

91-15



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

JAN 03 1992

MEMORANDUM FOR: The Chairman  
Commissioner Rogers  
Commissioner Curtiss  
Commissioner Remick  
Commissioner de Planque

FROM: James M. Taylor  
Executive Director for Operations

SUBJECT: NOTICE OF VIOLATION FOR SEQUOYAH FUELS  
CORPORATION (EA 91-153)

This is to inform the Commission that the staff intends to exercise broad discretion and not propose a civil penalty for a Severity Level III problem at Sequoyah Fuels Corporation (SFC). Prior notice to the Commission is required before exercising this authority in accordance with the "catch all" discretion of Section V.G of the Enforcement Policy. This action is based on failures on the part of SFC to conduct radiation surveys as necessary, to inform and instruct individuals working in restricted areas of the presence of radioactive materials and the precautions to be taken, to exercise adequate radioactive contamination controls over materials being taken from the facility, to report events to the NRC in accordance with established requirements, to establish procedures for all activities involving radioactive or hazardous materials, to follow procedures that had been established, and to comply with license conditions and requirements designed to ensure the protection of the environment.

The violations of NRC requirements discussed above were identified during an Augmented Inspection Team (AIT) inspection conducted from August 27 through August 29, 1990, and during several other inspections conducted between August 1990 and July 1991. In conjunction with these inspections, the NRC's Office of Investigations (OI) conducted an investigation to determine if any of the violations occurred in the interest of returning the SFC facility to operations and to determine if any false statements were made by SFC management and employees during the NRC inspections.

The violations of NRC requirements identified during these inspections, as well as violations and concerns developed during the OI investigations, resulted in an Order Modifying License & Demand For Information (Order) being issued to SFC on October 3, 1991, see SECY-91-301. The Order suspended SFC's licensed

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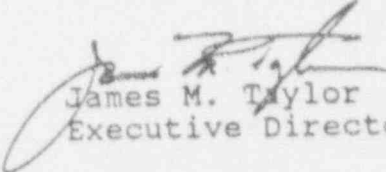
The Commissioners

- 2 -

activities until a plan is developed and approved by the NRC to improve the radiation safety and environmental protection programs, removed one manager from any responsibility over NRC-regulated activities, and demanded information on why several other employees should not be removed from responsibilities over NRC-regulated activities.

Normally, a civil penalty would have been proposed for this problem. However, in light of the significant actions that SFC is required by the Order to take to improve their operation, the fact that SFC is prevented from operating the facility until many of these improvements are in place, and the significant management changes that have been made at SFC since the violations occurred, including the appointment of a new president and the removal of two vice presidents, the staff intends to exercise broad discretion and not propose a civil penalty for this Severity Level III problem. Accordingly, in five days from the date of this memorandum, the staff intends to issue a Notice of Violation without a civil penalty to SFC.

This memorandum discusses a pending enforcement action and therefore should not be publicly disclosed.

  
James M. Taylor

Executive Director for Operations

CC:  
OGC  
SECY

Distribution

J. Taylor, EDO  
H. Thompson, DEDS  
R. Martin, RIV  
J. Lieberman, OE  
R. Laufer, OE  
G. Sanborn, RIV  
R. Bernero, NMSS  
EA File  
~~Day File~~  
BHayes, OI  
EDO R/F

\*SEE PREVIOUS CONCURRENCE

OE*	RIV*	NMSS*	OE:D*	DEDS*
RLaufer	RMartin	RBernero	JLieberman	HThompson
12/20/91	12/20/91	12/23/91	12/23/91	12/27/91

ED  
JTaylor  
01/3/92

# COPY

Compressed Air Bottles from  
Carlisle Training Center  
located in Number 1 Restricted  
Area

