

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Reports No. 70-925/85001(DRSS); No. 70-1193/85001(DRSS)

Docket Nos. 70-925; 70-1193

Licenses No. SNM-928; SNM-1174

Licensee: Sequoyah Fuels Corporation
Kerr McGee Center
Oklahoma City, OK 73125

Facility Name: Cimarron Facility

Inspection At: Cimarron Facility, Crescent, OK

Inspection Conducted: June 24 through July 19, 1985

Inspectors: *G. M. France III*
G. M. France, III

July 26, 1985
Date

W. B. Grant
W. B. Grant *for*

7/26/85
Date

Approved By: *L. R. Greger*
L. R. Greger, Chief
Facilities Radiation Protection Section

7/26/85
Date

Inspection Summary

Inspection On June 24 through July 19, 1985 Reports No. 70-925/85001(DRSS);
No. 70-1193/85001(DRSS))

Areas Inspected: Routine, unannounced safety inspection including:
organization, nuclear criticality safety, radiation protection program,
training, operations review, transportation and radioactive waste, and audits
and procedures. The inspection involved 54 inspector-hours on site by two NRC
inspectors.

Results: No violations or deviations were identified.

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DETAILS

1. Persons Contacted

- *R. J. Adkisson, Director, Contract Management and Cimarron Operations
- *R. L. Fine, Health and Safety Supervisor
- *M. W. Hodo, Accounting and Administrative Analyst
- *J. L. Kegin, Operation and Utilities Supervisor
- *A. W. Norwood, Standby Operations Manager
- *W. D. Rhodes, Decon Supervisor
- *V. D. Richards, Plutonium Decontamination Supervisor
- F. Murch, Senior Health Physics Technician
- J. F. Andrews, Senior Health Physics Technician
- D. Majors, Compliance Inspector, Environment and Health Management Division
- S. Munson, Environment and Health Management Division
- C. R. Bogardus, M.D., Licensee Medical Consultant

*Denotes those present at the exit interview conducted June 28, 1985.

2. General

This inspection of onsite licensee activities which began at 12:58 p.m. on June 24, 1985, was conducted to examine decommissioning activities in accordance with conditions specified in Materials Licenses No. SNM 928 and No. SNM 1174. The inspectors toured the licensee's Sequoyah Fuels Facilities located near Crescent, Oklahoma. During the course of this inspection the licensee noted that the Corporate Coal Solvents project had been terminated, and that five persons, three with previous fuel facility experience were transferred to Sequoyah Fuels.

3. Management Organization and Controls

The inspectors reviewed the licensee's management organization and controls for radiation protection, operations, and radwaste generation, including changes in the organizational structure, procedure revising and updating, and utilization of audit systems.

a. Organization

Several personnel changes that may affect the health physics program have occurred since the previous inspection. (70-1193/84002).

The Staff Health Physicist has retired. The Staff Health Physicist conducted monthly nuclear criticality safety audits, performed nuclear safety analyses and requested nuclear safety analyses from an independent reviewer, provided an independent review of the Health Physics supervisor's calculation on exposure evaluations, participated as an instructor in health and safety training for plant operators and health physics technicians, conducted quarterly ALARA audits and reported audit findings to plant and corporate management. Nuclear criticality safety and ALARA audits and the

general administration of the health and safety program will be continued by compliance inspectors from Kerr McGee's Environment and Health Management Division. The onsite radiation protection organization consists of 10 persons, to include: four Senior Technicians; three Technicians: one Instrument Maintenance Technician; one Health Physics Specialist, and one Health Physics Supervisor. Sequoyah Fuels Cimarron Operation now employs 44 persons in security, health and safety and plant operations for the decommissioning of the plutonium and uranium fuel facilities.

