

MAR 28 1986

Docket No.: 040-08027  
License No. SUB-1010

Sequoyah Fuels Corporation  
ATTN: W. L. Utnage  
Facility Manager  
P. O. Box 610  
Gore, Oklahoma 74435

Gentlemen:

This is to respond to your letter dated March 24, 1986, and the enclosed revised procedures for continuing the one-time draining of the cold traps. We tender the following comments in regard to these documents:

1. Item 3 of your letter should also require that cylinder #1033 be labeled "Overfilled--Do Not Heat."
2. Item 5 of your letter states that no restrictions apply to the future disposal of cylinder #637. We presume you were referring to "disposition" of this cylinder rather than "disposal." Please clarify.
3. Item 6 of your letter refers to the diversion of product to a backup cylinder on the north scale in case of line blockage or filter plugging. The procedure should address what should be done if both lines or filters become plugged during the draining operation.
4. The procedure should be amended to include a requirement that continuous visual surveillance of the draindown operation be maintained throughout its duration. That is, at least one operator should be continuously present at the drain station at all times.
5. Section 1.2 of the procedure should be updated to accurately reflect the previous inventory of traps already drained and revised estimates of material remaining in other traps.
6. Section 2.2 should specifically identify the documents to be reviewed.
7. Section 2.3 should be revised to state: "No cylinder is to be placed in a steam cabinet for heating." This will eliminate any ambiguity in regard to whether or not the cylinder is filled, the size of the cylinder, and the activities with which it has been associated.
8. Section 2.4 should specifically identify numbers, titles, and sections of the referenced procedures.

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9. Section 2.5 should be eliminated. The procedure should be amended to require that the cylinder not be removed from the drain bay until all material within the cylinder has solidified.
10. Section 2.6 should be revised to clearly specify gauge inspection criteria and when and how gauges should be repaired.
11. Since no more than 8,000 pounds of product is anticipated to be remaining in the traps, Section 2.7 should be amended to specify that draining operations should be terminated if any one cylinder net weight reaches 15,000 pounds of product. If such a condition is encountered, an evaluation should be made of the large discrepancy between the anticipated amount of residual product in the system and the actual amount.
12. Please supply copies of G-001, Rev. 3; N-270-4, Rev. 2; and N-270-9, Rev. 0 for our review. Also, we are aware that you have recently reissued procedure N-280-1. If you plan to use this revision during the draindown operation, send us a copy for review and revise Section 3.0 of the special procedure.
13. Regarding Section 4.1, you should identify which shift supervisor is in charge of the operation when shifts overlap. This section should also state that the shift supervisor or some other designated company official is clearly responsible for the cold trap draining operation and has been assigned the necessary authority to assure the success of the operation. This person is also the one that would be held accountable for any failure to follow procedures or conduct the operation safely.
14. Section 4.2 should be revised to include not only a review but also training in regard to the draindown procedure and all referenced procedures. The author of the special procedure should be involved in conducting the training. The training should include a dry run of the draindown procedure with shift supervisors and operators participating.
15. Section 4.4 should be revised to clarify that the described scale recheck shall be performed in accordance with all of the procedural steps that follow through 4.4.6.
16. Section 4.4.1 is applicable only for the south scale which has been determined to require a 3,710 pound bias to read zero. The north scales are likely to have a different bias. The procedure at this point should describe what, if any, similar test is required for the north scale.
17. Section 4.4.1(d) should be revised to state: "The cart weight plus 793 pounds should equal the indicated weight within  $\pm 60$  pounds."
18. Section 4.4.3(d) should be revised to state: "The indicated weight should be  $21,006 \pm 60$  pounds."
19. Section 4.5(g) should be revised as described in Item 7 above.

20. The procedure should be reformed to consolidate all equipment operability prerequisites at the beginning of the procedure.
21. The procedure should be signed by the author and all members of the management chain who had a part in the preparation and approval of the procedure.
22. The procedure should also require that the net weight of the cylinder be recorded every 30 minutes.
23. The procedure should require that a copy of the procedure be maintained at the drain station throughout the draindown operation.
24. The details of worker training in regard to the procedure should be documented and signed by the instructor(s).
25. You should provide a commitment to us that no operation will be performed unless it is addressed in an existing and referenced procedure. In particular, we have no procedures describing the following activities:
  - a. Drain station filter replacement
  - b. Locking of drain station scale dial indicators while carts are moved onto or off scales
26. NUREG-1179, Vol. 1, Appendix A, page A-6, lists short term recommendations to be instituted in regard to the drain bay scales. Indicate which of these actions you have implemented and explain your rationale in regard to those that you have not implemented.
27. Submit to us a technical evaluation detailing expected cylinder content temperatures and void fractions remaining for any cylinders that are in storage and known to be overfilled by any amount. Exposure to the summer sun should be one factor included in this evaluation. Particularly address the outside storage of cylinder #1033.
28. The procedure should state that daily cold trap draining will be terminated if operational problems are encountered and more coverage than provided by the day shift crew and standby team would be necessary.

We will continue our review of these issues upon receipt of final procedures incorporating the recommendations described above.

Sincerely,

*Richard L. Bangart*

Richard L. Bangart, Director  
Division of Radiation Safety  
and Safeguards

cc:  
Oklahoma Radiation Control Program Director

W. L. Utnage

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bcc:

DMB (IE-46)

RD Martin

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