

CIMARRON CORPORATION

P.O. BOX 315 • CRESCENT, OK 73028

September 13, 2007

Mr. Kenneth Kalman
Office of Nuclear Materials Safety & Safeguards
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Re: Docket No. 70-925; License No. SNM-928
Designation of Mr. Rick Callahan as Radiation Safety Officer

Dear Mr. Kalman:

Cimarron Corporation (Cimarron) submitted a license amendment request dated August 22, 2007, to amend License Condition 24. In accordance with our subsequent discussion, Cimarron herein retracts the August 22, 2007 license amendment request. Section 18 of NUREG-1757, Consolidated NMSS Decommissioning Guidance, states,

A licensee may replace a Radiation Safety Officer (RSO) without prior approval from NRC, as long as (a) the new RSO meets the criteria listed in Section 17.2.1 of this guidance; (b) the licensee or responsible party maintains the documentation that the individual meets the criteria listed in Section 17.2.1 of this guidance and makes it available during inspections; and (c) the licensee informs NRC, in writing, within 30 days of the change. The procedure for replacing the RSO should be included in the licensee's description of how modifications to decommissioning programs/procedures will be managed."

Ms. Karen Morgan's official last day with Tronox was September 1, 2007. NRC was initially notified of her departure in the August 22 license amendment request. Consequently, both the original license amendment request and this subsequent submittal are timely as per Section 18.

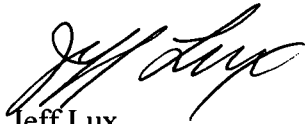
As we discussed, the reference to Section 17.2.1 of the guidance is in error – the reference should cite Section 17.2.3.1. Section 17.2.3.1 provides a summary of the qualifications of an RSO, as well as a description of the evaluation of a candidate and the documentation of the evaluation. Although this guidance is provided for the use of NRC staff, it is useful to licensees who desire to ensure compliance with NRC guidance. Cimarron has performed an evaluation and has determined that Mr. Rick Callahan is qualified to serve as Radiation Safety Officer.

This evaluation was documented and approved by the Cimarron ALARA Committee, with the exception of Mr. Callahan, who, as RSO, will be a member of the ALARA Committee. This documentation will be maintained and available during then next site inspection.

License Condition 24 currently designates Ms. Morgan as RSO, and will eventually need to be deleted. Cimarron will submit a license amendment request addressing several other outdated license conditions, and will include a request to delete License Condition 24 in that submittal.

If you have any questions regarding this evaluation and designation, please call me at 405-775-5194 (OKC) or 405-642-5152 (mobile).

Sincerely,

A handwritten signature in black ink, appearing to read "Jeff Lux", written in a cursive style.

Jeff Lux
Project Manager

Cc: Blair Spitzberg, NRC Region IV