

PR-Misc Notice
(Reg Guide)



KERR-MCGEE CORPORATION

KERR-MCGEE CENTER • OKLAHOMA CITY, OKLAHOMA 73125

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ENVIRONMENT AND HEALTH MANAGEMENT DIVISION

OFFICE OF
BOOKETING & SERVICE
BRANCH

Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

ES 401-4
DIVISION 3

Attention: Director, Division of Technical Information
& Document Control

Dear Sir:

Kerr-McGee Corporation and its subsidiaries, Sequoyah Fuels and Quivira Mining Company, have reviewed the NRC Draft Regulatory Guide, "Onsite Meteorological Measurement Program for Uranium Recovery Facilities - Data Acquisition and Reporting". The following comments are submitted on behalf of Kerr-McGee Corporation and its subsidiaries.

We believe the guide provides a proper basis for establishing a meteorological monitoring program at a facility and therefore propose only one change in the draft guide. The guide requires that a meteorological station be sited at the facility and operated under the authority of the licensee. We believe this to be an unnecessarily restrictive requirement in instances where it can be shown from short-term studies of wind speed and direction at site locations are comparable to those recorded at a regional federal or state operated meteorological monitoring station. In those equivalent instances the site related atmospheric dispersion of radioactive materials may be accurately described with data collected from the existing meteorological station. The guide should make provision for short-term monitoring of wind speed, direction and temperature at the site to establish equivalency between the license area and the regional meteorological station.

Sincerely,

J. C. Stauter

John C. Stauter, Ph.D.
Director, Nuclear
Licensing & Regulation

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