

August 8, 2003

Federal Express

Susan Frant, Chief Fuel Cycle Facilities Branch Division of Fuel Cycle Safety And Safeguards, NMSS U.S. Nuclear Regulatory Commission 11545 Rockville Pike Rockville, MD 20852-2738

Subject: License No. SUB-1010, Docket No. 040-08027 Reclamation Plan Acceptance Review, Request for Additional Information

Dear Ms. Frant:

In a letter dated March 24, 2003, your staff accepted the Sequoyah Fuels Corporation (SFC) Reclamation Plan for technical review. A request for additional information (RAI) was included in that letter. Enclosed, please find SFCs response to the majority of the RAI contained in the request (Enclosure 1). This response does not include questions related to protecting water resources, GW1 and GW2. SFC is currently working on the disposal cell liner configuration and leakage detection system in order to complete our response to your questions. We plan to submit our responses with any necessary changes to the Reclamation Plan by August 29, 2003.

Also enclosed with this letter is a complete revision to Appendix A (Enclosure 3) and Appendix E (Enclosure 2) of the Reclamation Plan submitted in January of this year. These appendices have been revised in response to your RAI. Please remove Appendix A from your copy of the Reclamation Plan and replace it with Enclosure 3. Remove Appendix E and replace it with Enclosure 2. Discard the current Appendix A and Appendix E. A spine insert is included inside the binder cover of Appendix E to replace the spine in the Reclamation Plan, Appendix $E - H$.

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Susan Frant Page 2 of 2

If you have any questions, don't hesitate to call me at (918) 489-5511, ext. 13 or Craig Harlin at ext. 14.

Sincerely,

John H. Ellis President

xc: Myron Fliegel, US NRC (3 copies) Rebecca Tadesse, US NRC (2 copies) Al Gutterman, ML&B Acting Chief, EPA Reg 6 Pat Gwin, Cherokee Nation

Patricia Ballard, NRMNC Michael Broderick, OKDEQ Kelly Burch, OKAG Timothy Hartsfield, USACE

ENCLOSURE I Sequoyah Fuels Corporation Reclamation Plan Acceptance Review Request for Additional Information

SFC Responses to Request for Additional Information August 8, 2003

ENCLOSURE **I** Sequoyah Fuels Corporation Reclamation Plan Acceptance Review SFC Responses to Request for Additional Information

This enclosure outlines the responses for the Requests for Additional Information (RAls) prepared by the U.S. Nuclear Regulatory Commission (NRC) in their acceptance review of the Reclamation plan for the Sequoyah Fuels Corporation facility near Gore, Oklahoma.

The NRC RAls are organized by the following technical areas: (1) geology, (2) seismology, (3) geotechnical stability, (4) surface water hydrology and erosion protection, (5) protecting groundwater resources, and (6) disposal of non-11e.(2) byproduct material. The RAls are presented below, followed by the response (in bold type) and where the supporting information is found.

Geology

GI. Requirement to account for potential capable faults (criterion 4(e) of 10 CFR 40, Appendix A]. Please provide information to demonstrate that SFC has investigated and analyzed known and potential faults within 200 miles of the site that might be capable faults. The following types of information should be provided for each potential capable fault: name, location, length, distance from site, evidence that it is a capable fault (see 10 CFR part 100, Appendix A), evidence of the frequency and amount of displacement, and age of last movement. The investigation should seek to discover and include up-to-date information concerning potential capable faults, such as recent geological maps, geophysical surveys, and seismicity maps.

The NRC has reviewed seismic conditions in the vicinity of the site, and determined that none of the known faults near the site are capable faults (documented In the December 18, 1995 letter from John Hickey to SFC). In developing responses to this RAI, SFC updated previously submitted information and revised In Its entirety Appendix E to the Reclamation Plan. The supporting Information that was previously supplied to NRC, and expanded evaluation of seismic conditions in the site area have been presented In the revised Appendix E to the Reclamation Plan which has been included here as Enclosure 2 to this response. Discussion of the material provided (consistent with the criteria in 10 CFR 40 and applicable guidelines In 10 CFR 100) Is Included In Sections 3 and 4 of the revised Appendix E of the Reclamation Plan.

