



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

June 10, 1996

Mr. Jess Larsen, Vice President
Cimarron Corporation
P.O. Box 25861
Oklahoma City, OK 73125

Dear Mr. Larsen:

The Nuclear Regulatory Commission staff has reviewed your letter of April 25, 1996, regarding soil characterization for on-site disposal. In your letter, you proposed a procedural change to enhance the efficiency of site decommissioning work. Under the existing procedure, Branch Technical Position (BTP) Option #2 materials excavated from an active remediation area are placed in a stockpile to await sampling, surveying, and demonstration of compliance with NRC criteria before being transported to the disposal cell. Your proposed change is to transport these BTP Option #2 materials directly to the Pit #3 disposal cell. You also stated, in your letter, that the proposed changes were prompted by site remediation considerations related to the lack of suitable areas for soil stockpiles and the potential for recontamination.

Your letter briefly discussed the sampling and survey methods being used with the existing procedure and the sampling and survey methods proposed for the revised procedure. Based on a review of your proposed procedural change and a follow-up telephone conference call on May 17, 1996, the staff has identified the following concerns: (1) the proposed change did not address the schedule for submitting a final survey report for Pit #3; and (2) your proposal did not address how compliance with the NRC criteria would be demonstrated.

During the May 17, 1996, telephone conference you agreed to take specific actions that would address the staff's concerns. In that conference call, Cimarron Corporation agreed to contact the staff several weeks before the anticipated completion of the first lift to allow sufficient time for NRC to schedule confirmatory surveys. In anticipation of the confirmatory survey for the first lift, Cimarron Corporation agreed to provide final survey data in a time frame that will support the scheduled confirmatory survey. The staff agreed that the final survey data need not be in final report form, but it would have to undergo all required QA review before it is provided to the staff. Pending the results of its review of data and activities associated with the first lift, the staff will provide guidance for all subsequent lifts.

Based upon its review of the Cimarron Corporation proposal of April 25, 1996, and subsequent clarifications and agreements made in the May 17, 1996, telephone conference, as noted in this letter, the staff finds the proposed procedural change acceptable.

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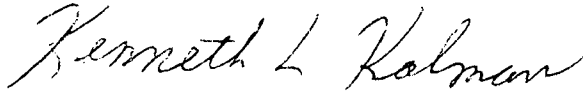
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J. Larsen

- 2 -

If you have any further questions, or have comments regarding the staff's understanding of commitments made by Cimarron Corporation, as defined in this letter, please contact me at (301) 415-6664.

Sincerely,

A handwritten signature in cursive script that reads "Kenneth L. Kalman".

Kenneth L. Kalman
Low-Level Waste and Decommissioning
Projects Branch
Division of Waste Management
Office of Nuclear Material Safety
and Safeguards

Docket No. 70-925
License No. SNM-928

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J. Larsen

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Sincerely,

LS
Kenneth L. Kalman
Low-Level Waste and Decommissioning
Projects Branch
Division of Waste Management
Office of Nuclear Material Safety
and Safeguards

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Sincerely,

Kenneth L. Kalman
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