

008 (1)

THIS IS KERR MCGEE CORP OKLA CITY OKLA MAY 12 1970

1147 AM

ATOMIC ENERGY COMMISSION

WASHINGTON, D C

BUCKET NO. 40-8027

Regulatory

File Of

ATTENTION MR HAROLD PRICE



MSG NO. 836

IN VIEW OF URGENCY OF LETTER MAILED YOU LAST WEEK AND YOUR ADVICE THAT IT HAS NOT BEEN RECEIVED, WE SEND FOLLOWING TWX CONFIRMING LETTER FOLLOWS..

QUOTE

WHEN KERR-MCGEE FIRST EMBARKED ON THE PLANNING STAGES FOR THE EASTERN OKLAHOMA PLANT /THE SEQUOYAH PLANT/ FOR THE CONVERSION OF NATURAL URANIUM ORE CONCENTRATES TO UF₆, MUCH THOUGHT WAS GIVEN TO THE SAFEST, MOST RELIABLE AND MOST ECONOMICAL MANNER OF DISPOSING OF THE RADIOACTIVE WASTE FROM THE PLANT.

OUR CONCLUSION IN 1967, WHICH I UNDERSTAND WAS CONCURRED WITH INFORMALLY BY THE AEC LICENSING PEOPLE AT THE TIME, WAS THAT BY FAR THE SAFEST AND MOST AESTHETICALLY ACCEPTABLE METHOD WAS DEEP WELL DISPOSAL, PROVIDED THE SUBSURFACE STRUCTURE UNDERLYING THE SITE WOULD ACCEPT AND RETAIN THE WASTE. WE PROCEEDED ON THIS APPROACH AFTER HAVING SATISFIED OURSELVES THAT THE SUBSURFACE CONDITIONS WERE EXCELLENT FOR THIS PURPOSE.

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PDR ADOCK 04008027
C PDR

ON SEPTEMBER 23, 1969, IN THE APPLICATION FOR A LICENSE FOR THE OPERATION OF OUR PLANT, WE REQUESTED APPROVAL FOR USE OF OUR DEEP WELL FOR DISPOSAL OF OUR LIQUID WASTE MATERIAL. I WILL NOT BURDEN YOU WITH THE DETAILS OF THE CORRESPONDENCE WHICH FOLLOWED SINCE THEY ARE A MATTER OF RECORD IN YOUR OFFICE. THE NET RESULT, HOWEVER, WAS THAT WHEN WE RECEIVED OUR LICENSE ON FEBRUARY 20, 1970, THE AEC IMPOSED A CONDITION SAYING.. "THIS LICENSE DOES NOT AUTHORIZE THE DISPOSAL OF LIQUID WASTE CONTAINING RADIOACTIVE CONSTITUENTS BY INJECTION INTO ANY DISPOSAL WELL."

SINCE ALL OF OUR STUDIES AND INVESTIGATIONS TO DATE HAVE CONFIRMED AND STRENGTHENED OUR ORIGINAL CONVICTION THAT DEEP WELL DISPOSAL AT SEQUOYAH IS FAR SUPERIOR FROM ALL STANDPOINTS TO ANY OTHER PROCEDURE, WE PREPARED AND SUBMITTED TO THE COMMISSION ON APRIL 10, 1970, A COMPREHENSIVE ANALYSIS AND SAFETY ASSESSMENT OF THE DEEP WELL METHOD OF RADIOACTIVE DISPOSAL AND REQUESTED THAT OUR LICENSE BE AMENDED TO AUTHORIZE USE OF THE WELL.

WE ARE CONVINCED THAT THE INFORMATION WE HAVE SUBMITTED WILL, WHEN CAREFULLY EVALUATED, DEMONSTRATE BEYOND ANY REASONABLE DOUBT THAT THE DEEP WELL DISPOSAL AS PROPOSED BY US WILL NOT RESULT IN EITHER CHEMICAL OR RADIOACTIVE POLLUTION OF THE SURFACE OR USABLE SUBSURFACE LAND AND WATER, AND THAT WE WILL EVENTUALLY GET APPROVAL FOR USE OF THE WELL.

