



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**  
REGION IV  
1600 EAST LAMAR BOULEVARD  
ARLINGTON, TEXAS 76011-4511

August 08, 2022

Mr. Bill Halliburton, Administrator  
Cimarron Environmental Response Trust  
c/o Environmental Properties Management, LLC  
9400 Ward Parkway  
Kansas City, MO 64114

SUBJECT: NRC INSPECTION REPORT 070-00925/2022-001

Dear Mr. Halliburton:

This letter refers to the routine, announced, U.S. Nuclear Regulatory Commission (NRC) inspection conducted on July 13-14, 2022, at your facility near Crescent, Oklahoma. This inspection examined activities conducted under your license as they relate to public health and safety, the common defense and security, and to confirm compliance with the Commission's rules and regulations and the conditions of your license. Within these areas, the inspection consisted of selected examination of procedures and representative records, interviews with personnel, and tours of the site.

The inspection findings were discussed with Mr. Jeff Lux, Project Manager, and members of Enercon, a contractor for the trustee, at the conclusion of the onsite inspection on July 14, 2022. No violations were identified and no response to this letter is required.

In accordance with 10 CFR 2.390 of the NRC's "Agency Rules of Practice and Procedure," a copy of this letter, its enclosure, and your response if you choose to provide one, will be made available electronically for public inspection in the NRC Public Document Room or from the Agency-wide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <https://www.nrc.gov/reading-rm/adams.html>. To the extent possible, your response should not include any personal privacy or proprietary information so that it can be made available to the Public without redaction.

Should you have any questions concerning this matter, please contact Dr. Robert Evans, Senior Health Physicist, at (817) 200-1234 (Robert.Evans@nrc.gov) or the undersigned at (817) 200-1249 (Greg.Warnick@nrc.gov).

Sincerely,



Anderson, Stephanie signing on behalf  
of Warnick, Gregory  
on 08/08/22

Gregory G. Warnick, Chief  
Decommissioning, ISFSI and Operating  
Reactor Branch  
Division of Radiological Safety and Security

Docket No. 070-00925  
License No. SNM-928

Enclosure:  
NRC Inspection Report 070-00925/2022-001

cc:  
M. Broderick, ODEQ  
J. Davis, ODEQ  
J. Lux, Burns and McDonnell

NRC INSPECTION REPORT 070-00925/2022-001 – DATED AUGUST 08, 2022

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ADAMS ACCESSION NUMBER: **ML22217A025**

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**U.S. NUCLEAR REGULATORY COMMISSION  
REGION IV**

Docket No. 070-00925

License No. SNM-928

Report No. 070-00925/2022-001

Trustee: Cimarron Environmental Response Trust  
c/o Environmental Properties Management, LLC

Location: former Cimarron Uranium Plant  
Crescent, Oklahoma

Dates: July 13-14, 2022

Inspectors: Robert J. Evans, PhD, CHP, PE, Senior Health Physicist  
Decommissioning, ISFSI, and Operating Reactor Branch  
Division of Radiological Safety and Security

Martha Poston-Brown, Health Physicist  
Uranium Recovery and Materials Decommissioning Branch  
Division of Decommissioning, Uranium Recovery, and  
Waste Programs  
Office of Nuclear Materials Safety and Safeguards

Accompanied by: Brittany Bolz, Health Physicist  
Uranium Recovery and Materials Decommissioning Branch  
Division of Decommissioning, Uranium Recovery, and  
Waste Programs  
Office of Nuclear Materials Safety and Safeguards

Approved by: Gregory G. Warnick, Chief  
Decommissioning, ISFSI and Operating Reactor Branch  
Division of Radiological Safety and Security

Attachment: Supplemental Inspection Information

Enclosure

## **EXECUTIVE SUMMARY**

### **Cimarron Environmental Response Trust NRC Inspection Report 070-00925/2022-001**

The U.S. Nuclear Regulatory Commission (NRC) performed a routine, announced health and safety inspection from July 13-14, 2022, at the former Cimarron Uranium Plant near Crescent, Oklahoma. The inspection included a review of records, interviews with site personnel, and tours of the site. The inspectors concluded that Cimarron Environmental Response Trust conducted decommissioning activities in accordance with regulatory and license requirements.

