

JAN 11 1971

40-8027

Kerr-McGee Corporation
ATTN: Mr. Parker S. Dunn
Vice President
Nuclear Engineering
Kerr-McGee Building
Oklahoma City, Oklahoma 73102

Gentlemen:

This refers to the inspection conducted at your Sequoyah facility on October 21, 22, and 23, 1970, of your activities authorized under AEC Source Material License No. SUB-1010. In addition, we wish to acknowledge receipt of a letter dated November 13, 1970, from Mr. A. M. Valentine reporting the exposure of personnel to radiation.

It appears that certain of your activities were not conducted in full compliance with a condition 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," no surveys were made to evaluate the quantities of radioactive material contained in the hydrofluoric acid, which had been recovered from hydrofluorination beds, prior to releasing the acid to commercial firms during the period July 24, 1970 to October 19, 1970.
2. Contrary to License Condition No. 8 which incorporates the representations, specifications, and procedures contained in Appendix A of the September 23, 1969 application, diffusion calculations were not performed, as specified on Page A-11 of the Appendix, to determine the areas of maximum ground level concentrations where quarterly air samples at upwind and downwind locations from the plant should be taken. It was found that no such calculations had been made since the plant started operations in early 1970.

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

8507310344 850530
PDR FOIA
BURR85-229 PDR

OFFICE ▶

SURNAME ▶

DATE ▶

JAN 11 1971

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; and (3) the date when full compliance will be achieved.

In addition to the items of noncompliance described above, we wish to point out other matters which we believe warrant your consideration:

- A. It was observed that Kerr-McGee did not promptly evaluate the environmental monitoring samples to determine whether the areas surrounding the plant were being contaminated by plant operations. The AEC inspector reported that while the company takes samples at various locations around and about the plant on a monthly and quarterly basis, the samples had not been analyzed since May 1970.
- B. During the inspection, the AEC inspector observed visible layers of uranium compounds on floors and equipment in the various processing areas. While steps had been initiated by Kerr-McGee to rectify the problem, it appears that the actions taken have not been adequate. In view of the foregoing, we believe that the company should re-evaluate its contamination control practices to improve their effectiveness in minimizing contamination in the processing areas.

Please provide us with your comments concerning the matters discussed above and the corrective steps taken or planned.

Kerr-McGee failed to make a timely report, pursuant to 10 CFR 20.405(a), with respect to the exposures of personnel to average weekly airborne concentrations of uranium in excess of AEC limits during July, August, and September 1970. In this regard, Mr. Valentine's written report of the exposures was not filed with the Commission until November 13, 1970. We understand that the company failed to make a prompt evaluation to determine whether these employees had, in fact, been exposed to airborne concentrations of radioactive material in excess of AEC limits during the months in question. It is necessary that Kerr-McGee take corrective steps to assure that such evaluations will, hereafter, be made promptly and that a timely report be sent to the Commission if the results of these evaluations indicate that an overexposure may have occurred.

OFFICE ►

SURNAME ►

DATE ►

JAN 11 1971

The AEC inspector reported that the organizational and functional responsibilities specified on Pages A-2 and A-3 of Appendix A to the application dated September 23, 1969 were revised on July 2, 1970. For purposes of keeping your licensing record accurate, you should send the revised pages to the Division of Materials Licensing.

Very truly yours,

Lawrence D. Low, Director
Division of Compliance

cc: Dr. Frank Pittman
Licensing and Regulation Officer

Mr. H. C. Eberline, Director
Physical Science and Measurement Dept.

bcc: PDR)
NSIC)
Docket Files) w/cpy ltr dtd
A. Giambusso, CO) 11/13/70
C. F. Eason, AWCRR)
Incident File)

✓ CO:IV
DR Central File.

OFFICE ▶	CO	CO	DML	CO		CO:DIR
	RHandler:akb	GW Roy	CR Buchanan	RH Engelken		LD Low
SURNAME ▶						
DATE ▶	1/7/71					

PART 1

Inspector: G-D-BrownDate of Inspection: OCT 21, 22, 23, 1970Licensee: Kerr-McGee Corp.Address: OKLAHOMA CITY, OKLALicense No.: SUB-1010 (DEC 147 40-8027)

II:

AEC-591 _____

A. Clear case (Initial/Reinsp) _____

B. Clear case (F/U of 592) _____

C. Noncompliance case _____

III:

AEC-417 X _____

A. Immediate Public Health and Safety Threat _____

B. Expenditure of more than nominal sum for compliance _____

C. Excess of 90 days appears necessary to achieve enforcement _____

D. N/C items of particular complexity _____; Licensing problems _____; Requires Headquarters interpretation _____

E. Appropriate for "Notice of Alleged Violation" _____

F. Uncorrected previous noncompliance _____

G. Other Hazard & Safety Items _____

IV:

AEC-592 _____

A. Involves nonsignificant risk _____

B. Involves significant risk _____

I II
R (1)

PART 2

Date Dispatched DEC 1 1970

Suspense Date _____

V and VI:

1. Adequate reply received from licensee:

_____; Copy to L&R for info _____
(Date)

2. Inadequate reply received from licensee:

Forwarded to L&R for action _____
(Date)

3. No reply received from licensee and forwarded to L&R for action _____

Note: If F/U is made on No. 1, 2, or 3 above, check a. or b. below:

a. F/U shows satisfactory corrective action:

cy AEC-591 to L&R for info _____

TWX report to L&R _____

b. F/U shows incomplete corrective action:

TWX report to L&R _____

VII:

ELAPSED DAYS INFO:

No. of days from date of Inspection to issuance of AEC-592:

10 or less _____; 11 to 15 _____; 16 to 20 _____;

21 to 25 _____; over 25 _____

From issuance of AEC-592 to licensee reply:

20 or less _____; 21 to 30 _____; 31 to 40 _____;

over 40 _____

From Inspection date to date of F/U Inspection:

20 or less _____; 21 to 40 _____; 41 to 60 _____;

61 to 90 _____; 91 to 120 _____

VIII:

Additional follow-up by agreement with L&R _____