SEC /AH FUELS CORP				
TIME <u>11:45</u>		DATE <u>2-3-92</u>		
		BETA mrad/hr	GAMMA mR/hr	TOTAL mrad/hr
Bottle #				
CONTACT	↓			
18 IN	1	<.2	<.2	<.2
CONTACT		<.2	<.2	<.2
18 IN	2	1.72	<.2	1.72
CONTACT		<.2	<.2	<.2
18 IN	3	6.02	<.2	6.02
CONTACT		<.2	<.2	<.2 <sup>can</sup>
18 IN	4	3.44	<.2	3.44
CONTACT		<.2	<.2	<.2
18 IN	5	6.45	.4	6.85
CONTACT		<.2	<.2	<.2
18 IN	6	3.44	.2	3.64
CONTACT		<.2	<.2	<.2
18 IN	7	7.74	.4	8.14
CONTACT		<.2	<.2	<.2
18 IN	8	2.58	.2	2.78
CONTACT		<.2	<.2	<.2
18 IN	9	N A		
CONTACT				
18 IN	10			
CONTACT				
18 IN	11			
CONTACT				
18 IN	12			
CONTACT				
18 IN				

INSTRUMENT RA 2

S/N 5846

TECH Connie Turner

REMARKS

REVIEWED BY [Signature]

DATE 2-3-92 m-1

Feedback Mechanisms and Related Improvements

- (1) The manager-on-shift program will be implemented for at least 30 days after restart until the President is satisfied it is no longer necessary. If achieving full production is delayed, the program will be extended as appropriate. The managers used for the program will typically be at the level of Area Manager or Department Manager. There will be a manager on every shift. He will be charged with making plant tours and will verify, among other things, the level of procedural adherence. See attached memorandum from J. J. Sheppard to R. Parker, dated November 20, 1991, which provides guidance to the managers in the discharge of their responsibilities under this program.
- (2) Augmentation of Health & Safety staff with 9 additional experienced contract Health Physics personnel for at least 120 days after restart. SFC has currently augmented the Health & Safety staff with 18 experienced contract technicians and two consultants. These contract technicians will be phased out as permanent H&S staff positions are filled. These contract H&S technicians provide additional experienced personnel to assure the adequacy of operational practices and to identify potential problems to management. The current plan is to schedule an SFC H&S technician with knowledge of the

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plant on shift with each H&S contract technician working on shift. The current on-shift SFC H&S technicians will be rotated into additional training after the other SFC H&S technicians complete their training and are available for on-shift duty.

- (3) Use of senior experienced consultants. Mr. Murray Selman has been retained to provide consultation to the President and the Senior Vice President. Mr. Selman's extensive experience in both the uranium conversion industry and the commercial nuclear power industry will be utilized to further assure a successful plant startup and operations. Mr. Selman has been onsite for extended periods during the preparations for startup. He will continue to be onsite for extended periods during the startup and until the plant reaches a steady state of operating conditions, and will be available as needed thereafter. Mr. Selman has and will continue to spend a considerable fraction of his time in the field observing ongoing maintenance and operations activities. In addition, he will undertake special tasks as deemed appropriate. Examples of tasks he has undertaken to date, and indicative of those he will undertake in the future include a review of revised operating procedures to assure the proper level of detail, performance of independent root cause analysis of the DUF<sub>4</sub> filter incident of January 9, 1992, review with operating

personnel of the pre-startup equipment checklists, and development of performance indicators for Operations and Maintenance (currently ongoing). In the performance of the tasks and in his field walkthroughs, Mr. Selman has and continues to observe and to interact extensively with operations and maintenance personnel. Mr. Paul Check will be utilized to assist management in a number of areas during restart and the early stages of operations. These will include, among others, participation in internal regulatory compliance self-assessment inspections, such as the one conducted during the week of January 6, 1992; review of SFC regulatory compliance for adequacy, lessons learned, and depth of understanding of issues; and assistance in the preparation and review of ongoing improvement plans and actions addressing issues based on past performance. Both Mr. Selman and Mr. Check were used as part of the senior management inspections during the week of January 6, 1992, and will be used, as appropriate, for such future inspections.