DURING THE MONTH SINCE WE SUBMITTED THIS REQUEST, WE HAVE INITIATED SEVERAL TELEPHONE DISCUSSIONS WITH PEOPLE IN YOUR MATERIALS LICENSING DIVISION AND HAVE NOT BEEN ABLE TO GET ANY FEELING AS TO WHEN WE COULD START THE SUBSTANTIVE DISCUSSIONS WHICH COULD LEAD TO A POSITIVE RESOLUTION OF THE PROBLEM.

WE REALIZE THAT THE WHOLE PROBLEM OF ENVIRONMENTAL CONTAMINATION, INCLUDING THE USE OF DEEP WELLS FOR DISPOSAL OF ANY TYPE OF WASTE, IS A MATTER OF GREAT CONCERN IN WASHINGTON AND ELSEWHERE IN THE COUNTRY, INCLUDING OUR OWN STATE. WE ARE ALSO AWARE THAT THE AEC MUST OBTAIN ADVICE AND COUNSEL FROM OTHER AGENCIES, SUCH AS THE USGS, HAVING SPECIFIC EXPERTISE IN DIFFERENT AREAS OF THE ENVIRONMENTAL PROBLEM. WE RECOGNIZE THAT SUCH REVIEW TAKES SOME TIME. HOWEVER, WE DO NEED AN EARLY RESOLUTION TO THIS PROBLEM. TIMING IS EXTREMELY IMPORTANT TO US. OUR PLANT WAS DESIGNED AND BUILT ON THE ASSUMPTION THAT OUR WASTE COULD BE DISPOSED OF IN THE DEEP WELL, AND THE RETENTION BASINS WERE ONLY FOR SHORT TERM EMERGENCY USE WHEN AND IF THE WELL BECAME TEMPORARILY INOPERATIVE. EVEN IN THIS CASE, THE MATERIAL TEMPORARILY STORED IN THE BASINS WOULD BE PUMPED INTO THE WELL AS SOON AS IT WAS RETURNED TO OPERATION.

WE NOW FIND OURSELVES FACED WITH A SITUATION WHERE WE MUST USE THE TEMPORARY RETENTION BASINS IN ROUTINE OPERATIONS. THIS RAISES SERIOUS PROBLEMS. THE CAPACITY OF OUR BASINS IS LIMITED AND, UNLESS WE GET RELIEF VERY QUICKLY, WE WILL BE FORCED TO CONSTRUCT ADDITIONAL RETENTION BASINS. EVEN IF THIS COULD BE DONE IN TIME TO PREVENT SHUTDOWN, IT NOT ONLY ADDS GREATLY TO OUR CAPITAL EXPENDITURES, IT ALSO TENDS TO DESTROY THE AESTHETIC QUALITY OF AN OTHERWISE BEAUTIFUL SECTION OF OUR STATE. IF, & WE ARE FIRMLY CONVINCED, THE AEC EVENTUALLY AGREES TO ALLOW US TO USE THE WELL, ADDITIONAL BASINS WILL NOT BE NEEDED. ON THE OTHER HAND, IF THE AE MAKES A POSITIVE DECISION THAT THE WELL IS NOT ACCEPTABLE, WE WOULD LIKE TO CAREFULLY PLAN OUR FUTURE LONG RANGE DISPOSAL, GIVING FULL CONSIDERATION NOT ONLY TO RETENTION BASINS BUT TO ALTERNATIVES.