#### **Decommissioning Inspection Procedure for Materials Licensees**

##### **Observation of Site Activities**

- The trustee and its contractor conducted work activities in accordance with procedures, appropriately identified hazards, and implemented necessary controls that were protective of the safety and health of the workers, the public, and the environment. (Section 1.2.a)

##### **Occupational Radiation Protection**

- The trustee implemented a radiation protection program that met the requirements of Title 10 to the *Code of Federal Regulations* (10 CFR) Part 20 and the license. The trustee's radiation protection program was commensurate with the risks involved based on current licensed activities. The trustee's program included the required program elements. (Section 1.2.b)

##### **Security and Control of Radioactive Materials**

- The trustee and its contractor demonstrated appropriate security and control of radioactive materials. Users of the calibration and reference sources were appropriately trained, and these users demonstrated appropriate control and oversight of radioactive materials when not in storage. (Section 1.2.c)

##### **Waste Generation, Storage and Transportation**

- The trustee is currently storing waste in accordance with regulatory requirements. The NRC staff measured the exposure rates for these stored wastes and confirmed compliance with regulatory requirements. (Section 1.2.d)

##### **Public Dose, Effluent Releases and Environmental Monitoring**

- The trustee conducted environmental monitoring in accordance with license and procedural requirements. The trustee reported the results in annual reports to the NRC. (Section 1.2.e)

##### **Management Organization and Controls**

- The trustee's organizational structure and staffing levels met the requirements specified in the license and were sufficient for the work in progress. The trustee's written safety plan, standard operating procedures, and activity plans were appropriate for the activities in

progress. The trustee's programs were commensurate with the risks currently present and were found to be in accordance with regulatory and license requirements. A previously identified violation was adequately addressed by the trustee and was closed. (Section 1.2.f)

#### Final Status Surveys

- The trustee did not conduct any final status surveys since the last inspection; therefore, this program area was not evaluated. (Section 1.2.g)

## Report Details

### Site Status

The Kerr-McGee Nuclear Corporation previously operated a fuel production facility at the Cimarron site. Uranium fuel was produced under NRC's Special Nuclear Material (SNM) license SNM-928, while mixed oxide fuel was produced under SNM-1174. The facility operated from 1966 until 1975 when operations permanently ceased. The plant was placed in standby in 1976, and decontamination and cleanup activities began in 1977. The mixed oxide fuel license SNM-1174 was subsequently terminated in 1993. The SNM-928 license remains in effect to support the remainder of site decommissioning.

License SNM-928 transferred from Kerr-McGee Nuclear Corporation to Sequoyah Fuels Corporation in 1985 and to the Cimarron Corporation in 1988. The license was subsequently transferred to the Cimarron Environmental Response Trust (CERT) in 2011. Amendment 21 of the license, dated February 14, 2011, was in effect at the time of this inspection.

The Cimarron site originally consisted about 830 acres. Approximately 117 acres west of Highway 74 and approximately 24 acres that included the former processing building were released by the NRC for unrestricted use in 2015. The southwestern area, which included unimpacted land, was sold in 2017. Additional property was sold in 2018 including the CERT office. The site currently consists of approximately 500 acres, including 330 acres of rolling hills and 170 acres of floodplain.

The site was divided into 15 subareas; all but three subareas have been released by the NRC for unrestricted use. Subareas F, G, and N remain under the NRC license until groundwater remediation has been completed. These three subareas include subsurface areas where groundwater concentrations exceed the site-specific release criteria for total uranium. The three areas are referred to as Burial Area #1, Western Alluvial Area, and Western Upland Area.

The trustee submitted a decommissioning plan to the NRC on December 31, 2015 (Agency-wide Documents Access and Management System [ADAMS] Accession No. ML16194A333), describing how it would remediate the groundwater. In response to NRC comments on the decommissioning plan, the trustee conducted a pilot test for treatment of groundwater. The trustee documented the test results in a report dated June 19, 2018 (ML18171A300 and ML18171A316). The results of the pilot test prompted changes to the decommissioning strategy.

The revised decommissioning plan was submitted to the NRC on November 2, 2018 (ML18323A195). In response to NRC comments, the trustee submitted Revision 2 of the decommissioning plan on February 26, 2021 (ML21076A456). At the time of the inspection, Revision 2 was still under NRC review; although, the trustee plans to submit Revision 3 of the Decommissioning Plan to the NRC in September 2022.

At the time of the inspection, the site was in standby. Site activities were restricted to routine surface water and groundwater sampling, radiological surveys, environmental monitoring, training, and periodic (annual) program audits. Routine site maintenance activities, including mowing, was being conducted as needed. During the onsite inspection, the trustee's contractor conducted annual groundwater and surface water sampling in accordance with license and procedural requirements.

