

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)	

AUG 8 1973

A N S W E R

COMES NOW Kerr-McGee Corporation and for its Answer to the Notice of Hearing filed herein states:

1. That the licensee's, equipment, facilities, and procedures proposed for use pursuant to the requested amendment are adequate to protect health and minimize danger to life or property; and that the issuance of the amendment will not be inimical to the health and safety of the public.

2. That Kerr-McGee generally and specifically denies that the issuance of the license amendment would not conform with the requirements set forth in 10 CFR 40.32(c) and (d) because:

A. Existing information is not adequate to demonstrate the presence, location, or nature of the faults that are purported to provide barriers to movement of fluid from the disposal formation, nor is there adequate information to demonstrate that known faults

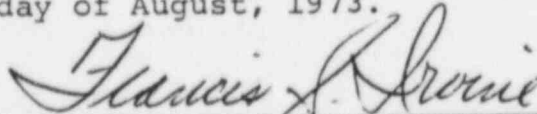
will act as barriers to such movement during continued operation of the proposed well.

B. The complexity of the geologic formation is such that there is no assurance as to the migration paths of the radioactive wastes and the brines which would be displaced.

C. The complexity of the geologic and hydrologic system effectively precludes emergency recovery of the injected radioactive wastes.

That Kerr-McGee will attend the hearing and will present evidence.

DATED this 8th day of August, 1973.



Francis S. Irvine, Attorney for
Kerr-McGee Corporation
600 Fidelity Plaza
Oklahoma City, Oklahoma 73102
Telephone: 272-9221

OF COUNSEL:

KERR, DAVIS, IRVINE, BURBAGE & GREEN, INC.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing instrument has been served on the following by deposit in the United States mail, first class or air mail, this 4th day of August, 1973:

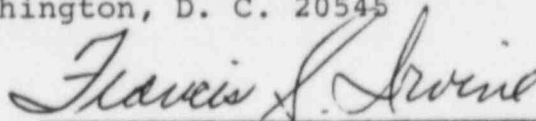
John B. Farmakides, Esq.
Atomic Safety and Licensing
Board Panel
U. S. Atomic Energy Commission
Washington, D. C. 20545

Mr. Frank W. Karas
Chief, Public Proceedings Staff
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Mr. James P. Murray, Jr.
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