G2. Requirement to account for geomorphic stability [criteria 4(d) and 6(1)(i) of 10 CFR 40, Appendix A. Please provide information to demonstrate that SFC has investigated and analyzed the terrain around the site to assure that there are not on-going or potential processes, such as gully erosion (e.g., gully #007), which would lead to impoundment instability over the next 200 to 1000 years. The types of information that should be provided are described in the geomorphic features and related sections of the "Standard Review Plan for-the Review of a Reclamation Plan for Mill Tailings Sites under Title II of the Uranium Mill Tailings Radiation Control Act" (NUREG-1620). The analyses should consider the potential effects of headward erosion of gullies over the next 200 to 1000 years. The effects on the site geomorphic and hydrologic systems caused by future removal or degradation of nearby river-dams should be considered. [Note: criterion 4(d) refers to potential gully erosion of the terrain surrounding the planned impoundment; other requirements pertain to gully erosion of the cover material].

The SFC site, as well as planned reclaimed features, are hydraulically separate and erosionally stable from extreme flood events on the Illinois and Arkansas Rivers. In addition, the criteria for geomorphic stability have been Incorporated In the disposal cell design by locating the cell at the top of the drainages and providing rock protection on the side slopes and perimeter apron of the completed cell. The stability of the site and these planned features In terms of gully Intrusion potential is addressed In Section 6 of the revised Appendix E of the Reclamation Plan.

Seismology

SI. Provide an updated listing and a map (up to the present) showing the earthquake distribution within 200 miles of the site.

This information is provided In Section 4 of the revised Appendix E of the Reclamation Plan.

S2. Identify which tectonic province both the site and the June 20, 1926 earthquake are located in and the other tectonic provinces within 200 miles of the site. Estimate the acceleration at the site from this earthquake, using an updated attenuation equation.

This Information Is provided In Section 4 of the revised Appendix E of the Reclamation Plan.

S3. Is the site located in the same tectonic province as the Black Fox NPP Station? Explain.

As shown on Figure 3.1 of The revised Appendix E of the Reclamation Plan, the SFC Facility Is located at approximately the contact between three tectonic provinces: (1) the Ozark uplift, (2) the Cherokee platform, and (3) the Arkoma basin. The Black Fox Nuclear Power Plant (NPP) **site is within the Cherokee platform tectonic province.**

S4. Discuss the effect of the earthquakes associated with the Nemaha Uplift, Ozark Uplift, Arkoma Basin-Ouachita **Uplift,** and Cherokee Basin-Central Oklahoma Platform on the site and estimate the acceleration, using a recent attenuation equation from the largest earthquake that has occurred or could occur in each of these uplifts and platform.

This Information is provided In **Section 4 of the revised Appendix E of the Reclamation Plan.**

S5. Provide and clearly explain the ground motion acceleration that will be used for the seismic design for the site and the basis for choosing this value.

This information Is provided In **Section** 5 of the revised Appendix E of the Reclamation Plan.

S6. Discuss whether recent fault mapping In the area identified any of the surrounding faults to be capable. If yes, estimate the maximum earthquake that could be generated from these faults (10 CFR 40, Appendix A).

Recent fault mapping in **the area did not Identify any of the surrounding faults to be capable. This Is explained** In **Section 3 of the revised Appendix E of the Reclamation Plan.**

Geotechnical stability

GT1 In the discussion of infiltration modeling, the statement is made, that with sufficient time for tree development, drainage through the bottom of the cover is essentially zero. This is based, in part, on modeling results that show a portion of the precipitation is stored as biomass, litter and in the soil. This assumes that the storage of precipitation (in biomass, litter, and the soil) continues to grow for

Enclosure I Page **3 of 6**

the design life of the cell. Please provide further justification that the storage capability of biomass, litter, and the soil will continue to grow, rather than reaching a steady state.

