

016  
RELATED CORRESPONDENCE

July 25, 1985

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

DOCKETED  
USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

\*85 JUL 30 A10:03

In the Matter of

KERR-MCGEE CHEMICAL CORPORATION

(West Chicago Rare Earths Facility)

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

Docket No. 40-2061-ML

ASLBP No. 83-495-01-ML

NRC STAFF SUPPLEMENTAL RESPONSE  
TO PEOPLE OF THE STATE OF ILLINOIS'  
SECOND SET OF INTERROGATORIES

The NRC staff is supplementing some of its answers to the People of the State of Illinois' Second Set of Interrogatories, dated November 27, 1984. The Staff filed its "Answers to People of the State of Illinois' Second Set of Interrogatories" on April 19, 1985.

Respectfully submitted,

*Ann P. Hodgdon*

Ann P. Hodgdon  
Counsel for NRC Staff

Dated at Bethesda, Maryland  
this 25th day of July, 1985

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#### INTERROGATORY 21

The existence of mill tailings on a particular site is a factor to be given weight in the Commission's determinations regarding disposal of those tailings. This consideration is consistent with Appendix A to Part 40 and the National Environmental Policy Act and reflects the fact that the Commission's determinations on the adequacy of existing tailings sites should include consideration of the benefits versus the costs of disposal at the existing sites as compared with alternative sites.

#### INTERROGATORY 30

The NRC staff has not made a determination on what post-closure maintenance measures it considers necessary. The Staff retains its objection to the interrogatory on the basis that it would require the performance of research.

#### INTERROGATORY 31

The Staff has not determined what, if any, measures will be required to exclude human beings from the West Chicago disposal site for the case of permanent disposal. The matter of interim measures to protect the site against human entry is addressed in the FES (e.g., at H-189). The Staff retains its objection to the interrogatory on the basis that a response would require the Staff to perform research.

#### INTERROGATORY 33

The Staff has not determined in any greater detail than that set forth in Section 7.4.3 of the FES what measures will be necessary for



post-closure radiological monitoring for onsite disposal. The Staff retains its objection to the interrogatory on the basis that a response would require the Staff to perform research.

INTERROGATORY 45

Without waiving its objection, the Staff notes that it has requested Kerr-McGee to provide estimates of the volume of contaminated soil that has been or may be moved back to the site from the scattered hot spots in the City of West Chicago, Reed Keppler Park, and the Sanitary Treatment Plant. The Staff has not yet received these estimates from Kerr-McGee.

INTERROGATORY 47

The FES does not include a comparison of the quality of groundwater at the West Chicago site with Illinois statutory standards. It does, however, include a comparison of the USEPA's drinking water and livestock water criteria with samples from onsite borings (See Table 4.18). Similar comparisons can be made with water quality in the dolomite aquifer (See Tables 4.19 through 4.21). In FES Section 5.6.2.1, the Staff reports its conclusions regarding the impacts on groundwater of disposal at the West Chicago site. One of those conclusions is that Alternative I would provide adequate protection for groundwater resources at the West Chicago site and that failure of the disposal cell proposed in Alternative I would not significantly alter the groundwater quality as it exists today. (FES at 5-12). Substituting Illinois standards for USEPA standards, the Staff's comparisons and conclusions reported in the FES would not be significantly



changed. The Staff (Dr. Steve Tsai of Argonne National Laboratory) checked the referenced tabular data against Illinois standards and made the judgment that the conclusions concerning impacts in FES Chapter 5 would be unchanged by such a substitution.

INTERROGATORY 82

Although there is information in the FES regarding West Chicago's demography, the Staff has not attempted to count the houses and residents within a half mile's distance of the site. The Staff does not consider such detail to be necessary for its determination regarding population exposure, as at such low levels of exposure gross estimates are adequate.



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Docket No. 40-2061-ML

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AFFIDAVIT OF DR. STEVE TSAI

I, Steve Tsai, being duly sworn, state as follows:

1. I am employed by Argonne National Laboratory.

2. I am duly authorized to provide the supplemental response to Interrogatory 47.

I hereby certify that the answer is true and correct to the best of my knowledge.

Steve Tsai  
Dr. Steve Tsai

Subscribed and sworn to before  
me this 25 day of July, 1985

Margaret A. Zurek  
Notary Public

MY COMMISSION EXPIRES

My commission expires: FEBRUARY 13, 1987



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## A circular notary seal for Maxine H. Laiefsky, a Notary Public in Montgomery County, MD. The seal features the name "MAXINE H. LAIEFSKY" in the upper arc, "NOTARY PUBLIC" in the center, and "MONTGOMERY COUNTY, MD." in the lower arc.



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BRANCH  
ASLBP No. 83-495-01-ML

CERTIFICATE OF SERVICE

I hereby certify that copies of "NRC STAFF SUPPLEMENTAL RESPONSE TO PEOPLE OF THE STATE OF ILLINOIS' SECOND SET OF INTERROGATORIES" in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class, or as indicated by an asterisk through deposit in the Nuclear Regulatory Commission's internal mail system, or as indicated by a double asterisk by use of express mail service, this 25th day of July, 1985:

John H. Frye, III, Chairman  
Atomic Safety and Licensing Board Panel  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555\*

Anne Rapkin, Esq.  
William J. Barzano, Jr., Esq.  
Assistant Attorneys General  
Environmental Controls Division  
100 W. Randolph  
13th Floor  
Chicago, Illinois 60601\*\*

Dr. Peter A. Morris  
Atomic Safety and Licensing Board Panel  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555\*

Peter Nickles, Esq.  
Richard Meserve, Esq.  
Covington and Burling  
1201 Pennsylvania Avenue, N.W.  
P.O. Box 7566  
Washington, DC 20044

Dr. James H. Carpenter  
Atomic Safety and Licensing Board Panel  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555\*

Atomic Safety and Licensing  
Board Panel  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555\*

Thomas W. Fawell, Esq.  
Fawell & Marutzky  
Attorneys at Law  
2021 Midwest Road  
Suite 206  
Oak Brook, Illinois 60521



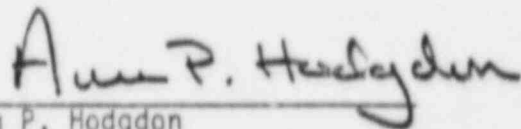
Atomic Safety and Licensing  
Appeal Board Panel (5)  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555\*

John C. Berghoff, Esq.  
Chadwell & Kayser, Ltd.  
8500 Sears Tower  
Chicago, Illinois 60606

Mr. Steven Seiple  
Illinois Department of  
Nuclear Safety  
1035 Outer Park Drive  
Springfield, Illinois 62704

Docketing and Service Section\*  
Office of the Secretary  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555\*

Mead Hedgdon, Esq.  
Kerr-McGee Corporation  
Kerr-McGee Center  
Oklahoma City, Oklahoma 73215

A handwritten signature in cursive script that reads "Ann P. Hodgdon". The signature is written in dark ink and is positioned above a horizontal line.

Ann P. Hodgdon  
Counsel for NRC Staff