

6. Lewis / Hodgdon / Vogler / Rutberg / R-1-

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before

869915

JOHN H. FRYE, III
Administrative Judge

In the Matter of:

SEQUOYAH FUELS CORPORATION

(Sequoyah UF6 to UF4 Facility)

)
) Docket No. 40-8027-MLA

)
) ASLBP No. 85-513-03-ML

NACE RESPONSE TO NRC STAFF REPORT ON IMPLICATIONS OF
ACCIDENT, REQUEST FOR ORDER FROM PRESIDING OFFICER
DIRECTING PRODUCTION OF DOCUMENTS AND ADDITIONAL COMPLAINTS

Pursuant to the Prehearing Conference Order of November 28, 1986, in the above captioned proceeding, NACE submits the following:

1. RESPONSE TO NRC STAFF REPORT.

As expressed at the Prehearing Conference, NACE believes the NRC Staff Report on Implications of the January 4th accident at the SFC facility to be undeniably and demonstrably flawed. The Staff concluded that the "root causes" of the January 4th accident - inappropriate physical equipment and facilities and inadequate training of workers - have been cured since the UF6 to UF4 facility has been designed to handle even the largest DOE cylinders and organizational changes have been undertaken to properly train SFC's workers. NRC staff has obviously confused "cause" and "effect" and not in a merely semantical sense.

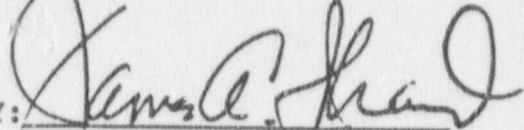
4. NACE'S REQUEST FOR INFORMATION FROM NRC.

NACE seeks information from the NRC which relates directly to the implication of the January 4th accident and the qualifications of SFC staff and requests the presiding officer to direct NRC staff to make available to all parties the following described documents:

1. Transcripts of all interviews or interrogations conducted by NRC's Region IV, AIT, or OIA with any SFC or Kerr-McGee employees or officers or with any employees of any contractor of SFC or Kerr-McGee concerning the January 4th accident.
2. Any affidavits or written statements executed by any SFC or Kerr-McGee employees or officers or any employees of a contractor of SFC or Kerr-McGee and submitted to NRC's Region IV, AIT, or OIA, concerning the January 4th accident.
3. All internal memoranda, written reports, or other communications in which NRC's Region IV, AIT, OIA, or Office of Inspection and Enforcement identify or otherwise describe those specific individuals, employees, or officers of Kerr-McGee or SFC who

were responsible for or contributed to the causes
of the January 4th accident.

N.A.S.E.

BY: 

JAMES A. IKARD, P.C.
4400 North Lincoln
Suite 11
Oklahoma City, OK
(405) 424-3302



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20545

10 DEC 22 PM 2 0

MARYLAND NATIONAL BANK BUILDING - (MNBB)

FACSIMILE NUMBER

RAPIFAX - GROUP-111

FTS-B-492-8185

3M - GROUP-1, 11 & 111 - FTS-B-492-7921

VERIFICATION NUMBER - FTS-B-492-7291 OR 492-7355.

U.S.N.R.C.
M&M-NAHB
86 DEC 22 AM 1:50

REQUEST FOR FACSIMILE

TO: NAME PHONE AGENCY LOCATION-CITY
Bill Hutchison 27246 01 - EW/S

FACSIMILE PHONE NUMBER

VERIFICATION PHONE NUMBER

FROM: NAME PHONE BRANCH
Steve Lewis 28139 OGC

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