# **1 Decommissioning Inspection Procedure for Materials Licensees (NRC Inspection Procedure 87104)**

## **1.1 Inspection Scope**

The objectives of the inspection were to: (1) determine if licensed decommissioning activities were being conducted in accordance with NRC license and regulatory requirements; and (2) verify that CERT's decommissioning program was being implemented in a manner to ensure the safety and health of workers, the public, and protection of the environment

## **1.2 Observations and Findings**

### **a. Observation of Decommissioning Activities**

The inspectors observed annual groundwater sampling. Prior to sampling, the trustee and its contractor conducted a pre-job briefing. The pre-job briefing included discussion of worker safety, emergency response actions, and plans for collecting 29 groundwater samples and two surface water samples. The inspectors observed the collection of two groundwater samples (T-82 and TMW-09) and one surface water sample (upstream river sample).

The inspectors reviewed the sampling plan and interviewed trustee and contractor representatives. Activity Plan 2022-005, "2022 Annual Environmental Monitoring," dated May 23, 2022, provided the instructions for the sampling event. In addition to the 31 routine water samples, the contractor collected three duplicate samples for quality assurance reasons. The inspectors noted that the contractors conducted sampling using the guidance provided in Cimarron Site Sampling and Analysis Procedures SAP-103, "Surface Water Sampling," Revision 4, and SAP-104, "Groundwater Sampling," Revision 5. In addition, the inspectors reviewed and discussed three supporting procedures related to sampling including: (1) RP-DI-20, "Radiological Surveys During Groundwater Sampling Activities," Revision 2; (2) SAP-111, "Sample Identification and Control," Revision 5; and (3) SAP-112, "Environmental Sample Packaging and Shipping," Revision 4.

The sampling program included both filtered and unfiltered samples with a nitric acid preservative. The contractor conducted radioactive contamination surveys of the samples as a precaution. The inspectors provided the trustee with several procedural enhancements for consideration during future revision of the respective procedures. In summary, the contractor collected the samples in accordance with site procedures.

During site tours, the inspectors conducted independent radiological surveys using a Ludlum Model 19 micro-Roentgen meter (NRC No. 016337, calibration due date of 8/19/22, calibrated to radium-226). With an outdoor background of 10 micro-Roentgen per hour ( $\mu\text{R/hr}$ ), the radioactive material stored in the office ranged from background to 50  $\mu\text{R/hr}$ , depending on location. The inspectors also conducted spot-checks of areas where groundwater sampling was conducted. In these areas, the ambient gamma radiation levels were found to be at background levels. No area was identified that met the definition of a radiation area (5,000  $\mu\text{R/hr}$ ).



As noted in Section 2.2 of NRC Inspection Report 070-00925/2020-001 dated August 20, 2020 (ML20233B018), during excavation activities for the 2017 pilot test in the Uranium Pond #1 area, the trustee's contractor identified a concrete foundation slab with fixed radiological contamination. The slab was relocated onsite, covered with a tarp, and conservatively posted as a radioactive materials area. Since the last inspection, the trustee removed the tarp for personnel safety reasons and painted the slab to prevent the spread of contamination. The inspectors conducted a radiological survey of the painted slab. The ambient gamma radiation levels of the surfaces ranged from background up to 25  $\mu\text{R/hr}$ , well below the definition of a radiation area. The trustee plans to permanently dispose of this slab at a later date.

b. Occupational Radiation Protection

License Condition 26 requires the trustee to conduct a radiation protection program in accordance with the Radiation Protection Plan (RPP). At the time of the inspection, the trustee was implementing a program in accordance with the instructions provided in Revision 4 of the RPP. License Condition 27.e allows the trustee to make changes to the RPP under certain conditions without prior NRC approval. The trustee submitted Revision 4 of the Plan to NRC on April 18, 2022 (ML22193A243).

The NRC inspectors reviewed the trustee's occupational monitoring program. The trustee discontinued occupational monitoring in 2006, as allowed by 10 CFR 20.1502, but continued to conduct area monitoring in the occupied portions of the site to confirm the 2006 decision. The trustee used area monitoring to estimate the doses to onsite workers. Dose records showed that the exposures in the building ranged from 23-26 mrem/quarter and were around 100 mrem/year. Dose records showed that doses received to dosimeters around the property similarly ranged from 25-30 mrem/quarter and were between 100-120 mrem/year. The inspectors confirmed that no occupational worker was likely to receive a dose greater than 500 millirem per year, the dose limit specified in 10 CFR 20.1502 for individual monitoring.

