

Sequoyah Fuels Corporation's report on hot ${\rm UF}_6$ cylinder handling at the Sequoyah Conversion Facility is attached in response to License Condition 11.

The report contains an assessment of the hot cylinder filling and handling steps. The possibility of occurrences resulting in a UF₆ release is quantified for the various steps using probabilistic risk assessment techniques. Plant modifications and response procedures that have been taken or could be taken to minimize the probability of accidental release of UF₆ from the cylinders and to mitigate the effects of any release are incorporated.

The risk analysis was based on continued use, for at least an interim period, of steam chests for heating filled cylinders requiring homogenization for sampling. The analysis therefore does not reflect other potential changes under consideration, such as installation of autoclaves for heating, that may further reduce the likelihood of an accidental release. We are also evaluating use of in-line sampling which would eliminate the need for heating filled cylinders for obtaining samples. Our analysis to date does not conclusively establish that autoclaves offer a significant advantage over steam chests, particularly if we are able to adopt in-line sampling. We expect to have the analyses complete by year end 1986.

The engineering and administrative changes already undertaken greatly reduce the possibility of placing an overfilled cylinder in a steam chest, the scenario with the most significant potential for a release. Nevertheless, during the interim, Sequoyah will either rely upon DOE Enrichment Facilities for sampling and analysis or use steam chests fitted with over-pressure protection should heating be required.

Sequoyah Fuels was assisted in preparing the report by Kerr-McGee Corporation technical staff and the consulting firm of Pickard, Lowe

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Wm. T. Crow April 20,1986 Fage 2

and Garrick, Inc., recognized experts in risk analysis. We are available to discuss further any questions you or your staff may have.

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J. C. Stauter, Director Nuclear Licensing & Regulation

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