

Mr. Jeff Lux
Kerr-McGee Corporation
Kerr-McGee Center
P.O. Box 25861
Oklahoma City, OK 73125

January 29, 1997

SUBJECT: NUCLEAR REGULATORY COMMISSION COMMENTS ON KERR-McGEE'S WORKPLAN -
EVALUATION OF LICENSED MATERIALS MIGRATION VIA GROUNDWATER
PATHWAYS

Dear Mr. Lux:

The Kerr-McGee Corporation (KMC) by letter dated October 23, 1996, submitted Workplan, Evaluation of Licensed Materials Migration via Groundwater Pathways for U.S. Nuclear Regulatory Commission review and approval. NRC has reviewed this workplan and has several comments (enclosed). NRC will resume its review of this workplan upon receipt of KMC's response to this letter. If you have any questions, please contact me at (301) 415-6605.

Sincerely,

[ORIGINAL SIGNED BY:]

Stewart Brown, Project Manager
Low-Level Waste and Decommissioning
Projects Branch
Division of Waste Management
Office of Nuclear Material Safety
and Safeguards

Docket No. 70-3073
License No. SNM-1999

Enclosure: As stated

cc w/encls: Kerr-McGee,
Cushing dist. list

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Kerr-McGee Corporation, Cushing Plant
Docket No. 70-3073, License No. SNM-1999

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UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

January 29, 1997

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Sincerely,

A handwritten signature in cursive script, reading "Stewart Brown", is written over the typed name.

Stewart Brown, Project Manager
Low-Level Waste and Decommissioning
Projects Branch
Division of Waste Management
Office of Nuclear Material Safety
and Safeguards

Docket No. 70-3073
License No. SNM-1999

Enclosure: As stated

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NRC COMMENTS RELATED TO
KERR-McGEE CORPORATION'S WORKPLAN
EVALUATION OF LICENSED MATERIALS MIGRATION VIA GROUNDWATER PATHWAYS
DOCKET NO. 70-3073

Workplan, Evaluation of Licensed Materials Migration via Groundwater Pathways, Cushing, Oklahoma Refinery Site, Kerr-McGee Corporation, October 1996.

- 1) Section 4.3.2.1 RMA-3. Explain how sampling the unsaturated zone soil in RMA-3 will provide indication of thorium migration through the saturated zone.
- 2) Section 4.3.2.3 RMA-11. This section does not indicate that a new down-gradient well will be installed in RMA-11. However, Figure 14 shows that a down-gradient well is proposed for RMA-11, please clarify.
- 3) Section 4.4.1.2 Soil Laboratory Analysis. Since enriched uranium can sometimes be contaminated with fission products, the soil samples should also be evaluated for beta/gamma emitting radionuclides. Also, Kerr-McGee should conduct distribution coefficient (Kd) testing using the generally accepted ASTM method rather than the Kerr-McGee specific method.
- 4) Section 4.4.2.2 Monitoring Well Installation. This section indicates that it has already been determined that groundwater monitoring wells will be installed in RMA-3, RMA-10, and RMA-11, and that the proposed locations are presented in Figure 14. However, Figure 14 does not show a proposed well location in RMA-3, please clarify.
- 5) Section 4.4.2.4 Groundwater Laboratory Analysis. Will the off-site laboratory be independent of Kerr-McGee Corporation?

Enclosure