The inspectors concluded that the radiation protection organization appears to have onsite management support and corporate support to ensure implementation of an effective control program.

b. Procedure Revising and Updating and Special Work Permits

The inspectors confirmed that the licensee periodically reviews and updates procedures during decommissioning operations. The inspectors reviewed about 22 procedures during the course of this inspection. Updated procedures are usually prepared by the Standby Operations Manager, reviewed for content by the appropriate Operating Supervisor, reviewed for health and safety by the Health and Safety Supervisor, approved for regulatory concerns by the Director, Nuclear Licensing and Regulation, and approved for implementation by the Director, Contract Management and Cimarron Operations. In addition, current copies of procedure changes are maintained onsite.

During a plant tour, the inspectors observed that facility operators performing steps to place items in glove boxes for decontamination operations were following updated procedures and special work permits. The Health Physics Supervisor noted that the Special Work Permit (SWP) form had been upgraded to include a job safety analysis. The SWP consists of a list of types of accidents which may occur and the recommended safeguards for prevention.

The inspectors concluded that the licensee's system for reviewing and approving procedures complies with license requirements, and that each SWP reviewed specified the necessary radiation safety controls.

c. Internal Reviews and Audits

The inspectors verified that the licensee utilizes independent audits conducted by corporate compliance inspectors as another means of reporting deficiencies to management. Since the staff Health Physicist has retired, corporate compliance inspectors, trained and experienced in operational health physics programs, will routinely act as liaison to management for conducting audits and promptly reporting deficiencies to management and/or the Director, Nuclear Licensing and Regulation for notification to the NRC.

The inspectors examined licensee records of compliance audits, compared audit findings with the Standby Manager's Facility Reviews, and verified that corrective actions were completed in a timely manner.

No violations and or deviations were identified.

4. Radiation Protection

The inspectors reviewed the licensee's radiation protection procedures for substantive changes including: verification that limits, precautions, and controls are consistent with regulations and license requirements.

The following new or recently revised procedures were reviewed. No problems were noted.

KM-NC-10-19	Revision 6	Low Level Radioactive Waste Packaging and Shipping
KM-NC-10-82	Revision 7	Transuranic Waste Packaging, Storage and Shipping
KM-NC-10-95	Revision 0	Record Retention and Documentation of Radiological Safety Related Practices

a. External Exposure Control

The inspectors reviewed the licensee's exposure control program including: adequacy of exposure control procedures used to evaluate, control and minimize exposures; required records, reports, and notifications; methods used to evaluate suspected overexposures or when the 40 MPC-hour control measure is exceeded.

Film badge data for calendar year 1984 showed the highest whole body dose to any individual was 2.1 rems; most individual doses were less than 500 mrem. The high dose individual had most of his work assignments involving glove box cleanup and glove box filter changing. The highest whole body dose for 1985 through April was 500 mrem.

Since July 1984, the licensee has used TLDs for restricted area fence line monitors. The vendor reports fence line data in average dose per week. The TLD data for the fourth quarter 1984 and the first quarter 1985 showed the average dose per week at the fence lines ranged from 1.5-15 mrem with no data approaching the regulatory limit.

b. Internal Exposure

The inspectors reviewed licensee records of internal exposure evaluations including: bioassay and air sampling results; whole body count data; and MPC-hour determinations.

The bioassay data for the six workers involved in the Room 129 plutonium transfer line removal discussed in Inspection Reports No. 70-1193/84001 and No. 70-1193/84002 was reviewed during this inspection. All six workers were placed on a delayed sampling schedule which in accordance with procedure KM-NC-10-67 requires the exposed individual to submit an initial urine sample one month after the incident and a sample every month thereafter until three

consecutive samples show less than 0.1 dpm per daily voiding. Sampling of the workers began in November 1984. The results of the next three consecutive monthly samples showed less than 0.1 dpm per daily voiding and sampling was discontinued. The workers were assigned 84 MPC-hours on the basis of lapel air sample data collected during the incident. The MPC-hour determination is conservative since the workers wore fullface respirators during the incident. This was discussed with licensee representatives during the inspection.

The urine bioassay data for the plutonium plant workers and the uranium plant workers was reviewed for the period of December 1984 through April 1985.