The inspectors reviewed the trustee's routine survey and contamination control programs. The trustee conducted surveys in its office and restricted areas that were routinely occupied. There were no routinely occupied restricted areas at the time of the onsite inspection. The trustee also conducted monthly surveys, or upon entry if entries were greater than monthly, in the radioactive material areas. The records for calendar years 2020 and 2021, and year to date for 2022, indicate that there were no contamination control issues.

The trustee implemented a corrective action program that included documentation of deficiencies. The corrective action program was found to be effective in implementing appropriate corrective actions to address identified deficiencies.

During the site tours, the inspectors observed postings and access controls. There were five radioactive material areas and no radiation areas within the trustee-controlled area. All radioactive material areas were posted as required by 10 CFR 20.1902. The trustee controlled physical access to the site with fences and gates.

c. Security and Control of Radioactive Materials

At the time of the inspection, fences and gates appeared to be in good working order per License Condition 27.d. The locations with radioactive material were posted with caution signs per 10 CFR 20.1902. The permanent markers (cairns) for the four corners of the disposal cell were being maintained per License Condition 23.b. In summary, the trustee continued to maintain site security and control in accordance with license and regulatory requirements.

The trustee possessed several calibration and references sources used for daily checks of radiation survey instruments. These sources and the associated survey meters were stored in a locked closet. The source containers and closet were both appropriately posted as containing radioactive material. The NRC inspectors did not identify any situations in which the calibration and references sources were not under the constant surveillance and control of an authorized user or locked in storage. In summary, the radioactive material was being maintained in accordance with 10 CFR 20.1801 requirements.

The leak test and inventory records for the calibration and reference sources were available onsite, and leak test and inventories were performed at the required frequency. All trustee and contractor personnel who have access to the calibration and references sources were current in their radiation safety training.

d. Waste Generation, Storage and Transportation

The trustee and its contractor have not generated or shipped any wastes since the previous inspection. The inspectors verified that the waste that was in storage during the last inspection is still onsite and access to the waste is controlled. The trustee has two drums and a carboy of used resin and general waste stored in a closet at the rear of the occupied trailer. The containers are appropriately labelled and marked. The footer excavated as part of the pilot test is also still onsite. Both the footer and the drums were surveyed. Results of these surveys are provided in Section 1.2.a of this inspection report.

The trustee is currently storing waste in accordance with regulatory requirements. The NRC staff measured the exposure rates for these stored wastes and confirmed compliance with regulatory requirements.

e. Public Dose, Effluent Releases and Environmental Monitoring

The environmental monitoring program requirements are provided in Section 15 of the RPP, referenced in License Condition 26. As part of the monitoring program, the trustee and its contractor collected groundwater samples from 29 onsite wells and two surface water samples from the Cimarron River. The current sampling program remains in effect until superseded by the revised decommissioning plan.

The water samples are analyzed for uranium isotopes, gross alpha and beta radioactivity, fluoride, and nitrate/nitrites. The release criteria are provided in License Condition 27.b. The release criteria for total uranium is 180 picocuries of uranium per liter of water.

The RPP requires the trustee to submit the results of annual sampling to the NRC within 30 days of the completion of the data review. The results for the sampling event conducted in 2021 were submitted to the NRC by letter dated October 1, 2021 (ML21274A052). The results indicate that 12 of 29 samples wells exceeded the release criteria indicating that these areas required additional remediation to meet the release criteria. Neither of the two surface water samples exceeded the release criteria.

In addition to sampling of the 29 wells, the trustee's contractor also measured the depth to water levels in all wells. At the time of the inspection, there were approximately 220 wells. An inventory of monitoring wells was provided to the NRC on March 22, 2022 (ML22087A028). The trustee recently recognized that its spreadsheet of depth to water data had erroneous cell formulas or incorrect top-of-well casing elevations. The trustee plans to correct these errors and submit a technical memorandum identifying the corrections to the NRC prior to the end of July 2022.