- (4) The Sequoyah Oversight Team, composed of independent experts, has developed a detailed restart plan to provide a focus upon certain critical procedures and activities during the restart period. See attached letters to J. J. Sheppard from B. J. Garrick dated January 10 and January 21, 1992.



- (5) SFC has adopted a program of senior management inspections as a means of self assessment, including selective assessment of procedure upgrades, plant walkdowns to evaluate procedural compliance and review of commitment implementations. Such an inspection was conducted during the week of January 6, 1992. Additional such senior management inspections will be conducted approximately every 8 weeks during the first six months after restart. Additionally, management walkthroughs to identify problems and obtain employee feedback were conducted during the weeks of November 25, 1991, and January 6, 1992. A third walkthrough is scheduled for February 4, 1992. Such management walkthroughs will continue on a monthly basis for at least 6 months after restart.
- (6) Procedure G-190 is being revised significantly to include a Deficiency Report, which can be initiated by anyone at SFC based on actual or perceived conditions adverse to health, safety, or environment. This revised procedure will be in place by March 15, 1992. This tool can provide significant feedback to management, since every individual becomes "eyes and ears" looking for quality problems and a tool is provided for reporting problems.
- (7) Operations and Maintenance have adopted a process under which, before the conduct of any non-routine activity not

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covered by a procedure, there will be an inter-departmental review in order to assure full consideration of safety hazards and environmental questions, as well as to assure employee safety. See attached memorandum from J. Martin to R. A. Parker and L. J. Silverstein dated January 24, 1992.

- (8) Prestart check lists have been developed by Operations to provide for a safe, orderly and pre-planned restart of the facility. Prestartup equipment checklists will be used in physical inspections of equipment to assure that any problems are addressed prior to startup. Process system startup checklists will be used to assure that startup operations are performed by procedure.
- (9) Operations has revised procedures to adopt a process of independent verification of block valves which isolate AHF and UF<sub>6</sub> relief systems. If a system is shut down for an extended period of time there will be independent verification that the block valves are open by another individual.
- (10) Managers make frequent visits to work areas to reinforce work standards and to improve communication between managers and employees, including obtaining feedback regarding problems or concerns.



- (11) Numerous improvements of the QA program are being developed. The conduct of programmatic audits has been initiated. A programmatic audit was performed of the Maintenance program and resulted in the preparation of a Maintenance Improvement Plan. An audit plan has been developed for a programmatic audit of the Design Control program.
  
- (12) The Readiness Review Committee, composed of four senior experts who assessed readiness for restart, will return within 4-6 months after restart to assess the effectiveness of changes that were implemented and whether the desired level of performance has been achieved.
  
- (13) There are also frequent meetings between SFC management and personnel both to reinforce SFC goals, objectives and expectations, to assure that management's messages are being received and to obtain feedback on problems and concerns. These include the President's periodic meetings with all employees; periodic meetings of the President, Senior Vice President and Vice President, Regulatory Affairs with small work groups; frequent meetings of the Vice President, Regulatory Affairs, with Health and Safety and Environmental personnel; and weekly meetings of the Manager of Operations with Operations shift personnel and area managers to discuss, among other

things, concerns or problems that occurred on shift.

- (14) Commitment tracking system: The CTS is operational. The first two week "look ahead" reports and set of Reply Forms have been sent out for responses. The CTS currently includes SFC commitments to the NRC.

Ultimately it will be expanded to include all NRC open items, QA open items, and other internal SFC commitments, such as Deficiency Reports under Procedure G-190. An element of the upgraded CTS is improved report format and trending and tracking mechanisms to focus management attention on problem areas. The CTS will be an important component of a Deficiency Reporting System since it will ensure that each item is tracked and ultimately dispositioned. Implementation of the upgraded CTS will be accomplished in steps, and is expected to be completed by April 30, 1992.

