

5/23/92

FOR INFO ONLY

Subject: AIRBORNE AND LIQUID EFFLUENT MONITORING

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2.0 PRECAUTIONS

None

3.0 REFERENCES

- 3.1 Procedure HSDEPT-118, "Counting Room Procedure"
- 3.2 Sequoyah Facility License SUB-1010, Sections 3.3.2, 5.1, 5.2, 12.8.3, and 12.8.4, as amended.
- 3.3 Sequoyah Facility Waste Discharge Permit WD-75-074, I.D. No. 68000010
- 3.4 Sequoyah Facility NPDES Permit OK 0000191
- 3.5 Sequoyah Fuels Operating Procedure G-109, "Environmental Airborne Radiological Monitoring"
- 3.6 Oklahoma Department of Health, Air Quality Service Permit No. 86-015-0.
- 3.7 Code of Federal Regulations, Title 10, Part 20.106 "Radioactivity in Effluents to Unrestricted Areas"
- 3.8 Code of Federal Regulations, Title 10, Part 20.403, "Notification of Incidents"
- 3.9 Code of Federal Regulations, Title 10, Part 20.405, "Reports of Overexposures and Excessive Levels and Concentrations"
- 3.10 Environmental Assessment for Renewal of Special Nuclear Material License No SUB-1010, NUREG 1157, August 1985.
- 3.11 Derivation of Elevated and Ground Level Release X/Qs in support of the implementation of Procedure HS-102, November 18, 1991, SFC Document.
- 3.12 Sequoyah Fuels Operating Procedure G-108, "Environmental Sample Submission and Data Reporting"
- 3.13 Health and Safety Department Procedure HSDEPT-106, "Stormwater Runoff Sampling"
- 3.14 Sequoyah Fuels Operating Procedure N-290-8, "Combination Stream Contamination Control"

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2. The KOH solution and the solution from the moisture trap shall be combined, mixed thoroughly, and a 10 ml sample removed and placed into a planchette.
3. Submit the scrubber solution to the Process Laboratory for fluoride analysis and a solution volume measurement.
4. The planchette sample shall be dried under a heat lamp and counted in a gas proportional counting system to determine the gross alpha activity.
5. The total solution volume (trap plus scrubber volumes) shall be divided by the volume of the sample aliquot (10 ml) to obtain a sample correction factor. Multiply this correction factor by the gross alpha analysis result of the aliquot to obtain the gross alpha activity collected by the scrubber solution.
6. A Health and Safety Technician shall remove the filters, dry, and analyze each for gross alpha activity in accordance with Procedure HSDEPT-118.
7. Calculate the alpha activity of the stack sample by adding the total activity collected on both filters and in the scrubber solution.

B. Other Release Points

1. Each of the airborne effluent release locations in Attachment 1 shall be sampled continuously through a particulate filter, if the vent's release rate exceeds 10 g-U/month (see Section 4.1.4).
2. The filter shall be changed daily and analyzed for gross alpha activity by a Health and Safety Technician in accordance with Procedure HSDEPT-118, "Counting Room Procedure."
3. Use the results to derive the corresponding uranium concentrations in the stack or vent exhaust.

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- * B. Daily, if the measured or estimated airborne activity in the restricted area is ≥ 0.5 MPC, the Manager, Health and Safety, or his designee, shall investigate the cause of the activity. He shall compare air sample results from site fence air samplers and review past releases.

If the measured or estimated airborne activity is ≥ 10 MPC in the restricted area, notify the NRC within 30 days. (See 10 CFR 20.405)

If the measured or estimated airborne activity is ≥ 500 MPC in the restricted area, notify the NRC within 24 hours. (See 10 CFR 20.403)

- C. Monthly, the release rate from each effluent release point or stack is summed with all other release points. The resulting release rate is then compared to the plant's limit of 30,000 uCi/qtr. The release rate is computed in Section 4.2. Compliance is determined by ratioing the cumulative release to the allowable release limit.

If the resulting ratio is ≥ 1.0 , the Manager, Health and Safety, or his designee, shall investigate the cause of the higher activity. He shall conduct additional sampling and/or review past records.

At the end of each quarter, if the resulting ratio is ≥ 10 , he shall notify the NRC within 30 days.

- * D. If the DUF_4 Plant Dust Collector exhaust exceeds 8 uCi/day (0.002 lbs/hr) UF_4 , the Manager, Environmental, shall be immediately notified. The Manager, Environmental, shall make notification to the Oklahoma Air Quality Service.

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2. Write in column 2 the air sample concentration, in uCi/ml. Check whether Nat-U or Depl-U. Nat-U or Depl-U are pre-printed for routinely monitored release points.

==NOTE==

For sample concentrations with more than one sample point (e.g., S-6), sum the concentration values and enter the total.

3. Write in column 3 the exhaust flow rate of the vent, in ft³/min. Get the nominal exhaust flow from Attachment 1. These are pre-printed for routinely monitored release points.
4. Multiply the values in columns 2, 3, and 4, and write the result in column 5.
5. Write in column 6 atmospheric dispersion factor (X/Q), in sec/m³, for the associated release point. Refer to Attachment 3 for the appropriate value. These are pre-printed for routinely monitored release points.
6. Multiply the values in columns 5, 6, and 7, and write the estimated concentration at the restricted area fence line (result in column 8).
7. Write in column 9 the applicable MPC, in uCi/ml, for the form of activity being reported. These are pre-printed for routinely monitored release points.