One uranium plant worker's sample showed 65 dpm/liter which is the licensee's investigation level. Investigation found the worker had been working in the sand blast area during that period. A dose of four MPC-hours was assigned to the worker using air sample data, respiratory protection worn, and time spent in the area. No MPC-hour calculation was made based on the bioassay data. This matter will be reviewed further during a future inspection.

Plutonium plant workers samples showed levels of less than 0.1 dpm per daily voiding.

The inspector reviewed the licensee's data on nasal smears and confirmed that additional urine sampling is required for workers showing nasal smears of 15 dpm or greater. Nasal smears are submitted at the end of each shift by all workers in the plutonium plant controlled area. There was one instance since January 1985 when 15 dpm or greater was detected on a worker's nasal smear. The delayed urine sampling program was initiated. Three consecutive monthly urinalyses showed levels of less than 0.1 dpm per daily voiding.

In response to inspector concerns about the action expected of personnel involved in unexpected airborne releases, the Health Physics Supervisor indicated the following:

- ° Assistance is usually provided by the standby operator.
- ° Employees are instructed to exit the area quickly.
- ° An HP is called if time permits.

In response to inspector concerns about assuring that 24-hour bioassay voidings are collected from persons involved in radioactive airborne releases, the licensee stated that was their policy and such instructions are given to their workers. In addition, the medical consultant indicated that early DTPA treatment is considered in order to isolate and chelate plutonium ions before retention occurs.

c. Air Sampling

Air sampling in both plants is conducted using fixed room samplers and, when breathing zone samples are needed, lapel samplers. At least one worker in the work crew normally wears a lapel sampler. Air samples are counted initially and recounted in five days if they show activity of greater than one MPC-hour. At the end of each shift workers fill out a card listing the areas they worked in, work duration, and the respiratory protection equipment worn, if any. After investigation this information and air sample data are used to assign an MPC-hour dose if needed.

The highest MPC-hour assignment for 1985 was 19.7 MPC-hours which resulted from a hole in a glove box glove in Room 128 of the plutonium building. No MPC-hour assignment exceeding regulatory requirements was noted.

The annual whole body counting (WBC) of plutonium and uranium plant workers began June 28, 1985. The WBC vendor set up the WBC trailer within the security fence near the emergency building. The WBC vendor will be onsite through July 3, 1985. This data will be reviewed during a future inspection.

d. Respiratory Protection

The licensee has an approved respiratory protection program. Use of respiratory protection equipment is determined by special work permits (SWP) which are issued for all specific work functions that can result in a radiological problem. Supplied air systems and full-face respirators are used. Half-face respirator use is not allowed in the plutonium building. Half-face respirators are allowed for some work in the uranium building.

The inspector reviewed records that verified annual training in respirator protection, fit testing, and medical qualifications for all workers required to wear respirators. No problems were noted.

All full-face respirators and a sampling of half-face respirators and filters are tested annually. Each day respirators which have been worn are washed, dried, smeared for contamination, inspected for defects, and reissued. No problems were noted.

e. Surveys

The inspectors reviewed the licensee's program for radiological surveys to verify compliance with the regulations and with license requirements including: schedules for periodic surveys; effectiveness of surveys, and adequacy of instrumentation.

A selective review of direct radiation and contamination surveys was conducted for the period December 1984 through May 1985. Surveys of floor areas for direct and removable alpha contamination were made at least at the frequency required by procedure. In addition health physics personnel make monthly unannounced surveys of personnel exiting the plant site who have surveyed themselves out of the controlled area. Safety reminders are issued to personnel on whom contamination is found. Removable alpha contamination in the production (controlled) areas averages less than 200 dpm/100cm². Contamination greater than 1000 dpm/60 cm² fixed or 500 dpm/100cm² removable is decontaminated. Removable alpha contamination in the nonproduction areas (office and locker rooms) is maintained at less than 10 dpm/100cm².

f. Sealed Source/Leak Tests

The inspectors reviewed records of leak tests made by the licensee on radioactive sealed sources. The Licensee has seven sealed sources on hand: a 1 mCi Radium 226, a 17.8 mCi Pu 238, and five Cs 137 sources ranging from 100 μ Ci - 3.5 mCi. The sources are inventoried and leak tested at six-month intervals. No removable activity greater than 0.005 μ Ci was detected.

g. Instruments and Equipment

The inspectors reviewed the licensee program for surveillance and calibration of instruments and equipment including: adequacy of procedures, acceptance criteria, and effectiveness of system used to identify instruments due for calibration.