Finally, the updated RPP provided instructions for monitoring for ambient radiation levels. Starting in October 2019, the trustee deployed dosimeters at various locations to establish the baseline background radiation levels prior to commencing with future decommissioning activities. At the time of the inspection, the trustee monitored radiation levels at 18 locations, although it planned to reduce the number of monitored locations from 18 to 11 at the end of September 2022. The monitored areas included the future Western Area Treatment Facility, Burial Area #1 Treatment Facility, and the roadway (haul path). The trustee did not report these results to the NRC in the annual report but provided the results to the inspectors during the inspection. The results ranged from a minimum of 21 millirem per quarter to 31 millirem per quarter, with an average of 26 millirem per quarter.

f. Management Organization and Controls

License Condition 26 references the trustee's RPP. The organizational requirements are provided in Section 3 of the RPP. The inspectors compared the program in place at the time of the inspection to the organizational structure provided in Figure 3-1, "Cimarron Environmental Response Trust Organization," in the RPP. The trustee had filled each of the required positions with qualified individuals. Contractors were used as needed to support onsite activities, including routine water sampling events. Sufficient staff were available to ensure compliance with licensed activities.

The trustee conducted routine operations under standard operating procedures. Non-routine activities were conducted using Activity Plans (APs). Section 9 of the RPP provided the requirements for APs. The inspector reviewed the following APs:

- AP-2022-01, Redox Sampling
- AP-2022-02, Well Repair
- AP-2021-001, Q1 Redox Sampling
- AP-2021-02, Q2 Redox Sampling

Each AP specified the training and qualification requirements for individuals working under the respective AP. The APs required that personnel performing radiation surveys must have current radiation worker training and be task qualified for conducting surveys

by either the radiation safety officer (RSO), RSO designee, or for some tasks, a subject matter expert.

Regulation 10 CFR 20.1101(c) requires the trustee to periodically (at least annually) review the radiation protection program content and implementation. Details about the audit requirements are provided in Section 5.2 of the RPP. The inspectors reviewed the annual audits for calendar years 2020 and 2021. The audits included evaluations of occupational exposures, radiation survey results, public doses, and training.

License Condition 27.e allows the license to make changes to the NRC-approved decommissioning plan and RPP without NRC's approval, if these changes are consistent with the As Low As Is Reasonably Achievable (ALARA) principle and the decommissioning process. All changes shall be approved by the Cimarron ALARA Committee. License Condition 27.e(3) requires, in part, that the trustee provide in an annual report to the NRC a description of all changes, tests, and experiments made or conducted and a summary of the safety and environmental impact of each action. The inspectors reviewed the annual report for 2021 (ML22193A243).

The trustee's ALARA committee met quarterly to discuss radiation safety issues. The inspectors reviewed the meeting minutes for 2020-2021. In addition, the trustee implemented a quality assurance program in accordance with the guidance provided in NUREG/CR-5849, "Manual for Conducting Radiological Surveys in support of License Termination." Details about the quality assurance program are provided in the Cimarron Site Quality Assurance Program Plan QAPP-001, Revision 3. The Quality Assurance Program Plan states that personnel performing quality activities will receive training in the quality assurance program.

The training requirements are provided in Section 2 of the RPP. The inspectors reviewed the trustee's training program. The inspectors spot-checked the training records for 2020-2022. The trustee provided orientation training for all contractors associated with the action plan work activities they were supporting. Radiation worker training was also provided to individuals who may work with radioactive material. In addition, the trustee provided annual refresher training in 2021-2022 for workers who previously received site access training.

During the July 2020 inspection, the inspectors identified that the trustee was unable to provide documentation that supported the qualification and training required for the crew collecting environmental samples. The trustee's failure to document task specific qualifications and training required by procedures (SOP-13 and SOP-14), and the RPP was identified as a violation (VIO 07000925/2020-01-01). The trustee responded to the Notice of Violation by letter dated September 17, 2020 (ML20261H586). The NRC inspection staff reviewed the corrective actions taken by the trustee and its contractor to address this violation and verified the following corrective actions have been taken:

- RP-DI-02, "Radiation Safety Designees", Revision 5, was issued August 21, 2020. The DI was modified to establish a grace period for annual training based on circumstances beyond the control of the RSO for three months. This revision allows up to 15 months to complete annual (12 month) refresher training. The DI also allows the RSO to determine if full requalification is required if the grace period is exceeded. The DI was expanded to include the content for the annual refresher training. The

NRC staff also reviewed the current version of the procedure (Revision 8), and the inspectors confirmed that the changes implemented in Revision 5 were still in place.