Species	Unrestricted MPC - Air (uCi/ml)
Nat-U	5 X 10 ⁻¹²
Depl-U	3 X 10 ⁻¹²

8. Divide the column 8 value (concentration) by the column 9 value (MPC), and write the result in column 10.
9. Repeat the above steps 1-9 for each release point and building being reported.

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5. Multiply columns 2, 3, 4, and 5, and write the result in column 6.

6. Repeat the above steps 1-5 for each release point for the building being reported.

* C. Sum all column 6 values and enter the result in box 6(a).

D. For each new sheet, write the totals from box 6(a) of the previous sheets in box 6(b) of the new sheet. On the last sheet, write the totals of all sheets in box 6(c).

E. Write beginning and ending Page 2 sheet numbers at the bottom of the page along the "Grand Totals" line.

4.2.3 Perform Compliance Check

* A. Each day, review the results shown in box 10(c), page 1. If the value is ≥ 0.5 , immediately notify the Manager, Health and Safety, or his designee.

B. Each month, sum all of the daily totals in box 6(c), page 2. If the total is $\geq 10,000$ uCi, immediately notify the Manager, Health and Safety, or his designee.

4.2.4 Assembly and Submission of the Airborne Effluent Computation Form

* A. Go through the entire set of Airborne Effluent Computation Work Sheets and arrange the pages in order. Then write in the upper right-hand corner of each page on the line provided the total number of sheets in the package.

B. Initial and date each sheet.

C. Submit the package to the Manager, Health and Safety, or his designee.

D. Submit a copy of the Daily Radiological and Environmental Status Report to the Manager, Environmental.

4.4 Liquid Effluent Monitoring

4.4.1 Combination Stream - Outfall 001

The combination stream effluent shall be sampled continuously by an automatic sampling device that draws water passing through the discharge weir at a nominal sampling rate of five (5) milliliters per minute and deposits the sample into a bottle which will hold an 8-hour sampling volume. Treat samples removed from the combination stream sampling point in the following manner:

- * A. Every Monday, Wednesday and Friday, a Health and Safety Technician shall visit the discharge sampler and:
 - 1. Inspect the sampler for proper operation. Flush the main sampling hose to clear debris. Inspect hoses and tubing, replace if necessary. If the device is not functioning, arrange for repair, as soon as possible and notify the Manager, Environmental, as soon as possible.
 - 2. Remove the filled sample containers, and follow instructions B. through G., below.
 - 3. Reload the sampler with clean, empty containers.
- * B. Take two 40 ml aliquots from each sample and place into two sample containers, for monthly composites. Prepare a third monthly composite during February, May, August, and November as a quality assurance sample.
- C. Mark the sample collection time and date on each sample container.
- D. Remove the 8-hour samples from the refrigerator, and complete a chain of custody form. Submit the samples and the chain of custody form to the Environmental Lab, for uranium, fluoride, total suspended solids (TSS) and nitrate analysis.
- * E. Once a week, usually on Wednesday, obtain an analysis for ammonia-nitrogen (as N) and Ra-226 (total).

SEQUOYAH FACILITY OPERATING PROCEDURE

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4.4.4 Verification of Compliance for All Outfalls

- A. Compliance with NRC requirements in the concentration of the outfall either singly or in combination, the Health and Safety shall investigate of the activity. When the concentration exceeds 10 times the MPC, he shall NRC within 30 days. The MPCs are CFR 20, Appendix B.
- B. Compliance with EPA (NPDES) requirements discussed in detail in procedure.
- C. Compliance with OWRB requirements in detail in procedure G-181.
- D. Excessive discharges from the outfall require the declaration of an "E" Refer to procedure G-004 for instructions regarding discharge quantities, be taken.
- E. Submit a copy of the Daily Radiological Environmental Status Report to Environmental.

4.4.5 Equipment Operational Checks

- A. The automatic flow proportioning installed at Outfalls 001 and checked periodically for operation calibration. The Instrument group shall be contacted if maintenance required.
- B. If significant changes in sampling (more than 10%), as determined by the calibration checks, are observed the Health and Safety, and the Manager, Health and Safety, shall be immediately determine if any past MPC or been exceeded due to changed sampling device malfunctions compliance according to steps.

The Manager, Health and Safety shall take the necessary steps to reevaluate and verify that none of the MPCs have been exceeded.

- C. If any of the MPCs and act exceeded, the Manager, Health and Safety shall take the necessary steps as specified in Section 4.4.4.

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ATTACHMENT 1
Page 2 of 3

AIRBORNE EFFLUENT RELEASE POINTS

LOCATION & BUILDING	INSTRUMENT SET POINT ± 10% (CFM)	ESTIMATED EXHAUST FLOW RATE (CFM)
MAIN PROCESSING BUILDING		
S-11 SAMPLE PLANT DUST COLLECTOR	1.0	13,000
COOLING AIR EXHAUST FROM HYDRO-FLUORINATION UNIT	N/A	5,600
* DECON ROOM	N/A	N/A
AMMONIUM OXIDE TANK EXHAUST NITRIC ACID TANK EXHAUST		
LAUNDRY DRYER EXHAUST	N/A	1,700
* PLANT AMBIENT AIR SAMPLING SYSTEM EXHAUST	N/A	N/A
RADWASTE COMPACTOR EXHAUST	N/A	N/A
DIGESTION BUILDING		
S-12 MISCELLANEOUS DIGESTION DUST COLLECTOR EXHAUST	1.0	4,000

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ATTACHMENT 2

Page 1 of 1

LIQUID EFFLUENT RELEASE POINTS

LOCATION	ESTIMATED SAMPLING RATE ($\pm 20\%$)
Outfall - 001	5 ml/minute Typical discharge rate: 1250 gpm.
* Outfall - 01A	Grab Sample
Outfall - 008	400 ml per 10,000 gallons discharge, during run-off periods only.