The modeling estimate of essentially zero Infiltration Is achieved after approximately 40 years of vegetation development. The estimated Infiltration Is based on reaching steady state biomass conditions at about 45 years, and not with Increasing biomass throughout the design life of the disposal cell. This is discussed on page 13 of the Preliminary Design Report for the Disposal Cell at the Sequoyah Fuels Corporation Facility, included as Appendix C to the Reclamation Plan.

Surface water hvdroloay and erosion protection

- SWI. Provide background information and analysis for conclusion #1 listed on page 2- 8 of the Reclamation Plan which states that the river flooding will have no effect on the impoundment.
	- a. For example, where are the elevation changes being calculated, at the reservoir or at the nearest stream bank? Provide details.
	- b. Provide information on upstream dams and effects of failure.

The estimated flood contours from the 500-year event on the Arkansas River as well as estimated high water contours from a Tenkiller Ferry Dam breach analysis and a Weber Falls Lock and Dam breach analysis were taken from a flood Insurance rate map and the US Army Core of Engineers emergency plans. The maximum water elevation In the site area from these sources is approximately 500 feet. The site facilities and planned disposal cell are above elevation 540 feet (see Figure 1 of this enclosure). Additional details are provided In Section 6 of the revised Appendix E of the Reclamation Plan.

SW2. Provide a discussion of the effects of stream hydraulics for the drainage streams at the site near the impoundment and back up data and modeling, if necessary.

This discussion Is provided in Section 6 of the revised Appendix E of the Reclamation Plan.

SW3. Provide a discussion of the types of vegetation that will flourish on the soil cover.

The planned types of vegetation for the cover were provided In the Technical Specifications, Attachment A to the Reclamation Plan.

SW4. Provide maps and/or drawings delineating sub-basins on and near the impoundment.

This basin delineation map is provided In Section 6 of the revised Appendix E of the Reclamation Plan.

SW5. Provide construction specifications and the **QA/QC** program for rock placement and re-grading.

The construction specifications and QA testing were provided in the Technical Specifications, Attachment A to the Reclamation Plan.

Disposal of non-1 1e.(2) bvyroduct material

NI. Provide a complete description of the non-1 Ie.(2) byproduct material proposed for disposal in the cell, including chemical analysis and radiological analysis. Identify locations where the non-11e.(2) byproduct material is currently located.

Non-11e.(2) byproduct material proposed for disposal in the cell includes the soils; buildings, equipment and concrete; scrap metal; solid waste burials; drummed contaminated trash; Emergency Basin sediment and soils; North Ditch sediment and soils; **the** Interim Soil Storage Cell; and Calcium Fluoride sludge and basin liners. Appendix A of the Reclamation Plan has been revised to better describe the non-11e.(2) materials, and the revised Appendix A Is provided with this response as Enclosure 3. Locations of non-11e.(2) materials are identified on Figure A-1 in the revised Appendix A to the Reclamation Plan.

Chemical and radiological analyses Information Is also included In the revised Appendix A to the Reclamation Plan.

N2. In the **SFC** response to RIS 2000-23 criterion 4, the following statement is made: Testing has shown that uranium is less leachable from the CaF sludge than from most of the 11e.(2) materials that will be placed in the cell." Provide details of the testing referred to.

Details of testing of the CaF sludge are included as Attachments 1 and 2 of the revised Appendix A to the Reclamation Plan.