- (15) The annual audit by General Atomics of the SFC QA program and SFC nuclear licensing program will be scheduled during the first few months of restart in order to provide early feedback in the effectiveness of these programs during plant operation. Increased oversight of SFC operations will be provided by the SFC Board of Directors, which now includes the new Chairman of the Board, Dr. Richard A. Dean, the Senior Vice President, Reactor Group, of General Atomics, who has extensive

nuclear experience, and the new Chief Executive Officer, Mr. Max D. Kemp, a Senior Vice President and Chief Financial Officer of General Atomics. They will also help to bring General Atomics' experience to bear on overall SFC operations. In addition, the SFC Board of Directors will be expanded to include two new outside members, both of whom will have extensive nuclear experience.

- (16) SFC has retained the services of four Kerr-McGee experts, one of whom was formerly director of Kerr-McGee's Research Center and the others essentially designed, started-up and were involved for 20 years in upgrades, problem solving, etc., in the denitration/reduction area, solvent extraction area and  $UF_4$  plant, respectively. They will provide technological information (e.g., design basis) to the SFC plant engineers through seminars. They will also be available for trouble-shooting as problems may come up and to assist SFC technical management, based on their detailed knowledge of the plant, on questions regarding safety, process operations and product quality.

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SEQUOYAH FUELS CORPORATION

INTERNAL CORRESPONDENCE

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TO: Dick Parker

DATE: November 20, 1991

FROM: Joe Sheppard *JS*

SUBJECT: Manager on Shift

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As part of our commitments with respect to planning for restart, we have said that we will provide a manager on shift for the first 30 days after restart. The purpose of the manager on shift is not to supersede or replace the Senior Shift Supervisor, but rather to support that individual. The duties I envision for the manager on shift are:

- 1) Maintain an overview of the overall plant operation. The manager on shift would assure that someone was watching the big picture and not caught up in the individual operational problems that may unduly divert the other supervisors.
- 2) Maintain an overview of any high potential for contamination activities on the shift to again assure that the whole picture was being reviewed.
- 3) Maintain an overview of any high or higher than normal potential hazards from chemical activities on the shift.
- 4) Maintain an overview of the overall use and compliance with procedures on the shift. Provide the shift supervisor with the support to assure that the procedures are available, and being used properly.
- 5) Provide readily available management support to the shift supervisor to quickly resolve problems by obtaining and committing resources as necessary, e.g. extra operators, maintenance support, etc.
- 6) Provide me with a shiftly report on problems encountered and their status, and achievements accomplished on the shift. This is to allow me quick feedback on any additional support that the shifts may need as we implement our new operating and health physics philosophies.

I envision utilizing four managers on twelve hour shifts to accomplish this mission. The twelve hour shifts will provide a continuity over the shift changes to, again, maintain the overview. I would like your comments on the above, your thoughts on who the managers ought to be, and what type of schedule you would like to adopt by November 27.

Please call me if you have any questions.

-----INTERNAL CORRESPONDENCE-----

SEQUOYAH FUELS  
CORPORATION

OPERATIONS  
DEPARTMENT

TO: R. A. Parker/  
L. J. Silverstein

DATE: January 29, 1992

FROM: J. K. Martin *JKM*

SUBJECT: Notification of Planned  
Non-Routine Maintenance  
or Operations Activities

It is essential that our plant start up and operations occur with the minimum number of unexpected transients and perturbations. To this end, I recently requested you to notify me of any planned maintenance or operations activities that are non-routine and potentially require unique or unusual precautions to assure they are completed without incident. It is my intent that we conduct and document a thorough review with all potentially affected departments, including Health and Safety and Environmental, prior to execution of such activities.

General guidelines to use in identifying such activities include:

- 1) Activities requiring unique or unusual personnel protective measures.
- 2) Activities that temporarily weaken or remove barriers to emissions, internal or environmental, such as filters, scrubbers, dust collection systems, vacuum systems, critical emissions monitoring instrumentation, etc.
- 3) Activities requiring unique or unusual measures to prevent contamination.
- 4) Activities with higher than normal potential for regulatory or environmental non-compliance.
- 5) Activities with a potential to adversely affect production.
- 6) Any special test or operation with the potential for any of the characteristics described in items (1) through (5).