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ATTACHMENT 3
Page 2 of 3

MAIN PROCESSING BUILDING - X/Q - SEC/M3 (a)

SECTOR	COMPASS POINT	ELEVATED X/Q	GROUND LEVEL X/Q
1	N	4.4 E-08	2.4 E-06
2	NNE	5.0 E-08	4.9 E-06
3	NE	8.8 E-09	4.0 E-06
4	ENE	1.9 E-09	2.5 E-06
5	E	4.0 E-10	2.1 E-06
6	ESE	1.8 E-09	2.4 E-06
7	SE	1.1 E-08	2.1 E-06
8	SSE	1.7 E-08	1.7 E-06
9	S	7.3 E-09	3.3 E-06
10	SSW	2.4 E-08	3.4 E-06
11	SW	3.1 E-08	2.1 E-06
12	WSW	6.4 E-08	5.4 E-07
13	W	9.2 E-08	5.5 E-07
14	WNW	2.9 E-08	1.0 E-06
15	NW	4.7 E-08	5.0 E-07
16	NNW	5.4 E-08	9.6 E-07

(a) X/Q for Plant Protected Area Fence at center of each sector.

Elevated X/Q applies only to the Main Stack

Ground Level X/Q applies to all other building vents and process exhaust points.

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ATTACHMENT 4

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AIRBORNE EFFLUENT COMPUTATION SHEET

AIRBORNE EFFLUENT COMPUTATION SHEET - Page 1

SEQUOYAH FUELS CORPORATION - BUILDING 1 MAIN PROCESS

URANIUM: NATURAL _____ DEPLETED _____

SAMPLING DATE _____

SHEET _____ of _____

Release Point Designation	Concentration (uCi/ml)	Exhaust Flow-Rate (Ft ³ /min)	Conversion factor (K1=472)	Release Rate (uCi/sec)	Atmospheric Dispersion (X/QR=sec/m ³)	Conversion factor (K2=10 ⁻⁶)	Plant Fence Concentration (uCi/ml)	MPC (uCi/ml)	Ratio Co/MPC (unitless)
1	2	3	4	5	6	7	8	9	10
S-8		22,000	472		3.7×10^{-7}	10^{-6}		5×10^{-12}	
S-4		3,500	472		1.4×10^{-5}	10^{-6}		5×10^{-12}	
S-6		3,700	472		1.4×10^{-5}	10^{-6}		5×10^{-12}	
S-7		25,000	472		1.4×10^{-5}	10^{-6}		5×10^{-12}	
S-11		13,000	472		1.4×10^{-5}	10^{-6}		5×10^{-12}	
1254		23,000	472		1.4×10^{-5}	10^{-6}		5×10^{-12}	
1255		23,000	472		1.4×10^{-5}	10^{-6}		5×10^{-12}	
1256		23,000	472		1.4×10^{-5}	10^{-6}		5×10^{-12}	
1257		85,000	472		1.4×10^{-5}	10^{-6}		5×10^{-12}	
1258		23,000	472		1.4×10^{-5}	10^{-6}		5×10^{-12}	

TOTALS - THIS SHEET (a)

TOTAL FROM PREVIOUS SHEETS (b)

GRAND TOTAL (from SHEET _____ To SHEET _____) . . . (c)

Completed by: _____ Date: _____

Reviewed by: _____ Date: _____

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* Revised

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AIRBORNE EFFLUENT COMPUTATION SHEET

AIRBORNE EFFLUENT COMPUTATION SHEET - Page 1

SEQUOYAH FUELS CORPORATION - BUILDING 1 MAIN PROCESS

URANIUM: NATURAL _____ DEPLETED _____

SAMPLING DATE _____

SHEET _____ of _____

Release Point Designation	Concentration (uCi/ml)	Exhaust Flow-Rate (ft ³ /min)	Conversion Factor (K1=472)	Release Rate (uCi/sec)	Atmospheric Dispersion (K/QR=sec/m ³)	Conversion Factor (K2=10 ⁻⁶)	Plant Fence Concentration (uCi/ml)	HPC (uCi/ml)	Ratio Co. HPC (unitless)
1	2	3	4	5	6	7	8	9	10
1259		23,000	472		1.4×10^{-5}	10^{-6}		5×10^{-12}	
1260		23,000	472		1.4×10^{-5}	10^{-6}		5×10^{-12}	
1261		85,000	472		1.4×10^{-5}	10^{-6}		5×10^{-12}	
1262		85,000	472		1.4×10^{-5}	10^{-6}		5×10^{-12}	
1263		85,000	472		1.4×10^{-5}	10^{-6}		5×10^{-12}	
1264		85,000	472		1.4×10^{-5}	10^{-6}		5×10^{-12}	
S-10-1		1,100	472		1.4×10^{-5}	10^{-6}		5×10^{-12}	
S-10-2		1,100	472		1.4×10^{-5}	10^{-6}		5×10^{-12}	
S-10-3		1,100	472		1.4×10^{-5}	10^{-6}		5×10^{-12}	
S-10-4		1,100	472		1.4×10^{-5}	10^{-6}		5×10^{-12}	
TOTALS - THIS SHEET								(a)	
TOTAL FROM PREVIOUS SHEETS								(b)	
GRAND TOTAL (from SHEET _____ To SHEET _____) . . .								(c)	

