

December 1, 1970

Gen W. Roy, Chief
Materials Inspection & Enforcement Branch
Division of Compliance, HQ

KERR-McGEE CORPORATION, OKLAHOMA CITY, OKLAHOMA
LICENSE NO. SUB-1010 (Docket No. 40-8027)
INSPECTION CONDUCTED OCTOBER 21, 22, and 23, 1970

Transmitted herewith for enforcement action is the subject inspection report.

The major item of safety, which was noted and that requires more attention by management, is the failure to promptly clean up contamination after process difficulties have occurred and are corrected. It was apparent from the audits conducted by the Health and Safety Officer, Mr. A. M. Valentine, that he felt production was being maintained at the expense of health and safety. As noted in the report, the visible compounds of uranium in the process areas, on floors, pipes, and sides of vessels no doubt contributes to the chronic above-MPC air concentrations in the process areas. Management indicated that they were concerned about the problems that have occurred in plant equipment, and are currently trying to solve the problems such that the material will be retained within process vessels, and that, in the interim, additional effort will be made to decontaminate the aforementioned areas.

The citation for failure to follow the organizational structure, as required by the documents incorporated in License Condition No. 8, is a technical citation and the current change appears to have strengthened the health and safety aspects of the licensee's operations, since this function has been removed from a line-type organization. The licensee has upgraded the health physics program at the facility by replacing Mr. F. J. Edwards, and bringing in Mr. Douglas Sly, along with obtaining other qualified and experienced persons to provide health physics coverage on a full-shift basis.

As noted in the attached report, corrective action has been taken on the items noted during the previous inspection. Conditions resulting in evaluated overexposures to 11 employees in excess of the limits (up to 3 times MPC), if continued, presents a significant problem. However, the trend of airborne

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concentrations in the restricted areas has shown a downward trend during the last 30 days of operation, and the licensee is devoting effort to improving the situation. No citation against failure of the licensee to submit reports of the exposures pursuant to 10 CFR 20.405 was made since the evaluations had been completed within the prior 30-day period. (The reports were submitted by letter dated November 13, 1970.)

A citation was made against the use of unauthorized liquid waste retention systems, in view of the telegraphic exchange between the licensee and the DML, on July 7, and 9, respectively. However, the licensee's application, as originally submitted and approved, allows for the licensee to build an earthen dike retention system in accordance with AEC licensing criteria.

Failure to obtain timely analyses on environmental liquid samples defeats the purpose of taking the samples since it is possible that contamination of ground water could occur over a significant period of time and not be noticed.

Failure to determine the uranium content of the recovered HF acid that was shipped to customers for use in consumer products (aluminum wrapping foil) presented a potential hazard. Analytical results performed on the HF acid subsequent to the inspection, showed a maximum concentration of 2.6×10^{-6} g/ml of uranium in the acid that had been shipped.

Although a citation for failure to take environmental air samples based on diffusion calculations, as required by Appendix A which is incorporated by License Condition No. 8, has been made, a diffusion calculation for the effluent, which is primarily particulate in nature, has little merit. However, the environmental sampling should be expanded to additional locations since the current two sampling locations may not necessarily represent the maximum concentration present in the unrestricted area.

In addition to addressing the enforcement letter to Mr. P. S. Dunn, Vice President, Nuclear Engineering, it is suggested that carbon copies be sent to Mr. Frank Pittman, Licensing and Regulation Officer, and Mr. H. C. Eberline, Director, Physical Science and Measurement Department.

G. D. BROWN

Glen D. Brown
Senior Radiation Specialist

Attachment:
Form AEC-417 Inspection Report

cc: A. Giambusso, CO, w/attach.
L. Kornblith, CO, w/attach.
R. H. Engelken, CO, w/attach.