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ENCLOSURE 2 Sequoyah Fuels Corporation Reclamation Plan Acceptance Review Request for Additional Information

Sequoyah Facility Seismicity Evaluation August 8, 2003

SEQUOYAH FUELS CORPORATION FACILITY SEISMICITY EVALUATION

Prepared For: **Sequoyah** Fuels **Corporation** I-40 & Highway 10 Gore, Oklahoma 74435

Prepared By: MFG Inc. 3801 Automation Way, Suite 100 Fort Collins, Colorado 80525

July 2003

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1.0 **INTRODUCTION**

The U.S. Nuclear Regulatory Commission (NRC) has reviewed seismic conditions in the vicinity of the Sequoyah Fuels Corporation (SFC) Facility in Sequoyah County, Oklahoma, and has determined that none of the known faults near the site are capable faults. This was documented in the December 18, 1998 letter from John Hickey to SFC (NRC, 1998b). This report expands and updates the review of seismic conditions and seismicity in the SFC Facility area, and assesses the disposal cell design for seismic events, following guidance given in the Code of Federal Regulations (Appendix A to 10 CFR 40 and Appendix A to 10 CFR 100). This report has been prepared for SFC by MFG, Inc.

1.1 **Background**

NRC requested that SFC evaluate the potential for seismic activity in the facility area in order to evaluate alternatives for reclamation. Specifically, SFC was asked to (1) account for capable faults in the area as defined in Appendix A of 10 CFR Part 100, (2) document the historical occurrence of seismic events in the area, (3) estimate site acceleration caused by historical and predicted earthquake events, and (4) discuss the input parameters used in the seismic stability analyses.

1.2 Scope of Report

This report has been structured to provide information responding to the four requested seismicity items listed above, as well as geomorphic stability information. The seismicity information in this report has been organized to (1) consolidate previously submitted documentation regarding seismic conditions and seismicity at the SFC Facility, (2) assess faults near the site in terms of capable faults (as defined in Appendix A of 10 CFR 100), (3) assess whether faults within a 200-mile radius of the site are capable of impacting the stability of the site, and (4) determine if the disposal cell design can provide adequate slope stability for potential "random" earthquake events. Supporting information is provided in appendices for this report.

2.0 REGULATORY CRITERIA

2.1 Capable Faults

Regulatory criteria for evaluating seismic conditions for nuclear reactor sites are outlined in Appendix A of 10 CFR 100. Although the SFC Facility is not a nuclear reactor, these criteria will be followed (as applicable) for documenting the capable faults in the site area.

As defined in 10 CFR 100 Appendix A III, (g) , a capable fault is a fault that has exhibited one or more of the following characteristics:

- 1. Movement at or near the ground surface at least once within the past 35,000 years or movement of a recurring nature within the past 500,000 years.
- 2. Macro-seismicity instrumentally determined with records of sufficient precision to demonstrate a direct relationship with the fault.
- 3. A structural relationship to a capable fault, according to characteristics (1) or (2) above, such that movement on one fault could be reasonably expected to be accompanied by movement on the other.

Faults that are considered of significance in determining the vibratory ground motion at the site are capable faults with minimum lengths as shown in the table below.

2.2 Seismicity

The design seismicity and vibratory ground motion at the site are determined following criteria given in Appendix A of 10 CFR 100 and Appendix A of 10 CFR 40. As stated in Appendix A of 10 CFR 40, Technical Criterion 6, design of the waste disposal area shall provide reasonable assurance of control of radiological hazards for 1,000 years, to the extent reasonably achievable, and, in any case, for at least 200 years.

2.3 Seismic Analysis

The approach for evaluation of the seismic stability of earth structures was based on procedures outlined in Seed (1979) and ICOLD (1989). The methods of analysis represent current state of practice, based on the seismicity of the site and the expected response to seismic vibration of the structure to be analyzed. Evaluation of long-term stability (200 to 1,000 years) dictates the use of the maximum credible earthquake as the seismic event producing the maximum acceleration at the structure.