Completed by: _____ Date: _____

Reviewed by: _____ Date: _____

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★ ATTACHMENT 4
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AIRBORNE EFFLUENT COMPUTATION SHEET

AIRBORNE EFFLUENT COMPUTATION SHEET - Page 1

SEQUOYAH FUELS CORPORATION - BUILDING : MAIN PROCESS

URANIUM: NATURAL _____ DEPLETED _____

SAMPLING DATE _____

SHEET _____ of _____

Release Point Designation	Concentration (uCi/ml)	Exhaust Flow Rate (Ft ³ /min)	Conversion Factor (K1=472)	Release Rate (uCi/sec)	Atmospheric Dispersion (X/QR=sec/m ³)	Conversion Factor (K2=10 ⁻⁶)	Plant Fence Concentration (uCi/ml)	MPC (uCi/ml)	Ratio Co/MPC (unitless)
1	2	3	4	5	6	7	8	9	10
S-10-5		1,100	472		1.4×10^{-5}	10^{-6}		5×10^{-12}	
S-10-6		1,100	472		1.4×10^{-5}	10^{-6}		5×10^{-12}	
S-10-7		1,100	472		1.4×10^{-5}	10^{-6}		5×10^{-12}	
S-10-8		1,100	472		1.4×10^{-5}	10^{-6}		5×10^{-12}	
S-10-9		1,100	472		1.4×10^{-5}	10^{-6}		5×10^{-12}	
S-10-10		1,100	472		1.4×10^{-5}	10^{-6}		5×10^{-12}	
			472		1.4×10^{-5}	10^{-6}		5×10^{-12}	
			472		1.4×10^{-5}	10^{-6}		5×10^{-12}	
			472		1.4×10^{-5}	10^{-6}		5×10^{-12}	
			472		1.4×10^{-5}	10^{-6}		5×10^{-12}	
TOTALS - THIS SHEET								(a)	
TOTAL FROM PREVIOUS SHEETS								(b)	
GRAND TOTAL (From SHEET _____ To SHEET _____) . . .								(c)	

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Reviewed by: _____ Date: _____

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AIRBORNE EFFLUENT COMPUTATION SHEET

AIRBORNE EFFLUENT COMPUTATION SHEET - Page 1

URANIUM: NATURAL _____ DEPLETED _____

SHEET _____ of _____

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* ATTACHMENT 4
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AIRBORNE EFFLUENT COMPUTATION SHEET

AIRBORNE EFFLUENT COMPUTATION SHEET - Page 1

SEQUOYAH FUELS CORPORATION - BUILDING 1 DUF4

URANIUM: NATURAL _____ DEPLETED _____

SAMPLING DATE _____

SHEET _____ of _____

Release Point Designation	Concentration (uCi/ml)	Exhaust Flow Rate (ft ³ /min)	Conversion Factor (K1=472)	Release Rate (uCi/sec)	Atmospheric Dispersion (X/QR=sec/m ³)	Conversion Factor (K2=10 ⁻⁶)	Plant fence Concentration (uCi/ml)	MPC (uCi/ml)	Ratio Co/MPC (unitless)
1	2	3	4	5	6	7	8	9	10
DS-1		7,600	472		7.9×10^{-5}	10^{-6}		3×10^{-12}	
DS-2		2,500	472		7.9×10^{-5}	10^{-6}		3×10^{-12}	
DS-3		1,100	472		7.9×10^{-5}	10^{-6}		3×10^{-12}	
5935		11,200	472		7.9×10^{-5}	10^{-6}		3×10^{-12}	
5936		7,950	472		7.9×10^{-5}	10^{-6}		3×10^{-12}	
5937		11,200	472		7.9×10^{-5}	10^{-6}		3×10^{-12}	
5938		11,200	472		7.9×10^{-5}	10^{-6}		3×10^{-12}	
5939		11,200	472		7.9×10^{-5}	10^{-6}		3×10^{-12}	
			472		7.9×10^{-5}	10^{-6}		3×10^{-12}	
			472		7.9×10^{-5}	10^{-6}		3×10^{-12}	
TOTALS - THIS SHEET								(a)	
TOTAL FROM PREVIOUS SHEETS								(b)	
GRAND TOTAL (From SHEET _____ To SHEET _____) . . .								(c)	

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ATTACHMENT 4

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AIRBORNE EFFLUENT COMPUTATION SHEET

AIRBORNE EFFLUENT COMPUTATION SHEET - Page 1

SEQUOYAH FUELS CORPORATION - BUILDING :

URANIUM: NATURAL DEPLETED

SAMPLING DATE _____

SHEET _____ of _____

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ATTACHMENT 5
Page 1 of 2

EQUATIONS FOR AIRBORNE EFFLUENT CALCULATIONS

Computation of Activity Release Rate:

$$Q_p = (C_p) (F_p) (k_1)$$

where:

 Q_p = Activity release rate for release point p (uCi/sec) C_p = Sample concentration for release point p (uCi/ml) F_p = Effluent flow rate for release point P (ft³/min) k_1 = Dimensional conversion factor:
(28,316 ml/ft³) (1 min/60 sec) = 472

Computation of Off-site Concentration:

$$A_p = (Q_p) (X/Q_p) (k_2)$$

where:

 A_p = Off-site activity concentration for release point p
(uCi/ml) Q_p = Activity release rate for release point p (uCi/sec) X/Q_p = Atmospheric dispersion factor for release point p
(sec/m³) k_2 = Dimensional conversion factor:
(1 m³/10⁶ ml) = 10⁻⁶

Computation of Compliance Ratio:

$$R_p = A_p / MPC$$

where:

 R_p = Ratio of off-site activity concentration for release point p with MPC A_p = Off-site activity concentration for release point p
(uCi/ml)

MPC = Maximum permissible concentration off-site (uCi/ml)

ATTACHMENT 6

SAMPLE LOCATIONS - SAMPLE TRAY LOCATIONS

1) UF₆ Stack Samples

Sample No.	Tray No.	Sample No.	Tray No.
S-4	----- 78	S-7	----- 79
S-6	----- 108 (Liquid)	S-8	----- 80
S-6A	----- 109	S-11	----- 91
S-6B	----- 110	S-12	----- 92
			118 (Liquid)

2) UF₆ Roof Fans

Sample No.	Tray No.	Sample No.	Tray No.
1254	----- 93	1260	----- 99
1255	----- 94	1261	----- 100
1256	----- 95	1262	----- 101
1257	----- 96	1263	----- 102
1258	----- 97	1264	----- 103
1259	----- 98		

3) Lab Hood Exhaust

Sample No.	Tray No.	Sample No.	Tray No.
10/01	----- 81	10/06	----- 86
10/02	----- 82	10/07	----- 87
10/03	----- 83	10/08	----- 88
10/04	----- 84	10/09	----- 89
10/05	----- 85	10/10	----- 90

