



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

*O'Connell*

JUN 11 1986

MEMORANDUM FOR: ~~Edward L. Cunningham, Director~~  
Division of Fuel Cycle and Materials Safety  
Office of Nuclear Materials Safety  
and Safeguards

THRU: *SA* Edward L. Jordan, Director  
Division of Emergency Preparedness  
and Engineering Response  
Office of Inspection and Enforcement

FROM: Kenneth E. Perkins, Chief  
Incident Response Branch  
Division of Emergency Preparedness  
and Engineering Response  
Office of Inspection and Enforcement

SUBJECT: STATUS OF KERR-MCGEE PROMPT ACTION ITEMS

In my memorandum of April 7, 1986 I identified nine (9) prompt action items, for which action was expected in 60 days. Enclosed is a status of these items. If you have any questions, please call me.

*Kenneth E. Perkins*  
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Enclosure: As stated

cc: J. Blaha, IE

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1. Assure that the Operations Center has the correct telephone numbers to reach those NMSS licensees that have been ordered to submit contingency plans.

Status: A review of the 31 fuel cycle facilities for which we have radiological contingency plans indicated that only two contained telephone numbers for contacting the facility in the event of an emergency. Consequently, we obtained the appropriate 24-hour numbers for these facilities. These numbers have been incorporated into the existing HOO call lists maintained at the Operations Center.

2. Assure that NMSS licensees that have been ordered to submit contingency plans have the correct telephone numbers to reach the NRC.

Status: Each of the regions were contacted and they have all confirmed that the licensees have the correct phone number to notify the NRC in the event of an emergency.

3. Issue an information notice advising all NRC licensees of the correct telephone numbers to use to report incidents.

Status: Information Notice Number 86-28 was issued April 24, 1986 advising all NRC licensees of the correct telephone numbers to use for reporting incidents.

4. Review NRC response procedures and modify, if necessary, to assure that "prompt" events, i.e., those that occur and are over very quickly, are addressed.

Status: Events that occur and are over prior to the time reported to the NRC Operations Center are handled in a manner subject to the judgment of management. Generally, notifications made by the HOO are the same as if the event were ongoing; i. e., this is according to procedures established for the Operations Officer based on the type and classification of event. However, beyond that point, it is generally up to the judgment of higher level management as to how the situation is handled and in the case of some agencies, this depends on the mode of response in which upper management places the agency. Because of the numerous variables involved it is extremely difficult to develop explicit procedures for every possible event. We consider that existing procedures calling for upper management to make a judgment are sufficient for such "prompt" events.

5. Review NRC response procedure and modify, if necessary, to assure agency response modes address potential incidents at a fuel facility or large materials user.

Status: The response procedures and plan address potential incidents at fuel facilities or large materials users. The problem in responding to this event was not that response modes fail to address potential incidents at fuel facility or large material users, but rather that the procedures were not appropriately implemented. We are adding to the Operations Center procedures and training the need to consider chemical as well as radiological hazards of events reported when determining the appropriate response.

6. Review NRC internal procedures for notifying Commission (and EDO) of high-profile events.

Status: Our review of NRC internal procedures indicated that several changes were in order. Consequently, the appropriate procedures were revised and are currently circulating for approval. It is expected that the revised procedures will be issued prior to June 30. In the interim, a memorandum was issued on March 17, 1986 informing all affected parties of the necessary changes.

7. Consider use of status summary reports as input to PNs.

Status: It is difficult to predict if a PN or Status Summary Report would be issued first during an event. Therefore we are:

- a. Sending a memorandum to the regions requesting they revise their procedures to consider using any Status Summaries issued during an event in PNs.
- b. Revising Headquarters Operations Center, Status Officer procedures to have any PNs issued during an event be considered for inclusion in a Status Summary.

8. Review the current list of agencies that are notified in an emergency and the threshold conditions for their notification (e. g., Center for Disease Control, Department of Agriculture, etc).

Status: Since the Sequoyah Fuels accident, the Operational Response Procedures between NRC, DOE, EPA, and HHS has been revised to include USDA as a full participant in these procedures. These procedures have been reviewed and the staff believes that current thresholds for notifying these agencies are adequate. However, we have written to each of these agencies and requested their comments as to the adequacy of the notification thresholds. We have also conferred with HHS (FDA) and EPA (ORP) to reconfirm previous arrangements that each of these primary agency contacts has accepted the responsibility to make further contacts within their agencies, i.e., in HHS, FDA will notify CDC and NIOSH and in EPA, ORP will inform CERCLA staff. In accordance with NUREG-0981, FEMA continues to notify other Federal agencies of any incident where NRC goes into Standby Mode.

9. Consider establishing a contingent umbrella technical assistance contract to provide various types of support following an incident.

Status: A task order agreement (TOA) was established early in 1986 specifically to cover the unanticipated needs that may arise following an incident. We consider that the existing TOA is sufficient for providing support outside of the national lab arena. In addition, experience has indicated that national lab support, if required, can be funded through a transfer of funds from other projects on an as needed basis.