

NOTE TO: Larry Chandler
FROM: Susan L. Uttal
RE: Sequoyah Fuels Corporation (SFC) License Renewal Proceeding
DATE: January 27, 1992

The following is a list of the areas of concern raised by NACE in the license renewal proceeding, and found to be germane by the presiding officer's Order of January 24, 1991.¹ 10 CFR 2.1205(g).

(1. Prior accidents, and incidents of soil and water contamination under current review by the NRC, raise serious questions whether health and safety standards can be met.

2. The present contamination should be evaluated and removed prior to any license renewal.

3. The causes of SFC's "poor" safety and environmental record must be addressed and resolved to prevent a repetition of these matters.

4. SFC's proposed changes in its management structure may not provide assurance that adequate compliance with safety and environmental requirements will be provided.

5. The cumulative impact of permitted discharges to the air, water and land during 10 more years of operation may pose an unacceptable risk to the public health and environment.

6. The environmental and safety impacts of the raffinate fertilizer program require review.

7. The matters raised by the Staff in its October 5, 1990 Order for Modification of License and a Demand for Information dated November 5, 1990

The presiding officer also held, in his May 6, 1991 Order,² that the following additional areas of concern raised by the Oklahoma Department of Wildlife Conservation (ODWC) and the Cherokee Nation of Oklahoma (CNO).

As to ODWC:
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PDR FOIA
CURRAN92-204 PDR

¹ "Memorandum and Order (Requests for Hearing and Petitions for Leave to Intervene)," January 24, 1991.

² "Memorandum and Order (Petition for Leave to Intervene and Request for Opportunity to Participate)," May 6, 1991.

1. The impact to fish and wildlife resources due to past and present operations of the SFC uranium processing facility.

(2). The adequacy of SFC's environmental monitoring.

As to CNO:

(1). Unacceptable contamination levels found outside the restricted area of the main processing building exceeding the environmental action level.

(2). The apparent unwillingness of SFC management to be candid with NRC investigators regarding incidents of contamination.

3. Concern for the health of members of the Cherokee Nation due to the constant chemical and radioactive releases from the SFC facility.

(4). Interest in the quality of the sediments of, and the quality of the water in, the Arkansas River, and its ability to support aquatic life.