You must obviously use your good judgement in identifying those activities requiring the proposed review. Activities that are routinely performed and thoroughly proceduralized should not, in most cases, require a special review. However, those activities that are first-time evolutions or performed on an in-frequent basis and have the characteristics described above deserve the extra level of review.

If you have any questions or comments please call.

JKM:am

xc: J. J. Sheppard  
J. D. Richardson  
R. J. Adkisson





ENGINEERS • APPLIED SCIENTISTS •  
MANAGEMENT CONSULTANTS

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JAN 13 1992

STANDARD FORM 64

January 10, 1992  
SFC-5074-PLG-113

Mr. James J. Sheppard  
Sequoyah Fuels Corporation  
Interstate 40 and Highway 10  
Gore, OK 74435

Dear Mr. Sheppard:

#### SEQUOYAH OVERSIGHT TEAM ACTIVITIES DURING RESTART OF SEQUOYAH FACILITY

During the U.S. Nuclear Regulatory Commission (NRC) audit in December 1991, Mr. Michael Vasquez indicated that the NRC would like a summary of the activities that are planned by the Sequoyah Oversight Team (SOT) during restart of the Sequoyah Facility. This letter presents our planned coverage for the restart. It covers activities from the time of completion of the second NRC audit visit, which is expected on January 17, 1992, through startup of all main process systems and the establishment of normal process flow.

These activities are in two parts. The first is a check of the status of various commitments and activities that are to be complete before facility restart. A summary of commitments and activities that the SOT currently plans to evaluate is given in Enclosure 1.

The second part of the SOT activities will occur as the facility process systems are restarted. These activities will consist of observing the step-by-step completion of selected representative procedures during restart of the process systems. Complete coverage of all procedures is not planned, and the extent of observation on each selected procedure will be based on the quality of performance observed. Our rationale is that the facility staff will have been trained on all new and revised procedures that are effective at the time of restart, and therefore the oversight activity should focus on sampling the performance of these procedures.

To facilitate SOT coverage during restart, we will identify the representative procedures that are to be observed and then coordinate our onsite oversight periods to ensure that the SOT member who is present during the restart is able to observe performance of the selected procedures. A tentative list of procedures that are to be observed is included in Enclosure 2. A form sheet for recording the team member's observations is provided in Enclosure 3.

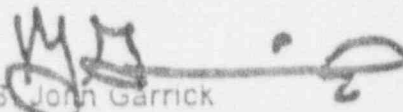
Mr. James J. Sheppard  
Sequoyah Fuels Corporation

January 10, 1992  
Page 2

Throughout both the pre-restart period and the restart period, the planned SOT coverage will remain at 8 hours in each 24-hour period unless unusual problems are encountered or the NRC requests a higher level of oversight. In view of the extensive effort by SFC to prepare for the restart, we believe that one SOT member spending 8 to 12 hours in each day should be sufficient to provide a satisfactory level of oversight.

Please call me if you have any questions.

Very truly yours,

  
B. John Garrick  
President

Enclosures

**LIST OF PRE-RESTART ACTIVITIES  
TO BE OBSERVED OR CHECKED BY  
SEQUOYAH OVERSIGHT TEAM**

**PROCEDURES AND TRAINING**

1. All Health & Safety and Environmental procedures committed to completion prior to restart are complete and approved, including responses to NRC comments.
2. Training completed on all procedures in item 1. Completion includes answers to all questions raised during training, and evidence that the questioners have understood the answers.
3. All temporary operating procedures (TOP) have been properly prepared and distributed, and the appropriate personnel have reviewed the TOPs.

**HEALTH AND SAFETY AND ENVIRONMENTAL READINESS**

1. Document summarizing the facility ALARA program completed and approved.
2. Planning for Health & Safety coverage during restart completed, and manning level established to support coverage.

