

APR 24 1992

MEMORANDUM FOR: Richard E. Cunningham, Director
Division of Industrial and Medical
Nuclear Safety, NMSS

FROM: L. J. Callan, Director
Division of Radiation Safety and Safeguards
Region IV

SUBJECT: REVIEW OF SEQUOYAH FUELS CORPORATION (SFC) ACTION PLAN

By this memo I am forwarding the results of the Region IV review of SFC's environmental Action Plan. SFC submitted an Action Plan and a Revised Environmental Report by cover letter dated January 10, 1992. Gary Konwinski from our Uranium Recovery Field Office performed the review and his detailed comments are attached. Mr. Konwinski will also perform a review of the SFC Environmental Report and his comments will be forwarded to NMSS on or before May 31, 1992.

The attachment describes two basic areas of concern regarding the Action Plan. First, its focus is narrow, in that uranium is the only constituent that is given consideration. In our view, effective corrective actions cannot be implemented without considering other constituents (arsenic, fluoride, nitrate, radium, and thorium) that are known to be present in the plumes. Secondly, the plan doesn't provide a commitment to remediate known contamination.

Should you have any questions about our comments, please contact myself or Gary Konwinski (FTS 8 (303) 231-5800).

Sincerely,

ORIGINAL SIGNED BY:

L.J. CALLAN

L. J. Callan, Director
Division of Radiation Safety
and Safeguards, Region IV

Attachment:
As stated

cc: w/atch.
R. D. Martin, RIV
J. T. Greeves, NMSS
M. Tokar, NMSS
Merri Horne, NMSS
R. E. Hall, URFO

RIV:URFO
GKonwinski
4/ /92

D:URFO
REHall
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LJCallan
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Richard E. Cunningham

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bcc:

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DRSS File