- A new Quality Assurance Implementing Procedure 4.4, "Documentation of Training and Task Qualification," was issued on October 31, 2020. This new procedure was developed to document qualifications to perform work in accordance with the task order in response to issues associated with verbal communication of completion of training and task qualifications.
- Quality Assurance Implementing Procedure 2.1, "Activity Plan Preparation," Revision 3, was issued October 31, 2020, to clarify responsibilities and address issues raised during the previous inspection.
- The RPP was revised to reflect the changes to the quality assurance implementing procedures and other program changes to address the violation. The revised RPP (Revision 4) was submitted to the NRC for review on April 18, 2022 (ML22193A243). The proposed revisions to the RPP were under NRC review at the time of the inspection.

The inspectors verified that the corrective actions detailed in the trustee's response to the violation has been completed. Violation (VIO 070-00925/2020-01-01) is closed.

In the previous inspection, it was identified that the trustee was leasing approximately a third of an acre from the owner of one of the previously released parcels of land. The trailer placed on this land is used as office spaces by the trustee. This space is also used to store records, radioactive calibration and reference sources, survey and counting instrumentation and low-level radioactive wastes. The property owner recently sold the majority of his property but retained the one-third of an acre that the trustee occupies and the lease remains in effect.

g. Final Status Survey

The trustee and its contractor did not conduct any final status surveys during the inspection period from July 2020 to July 2022, so this program area was not assessed.

1.3 Conclusions

The trustee and its contractor conducted work activities in accordance with procedures, appropriately identified hazards, and implemented necessary controls that were protective of the safety and health of the workers, the public, and the environment.

The trustee implemented a radiation protection program that met the requirements of Title 10 to the Code of Federal Regulations (10 CFR) Part 20 and the license. The trustee's radiation protection program was commensurate with the risks involved based on current licensed activities. The trustee's program included the required program elements.

The trustee and its contractor demonstrated appropriate security and control of radioactive materials. Users of the calibration and reference sources were appropriately trained, and these users demonstrated appropriate control and oversight of radioactive materials when not in storage.

The trustee is currently storing waste in accordance with regulatory requirements. The NRC staff measured the exposure rates for these stored wastes and confirmed compliance with regulatory requirements.

The trustee conducted environmental monitoring in accordance with license and procedural requirements. The trustee reported the results in annual reports to the NRC.

The trustee's organizational structure and staffing levels met the requirements specified in the license and were sufficient for the work in progress. The trustee's written safety plan, standard operating procedures, and activity plans were appropriate for the activities in progress. The trustee's programs were commensurate with the risks currently present and were found to be in accordance with regulatory and license requirements. A previously identified violation was adequately addressed by the trustee and was closed.

The trustee did not conduct any final status surveys since the last inspection; therefore, this program area was not evaluated.

## **2 Exit Meeting Summary**

The inspectors presented the inspection findings to the trustee's representatives at the conclusion of the onsite portion of the inspection on July 14, 2022. During the inspection, the trustee did not identify any information reviewed by the inspectors as proprietary.

## **SUPPLEMENTAL INSPECTION INFORMATION**

### **Partial List of Persons Contacted**

#### Trustee Personnel

C. Beatty, Quality Assurance Coordinator, Enercon  
B. Brittain, Subject Matter Expert, Enercon  
D. Kaylor, Environmental Specialist, Enercon  
J. Lux, Project Manager, Environmental Properties Management  
J. Maisler, Radiation Safety Officer, Enercon  
S. Scherm, Environmental Specialist, Enercon  
D. Watson, Project Manager, Enercon

#### Oklahoma Department of Environmental Quality

J. P. Davis, Environmental Program Specialist

### **Inspection Procedures Used**

IP 87104      Decommissioning Inspection Procedure for Materials Licensees

### **Items Opened, Closed and Discussed**

#### Opened

None

#### Closed

070-00925/20-01-01    VIO      Failure to document task-specific qualifications

#### Discussed

None

### **List of Acronyms**

ADAMS	Agencywide Documents Access and Management System
ALARA	As Low As is Reasonably Achievable
APs	Activity Plans
CERT	Cimarron Environmental Response Trust
CFR	<i>Code of Federal Regulations</i>
IP	NRC Inspection Procedure
µR/hr	microRoentgen per hour
NRC	U.S. Nuclear Regulatory Commission
RPP	Radiation Protection Plan
RSO	radiation safety officer
SNM	special nuclear material
VIO	violation