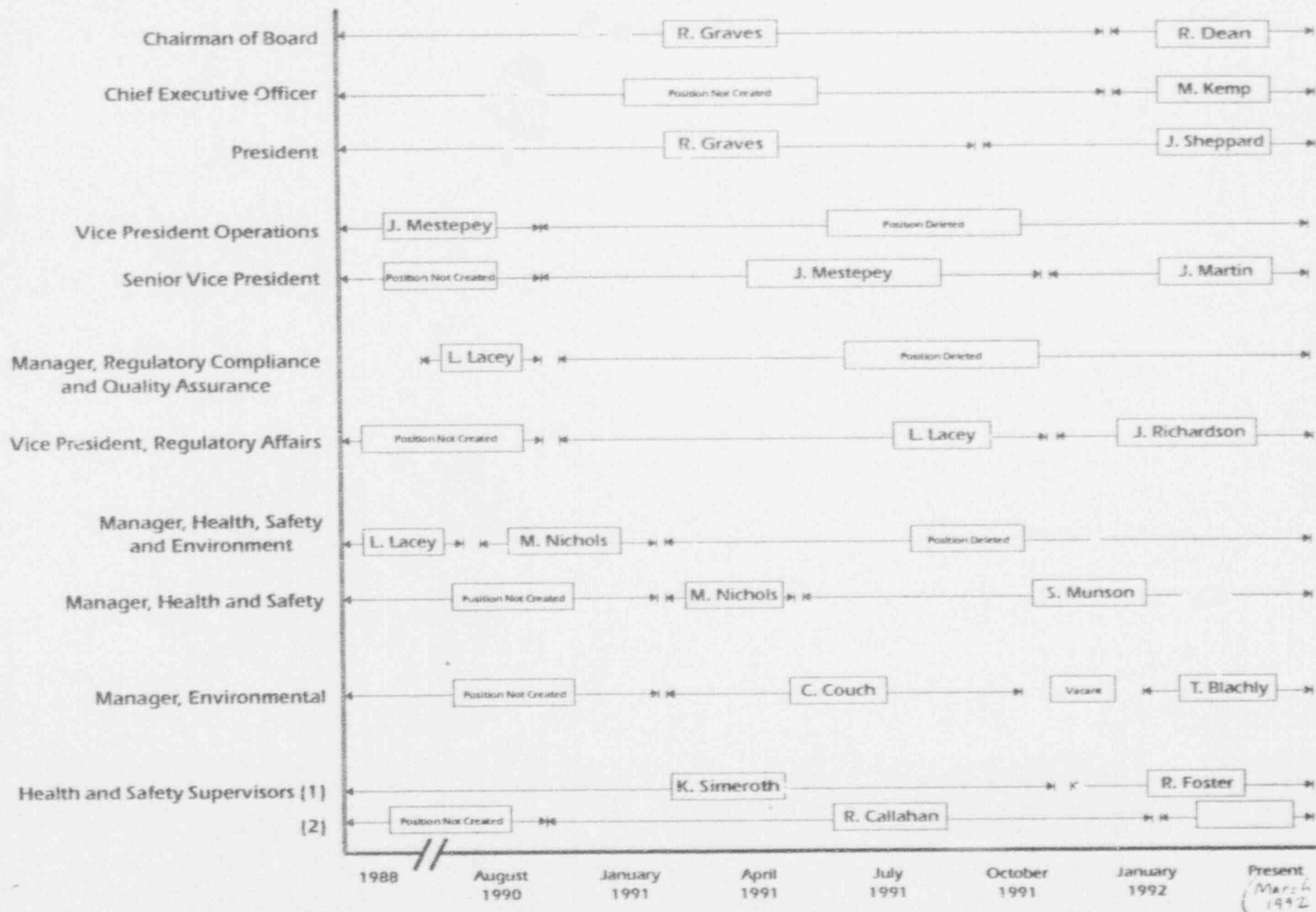
4) DUF₄ Plant Stacks and Roof Fans

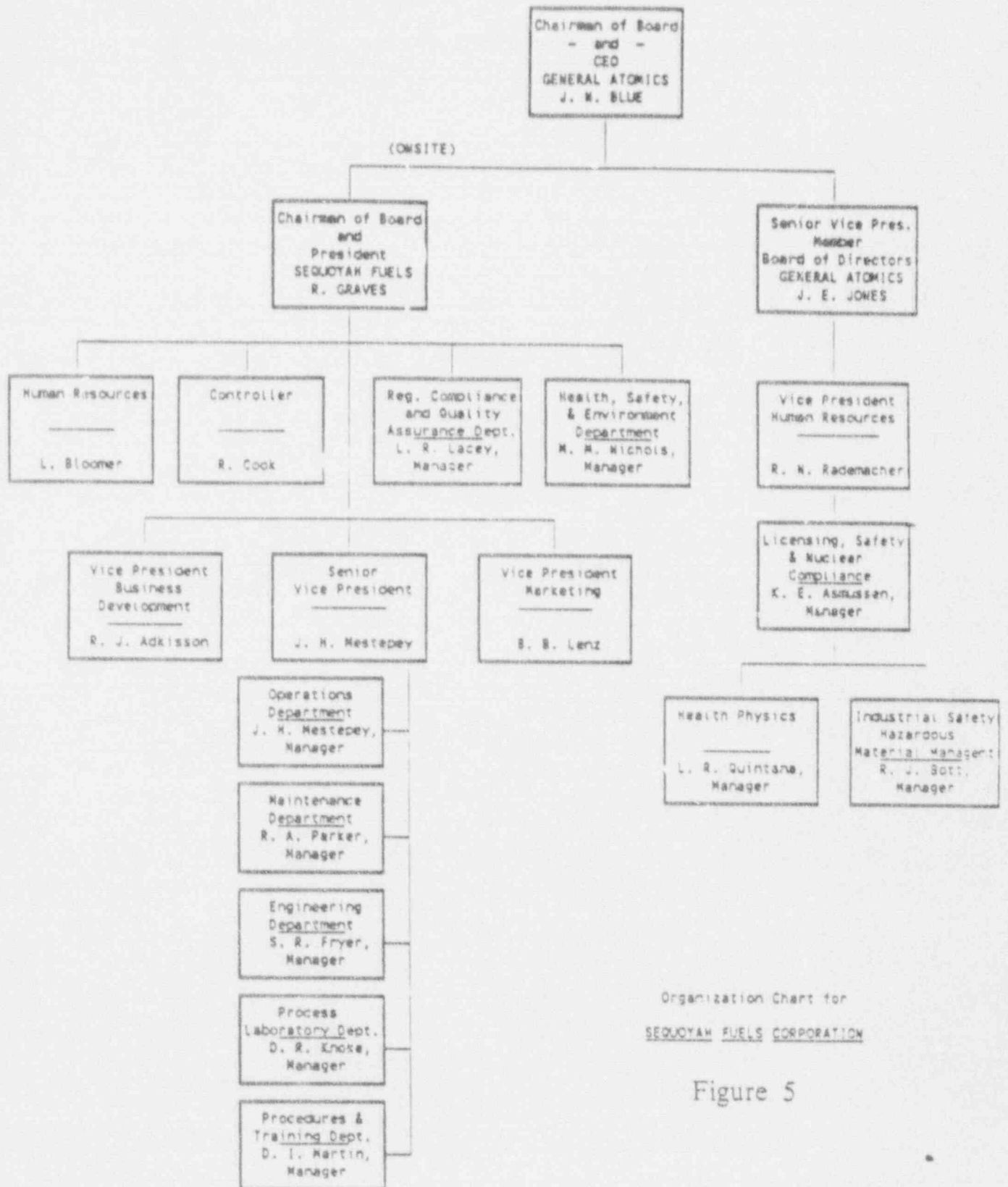
Sample No.	Tray No.	Sample No.	Tray No.
DS-1	----- 51 (Liquid)	5935	----- 73
DS-1A	----- 69	5936	----- 74
DS-1B	----- 70	5937	----- 75
DS-2	----- 71	5938	----- 76
DS-3	----- 72	5939	----- 77

