



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

February 12, 1997

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

SUBJECT: ISSUANCE OF AMENDMENT NO. 6 TO MATERIALS LICENSE NO. SNM-1999,
CUSHING REFINERY SITE

Dear Mr. Lux:

The Commission has issued the enclosed Amendment No. 6 to Materials License No. SNM-1999 for the Cushing Refinery Site. This amendment is in response to Kerr-McGee's license amendment request, dated October 20, 1995, and is separated into four main sections. These sections are: (1) the organization supporting the decommissioning of the Cushing site; (2) the approval requirements of radiation safety procedures; (3) the commitments of the bioassay and air sampling programs implemented under the radiation safety program; and (4) other miscellaneous items addressed in the license application.

The first section of the license amendment application requests that the licensee's organization be changed as shown on a chart it submitted as amended on February 9, 1996, and that Mr. Terence Moore be no longer designated by name as the radiation safety officer (RSO). NRC staff concludes that the organization changes are adequate to ensure that licensed material will be used in accordance with NRC regulations. Accordingly, License No. SNM-1999 is amended as follows:

- 11.K. Except as specifically provided otherwise in this license, the licensee shall conduct its program in accordance with statements, representations, and conditions contained in a letter dated September 25, 1992, as supplemented on December 18, 1992, January 14, 1993, February 23, 1993, August 26, 1993, January 5, 1994, and February 9, 1996.

NRC staff addressed the issue regarding the designation of the RSO in a letter dated November 14, 1995, in which NRC staff believes it is appropriate to specifically list the RSO on the license to ensure NRC will have an opportunity to review qualifications for the replacement of RSO's. The licensee withdrew this amendment request in a letter dated February 15, 1996, and said that it will continue to operate in accordance with this license condition.

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The second section of the licensee's request is to either delete approval requirements for the radiation safety plan and procedures or require approval of the radiation safety procedures by the RSO only and not by management. NRC staff agrees with the licensee that the licensee's managers do not need to approve the technical radiation protection program procedures. In addition, the licensee said in a letter, dated February 15, 1996, that the revisions to the radiation safety plan would continue to be approved by the RSO, the Site Manager, the Project Manager, and the Project Leader. NRC staff believes that revisions to the radiation safety plan would be reviewed by the appropriate level of the licensee's managers. Accordingly, License No. SNM-1999 is amended as follows:

- 11.F. All radiation protection program procedures or revisions to these procedures shall be approved by the Radiation Safety Officer. All revisions to the radiation safety plan shall be approved by the Radiation Safety Officer, Site Manager, Project Manager, and Project Leader.

The third section of the amendment request, regarding the commitments of the bioassay and air sampling programs implemented under the radiation safety program, requests to be relieved from three commitments. The commitments are to collect daily lapel and area air samples, provide 50 percent of all workers with lapel air samplers when working in radioactive materials areas, and provide bi-monthly urinalysis and bi-annual in-vivo lung count. The staff concludes that the licensee's request to replace its commitments with revised air sampling and bioassay programs acceptable. However, NRC staff recommends that the revised programs be included in the Cushing license as a license condition. Accordingly, License No. SNM-1999 is amended as follows:

- 11.D. Lapel air samplers will be issued when required by a special work permit or at the direction of the health physics personnel. Lapel air samplers would be issued when there is a reasonable probability that personnel may be exposed to airborne radioactive material. Lapel air samplers may be issued at a minimum of one per work crew, or a maximum of one per individual, depending on the work scope and the potential for worker exposure. Downwind area air sampling would be performed when work activities are being performed that would cause the potential of producing airborne radioactivity, such as earthmoving.

Urine sampling and analysis for uranium isotopes will be performed for all workers in a crew, if either area air sample(s) or lapel air sample(s) indicate the following:

>40 DAC-hrs for a single air sample result,
>100 DAC-hrs/yr accumulated exposure for any one
worker.

Fecal analysis will be performed in cases where
thorium exposure is suspected and either area air
sample(s) or lapel air sample(s) indicate chronic
or acute exposures in excess of 100 DAC-hrs.

The final section of the license amendment request contains three
miscellaneous items addressed in the license application. The requests are:
(1) NRC recognizes stipulated times of training programs are not appropriate
as criteria for judging the adequacy of a radiation safety training program;
(2) all film badges for both workers and visitors to be submitted on a
quarterly basis; and (3) all radiation monitoring instruments to be calibrated
either by the manufacturer or at the Cushing facility.

NRC staff addressed the issue regarding the radiation safety training program
in a letter dated November 14, 1995, in which NRC staff agreed that the
content of training courses, not the number of hours devoted to each course,
is the germane issue. Thus, NRC staff requested alternate designations for
the two training courses, and the licensee responded in a letter dated
February 15, 1996. Accordingly, License No. SNM-1999 is amended as follows:

- 11.C. Both the Initial Radworker Training and the Annual
Radworker Regualification Training, described in
Item 8 of the application, shall include all of the
topics described in 10 CFR 19.12.

NRC staff acknowledges the modification for film badge submittal in the
radiation safety program, as appropriate, based on the data submitted by the
licensee. NRC staff also acknowledges the modification for the location of
instrument calibration as acceptable.

NRC staff has considered the potential for environmental impact of the license
modifications and has determined that the amendment will not result in any
significant environmental impact. Having made this determination, we have
further concluded that the amendment does not substantially modify existing
regulations and involves actions which are administrative, organizational, and
procedural in nature and, as provided by the categorical exclusion of 10 CFR
51.22(c)(11), an environmental assessment need not be prepared in connection
with the issuance of this amendment.

J. Lux

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All other conditions of the license shall remain the same. The revised License No. SNM-1999, which incorporates Amendment No. 6, and the related Safety Evaluation are enclosed. Further, if you have any questions, please contact me at (301) 415-6605.

Sincerely,

[Original signed by]

Stewart W. 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

Enclosures: 1. Amendment No. 6 to
License No. SNM-1999
2. Safety Evaluation
3. Categorical Exclusion

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

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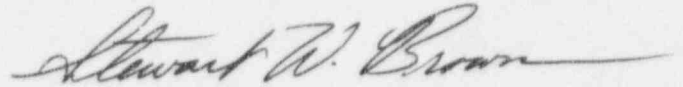
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cc w/encls: Kerr-McGee, Cushing dist. list

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

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Enclosure 1