

August 31, 2016

Mr. Ken Kalman
U.S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852-2738

Mr. Paul Davis
Oklahoma Department of Environmental Quality
707 North Robinson
Oklahoma City, OK 73101

Dr. Gerald Schlapper
U.S. Nuclear Regulatory Commission
1600 East Lamar Blvd; Suite 400
Arlington, TX 76011-4511

Re: Docket No. 70-925; License No. SNM-928
Subsurface Data Supporting Release of Subarea F Outside of the Proposed Licensed Area

Dear Mr. Kalman:

Environmental Properties Management, LLC (EPM) submitted *Cimarron Facility Decommissioning Plan* (D-Plan) in December 2015. In Section 6 of the D-Plan, EPM requested several amendments to License SNM-928. One of the amendment requests was to re-define the licensed site. This is necessary because some portions of the Cimarron site which currently contain or will contain licensed material exceeding decommissioning criteria have already been released from License SNM-928. The proposed amendment is intended to bring such property back under license.

Amending the license to include only property which contains or will contain licensed material exceeding decommissioning criteria also involves releasing from License SNM-928 a portion of Subarea F which does not and will not contain licensed material exceeding decommissioning criteria.

EPM met with the Nuclear Regulatory Commission (NRC) and the Oklahoma Department of Environmental Quality (DEQ) in June to present the decommissioning plan to agency reviewers. When discussing requirements for licensing and controls, EPM explained that the revised D-Plan, which will be submitted after receiving requests for additional information from the NRC and the DEQ, will revise the drawings depicting those areas which will remain under License SNM-928. After the June meeting, the NRC requested a report presenting the data for subsurface soil in the portion of Subarea F that would not be under license, if amended in accordance with the revised D-Plan.

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Final Status Survey Report, Subarea F (Nextep Environmental, August 2005) demonstrated that surface soil in Subarea F complies with the criteria for unrestricted release. Limited data for subsurface soil was included in that report; only that which was required by *Final Status Survey Plan for Phase II Areas* (Chase Environmental Group, July 1995). However, sampling and analysis of subsurface soil had been performed in 1991, 1999, and 2002, and every sample yielded uranium activity below the decommissioning criterion for soil.

The enclosed report presents the data for all subsurface soil samples that have been collected in that portion of Subarea F which will not remain under license. Figure 2 in the enclosed report presents the area that will remain under License SNM-928 (as proposed in the revised D-Plan). That portion of Subarea F proposed to be released from License SNM-928 is referred to in the enclosed report as the "Subject Area".

Thirteen monitoring wells are located either in or on the border of the Subject Area. Two of the monitoring wells located on the border of the Subject Area yielded groundwater exceeding the decommissioning criterion for groundwater in 2002 and 2004. EPM therefore included groundwater data for monitoring wells located in and on the border of the Subject Area in the report. The other eleven monitoring wells have never produced groundwater exceeding the decommissioning criterion. Every groundwater sample collected since 2004 has yielded uranium activity below the decommissioning criterion for groundwater.

EPM believes that the portion of Subarea F that lies outside of the proposed licensed area is releasable for unrestricted use. Please contact me at 405-642-5152, or e-mail me at jlux@envpm.com if you have questions or desire clarification.

Sincerely,



Jeff Lux, P.E.
Project Manager

Enclosure

cc: NRC Document Control Desk (electronic copy only)