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RELATED CORRESPONDENCE

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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

Before

John H. Frye, III  
Administrative Judge

In the Matter of:

SEQUOYAH FUELS CORPORATION  
(Sequoyah Facility)

Docket No. 40-8027 *MLA*  
ASLBP No. 85-513-03-ML

OUTLINES OF TESTIMONY BY  
ED HENSHAW

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PDR ADOCK 04008027  
C PDR

*DS03*  
*add: V Thargue*  
*396 SS*

OUTLINE OF TESTIMONY BY ED HENSHAW  
BEFORE ADMINISTRATIVE JUDGE JOHN H. FRYE, III  
UNITED STATES NUCLEAR REGULATORY COMMISSION

January 7, 1986

- I. Introduction
  - a. General
  - b. Location Description
- II. Authorized Activities
  - a. General Summary
  - b. Process Description
    - i. Vaporization
    - ii. Reduction
    - iii. Cooling Screw Conveyor
    - iv. Pulverizing and Packaging
    - v. Off Gas Treatment
- III. License Review History
- IV. Organization and Administration
  - a. Organization
  - b. Minimum Qualifications
  - c. Administrative Practices
- V. Radiation Protection
  - a. Internal Exposure Control
    - i. Ventilation
    - ii. Air Sampling
  - b. Surface Contamination Control
- VI. Environmental Protection
- VII. Operational Experience and Safety
- VIII. Conclusions and Recommendations
- IX. Other Considerations

January 8, 1986

- I. Purpose and Need for Action
- II. Alternatives
- III. Affected Environment
- IV. Environmental Consequences
- V. Other Considerations

OUTLINE OF TESTIMONY BY ED HENSHAW  
BEFORE ADMINISTRATIVE JUDGE JOHN H. FRYE, III  
UNITED STATES NUCLEAR REGULATORY COMMISSION

ADDENDUM

My concerns about the licensing of a new process at the Sequoyah Facility are centered around the failure of the appropriate regulatory bodies to properly monitor and regulate the existing facility and whether that failure is an example of future performance. For example:

- the #2 raffinate pond that leaked for over 10 years
- a waste injection well that was used in direct violation of an Atomic Safety and Licensing Board ruling
- the licensing of burial of at least 42,000 pounds of uranium in shallow ground very near the Illinois River
- contamination of the burial ground leak detection monitor well, which was explained away as surface contamination
- open pit incineration of contaminated waste
- environmental sample point locations changed
- environmental monitoring equipment operated improperly
- what appears to be two sets of environmental records
- many hydrofluoric acid releases to the atmosphere
- monitor wells not installed in accordance with submittals to the Nuclear Regulatory Commission Staff
- monitor wells in a proposed raffinate sludge burial area which exhibited very high pH values (12.2 in well #S-8)
- the local public document room which was not maintained

If our national security is in jeopardy by a delay in this hearing, as was declaimed by Mr. Meserve, then I implore my government to restart one or two of the taxpayer built facilities that are capable of producing depleted  $UF_4$  and now sit idle. As for the economic considerations he raises, the taxpayers' economic considerations should be foremost. Regardless of all the above, I am in favor of licensing of the new facility if all of the appropriate regulatory bodies police and maintain the quality of environment that preceded the original licensing process of the Sequoyah Facility. Also, I wish to be placed on the list of persons that wish to make the facility tour.

xc: Office of the Secretary USNRC (3)

John H. Frye, III

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Sincerely,

A handwritten signature in dark ink, appearing to read 'Ed Henshaw', with a stylized, flowing script.

Ed Henshaw