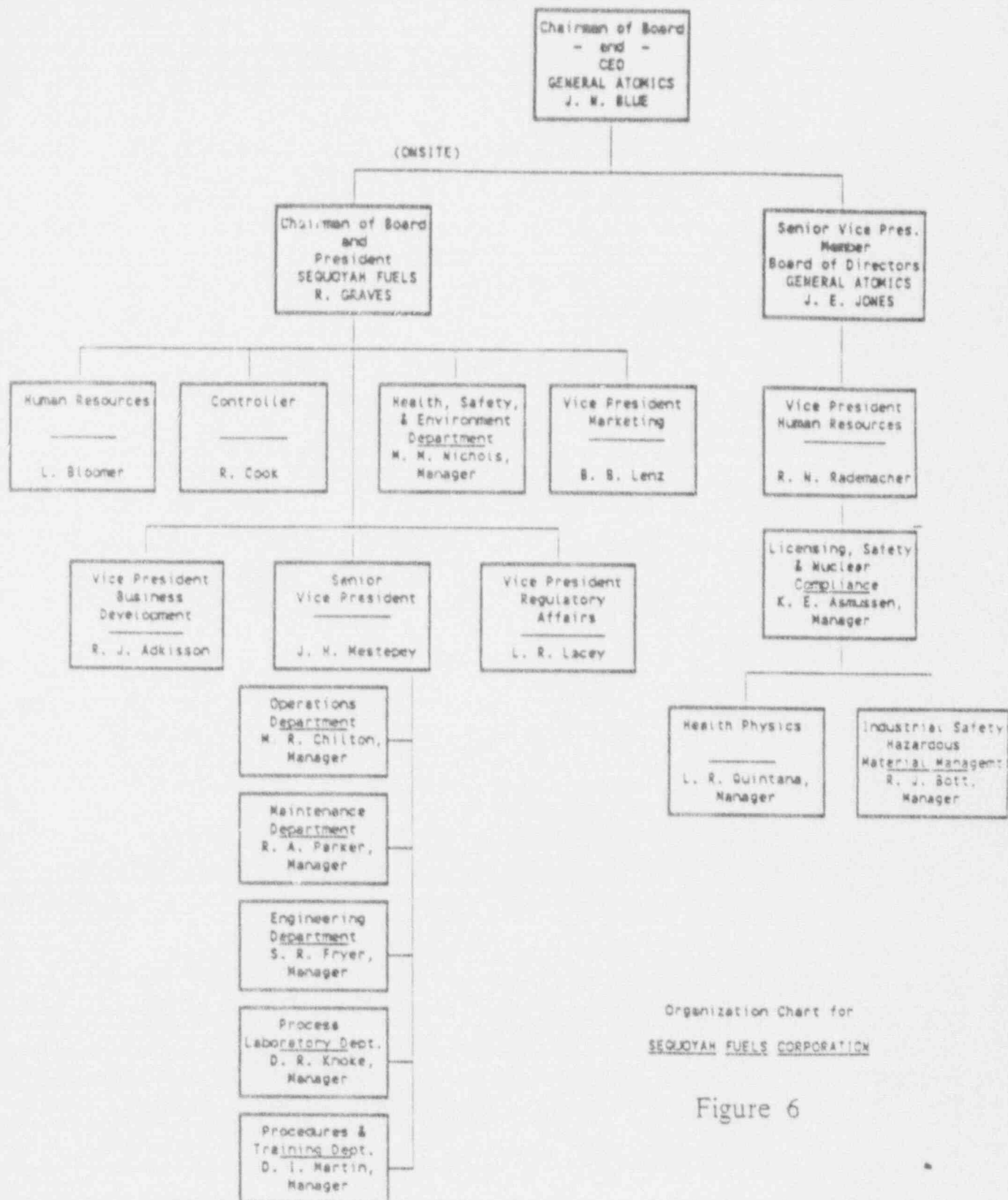
5) Fenceline Samples

Sample No.	Tray No.
E-1	----- 104
E-2	----- 105
E-3	----- 106
E-4	----- 107

RECENT MANAGERIAL CHANGES AT SEQUOYAH FUELS CORPORATION

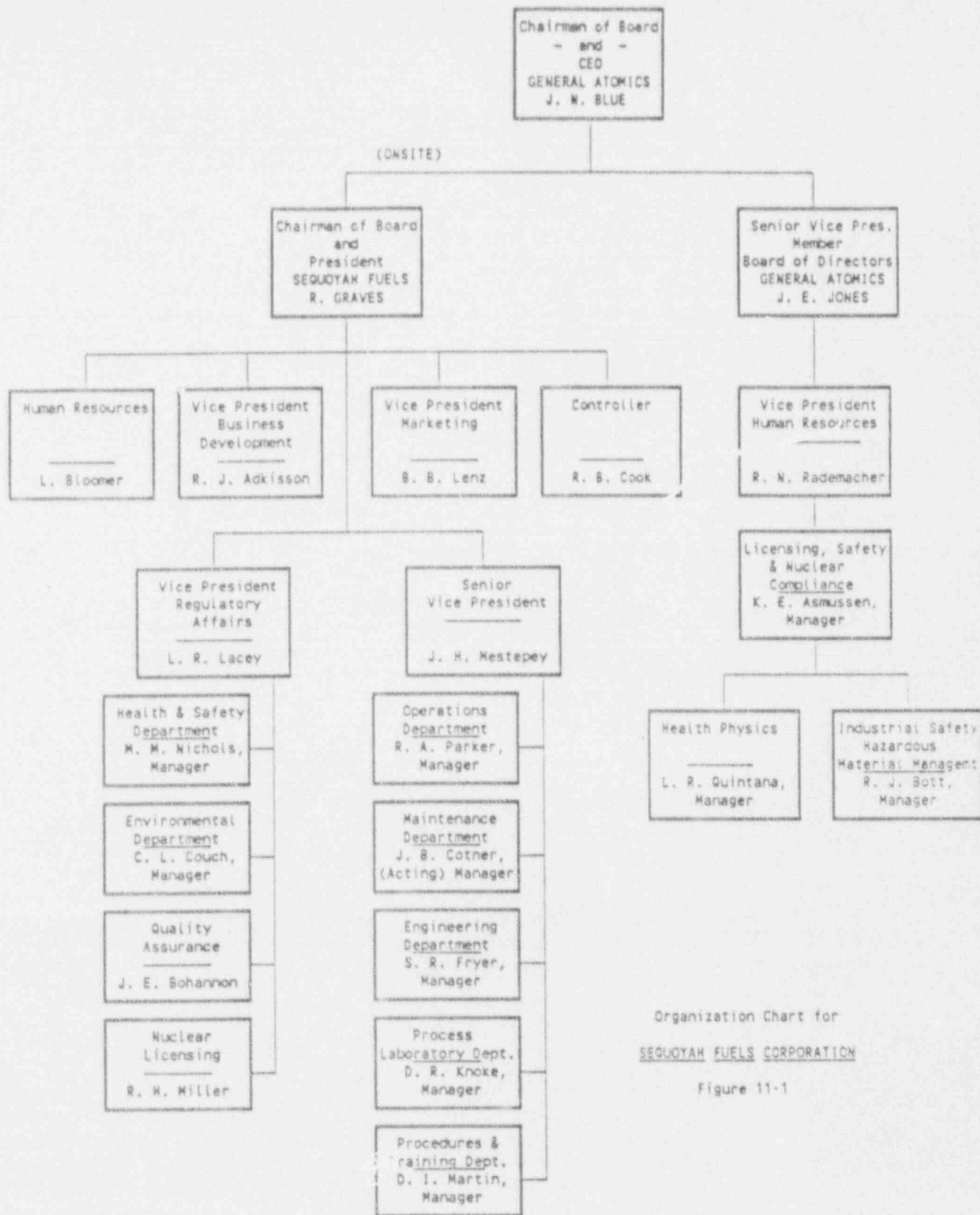