**OPERATIONS DEPARTMENT READINESS**

1. Startup checklists completed, approved, and ready for implementation.
2. Updated shift turnover program established, and turnover checklists available for use by shift supervisors and area managers.
3. All operations personnel have walked through new and revised operating procedures that will be effective during restart.
4. All Hazardous Work Permits are properly accounted for and controlled, including Health & Safety log of permit status.

**MANAGEMENT READINESS**

1. All new managers appear to be aware of their responsibilities and are prepared to perform any startup activities assigned to them.
2. All SFC commitments for response to the Independent Management Assessment prior to restart have been completed.
3. Adequate coverage for Environmental Department Manager has been established.
4. NRC concerns on Quality Assurance effectiveness have been satisfactorily addressed for startup.

**PROPOSED REPRESENTATIVE PROCEDURES  
FOR SOT OBSERVATION DURING RESTART  
OF SEQUOYAH FACILITY**

Performance of the following procedures will be observed by the SOT member who is onsite at the time that the procedure is initially implemented during the restart of the Sequoyah Facility. This is a proposed list and may be altered based on any comments that you or the NRC provide or on findings of the SOT during the period immediately preceding restart of process operations.

To enable the SOT to be present during initial performance of each of the following process system procedures (N-Series), we request that the expected time of initial implementation for the procedure be provided to the onsite SOT member as soon as possible after determination that the procedure will be implemented. The onsite SOT member will also maintain contact with the facility staff to track the expected start times for each N-Series procedure.

G-111	Access to Restricted Areas and Controlled Access Areas
G-114	Change Room Procedure
G-115	Survey of Low Specific Activity (LSA) Radioactive Shipments and Receipts
G-158	Radioactive Contamination Control
G-304	Hazardous Work Permits
HS-102	Airborne and Liquid Effluent Monitoring
HS-104	In-Plant Air Sampling and MPC-Hour Exposure
HS-301	Radiation, Contamination, and Release Surveys
HS-502	Issuing Respiratory Protection Equipment
HS-506	Laundry Facility Operation
HSDept-119	Entry by Personnel Into High Radiation Areas
N-170-1	H <sub>2</sub> -F <sub>2</sub> Burner and Scrubber Operation
N-230-1	Digestion of Yellowcake and Transfer of Slurry
N-240-2	Solvent Rework
N-250-1	Uranyl Nitrate Hexahydrate (UNH) Boildown
N-270-4	Primary Cold Trap Operation
N-270-8	Primary Fluorination Tower Operation
N-270-10	Ash Grinding
N-280-1	Uranium Hexafluoride Product Handling and Shipping
N-340-1	Receiving Anhydrous Hydrofluoric Acid (AHF)
N-340-8	Anhydrous Hydrofluoric Acid Vaporization
N-800-2	Operation of the Autoclaves and UF <sub>6</sub> Feed System
N-800-7	Operation of the Anhydrous Hydrogen Fluoride (AHF) Recovery System

SEQUOYAH OVERSIGHT TEAM  
PROCEDURE OBSERVATION RECORD

PROCEDURE NO. \_\_\_\_\_ REVISION NO. \_\_\_\_\_ DATE/TIME OBSERVED \_\_\_\_\_

PROCEDURE TITLE:

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PERSON(S) PERFORMING PROCEDURE:

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PERSON(S) TRAINED: YES \_\_\_ NO \_\_\_

TRAINING DEFICIENCIES IF ANY:

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STEPS OBSERVED (List step numbers or page numbers observed):

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OBSERVATIONS ON PERFORMANCE

PERFORMANCE SATISFACTORY: YES \_\_\_ NO \_\_\_

DEFICIENCIES NOTED:

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OTHER REMARKS OR COMMENTS:

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SOT OBSERVER \_\_\_\_\_

DATE \_\_\_\_\_

(Printed Name)

(Signature)



ENGINEERS • APPLIED SCIENTISTS •  
MANAGEMENT CONSULTANTS

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PLG, Inc., Washington, D.C., Office  
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January 21, 1992  
SFC-5074-PLG-117

Mr. James J. Sheppard  
Sequoyah Fuels Corporation  
P.O. Box 610  
Gore, OK 74435

Dear Joe:

REVISIONS TO SEQUOYAH OVERSIGHT TEAM ACTIVITIES  
DURING RESTART OF SEQUOYAH FACILITY

Subsequent to my letter of January 10, 1992, additional information and documentation on Sequoyah restart activities were provided to the Sequoyah Oversight Team by you and your staff. Therefore, we are submitting the following revisions to Enclosures 1 and 2 of my letter.

