modified by NRC Order, dated October 2, 1986 requires SFC to submit a report containing a description of each change to the Contingency Plan for Sequoyah Facility and a summary of the types of changes made to the Contingency Plan Implementing Procedures (CPIP's) within six (6) months after the change is made.

This letter is to inform the NRC that during the period October 2, 1986 to April 2, 1987 minor changes have been made to the Contingency Plan based on experience gained from the many emergency drills that have been conducted at the facility during this period. None of these changes have in any way decreased the effectiveness of the Plan previously approved by the NRC. The changes that have been made are currently being processed and will be distributed to all holders of "Controlled" copies of the Plan (NRC has two controlled copies) in the immediate future.

During this same period a number of changes also have been made to the Contingency Plan Implementing Procedures. Enclosed with this letter is a current listing of CPIP's (Exhibit I) and a summary of the revisions (Exhibit II) that have been made to the CPIP's for the past six months. Copies of all revised CPIP's are available at Sequoyah Facility for your review.

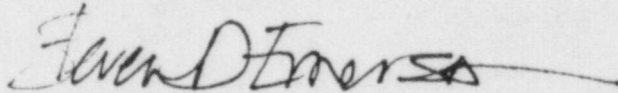
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Response to Condition #22
April 3, 1987
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Should you have any questions concerning any of these changes, please feel free to contact Lee Lacey (918-489-5511) or myself (405-270-3740).

Sincerely,

A handwritten signature in cursive script that reads "Steven D. Emerson". The signature is written in dark ink and has a long, sweeping horizontal line extending to the right.

Steven D. Emerson
General Manager
Sequoyah Fuels Operations

SDE/JTC/jkw

Enclosure as Stated

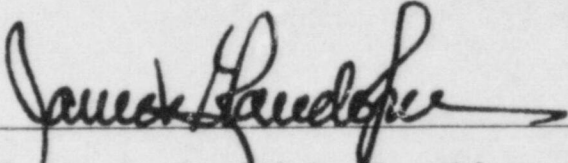
xc: R.L. Bangart, Region IV

A F F I D A V I T

STATE OF OKLAHOMA
COUNTY OF OKLAHOMA

SS: License SUB-1010; Docket 40-8027
Response to License
Condition #22

I, James G. Randolph, President, Sequoyah Fuels Corporation, hereby attest that the facts contained in the attached documents are accurate to the best of my knowledge.


James G. Randolph, President
Sequoyah Fuels Operations

Subscribed and sworn before me on this 3rd day of April, 1987.


Notary Public

My Commission Expires:
Dec 5, 1990

EXHIBIT I
CONTINGENCY PLAN IMPLEMENTING PROCEDURES

<u>No.</u>	<u>Rev.</u>	<u>Subject</u>
<u>ACTIVATION</u>		
CPIP-11	#3	Recognition and Classification of an Emergency
CPIP-12	#1	Unusual Event
CPIP-13	#2	Alert
CPIP-14	#2	Site Area Emergency
CPIP-15	#2	General Emergency
CPIP-16	#1	Activation of Assembly and Support Center (ASC)
<u>ASSESSMENT</u>		
CPIP-21	#2	Hazards Assessment and Projection
CPIP-22	#1	Onsite Monitoring
CPIP-23	#2	Offsite Environmental Monitoring
<u>PROTECTIVE ACTIONS</u>		
CPIP-31	#1	Emergency Exposure Control and Respiratory Protection
CPIP-32	#2	Emergency Contamination Control and Decontamination
CPIP-33	#0	Emergency Personnel Monitoring
CPIP-34	#2	Emergency Evacuation
CPIP-35	#1	Personnel Accountability
CPIP-36	#1	Rescue and Assistance
CPIP-37	#3	Traffic and Access Control

No. Rev. Subject

COMMUNICATIONS, DOCUMENTATION, AND RECORDS

CPIP-41	#1	Communications During An Emergency
CPIP-42	#0	Record Keeping and Documentation During An Emergency
CPIP-43	#1	Reports