The inspectors reviewed records of calibration of portable survey instruments, constant air monitors, plutonium plant stack monitor, portable survey instruments maintained for emergency use and located in the licensee's emergency building, and the portal instruments used at the exits to the men's and women's locker rooms. Calibrations were performed as required. Source checks and checks for shorted cables are performed at least weekly.

No violations or deviations were identified.

5. Operations Review

The inspectors reviewed decommissioning procedures for both the plutonium and uranium plants, observed ongoing activities during the course of three tours of the facility, and reviewed the status of decommissioning with the Standby Manager. During facility tours the inspectors observed licensee performance in accordance with statements, representations, and conditions contained in Appendix A of the licensee's application.

a. Plutonium Plant

Decommissioning of plant laboratory facilities is nearly complete. Several laboratory rooms are scheduled for radiation surveys for subsequent release and use as storage areas. In the scrap recovery area several gloveboxes were dismantled and the lower flight staircase was moved 90 degrees to accommodate additional working space.

The licensee noted that as a result of decontamination activities about 60 percent of the plutonium is being recovered, compared to predetermined (NDA) plutonium hold-up values. Several gloveboxes previously used in scrap recovery operations were placarded with radiation exposure levels. These levels will be considered when special work permits are issued to dismantle the gloveboxes.

b. Uranium Plant

Processing and ancillary equipment continue to be stockpiled in the rear of the plant. The licensee is also conducting activities to remove underground overflow pipes routed from the sanitary lagoon to the river, to remove underground piping routed between evaporation ponds, and to remove underground piping routed between evaporation ponds and the river. Recovered underground piping and other stockpiled equipment will be surveyed for radioactive contamination, and decontaminated to levels consistent with regulatory requirements.

Dismantling activities within the uranium operations building are about 85 percent complete, while the percentage of cleanup for the overall project completion at the plutonium facility is about 50 percent.

c. Housekeeping

During the course of this inspection, the inspectors observed that equipment and waste material contaminated with SNM material was stored in designated storage areas. The inspection also disclosed that exits and evacuation pathways were clear, and based on quantitative recovery data the potential for accumulating fissile materials in critical quantities and or in unauthorized locations was minimized.

The inspectors concluded that the licensee's decommissioning activities are being conducted in a manner that is commensurate to practices that appear adequate to protect the health and safety of facility workers and members of the general public.

No violations or deviations were identified.

6. Waste Generator Requirements, 10 CFR 20 and 61

The inspectors reviewed waste generation activities to determine whether the licensee has established and is maintaining adequate management control procedures which reasonably assure compliance with the requirements of 10 CFR 20 and 10 CFR 61 applicable to low level and transuranic radwaste form, waste characterization and classification, waste stabilization, and shipment manifests and tracking.

The Standby Operations Manager has the responsibility for establishing and maintaining adequate management controlled procedures in accordance with 10 CFR 20 and 10 CFR 61. The licensee's Waste Packaging, Storage and Shipping procedures (KM-NP-10-82, R7) appear to address the regulatory concerns for carrying out various radwaste packaging and shipping activities. By procedure the licensee performs quality assurance inspections for container integrity and conducts preshipment surveys for radiation levels. There is a clear delineation of authority and responsibility among members of the Cimarron Facility Organization assigned to radwaste processing for low-level and transuranic radwaste disposal. Personnel assigned to conduct quality assurance inspections in order to identify certification problems, initiate, recommend, or provide solutions to problems, and verify implementation of solutions to problems include the following:

- ° Director, Contract Management and Cimarron Operations
- ° Standby Facility Manager
- ° Administrative Accountability Analyst
- ° Facility Senior Engineer
- ° Maintenance and Utility Supervisor
- ° Decon Supervisors (two)
- ° Administrative Clerk
- ° Health Physics Supervisor

Licensee records appeared adequate to document a manifest tracking system to include waste form and classification, as required under 10 CFR 20 and 10 CFR 61. The inspector verified that the licensee maintained a current copy of the disposal site license.

The inspector interviewed the Administrative and Accountability Analyst, and the Standby Operations Manager and verified that the Standby Operations Manager is the cognizant person required to effect an investigation in any instance where receipt of shipment has not been verified within the specified period. The Standby Operations Manager allowed that investigations concerning waste shipment may be delegated to the Administrative and Accountability Analyst.

During the course of the inspection the Health Physics Supervisor noted that several drums of radwaste generated during decommissioning activities at the uranium plant contained steam line insulation made from asbestos. Since the material was contaminated with uranium, disposal methods will follow those procedures that provide instructions for handling radioactive contaminated materials. Precautions were taken to include the following:

- ° Consultation with Corporate industrial safety specialist.
- ° Determinations for eight-hour permissible exposure based on two fibers/cc of air; time weighted average.
- ° Ventilation control-HEPA filter testing
- ° Designated storage area for drums containing contaminated asbestos insulation material.
- ° Labeling.

No violations or deviations were identified.

7. Transportation

The inspector reviewed the transportation activities to determine whether the licensee is maintaining an adequate program to assure radiological safety in the receipt; packaging, and delivery of licensed radioactive materials.

The inspector reviewed licensee shipping records and confirmed that health physics surveys were documented. The inspector noted that a system is in place to maintain a record of each shipment of licensed material in accordance with 10 CFR 71. In addition, shipping records disclosed that the licensee performed radwaste program requirements that covered:

- ° Monitoring for radiation and contamination of radwaste packages and transport carrier,
- ° Package marking and labeling, and vehicle placarding,
- ° Instructions that provide disposal site acceptance criteria,
- ° And shipping paper documentation in accordance with licensee procedures.

During onsite tours of the licensee areas designated for radwaste shipment preparation, the inspector noted that a separate area was maintained for the licensee to conduct integrity tests for radwaste drums. The loading and shipping areas of both the uranium and plutonium plants were adequately lighted and housekeeping was generally good. Under the conditions observed there was no evidence of obstacles that would hinder operators from performing activities associated with the preparation of radwaste for transport.

No violations or deviations were identified.

8. Nuclear Safety

The inspector examined records of audits performed by the licensee in order to determine if any breach of procedures had occurred since the previous inspection. The inspector accompanied two compliance inspectors on a plant tour and discussed criticality safety review of plant activities. Areas were examined where SNM is stored in accordance with batch limits and/or proper storage arrays. During a tour of the uranium plant the corporate compliance inspector corrected a condition that showed two containers violating the edge to edge spacing requirement. The inspector discussed the item during the exit meeting and stressed the importance of good safety practices.

NDA measurements have indicated that the recovery of critical quantities of five percent or less of enriched uranium (SNM) is unlikely. Although the uranium plant does not have a license requirement for criticality alarms, the licensee maintains and tests the criticality alarms as part of the facility safety test programs. During a tour of the plutonium plant the inspector verified that the quantity of plutonium stored in the vault did not exceed the procedure limit posted in each isle of the vault. In discussions with the Vault Custodian and a Health Physics Technician, the inspector confirmed that a spare criticality monitor was serviced and ready for implementation. An examination of records for 25 drums disclosed that each drum contained a quantity of plutonium that was less than the SOL requirement of 5 grams per cubic foot of volume.

