

JUL 17 1985

Ms. Marjorie A. Spees  
C.A.S.E.  
P. O. Box 54675  
Tulsa, Oklahoma 74155

Dear Ms. Spees:

This is in response to your letter dated June 20, 1985, in which you requested that the Nuclear Regulatory Commission (NRC) prepare an environmental impact statement related to the proposed expansion of the Sequoyah Fuels Facility near Gore, Oklahoma. NRC's regulations require and we are currently preparing an Environmental Assessment (EA) to evaluate the impact of this proposed action on the environment. When our review is completed, we will send you a copy of the assessment.

In your letter, you cited four reasons for your request. Some of these reasons indicate that the Citizens Action for a Safe Environment (CASE) has been given some misinformation regarding the process proposed for the Sequoyah Facility. Accordingly, I would like to take this opportunity to set the record straight. You stated as follows:

Comment 1: Interstate transportation of high level radioactive spent fuel rods.

Response:

The conversion of depleted uranium hexafluoride ( $UF_6$ ) to uranium tetrafluoride ( $UF_4$ ) has nothing to do with high level radioactive spent fuel rods. The term "depleted uranium" refers to uranium depleted in the U-235 isotope as a result of the uranium enrichment process. The depleted uranium is actually less radioactive than either natural uranium, as found in nature, or uranium enriched in the U-235 isotope.

Comment 2: Higher level waste from process of converting uranium  $U_6$  to  $U_4$  [sic].

Response:

The process which Kern-McGee proposes to use to convert  $UF_6$  to  $UF_4$  is a dry process, i.e., two gases,  $UF_6$  and hydrogen from cracked ammonia, which react at an elevated temperature to form  $UF_4$  (a solid) and hydrofluoric acid (HF) which is condensed to a liquid. The HF will be recycled and used as feed material in the production of fluorine. The non-condensable gases from this reaction are scrubbed to remove any entrained fluorides prior to discharge. Therefore, the amount of waste generated by the production of  $UF_4$  from  $UF_6$  will be minimal.

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Comment 3: Kerr-McGee repeatedly violates EPA permit by a leaking holding pond and violates NPDES [sic] discharge limitations.

## Response:

The violations of the NPDES permit limits are of a short-term nature involving nonradiological parameters. The NPDES permit is under the authority of the U. S. Environmental Protection Agency (EPA). The EPA has required Kerr-McGee to take corrective actions on these items.

Comment 4: Substantial expenditures (est. \$5 million).

## Response:

The cost of a project is generally not a major factor that is considered in the preparation of an EA. The main issues addressed in an EA relate to the construction and operation of the proposed facility and its impact on the quality of the environment.

Regarding your request to participate in any hearings that may be held, your letter has been forwarded to the Office of the Secretary for appropriate disposition.

Sincerely,

Original Signed By:

W. T. Crow

W. T. Crow, Acting Chief  
Uranium Fuel Licensing Branch  
Division of Fuel Cycle and  
Material Safety, NMSS

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**Docket 40-8027**

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OFFICE	FCUP WTC	FCUP VL	Region IV	WTC OGC			
SURNAME	WTCrow/ks/as	VLTharpe	McConnell	San Bell/ucg			
DATE	7/17/85	7/17/85	7/17/85	7/17/85			

June 20, 1985  
C.A.S.E.  
P. O. Box 54675  
Tulsa, Okla. 74155

Nuclear Regulatory Commission  
Washington, D. C. 20555

Attention: Mr. William Crow

Dear Mr. Crow:

Citizens' Action for a Safe Environment request an environmental impact statement for the Sequoyah Fuels (Kerr-McGee) plant near Gore, Oklahoma due to the application to expand the facility. These are the reasons:

1. Interstate transportation of high level radioactive spent fuel rods.
2. Higher level waste from process of converting uranium U6 to U4.
3. Kerr-McGee repeatedly violates EPA permit by a leaking holding pond and violates NPDES discharge limitations.
4. Substantial expenditures (est. \$5 million).

We also request radio-nuclide inventory on spent fuel assemblies proposed to be used in new conversion process.

We also request to participate with attorney in any public hearing regarding this application.

Respectfully,  
C.A.S.E.  
Corresponding Secretary,  
Marjorie A. Spees

*Marjorie A. Spees*

*647-1157* 1p