RECOVERY

CPIP-51	#1	Re-Entry
CPIP-52	#0	Emergency Closeout/Transition to Recovery

ADMINISTRATIVE

CPIP-01	#2	Onsite Contingency Response Organization
CPIP-02	#1	Offsite Response Organization
CPIP-03	#2	Contingency Training Program
CPIP-04	#1	Drills and Excercises Program
CPIP-05	#3	Emergency Equipment and Supplies
CPIP-06	#1	Contingency Plan Maintenance

EXHIBIT II
CPIP REVISIONS

<u>CPIP #</u>	<u>REV. #</u>	<u>DATE</u>	<u>SUMMARY OF REVISION</u>
01	#2	11/24/86	<ul style="list-style-type: none">- Added precautions dealing with Shift Supervisor remaining in close proximity to the Control Room; and, no assignment to the response team until training is completed.- Changed assignment of Technical Support Coordinator from the Lab Manager to the Manager, Engineering, added Attachments 1 and 2 to display the Onsite Contingency Response Organization, and the order of succession for the Onsite Emergency Director, Operations Coordinator and the Hazards Assessment and Control Coordinator.
11	#2	11/24/86	<ul style="list-style-type: none">- Added a precaution requiring a warning announcement to personnel by use of the onsite alarm horn in the event of a release of hazardous materials or a hazardous condition within the plant.- Added an Event Sequence Flow Chart to the procedure attachment.
	#3	03/25/87	<ul style="list-style-type: none">- Revised the discussion section on classification to clarify the guidelines on the time frame of classification.- Modified and clarified the tabular data sheet for spill of dry uranium compounds.- Clarified the tabular data sheet for chemical release or spill.- Modified the tabular data sheet for loss of electrical power.- Modified the tabular data sheet for fire.- Modified the tabular data sheet for explosion.- Modified the tabular data sheet for security.- Modified the tabular data sheet for toxic or flammable gas release.

- 13 #2 11/20/86 -- Added a procedural step to activate the onsite alarm horn prior to the public address system message announcing an "Alert" message and information.
- Added the National Response Center to the list of "Notifications" attachment to the procedure.
- 14 #2 11/20/86 - Added steps necessary to activate an Assembly Support Center and a step requirement to activate the onsite alarm horn prior to the public address announcement.
- Added atmosphere stability class table to Attachment 3.
- 15 #2 11/21/86 - Added steps necessary to activate an Assembly Support Center and a step requirement to activate the onsite alarm horn prior to the public address announcement.
- Added atmosphere stability class to table in Attachment 3.
- 16 #1 11/21/86 - Added an equipment inventory list for ASC equipment and a step requirement for a record log of events.
- 21 #2 11/21/86 - Added a "Definitions" statement explaining an exponential notation within the procedure.
- 23 #2 1/4/87 - A major revision has been made to this procedure. It has been expanded from 6 to 14 pages. Detailed procedural steps have been added to provide for General Monitoring, Radiological Surveys, and Environmental Sampling. Three attachments have been added to provide for: (1) an inventory list of offsite monitoring equipment; (2) a radiological survey report; and (3) a chain of custody record.

- 31 #1 12/19/86 - A single-page correction was made to correct a typographical error and change "Natural Uranium Airborne Exposure Guideline" from 1 to 10 MPC.
- 32 #2 11/28/86 - Two minor language corrections were made one to clarify and the other to correctly identify Health and Safety personnel.
- 34 #2 12/11/86 - Two definitions were added--one for "Local Evacuation" and one for "Site Evacuation."
- 36 #1 12/19/86 - A single-page correction was made to this procedure. If electrical hazards are secured, it permits one rescuer to spray other rescuers with water while the rescue is performed.
- 37 #3 11/24/86 - A small addition was made to alert truck drivers onsite and at the gate to an emergency.
- 41 #1 11/24/86 - An attachment was added to the procedure to provide the "Response Center Communications Scheme."