The inspector reviewed the licensee's documentation of facility changes requiring criticality considerations, including determination of whether the licensee has the appropriate expertise to establish criticality safety limits for facility operations, and determination of whether the licensee has positive management controls to ensure that facility operations are conducted within nuclear criticality safety limits. A particulate separator, previously used during operations at the uranium facility was reviewed for criticality safety by the Staff Health Physicist and is deployed in the separation of waste sludge generated during steam cleaning operations and the separation of mop water containing solid waste generated from spills and decon operations. At the plutonium facility a portable down draft suction unit containing a 2' x 2' HEPA filter will be deployed to supply filtered air or ventilation to confined operations. The inspector noted that the collection of critical quantities of uranium or plutonium is not credible in either of the above facility or equipment modifications.

With retirement of the Staff Health Physicist, the Compliance Inspector will assume the duties of criticality review of facility modifications and perform nuclear safety audits in compliance with license requirements. The inspector concurs that the overall health physics experience of the Compliance Inspector included enough nuclear safety experience to conduct the nuclear safety requirement in accordance with license conditions.

No violations or deviations were identified.

9. Training

The inspectors reviewed the licensee's provisions for training new employees for work assignments in the decommissioning program.

Five new employees were hired since the last inspection (70-1193/84002). Three of the employees had previously worked at the facility as operators during plant production. In accordance with the license all five new employees are scheduled to receive 20 hours of radiological safety training prior to starting work in radiological areas. The licensee's medical consultant discusses biological effects of radiation and the administering of DTPA to persons involved in plutonium exposures. Other subjects given during the 20-hour orientation course include:

- ° Discussion, Regulation Guide 8.29, Risk From Occupational Exposure
- ° Discussion, Regulation Guide 8.13, Female Employees, Preventive Radiation Exposure
- ° Evacuation Procedures and Requirements

The inspectors examined documentation of attendance records and interviewed the licensee's medical consultant concerning rad protection and DTPA treatment. The licensee noted that new employees are issued health and safety manuals and assigned to work with experienced employees for on-the-job training.

The inspectors concluded that the 20-hour course appears to meet the training requirements of 10 CFR 19.12, "Instructions to Workers".

No violations or deviations were identified.

10. Maintenance Surveillance

The inspectors examined the licensee's maintenance operations to determine if records are maintained on plant systems pertinent to safety.

Records showed that an annual emergency generator load test was performed in December of 1984. The records also disclosed that the emergency generator timing circuit was repaired and returned to service. Weekly tests are usually performed in order to check for loose or worn parts during three-minute test runs. Maintenance inspection and performance records are also maintained for the following safety oriented systems:

- ° Criticality alarm-source check
- ° Emergency door check
- ° Electric fence lock checks
- ° Glovebox liquid level alarms
- ° Setpoint checks for controller or negative alarm.

Fire Brigade training is also provided to workers concerned with firewatch requirements and ignition source controls. The inspectors

concluded that emergency utility services and surveillance tests as conducted under general maintenance operations is being maintained and that satisfactory results were obtained.

No violations or deviations were identified.

11. Allegation Followup

Analytical results of environmental samples collected during a previous inspection (70-1193/84002) were reviewed. The samples were collected in response to allegations by a former licensee employee. The inspectors also observed HP Technicians taking well water samples and sod samples in accordance with environmental monitoring procedure KM-NC-20-02, required by License Condition 11.

As described in Inspection Report No. 70-1193/84002, samples were collected of surface water, soil and vegetation. Each sample was split between the licensee and the NRC. The USDOE Idaho Operations Office, Radiological and Environmental Sciences Laboratory (RESL) performed isotopic measurements on the NRC portion of each sample. Sample results from the Kerr McGee/Technical Center Laboratory analyses will be examined during a future inspection. The inspectors also reviewed the licensee's historical environmental reports on plant vicinity samples required by LC. 11.

