

## APPENDIX A

### NOTICE OF VIOLATION

Sequoyah Fuels Corporation (SFC)  
Gore, Oklahoma 74435

License No. SUB-1010  
Docket No. 40-8027

During an NRC inspection conducted on October 13-23, 1992, two violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violations are listed below:

A. License Condition 9 of License SUB-1010 authorizes use of licensed material in accordance with the statements, representations, and conditions contained in Chapters 1-8 of the license renewal application dated August 23, 1985, as supplemented. Section 2.2, Chapter 2 of said license renewal application states that the Manager, Health and Safety, shall be responsible for implementing procedures in the functional area of health physics.

1. Procedure HS-013, "Personnel Contamination Assessment and Decontamination," Section 4.2.9 as modified by temporary operating procedure No. 92-476, instructs health and safety technicians to indicate on the contamination event record whether contamination was found on the skin or clothing or both skin and clothing.

Contrary to the above, the contamination event report for an SFC manager dated October 19, 1992, did not indicate that the individual was actually contaminated on both skin and clothing. The documentation indicated skin contamination only.

2. Procedure HSDEPT-102 specified the training for health and safety technicians prior to assignment on shift, including practical factors and an overall certification by the health and safety department manager.

Contrary to the above, at the time of the inspection, 10 SFC health and safety technicians assigned on shift had not completed training on all required practical factors and had not received the overall certification by the health and safety department manager.

This is a Severity Level IV violation (Supplement VI).

B. License Condition 9 of License SUB-1010 authorizes use of licensed material in accordance with the statements, representations, and conditions contained in Chapters 1-8 of the license renewal application dated August 23, 1985, as supplemented. Section 5.2, Chapter 5, of said license renewal application states, in part, that the Sequoyah facility shall use the quality assurance guidance outlined in those sections of Regulatory Guide 4.15, "Quality Assurance for Radiological Monitoring

Programs (Normal Operations) - Effluent Streams and the Environment," which apply to a uranium conversion facility.

Section 6.3.1 of Regulatory Guide 4.15 states that spiked and blank samples should be submitted for analysis as unknowns to provide an intralaboratory basis for estimating the accuracy of the analytical results. Further, Section 6.3.2 of the Regulatory Guide states that laboratories of licensees or their contractors that perform environmental measurements should participate in the EPA's Environmental Radioactivity Laboratory Intercomparison Studies (Cross-check) Program, or an equivalent program.

Contrary to the above, at the time of the inspection, SFC had not submitted spiked samples for analysis in the health and safety laboratory used to analyze environmental airborne samples to provide an intralaboratory basis for estimating the accuracy of the analytical results. Also, the health and safety laboratory used to analyze environmental airborne samples had not participated in EPA's Environmental Radioactivity Laboratory Intercomparison Studies (Cross-check) Program, or an equivalent program.

This is a Severity Level IV violation (Supplement VI).

Pursuant to the provisions of 10 CFR Part 2.201, Sequoyah Fuels Corporation is hereby required to submit a written statement or explanation to the Regional Administrator, Region IV, with a copy to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, the Commission may issue an Order or Demand for Information as to why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Dated at Arlington, Texas  
this 11th day of December , 1992