



**KERR-McGEE CHEMICAL LLC**  
KERR-McGEE CENTER • P.O. BOX 25861 • OKLAHOMA CITY, OKLAHOMA 73125

April 22, 2002

VIA OVERNIGHT MAIL

D. Blair Spitzberg, Ph.D., Chief  
Fuel Cycle Decommissioning Branch  
United States Nuclear Regulatory Commission  
Region IV  
611 Ryan Plaza Drive, Suite 400  
Arlington, TX 76011-8064

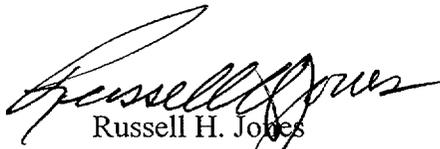
**Re: Docket No. 040-08006; License No. SUB-986  
Kerr-McGee Chemical L.L.C. (KMCLLC) Technical Center  
Responses to NRC Region IV Request for Information to Support the  
Environmental Assessment of Proposed Remediation Activities**

Dear Dr. Spitzberg:

Attached please find our responses to your letter dated January 22, 2002 requesting information to support an environmental assessment as part of our decommissioning of the above reference source material license. In addition, letters from agencies responding to comments #1 and #3 are also attached. As indicated in the attachment, I am still waiting for a response from the U.S. Fish and Wildlife Service and the State Historic Preservation Office. I will provide this information to the NRC as soon as it becomes available.

If you have any questions regarding this matter, please feel free to contact me at (405) 270-2665.

Sincerely yours,

  
Russell H. Jones  
Project Manager

Attachments

1507

**Responses to NRC's Request for Information  
to Support the Environmental Assessment of Proposed Remediation Activities at the  
Kerr-McGee Technical Center**

**NRC Comment #1:**

The evaluation of the ecological resources should include a list of threatened or endangered species (plants and animals) known to occur, or that could potentially occur and a qualitative estimate of the importance of habitat of threatened, endangered species in the remediation area. The source of information and time frame in which it was collected should be identified.

**KMCLLC Response:**

Attached is a letter from the Oklahoma Natural Heritage Inventory that discusses T & E species at the KMCLLC Technical Center. A request for additional information has been submitted to the Tulsa office of the U.S. Fish and Wildlife Service. To date we have not received a response. That information will be provided as soon as it becomes available.

**NRC Comment #2:**

The evaluation of noise should include the noise baseline at and near the site of the remediation activities and any impacts by the proposed action.

**KMCLLC Response:**

Remedial activities may involve the use of heavy equipment such as a front-end loader or backhoe. At this time, based upon characterization data, there are several areas investigated that will likely require remediation via removal of soils. Heavy equipment such as that which will be used for remedial activities is similar to equipment used on adjacent properties for excavation and building. Noise levels near the equipment will be elevated but will not be significant at the site boundary due to the amount of buffer land present.

**NRC Comment #3:**

The evaluation of cultural resources should include the likelihood of encountering any artifacts in the area where remediation shall occur.

**KMCLLC Response:**

Attached is a letter from the Oklahoma Archeological Survey indicating that there are no sites on their data base that occur within our project area and no archeological materials are likely to be encountered. A request for information was also submitted to the State Historic Preservation Office. To date, we have not received a response. That information will be provided as soon as it becomes available.

**NRC Comment #4:**

The evaluation of air quality should include the likelihood of radiological airborne and the derived air concentration (DAC) estimate for radiological airborne as a result of the proposed action.

**KMCLLC Response:**

Kerr McGee and contractor staff have extensive experience in remediation of radioactive soils. Past experience at the KMCLLC Technical Center (during excavation of the Test Pits and at the Cimarron Facility indicates that there will not be any significant radioactive airborne contamination levels (i.e., less than 10 % of the derived airborne concentration) resulting from remedial actions. Workers ensure soil is moist, or will use water when needed, to circumvent the possibility for generation of airborne particulate.

**NRC Comment #5:**

The evaluation of personnel exposures should include the estimated highest exposure to a worker(s) who is performing the decommissioning activities and the determination if any immediate threat to public health and safety exists. The estimated exposure should include any expected exposure to members of the public as defined by 10 CFR 20.1301, as a result of the decommissioning activities.

**KMCLLC Response:**

Some of the areas to be remediated have small volumes of radioactive materials in concentrations that result in exposure rates as high as 180 micro-R per hour on contact with the ground surface. The exposure rate drops off significantly with distance from the ground surface. As discussed in the response to comment #4 above, airborne releases will be insignificant. While it is possible that workers will not receive any measurable exposure from licensed materials, there is a small likelihood of exposure up to approximately 100 mrem total effective dose equivalent from these activities.