The three sample media collected by NRC were analyzed for plutonium (Pu-238 and Pu 239/240) and uranium (U-238, U-235, U-233/234). According to RESL, the plutonium analytical results were not positive (did not "indicate detection") for any of the samples. Uranium results, however, were positive for almost all samples. This is expected because of naturally occurring uranium in soil. The U-238 results will be used for comparative evaluation because of its predominance in the Kerr McGee fuel processes. Evaluation of the samples collected by NRC follows.

- ° Lake Water Sample: As stated, plutonium analytical results were not positive. This agrees with previous licensee environmental results. Although the uranium (U-238) analytical results were positive ($3E-10$ $\mu\text{Ci/ml}$ or approximately 0.001 mg/l), these results are consistent with background surface water U-238 concentrations in this area (upstream Cimarron River samples) and therefore are not indicative of lake contamination from licensee operations.
- ° Soil Sample: As stated, plutonium analytical results were not positive. Therefore, this sample does not support the allegation that out leakage occurred beneath the emergency door of the scrap recovery process area of the plutonium plant.

- ° Vegetation: As stated, plutonium analytical results were not positive. This agrees with previous licensee environmental results. The uranium (U-238) analytical results were positive (2E-7 $\mu\text{Ci/g}$ or approximately $1\mu\text{g/g}$), and were higher than previous licensee environmental results. The licensee's environmental monitoring results for vegetation above the former burial area for the past six years have not shown abnormally high results. The higher than expected vegetation U-238 content in this sample may have been due to sample preparation or analytical error since the results are inconsistent with numerous previous vegetation analyses from the same area. However, additional vegetation samples will be taken during a future inspection to resolve this matter.

Although based on routine licensee environmental sampling results there is no reason to suspect that the radioactivity levels of vegetation above the previously buried radioactive waste is abnormally high, the licensee agreed to lock the entrance to the burial area until further NRC samples are collected and analyzed. As noted previously (Inspection Report No. 70-1193/84002), it did not appear that cattle grazing had occurred within the fenced burial area.

With the possible exception of the vegetation sample, the NRC sample analytical results did not substantiate the allegations. The NRC vegetation analytical results are contradicted by previous vegetation analytical results. As noted, additional vegetation samples will be collected and analyzed during a future inspection; however, cattle do not appear to have grazed within the fenced burial area and interim licensee actions to lock this area appear sufficient to provide positive assurance against cattle grazing until further confirmatory surveys are completed.

No violations or deviations were identified.

12. Request For License Amendment-HP-Schedule Revision

The inspector met with the Standby Operations Manager and examined the licensee's request to reassign all health physics technicians at the Cimarron Facility from the midnight to 8:00 a.m. shift and replace them with operator mechanics. The Standby Operations Manager noted, as stated in the license amendment request dated July 15, 1985, that the change in the HP-Tech schedule would permit the licensee to expedite contamination surveys and release material decontaminated to levels consistent with regulatory requirements. The licensee plans to maintain backup health physics coverage through the emergency roster for the work shifts not manned by a health physics staff member. Operator mechanics will be assigned to the night shift to provide backup security and or relief to the guards and perform general maintenance of utility equipment.

The inspectors concluded that the licensee's desire to eliminate decontamination activities on the midnight to 8:00 a.m. shift does not materially alter the previously approved safety program.

13. Exit Meeting

The inspectors met with licensee representatives (denoted in Section 1) at the conclusion of the onsite inspection on June 28, 1985 and by telephone with the Standby Operations Manager on July 19, 1985. The inspectors summarized the scope and findings of the inspection.

- a. In response to inspector concerns the licensee agreed that HP Techs would receive additional training and evaluation in the proper way to survey personnel exiting an enclosure.
- b. The licensee stated that the entrance to the burial site would be chained and padlocked shut immediately.
- c. In response to inspector concerns, the licensee agreed to notify the Commission, Region III, if any plutonium contamination is found in the soil.

Nuclear safety practices in the uranium plant and the conduct of nuclear criticality audits were emphasized. During the course of the inspection and the exit meeting, the licensee did not identify any documents or inspector statements and references to specific processes as proprietary.