



40-8027

UNITED STATES
ATOMIC ENERGY COMMISSION
WASHINGTON, D.C. 20545

Handwritten: C. W. [unclear]
H. [unclear]
Brown

JUN 8 1970

Kerr-McGee Corporation
Kerr-McGee Building
Oklahoma City, Oklahoma 73102

Attention: Mr. Parker S. Dunn, Vice-President
Nuclear Engineering

Gentlemen:

This refers to the inspection conducted at your Sequoyah facility on April 29 and 30, 1970, of your activities authorized under AEC Source Material License No. SUB-1010.

It appears that certain of your activities were not conducted in full compliance with conditions of your license and the requirements of the AEC's "Standards for Protection Against Radiation," Part 20, Title 10, Code of Federal Regulations, in that:

1. Contrary to 10 CFR 20.201(b), "Surveys," during March and April, 1970, surveys were inadequate to determine compliance with 10 CFR 20.106 with respect to the airborne concentrations of uranium released to unrestricted areas from the stacks used for the sampling plant dust collection system and the sample preparation room. Based on your recorded data, it appears that the concentrations of uranium released from these stacks may have exceeded the limits specified in Appendix B, Table II of 10 CFR 20.
2. Contrary to 10 CFR 20.201(b), "Surveys," from March 3 through March 20, 1970, no surveys were made to determine compliance with 10 CFR 20.103 with respect to the airborne concentrations of uranium to which employees were exposed while working in the third and fourth floor areas of the sampling tower and in the sample preparation room. Also, from March 3 through March 31, 1970, surveys were inadequate to evaluate the airborne concentrations of uranium to which employees were exposed while working on the first and second floor areas of the sampling tower, contrary to 10 CFR 20.201(b), "Surveys." It was observed that

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time-weighted exposures had not been calculated during the weeks when airborne surveys showed the existence of concentrations higher than those permitted for continuous exposure for a 40-hour work week. It was also observed that no evaluation was made to assess the protection provided by respiratory equipment.

3. Contrary to 10 CFR 20.201(b), "Surveys," surveys were inadequate to determine compliance with 10 CFR 20.103 with respect to the airborne concentrations of uranium to which employees were exposed (1) during maintenance and repair work on the bucket elevator on March 2, 1970, after seven drums of yellow cake were placed on the elevator; (2) following the spill of about 250 pounds of yellow cake on March 11, 1970, when the mechanical drum dumper failed to function properly; and (3) during and subsequent to a spill of some yellow cake on the storage level on March 13, 1970.
4. Contrary to License Condition No. 8 which incorporates the representations, specifications and procedures contained in Appendix A of the September 23, 1969 application, since March 2, 1970, environmental airborne samples were not collected on a monthly basis at downwind locations along the restricted area fence as specified on page 11 of the Appendix.
5. Contrary to License Condition No. 11 which incorporates the conditions and specifications outlined in Annex A of the license,
 - a. no procedures were established as specified in paragraph 1C(ii) of the Annex, to assure proper selection, supervision and adequate training of personnel using respiratory protective equipment;
 - b. no procedures were established to assure adequate fitting of respirators and the testing of equipment for operability, as specified in paragraph 1C(iii) of the Annex;
 - c. no procedures for maintenance were established in accordance with paragraph 1C (iv) of the Annex to assure full effectiveness of respiratory protective equipment, including the issuance, cleaning, decontamination, inspection, repair and storage of such equipment;

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- d. bioassays of individuals were not adequately evaluated to determine individual exposures and to assess protection provided by the respiratory equipment as specified in paragraph 1C(v) of the Annex; and
- e. adequate records to permit periodic evaluation of the adequacy of the respiratory protective program were not maintained as required by paragraph 1C(vi) of the Annex.

This notice is sent to you pursuant to the provisions of Section 2.201 of the AEC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations. Section 2.201 requires you to submit to this office within twenty (20) days of your receipt of this notice, a written statement or explanation in reply including: (1) corrective steps which have been taken by you, and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved.

In addition to the above matters, it was found that the Facility Manager, the Health and Safety Officer and the Licensing and Regulation Officer of Technical Services did not perform quarterly audits of the company's health and safety program. We wish to call your attention to page 11, Appendix A of your September 23, 1969 application which requires that such audits be made by these persons. Please inform us of the steps which have been or will be taken to assure your compliance with this specific procedure.

Very truly yours,

Lawrence D. Low, Director
Division of Compliance

cc: Mr. G. E. Wuller
Licensing and Regulation Officer