Excavated soils will be placed into containers upon removal to ensure that there is no possibility of runoff from rain events. There is sufficient distance between the proposed remedial activities and public lands to ensure that any dose from activities is insignificant. As stated above, airborne releases are not a pathway to the public. Therefore, there is no expected dose impact to members of the public from remedial activities. There will not be any immediate threat to public health and safety from the proposed remedial activities.

**NRC Comment #6:**

The evaluation of future land use should consider the proposed action and determine if the remediation activities will have a beneficial environmental impact.

**KMCLLC Response:**

Remedial activities are expected to have beneficial impact due to the improvement of land valuation from not having environmental concerns about the property. The property is thus more easily conveyed to another party without the expense and stigma of having impacted soils present. In addition, the State of Oklahoma Department of Transportation is slated to acquire portions of the KMCLLC property for use as right of way for the widening of Highway 74 which runs adjacent to the property. The highway acquisition would require that the land be remediated and that any radioactive materials license be terminated for the transferred portions.



*Oklahoma*  
*Natural Heritage Inventory*

OKLAHOMA BIOLOGICAL SURVEY  
111 E. Chesapeake Street  
Norman, Oklahoma 73019-0575, USA  
(405) 325-1985  
FAX: (405) 325-7702

**RECEIVED**

**APR 18 2002**

**R. H. JONES**

Russell H. Jones  
Kerr-McGee Chemical LLC  
P.O.Box 25861

Friday, April 12, 2002

**OBS Ref.: 2002-144-BUS-JON**

**Re: T & E species at Kerr-McGee Corporation L.L.C. (KMCLLC) Technical Center -(T13N, R04W, SEC.1)**

Dear Mr. Jones,

This letter is in response to your request for information on the presence of endangered species or other elements of biological significance at the referenced site. We have reviewed the information currently in the Natural Heritage Inventory database and have found no records of elements at the location you describe.

Because the database is only as complete as the information that has been collected, we cannot say with certainty whether or not a given site harbors rare species or ecological communities. In addition, the Oklahoma Biological Survey has no regulatory authority for endangered species and cannot say whether a project is or is not compliant with state or federal laws. Endangered species regulatory authorities in Oklahoma are the U.S. Fish and Wildlife Service office in Tulsa (918-581-7458) and the Oklahoma Department of Wildlife Conservation in Oklahoma City (405-521-4619). These offices also may have site specific information of which we are unaware.

Sincerely,

*for* Ian Butler  
Biological Data Coordinator



## Oklahoma Archeological Survey

THE UNIVERSITY OF OKLAHOMA

RECEIVED  
APR 16 2002  
R. H. JONES

April 11, 2002

Russell Jones  
Kerr McGee  
PO Box 25861  
Oklahoma City, OK 73125

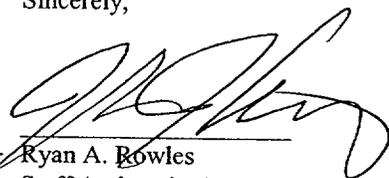
Re: Kerr McGee Chemical LLC possible digging up of hazardous material at Technical Center. Legal Description: NE ¼ NW ¼ SW ¼ Section 1 T13N R4W, Oklahoma County, Oklahoma.

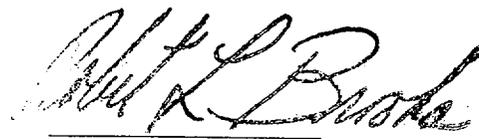
Dear Mr. Jones:

The above referenced project has been reviewed by the Community Assistance Program staff of this agency to identify potential areas that may contain prehistoric or historic archaeological materials (historic properties). The location of your project has been cross-checked with the state site files containing approximately 17,500 archaeological sites that are currently recorded for the state of Oklahoma. No sites are listed as occurring within your project area, and based on the topographic and hydrologic setting, no archaeological materials are likely to be encountered. Thus an archaeological field inspection is not considered necessary. However, should construction activities expose buried archaeological materials such as chipped stone tools, pottery, bone, historic crockery, glass, metal items or building materials, this agency should be contacted immediately at (405) 325-7211. A member of our staff will be sent to evaluate the significance of these remains.

This environmental review and evaluation is performed in order to locate, record, and preserve Oklahoma's prehistoric and historic cultural heritage in cooperation with the State Historic Preservation Office, Oklahoma Historical Society. In addition to our review comments, under 36CFR Part 800.3 you are reminded of your responsibility to consult with the appropriate Native American tribe/groups to identify any concerns they may have pertaining to this undertaking and potential impacts to properties of traditional and/or ceremonial value. Thank you.

Sincerely,

  
Ryan A. Rowles  
Staff Archaeologist

  
Robert L. Brooks  
State Archaeologist

:ls

cc: SHPO