Organization Chart for
SEQUOYAH FUELS CORPORATION

Figure 6



Organization Chart for
SEQUOYAH FUELS CORPORATION

Figure 11-1

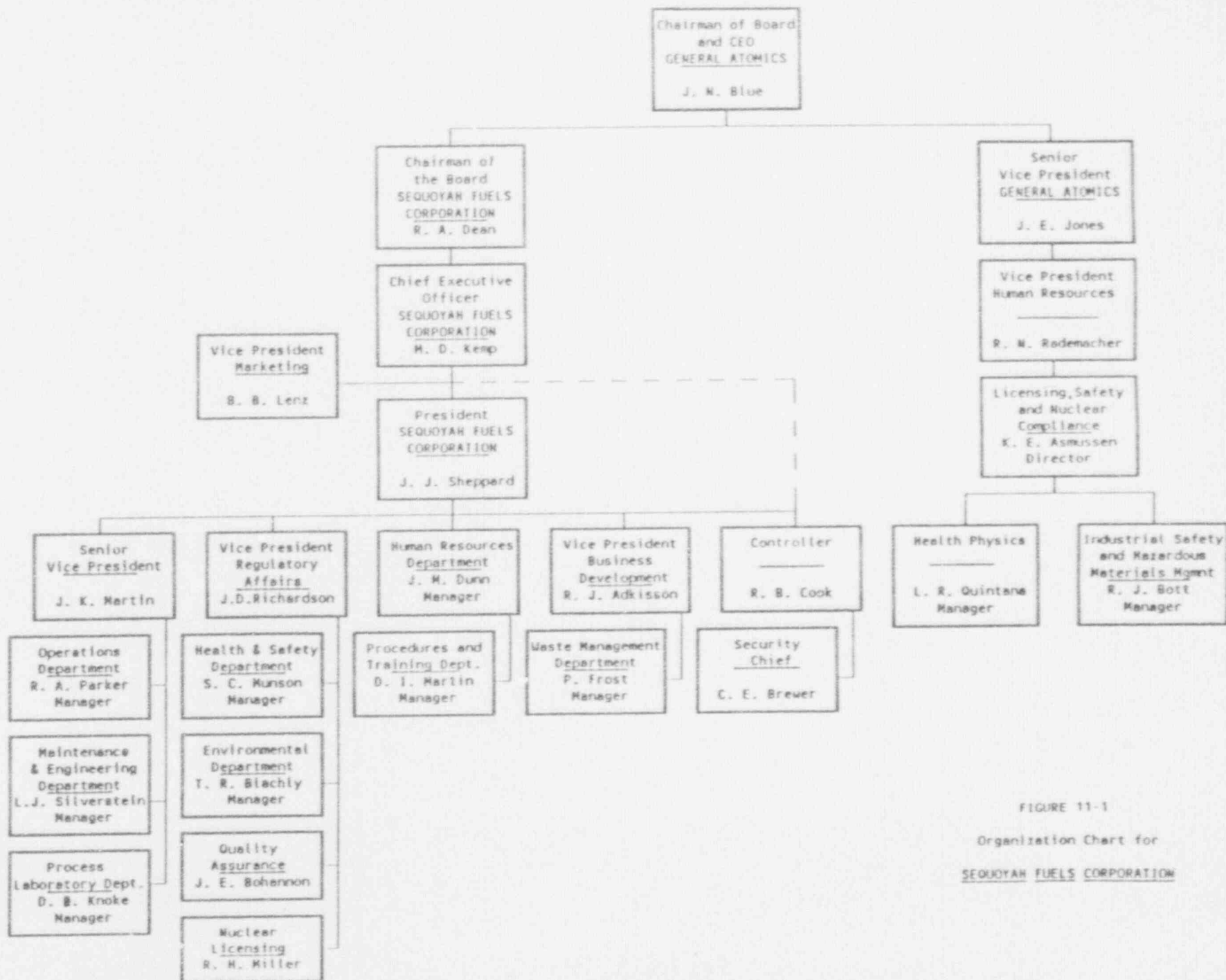


FIGURE 11-1
Organization Chart for
SEQUOYAH FUELS CORPORATION