Please call me if you have any questions.

Very truly yours,

B. John Garrick

Enclosures

RECEIVED

JAN 23 1992

Sequoyah Fuels Corporation



Enclosure 1  
Revised  
January 21, 1992

## LIST OF SEQUOYAH OVERSIGHT TEAM ACTIVITIES TO BE OBSERVED/VERIFIED BEFORE RESTART

### PROCEDURES AND TRAINING

1. All Health & Safety and Environmental procedures committed for completion prior to restart are completed, approved, and implemented.
2. Training completed on all procedures in item 1, including evidence of appropriate training for revisions to procedures after they were implemented.
3. Training completed on all other procedures or procedure revisions that have been implemented.
4. All temporary operating procedures (TOP) have been prepared and distributed per procedure G-002 revision currently in effect, and TOPs have been reviewed by appropriate personnel.

### HEALTH & SAFETY AND ENVIRONMENTAL READINESS

1. Planning for Health & Safety coverage during restart completed and manning level established to support coverage.
2. Environmental manager in place and prepared to direct environmental program.
3. Coordination of all sampling (environmental, process, and health & safety) pertinent to environmental monitoring has been established.

### OPERATIONS READINESS

1. Startup checklists completed and approved (includes system status checks and any other prestartup alignment checks).
2. Shift turnover program established and turnover checklists available for use by shift supervisors.
3. Hazardous Work Permits are being properly accounted for and controlled per Procedure G-304.
4. Manager-on-Shift program established.

### MANAGEMENT READINESS

1. Emergency plan readiness established, including confirmation of manager assignments and understanding.
2. All prestartup commitments have been completed; e.g., from Independent Management Assessment.
3. U.S. NRC concerns on Quality Assurance effectiveness have been addressed for startup.



UNITED STATES

NUCLEAR REGULATORY COMMISSION

REGION IV

URANIUM RECOVERY FIELD OFFICE  
BOX 25325  
DENVER, COLORADO 80225

FEB 07 1992

Docket No. 40-8027

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

FROM: Ramon E. Hall, Director

SUBJECT: SFC-GORE WATER SAMPLE RESULTS

During the June 24-28, 1991, inspection, Gary Konwinski collected 14 water samples. The samples are designated as north ditch, emergency basin, MW-34T, MW-33T, MW-10, MW-36 (partial), MW-36A, MW-10A, MW-2326, MW-2302B, fluoride clarifier decant, RW-3, roof drain, and laundry H<sub>2</sub>O. The partial designation associated with sample MW-36 indicates that sufficient water was not available; therefore, the results of this well could be questionable.

The analytical work that was requested included metals, radionuclides, nitrates, as well as various anions and cations. Each sample was collected, preserved, split with SFC, and sent to the laboratory in accordance with standard protocol. To be consistent with SFC procedures, none of the samples were filtered; therefore, they represent total analysis for the various constituents.

These data will be used as supplementary information during Gary Konwinski's review of the January 10, 1992, "Sequoyah Fuels Corporation Action Plan." Gary will coordinate this review with other regional staff.

Ramon E. Hall  
Director

Attachments:  
Oak Ridge National Laboratory:  
Chemical & Physical Analysis, 30 pages  
Low-Level Radionuclides Analysis, 3 pages

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FEB 07 1992

cc: w/encl.

J. Hickey

M. L. Horn

w/o encl.

G. M. Vasquez, RIV

J. P. Jaudon, RIV

S. L. Uttal, OGC

T. R. Combs, OCA