IN REACHING THE DECISION TO USE THE DEEP WELL FOR WASTE DISPOSAL, WE GAVE COMPREHENSIVE CONSIDERATION TO ALTERNATIVE METHODS BEFORE REJECTING THEIR USE AT THE PLANT. IN "OIL COUNTRY" SUCH AS OKLAHOMA, THE PUBLIC GENERALLY ASSOCIATES PONDING WITH POTENTIAL POLLUTION DUE TO SOME POORLY OPERATED PONDS DURING EARLY OIL FIELD HISTORY, AND THEY, LIKEWISE, ASSOCIATE DEEP WELL DISPOSAL WITH EFFICIENT, SAFE WASTE DISPOSAL BASED ON SOME 25 YEARS\ EXPERIENCE WITH SAFE DISPOSAL OF CONCENTRATED BRINES IN THE MID-CONTINENT AREA. WE BELIEVE THE SUBSURFACE DATA, INCLUDING THE GEOLOGICAL INTERPRETATION, GEOHYDROLOGY INTERPRETATION, WELL DESIGN AND TESTING PROCEDURES, CORE ANALYSIS, AND OTHER PERTINENT INFORMATION TRANSMITTED TO THE COMMISSION SETS FORTH AN IDEAL SITUATION FOR THIS METHOD OF DISPOSAL. FURTHER, OUR COMPANY HAS HAD LONG EXPERIENCE WITH SUBSURFACE DISPOSAL OF CONCENTRATED BRINES, AS WELL AS CONTROLLED SUBSURFACE INJECTION IN WATER FLOODING OPERATIONS, AND THE CONSEQUENT EXPERTISE AND CONFIDENCE THAT GROWS FROM THIS LONG EXPERIENCE, NO DOUBT, ADDS TO THE BASIS OF OUR DEEP CONVICTION THAT THE DEEP WELL DISPOSAL IS FAR SUPERIOR TO THE ALTERNATIVES AT THIS PLANT.

IN VIEW OF THE URGENCY OF OUR SITUATION, WE RESPECTFULLY REQUEST A MEETING AT YOUR EARLIEST CONVENIENCE TO ANSWER ANY QUESTIONS AND ATTEMPT TO RECONCILE ANY DIFFERENCES IN INTERPRETATION OF THE SUBSURFACE INFORMATION OR OTHER DATA FURNISHED YOUR OFFICE. WE WOULD HOPE WE COULD PROMPTLY OBTAIN AT LEAST TEMPORARY APPROVAL FOR THE USE OF THE DEEP WELL DISPOSAL FACILITIES. THIS WOULD ALLOW THE COMMISSION TO REASSESS ITS FINAL DECISION ON INFORMATION GAINED FROM ACTUAL OPERATION OF THE DEEP WELL, AND IT WOULD NOT PLACE US IN A POSITION WHERE WE WOULD HAVE TO EITHER SHUT THE PLANT DOWN OR EXPAND THE CAPACITY OF THE PRESENT TEMPORARY RETENTION BASINS.

GEORGE B. PARKS

EXECUTIVE VICE PRESIDENT

END QUOTE

RV RCVD OK AL

THANKS AAAO

TWX INCOMING

Rec'd Off. Dir. of Reg

Date 5/12/70

Time 4:30

30

FROM:

Kerr-McGee Corp.
Oklahoma City, Okla.
(George Parks)

DATE OF DOCUMENT
5-8-70

DATE RECEIVED
5-15-70

NO.: 1748

LTR.
X

MEMO:

REPORT:

OTHER:

5
6-10-70
#10

TO:

Harold Price

ORIG.:
1

CC:
1

OTHER:

ACTION NECESSARY ☐
NO ACTION NECESSARY ☐

CONCURRENCE ☐
COMMENT ☐

DATE ANSWERED
BY:

CLASSIF:

U

POST OFFICE

REG. NO:

FILE CODE:

DOCKET: 40-8027

DESCRIPTION: (Must Be Unclassified)

Ltr. regarding their proposed use
of their deep well disposal system...

REFERRED TO

DATE

RECEIVED BY

DATE

** Original & copy rec'd fm HLP's office on
6-5-70 for placing in PDR....

ENCLOSURES:

Distribution:

1-reg. file cy.

1-AEC PDR

1-Hayfield (for info)

1-Harmon (for ; info)

REMARKS:

asc

U.S. ATOMIC ENERGY COMMISSION

MAIL CONTROL FORM

FORM AEC-3265
(8-60)

6/3/70

Action

Re the letter from Mr. Parks of Kerr-McGee,
has any action been taken to put it in the
Public Document Room?

In your conversation with Mr. Parks on
5/13, he had no objection to the letter
being put in the PDR - said it was just an
error that the letter was marked Confiden-
tial - he wanted to be sure it got to you
first. The confirmation copy is not
marked confidential.

Put in Doc rm'

IMH 6/5/70