



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

December 24, 1985

John H. Frye, III
Administrative Judge
Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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In the Matter of
SEQUOYAH FUELS CORP.
(Sequoyah Facility)
Docket No. 40-8027; ASLBP No. 85-513-03-ML

MLA

Dear Judge Frye:

You have requested that the NRC staff provide information for the hearing file in this proceeding regarding 1) whether the Staff approved the Sequoyah Fuels Corporation (SFC) Comprehensive Solid Waste Disposal and Storage Plan (May 25, 1985) ("Comprehensive Plan") in its Finding of No Significant Impact for the proposed UF_6 to UF_4 license amendment and 2) if not, what the status is of the Staff's review of the Comprehensive Plan. This letter supplements the information that I provided to you by telephone and that is reflected in your Memorandum and Order (Ruling on Petition to Reconsider and Miscellaneous Matters), dated December 11, 1985, at 2.

In Condition 2 to License Amendment No. 25 (January 24, 1984) the Staff required SFC to submit a plan for the disposal of solid waste generated by activities at the Sequoyah Facility. The Comprehensive Plan was submitted pursuant to that requirement and is currently under review by the Staff.

There are two principal elements to the Comprehensive Plan: 1) a proposal for the disposal of calcium fluoride sludge, contaminated non-combustible materials, and incinerator ash by onsite burial and 2) a proposal for the onsite storage of raffinate sludge pending SFC's finding a contractor to accept the sludge for uranium recovery.

The proposed UF_6 to UF_4 facility does not create raffinate waste. See Environmental Assessment for the UF_6 to UF_4 amendment ("Amendment EA"), Section 2.3.2.3. The UF_6 to UF_4 process would create some calcium fluoride wastes and other radiologically contaminated and non-contaminated wastes. See Amendment EA, Section 2.3.2.3. The wastes from the proposed UF_6 to UF_4 process would constitute only approximately 1.6% of the wastes from the existing UF_6 facility and would be stored or disposed of in the same manner as currently used for similar wastes from the UF_6 facility. See Response of

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Sequoyah Fuels Corporation to Petitions Concerning the Proposed UF₆-To-UF₄ Conversion Facility (October 16, 1985), Table 17, as corrected by letter dated October 31, 1985; Environmental Assessment for renewal of the existing UF₆ facility license (NUREG-1157) ("Renewal EA") Section 2.2.2.3. Calcium fluoride sludge from the proposed UF₆ to UF₄ process would be stored temporarily in the sludge pit currently being used. Renewal EA, Section 2.2.2.3. Contaminated equipment and maintenance wastes would be packaged to minimize spread of contamination and stored for later disposal. Id. Uncontaminated equipment and material wastes would be transported to an approved offsite disposal area by a local sanitation service. Id.

As indicated by this description, the Staff's Finding of No Significant Impact for the proposed UF₆ to UF₄ amendment was based upon storage or disposal under the practices currently used at the existing facility.

Turning to your second question, as noted in Mr. Meserve's letter to Mr. Chilk, Secretary to the NRC, dated December 12, 1985, Condition 21 of the Sequoyah Facility renewed license requires SFC to submit by October 1, 1986 changes to its decommissioning plan to encompass the permanent disposal of all solid wastes generated by the facility. This would include the wastes generated by the proposed UF₆ to UF₄ facility. Since the Comprehensive Plan submitted on May 25, 1985 does not contain a proposal for permanent disposal of the raffinate sludge, the Staff will await submission of the changes to the decommissioning plan before making a decision on the disposal of raffinate sludge. The Staff has the proposal for onsite burial of the fluoride sludge under review, but this review will not be completed before the hearing on the UF₆ to UF₄ application scheduled for January 7-8, 1986.

Sincerely,

Stephen H. Lewis

Stephen H. Lewis
Deputy Assistant Chief Hearing Counsel

cc: Service List