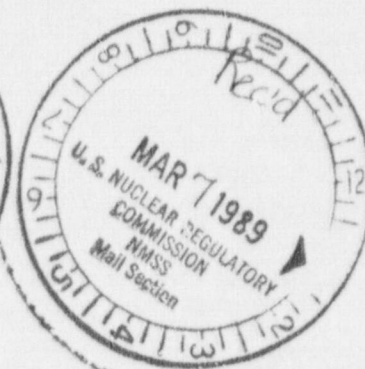


March 2, 1989

Certified Mail  
Return Receipt Requested



Mr. Leland C. Rouse, Chief  
Fuel Cycle Safety Branch  
Division of Industrial and  
Medical Nuclear Safety, NMSS  
U.S. NUCLEAR REGULATORY COMMISSION  
Washington, D.C. 20555

RE: License SUB-1010; Docket No. 40-8027  
Amendment Application  
Request to Delete License Condition #40

Log	Mar 89-2
Remitter	
Check No.	044836
Amount	948-24
Fee Category	Am D
Type of Fee	
Date Check Rec'd	3/14/89
Date Completed	
By:	Quinn

Dear Mr. Rouse:

Amendment No. 8 to Sequoyah Facility License SUB-1010, issued by the NRC on March 25, 1987, established License Condition No. 40 which required SFC to maintain a defined level of staffing whenever the UF6 Reduction (DUF6-DUF4) Facility is being operated. This condition further required SFC to report to the NRC any significant changes in duties of the staff within 30 days of a change and not to make any changes which reduce the number of persons assigned to the facility without prior NRC approval. This condition applies to the shift supervisor, the control room operator, the chemical operators, and the cylinder handling yard crew assigned to the UF6 Reduction Facility.

After two years of experience with operations and activities related to the UF6 Reduction Facility, SFC believes that this condition is overly restrictive, reduces our flexibility in managing the overall operating staff in a manner that provides maximum safe and efficient operation of the Sequoyah Facility, and is unwarranted in view of the fact that none of our other licensed activities have such staffing level requirements imposed on them.

SFC also believes that it is not possible to directly equate safe operations with the number of operating personnel assigned to a particular process. We do believe, however,

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that in the case of Sequoyah Facility, safe operation can be related to the specific qualifications, the comprehensive training program, and the operator certification program required by SFC and the NRC and the strict adherence to procedures.


In addition, SFC is not aware of any other licensee of our type who has a license condition related to its facility staffing level.

On the basis of the foregoing comments, SFC requests that License Condition No. 40 be rescinded and deleted from the Sequoyah Facility License.

Enclosed with this letter is Check No. 044836, dated 3/2/89, in the amount of \$150.00 as Sequoyah Fuels Corporation's fee for the amendment request.

Should you have any questions concerning this request, please contact me at your earliest convenience.

Sincerely,

  
Scott P. Knight  
Vice President  
Administration

SPK:vp

Enclosure as stated

cc: R. D. Smith, URFO - Region IV  
K. E. Asmussen, General Atomics

DOCKET NO. 40-8027

CONTROL NO. 25264

DATE OF DOC. March 2, 1989

DATE RCVD. March 7, 1989

FCUF ☒ PDR ☒

FCAF ☐ LPDR ☒

I & E REF. ☒

SAFEGUARDS ☐

FCTC ☐ OTHER ☐

DATE 3/8/89 INITIAL SLN