

September 21, 1973

YELLOW  
40-8027

UNITED STATES OF AMERICA  
ATOMIC ENERGY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

Kerr-McGee Corporation  
Kerr-McGee Building  
Oklahoma City, Oklahoma

)  
)  
)  
)  
)

Amendment to Source  
Material License SUB-1010

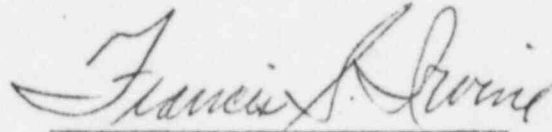
JOINT MOTION FOR SCHEDULING

The Regulatory Staff of the Atomic Energy Commission and the Applicant hereby move that the following schedule be adopted in this proceeding:

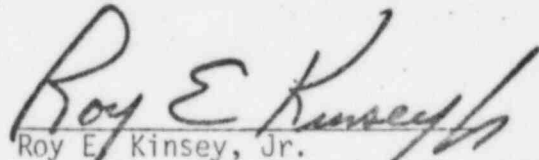
1. Each party who sponsors a witness shall present written testimony to the Atomic Safety and Licensing Board and the other party by October 9, 1973 on the subject matter to which the witness will address himself.
2. The hearing shall commence on October 15, 1973 in Washington, D.C. and shall continue until completed. Said hearing shall be held from 9:30 a.m. to 5 p.m. on the aforementioned days.
3. Witnesses will appear in the following order:
  - (a) witnesses sponsored by the Applicant
  - (b) witnesses sponsored by the AEC Regulatory Staff

8512180162 730921  
PDR ADOCK 04008027  
C PDR

Respectfully submitted,

A handwritten signature in cursive script, reading "Francis S. Irvine".

Francis S. Irvine, Esq.  
Attorney for Kerr McGee Corp.

A handwritten signature in cursive script, reading "Roy E. Kinsey, Jr.". The signature is written over a horizontal line.

Roy E. Kinsey, Jr.  
Counsel for AEC Regulatory Staff

Dated at Bethesda, Maryland  
this 21st day of September, 1973.

In the Matter of

Amendment to Source  
Material License SUB-1010

*Roy E. Kinsey, Jr.*  
Roy E. Kinsey, Jr.  
Counsel for AEC Regulatory Staff

September 21, 1973

YELLOW  
40-8027

UNITED STATES OF AMERICA  
ATOMIC ENERGY COMMISSION

IN THE MATTER OF	)	
	)	Amendment to Source
KERR-McGEE CORPORATION	)	Material License
Kerr-McGee Building	)	SUB-1010
Oklahoma City, Oklahoma	)	

JOINT STATEMENT OF PROPOSED ISSUES

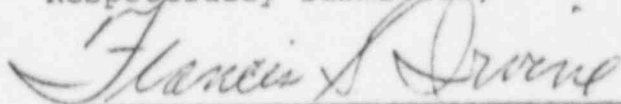
Pursuant to the Board's request during the prehearing conference held on August 14, 1973, in connection with the captioned proceeding (Tr. p. 4), the AEC Regulatory Staff and the applicant herewith jointly propose that the following be considered as the issues before this Board in this matter:

1. Whether the Webers Falls fault exists and, if it does, at what distance is it located northeast of the proposed disposal well?
2. Whether the South fault exists and, if it does, at what distance is it located southwest of the proposed disposal well?
3. Whether additional faults exist within the disposal formation (fault block) that may act as either barriers to fluid movement within the fault block or conduits for fluid movement within the formation.
4. Whether the nature of the faults comprising the fault block are such that the faults will act as barriers to fluid movement under increasing fluid pressure.

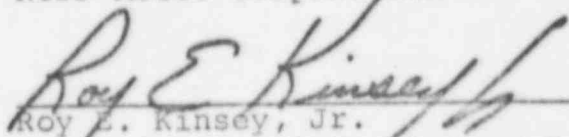
Dup of  
8512180462

5. Whether the five disposal zones composing the Arbuckle Formation can be assumed to be homogeneous, isotropic, and constant in thickness, porosity, and permeability, thereby permitting the calculation of the movement of the disposed waste fluid from the well bore.
6. Whether a three dimensional analysis of geohydrologic problems by the finite difference method, based on test data obtained from a single well, can accurately predict the nature and performance of the injection horizons.
7. Whether monitoring by pressure testing at the well head is adequate to detect fluid movement, or whether there is a need for direct monitoring of the recipient formation.
8. Whether in the event of a demonstrated leak in the retention reservoir or fault block the waste fluid can be recovered.

Respectfully submitted,



Francis Irvine, Attorney for  
Kerr-McGee Corporation



Roy E. Kinsey, Jr.  
Counsel for AEC Regulatory Staff

Dated at Bethesda, Maryland  
this 21st day of September,  
1973.

UNITED STATES OF AMERICA  
ATOMIC ENERGY COMMISSION

Kerr-McGee Corporation  
Kerr-McGee Building  
Oklahoma City, Oklahoma

Amendment to Source  
Material License SUB-1010

CERTIFICATE OF SERVICE

I hereby certify that copies of "Joint Statement of Proposed Issues," dated September 21, 1973 in the captioned matter have been served on the following by hand delivery or by deposit in the United States mail, first class or air mail, this 21st day of September, 1973:

John B. Farmakides, Esq., Chairman  
Atomic Safety and Licensing Board Panel  
U.S. Atomic Energy Commission  
Washington, D.C. 20545

Dr. Dale F. Babcock  
711 River Road  
Wilmington, Delaware 19809

Mr. Lester Kornblith, Jr.  
Atomic Safety and Licensing Board Panel  
U.S. Atomic Energy Commission  
Washington, D.C. 20545

Karin P. Sheldon, Esq.  
Berlin, Roisman & Kessler  
1712 N St., N.W.  
Washington, D.C. 20036

Francis Irvine, Esq.  
600 Fidelity Plaza  
Oklahoma City, Oklahoma 73102

Mr. Frank W. Karas  
Chief, Public Proceedings Staff  
Office of the Secretary of the  
Commission  
U.S. Atomic Energy Commission  
Washington, D.C. 20545

Atomic Safety and Licensing  
Appeal Board  
U.S. Atomic Energy Commission  
Washington, D.C. 20545

Roy E. Kinsey, Jr.  
Counsel for AEC Regulatory Staff