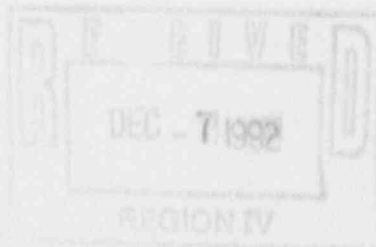


December 2, 1992



Mr. James L. Milhoan
Regional Administrator
Region IV
U.S. NUCLEAR REGULATORY COMMISSION
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

RE: License No. SUB-1010; Docket 40-8027
Completion of UF₆ Production System (Dry End)
Stabilization Activities

Reference: Confirmatory Action Letter from James L. Milhoan,
dated November 18, 1992

Dear Mr. Milhoan:

Sequoyah Fuels Corporation (SFC) staff have reevaluated the current condition of its "dry-end" production systems with respect to current plans to place the facility in a standby condition. As a result, it has been determined that the activities described below are necessary to ensure that an inadvertent release of UF₆ vapors will not occur and at the same time allow the cleanup of process streams that will no longer be required. While the Confirmatory Action Letter specifically allows us to take any actions we deem necessary to assure the safe shutdown of process streams in accordance with good engineering and operational practices, this notification is being provided since certain cleanup actions might be mistakenly construed as constituting system startup. You may be certain that this is not and will not be the case; planned actions are solely for the purpose of removing any remaining entrained UF₆ vapor and the transport of existing powders to a convenient drumming location.

The activities planned are as follows (the order is not necessarily representative of sequence of actions to be performed):

- A. Elevate the temperature of the fluorination towers, by applying steam heat, and establish a nitrogen purge through the towers to the cold traps to ensure any remaining UF₆ vapor is properly captured and allow easier removal of remaining ash. After several days in this mode the towers will be returned to ambient conditions.
- B. Operation of the ash grinders as required to support Ash Receiver cleanup.

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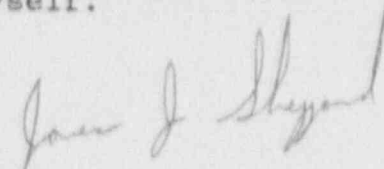
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- C. Operation of system conveyance equipment for transport and drumming of powders.
- D. Nitrogen purge of tower filters and backup filters to cold traps.
- E. Operation of the steam chest to allow emptying of UF₆ sample cylinders to the cold traps.
- F. Heating, emptying, and nitrogen purging of primary, secondary, and cleanup reactor coldtraps to ensure complete removal of UF₆.
- G. Opening of the various subsystems (via inspection ports, manways, etc.) for vacuum removal of remaining accessible powders.

Again, be advised that at no time will the above activities result in the production or process conversion of any product within the system. Additionally, each of the described activities will be performed in a controlled manner with appropriate radiological and industrial safety precautions assured through the utilization of approved procedures.

It is SFC's intent to initiate these activities on Saturday, December 7, 1992. If you have any questions or comments regarding this plan, please contact John Dietrich or myself.

Sincerely,


James J. Sheppard
President

JJS/RAF:lh

cc: Robert M. Bernero

