

KERR-MCGEE NUCLEAR CORPORATION

KERR-MCGEE CENTER • OKLAHOMA CITY, OKLAHOMA 73125

August 25, 1975

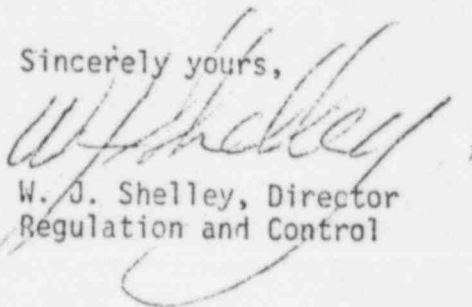
Mr. Glen D. Brown, Chief
Radiological and Environmental Protection Branch
Region IV, Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Suite 1000
611 Ryan Plaza Drive
Arlington, Texas 76012

Dear Mr. Brown:

In accordance with a request by Mr. J. B. Baird of your office, additional information is furnished in regard to our "Response to Observations Made During Inspection by Region IV, USNRC, on June 7-9, 1975, dated August 13."

The enclosure has been modified to reflect this additional information and a replacement is attached hereto.

Sincerely yours,



W. J. Shelley, Director
Regulation and Control

WJS:ml

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ENCLOSURE

KERR-McGEE NUCLEAR CORPORATION
LICENSE #SUB-1010, DOCKET 40-827

RESPONSE TO OBSERVATIONS MADE DURING INSPECTION BY REGION IV,
USNRC ON JUNE 7-9, 1975.

Item 1-a

Quarterly audits of the Health and Safety Program were not complete in accordance with your observation for the period noted. The Health and Safety Coordinator routinely reviews all reports issued by the Sequoyah Health and Safety Manager and any special reports of exposure or release. These reviews have not been adequately documented however.

Commencing with the third quarter of 1975, these reviews will be conducted in accordance with the License and documented as required.

Item 1-b

Personnel have been lax in submitting urine samples in accordance with License requirements.

Procedures have been instituted to review response to urine sample schedules seven days prior to termination of the 30-day period, and disciplinary action will be taken as necessary in those instances where employees are negligent in supplying samples.

Item 2

The use of MSA Model 88182 canisters will be discontinued until NIOSH approval is supplied by the manufacturer. Air supply masks will be used in those cases where protection from radioactive particulates and acid gases are required simultaneously.

Management Action

These items will be inspected by supervisors responsible and performance reported on Monthly Reports to Management to assure continued compliance.

Central File

UNITED STATES
Nuclear Regulatory Commission
OFFICE OF INSPECTION AND ENFORCEMENT
REGION IV
611 RYAN PLAZA DRIVE, SUITE 1000
ARLINGTON, TEXAS 76012

July 28, 1975

Kerr-McGee Nuclear Corporation
ATTN: Mr. W. J. Shelley, Director
Regulation and Control
Kerr-McGee Building
Oklahoma City, Oklahoma 73102

License No. SUB-1010
Docket No. 40-8027

Gentlemen:

This refers to the inspection conducted by Richard L. Bangart of this office, on July 7, 8 and 9, 1975, of the activities at your Sequoyah Facility authorized by NRC Source Material License No. SUB-1010, and to the discussion of our findings held by Mr. Bangart with Messrs. B. E. Brown and C. A. Grossclaude on July 9, 1975.

The inspection was an examination of the activities conducted under the license as they relate to radiation safety and to compliance with the Commission's rules and regulations, and the conditions of the license. The inspection consisted of selective examinations of procedures and representative records, interviews of personnel, independent measurements and observations by the inspector.

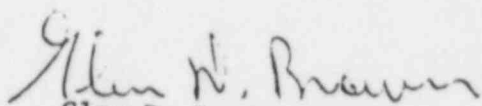
Based on the results of this inspection, it appears that certain of your activities were not conducted in full compliance with NRC requirements, as set forth in the Notice of Violation, enclosed herewith. These items of noncompliance have been categorized into the levels as described in the correspondence to you dated December 31, 1974.

This notice is sent to you pursuant to the provisions of Section 2.201 of the NRC "Rules of Practice", Part 2, Title 10, Code of Federal Regulations. Section 2.201 requires you to submit to this office, within twenty (20) days of your receipt of this notice, a written statement or explanation in reply including: (1) corrective steps which have been taken by you and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved.

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Should you have any questions concerning this letter, please let me know.

Sincerely,



Glen D. Brown, Chief
Radiological and Environmental
Protection Branch

Enclosure:
Notice of Violation

Notice of Violation

Based on the results of NRC inspection conducted on July 7, 8 and 9, 1975, it appears that certain of your activities were not conducted in full compliance with conditions of your NRC License No. SUB-1010 as indicated below:

1. Contrary to License Condition 8 which incorporated the representations, specifications, and procedures in Appendix A of the September 23, 1969, license application, as supplemented on January 14 and February 3, 1970,
 - a. a quarterly audit of the overall health and safety program (as described in Appendix A, p. 11) was not made by the Facility Manager, the Health Physics Officer, and the Licensing and Regulation Officer during the fourth quarter of 1974, and the audits performed in March and June of 1975 were not overall health and safety audits in that most components of the health physics program were not inspected.
 - b. urine samples were not always collected monthly as required by your established routine internal dosimetry program (described in Appendix A, p. 8).

These infractions had the potential for causing or contributing to an occurrence related to health and safety.

2. Contrary to License Condition 11 which incorporates Annex A to Source Material License No. SUB-1010, MSA canisters, model 88182, were used on full face mask respirators without first having been evaluated by the licensee or approved by the U. S. Bureau of Mines, as required by paragraph 1.D. of Annex A.

This infraction had the potential for causing or contributing to an occurrence related to health and safety.

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