

**KERR-MCGEE CORPORATION**

KERR-MCGEE CENTER • OKLAHOMA CITY, OKLAHOMA 73125

Dockets: 40-08027/85-01
30-05948/85-01

June 10, 1985

ENVIRONMENT AND HEALTH MANAGEMENT DIVISION



CERTIFIED MAIL
RETURN RECEIPT REQUESTED

R.J. Everett, Acting Chief
Nuclear Materials Safety and Safeguards Branch
United States Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

Re: License SUB-1010
Docket 40-8027

Dear Mr. Everett:

This letter responds to NRC's letter dated May 8, 1985, reporting the results of the routine, unannounced radiation safety inspection conducted at the Sequoyah Facility on March 11-15, 1985. During the inspection three items were identified which require Sequoyah Fuels Corporation to respond in writing concerning corrective actions taken and the dates when compliance will be achieved. These citations are addressed below:

1. Violation (Severity Level IV): License Condition 9 -- Cleanup Activities. Failure to promptly clean up radioactive contamination (yellowcake).

The procedures and assigned responsibilities to insure the maintenance of a clean and orderly facility are provided in the Sequoyah Facility Standard Operating Instructions manual under Procedure G-012, "Housekeeping, Cleanup and Decontamination Responsibilities." This procedure requires that all spills are to be cleaned up expeditiously to minimize contamination spread and exposure. Strict adherence to the facility cleanup procedures has been reemphasized to all facility area managers and shift supervisors by Mr. Jim Carr, facility manager.

To assure compliance in the process areas the audit function currently in effect will be maintained. This function consists of a shift-wise inspection, by H.P. personnel, with a report of the findings being given to the shift supervisor. This audit function does not relieve supervision and other facility personnel from the responsibility for reporting and/or initiating cleanup action when uncontained uranium is found. The yellowcake and UF₆ storage areas will be inspected weekly by the supervisor in charge of the yard areas. The inspection results will be duly noted in the shift logs. In the event of a documented spill the shift log will reflect when the spill was noted and when cleanup was completed.

IC-087/85

B507310071 B50715
PDR ADOCK 04008027
C PDR

0222E

The requirements and responsibilities for assuring that contamination is promptly cleaned up will be emphasized during all May and June employee safety/health meetings. All employees will have been notified by July 1, 1985.

2. Violation (Severity Level V): Radiation Area Posting (10 CFR 20.203(b)). Failure to post a process area that exceeded 10 CFR 20.202(b)(2) dose criteria.

The second level fluorination section is a low occupancy area and generally exhibits radiation levels below the posting criteria established in 10 CFR 20.202(b)(2). Typically, the only time dose rates in excess of the standard occurs is when tower ash is being reprocessed. The ash, which contains daughters of natural uranium, exhibits higher beta-gamma emission rates than the normally processed natural uranium without daughters present.

Although elevated conditions are transient, we concur that posting is an appropriate action. The second level of the fluorination area has been posted as a permanent "Radiation Area." Posting was done on March 14, 1985.

3. Deviation -- License Condition 11: Respirator Control. Failure to properly monitor respirator use.

The instances of improper respirator use documented by the inspectors is not condoned and is in violation of respirator use procedures established in the Sequoyah Facility Standard Operating Procedures manual practices embodied in HP-1, HP-2, and HP-3.

To insure that proper respirator control is maintained, the respirator procedures are amended to clearly enforce the following:

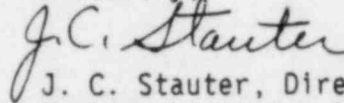
- a. Respirators must be bagged at all times when in the process area except when they are being worn.
- b. If a respirator is worn during a shift it may be worn several different times during the shift, by the same person, but it must be bagged when it is not being worn. A spare bag to be carried by the operator will be placed in the bag with a clean respirator. Respirators are to be re-bagged during the shift when not being worn.
- c. All used respirators must be returned to the safety equipment room and placed in the used container provided. This will be done at the completion of a job in some cases or in other cases at the end of a shift.

These respirator procedures will be audited by health physics technicians and others on an unannounced inspection basis of work areas and documented on facility HWP audit forms. Individuals found not adhering to the procedure are issued a first time warning which is followed by mandatory furlough; e.g., three days without compensation, for any subsequent violation.

The respirator program and procedure amendments will be covered with employees in May and June tail-gate meetings. All personnel will have been fully informed by July 1, 1985.

If you should have any questions concerning the actions taken to correct these items, please call me at (405) 270-2623.

Sincerely,

A handwritten signature in cursive script that reads "J. C. Stauter".

J. C. Stauter, Director
Nuclear Licensing & Regulation

JCS/cwp