&quoyah Fuels Corporation MFG Inca P.u _,eaowft d~ Evakmdoc 4 *July 17. 2003*

3.0 REGIONAL GEOLOGY AND FAULTING

3.1 Regional Structure

The SFC Facility is located on the southwest flank of a large tectonic feature known as the Ozark Uplift, a major tectonic feature extending from east-central Missouri to northwest Arkansas and northeast Oklahoma (Arbenz, 1956). Quatemary-age alluvial and terrace deposits exist along and adjacent to the major rivers in the region. Bedrock formations present in the region consist of Pennsylvanian, Mississippian, Devonian, Silurian and Ordovician-aged shale, limestone, siltstone and sandstone formations (over 300 million years old). The geological formations regionally dip to the southwest at one to four degrees toward another tectonic feature known as the Arkoma Basin or Shelf. Other major tectonic provinces within a 200-mile radius of the site include the Cherokee Basin-Central Oklahoma Platform (northwest of the site), Nemaha Uplift (northwest of the site), Anadarko Basin and Shelf (west of the site). These provinces are shown in Figure 3.1. The SFC Facility geology is discussed in more detail in the Draft Site Characterization Report (SFC, 1996).

3.2 Faulting

The horst and graben type structural movement found in the area coincides with normal faults, which suggest that tensional forces have been responsible for their formation (Blythe, 1959). Although these faults are not exposed at the surface, some are visible in highway cuts and others are revealed by low hummocky parallel ridges that stretch across pasture lands. Quaternary-aged terrace deposits and alluvial material cover most all of the Atoka Formation Bedrock in the area except where streams and manmade activity has exposed portions of bedrock

The minimum fault lengths for vibratory ground motion in Section 2 (from Appendix A of 10 CFR 100) are established as a guide for determining the Safe Shutdown Earthquake for nuclear reactor sites. Although these criteria are conservative for the design of the disposal cell at the SFC Facility, these minimum fault lengths were used for evaluating faults in the site area.

3.2.1 Faults Within 5 Miles of Site

Figure 3.2 shows all known faults within 5 miles of the SFC Facility, as presented in SFC (1997b). These faults include: (1) the Marble City Fault and its splay (MCF), (2) faults associated with the South Fault of Warner Uplift (SFWU), and (3) the Carlile School Fault. NRC concluded that none of these faults are capable faults (NRC, 1998a), as discussed below.

3.2.1.1 Marble City Fault

As concluded in the December 3, 1998 NRC letter (1998a), the MCF does not meet the criteria for being a capable fault. It does not appear to have experienced displacement in the last 35,000 years or two displacements in the last 500,000 years (Black Fox and Arkansas Nuclear One SERs). There is no macroseismicity associated with it (Earthquake Map of OK, 1995, and updates and interviews with Kenneth Luza). In addition, it is not structurally related to a known capable fault (Black Fox and Arkansas Nuclear One SERs).

The trace of the MCF and its relationship to the CF is shown differently on the Tectonic Map of Oklahoma Showing Surface Structural Features (Arbenz, 1956), Hydrologic Atlas 1 Map (Marcher 1969), and others by Chenoweth (1983), SFC (1996), and Van Arsdale (1998). SFC questions the basis of the state maps in the vicinity of SFC and believes the fault is shown incorrectly. A detailed discussion of the consistency between various geologic maps is in an April 8, 1998 letter to NRC from SFC (SFC, 1998b). However, NRC concluded that the location of the MCF and its relationship to other faults near the SFC site do not need to be pinpointed for the purpose of ascertaining seismic design basis at the site (NRC, 1998a).

3.2.1.2 South Fault of Warner **Uplift**

The SFWU is tectonically similar to the MCF, in that it is one of a series of northeast-trending normal faults that are arrayed on the southwestern flank of the Ozark uplift or dome. The SFWU is seismotectonically similar to the MCF in that it does not meet any of the criteria for capable faults (e.g., reasons similar to that for MCF as above).

3.2.1.3 Carlile School Fault

As discussed by Van Arsdale (1998) and NRC (1998a), the Carlile School Fault (CF) lies within the transition zone between the Ozark uplift and the Arkoma Basin. The trace of the CF is a narrow zone of tilted Pennsylvanian Atoka Formation strata, marked by a rubbly vegetated ridge approximately 200 feet wide by up to 20 feet high and up to one mile long. The fault has a northeast strike, a displacement of about 100 feet down to the southeast, and a moderate dip to the southeast. Van Arsdale indicates that the fault zone is characterized by rock strata with dips up to 17 degrees southeast, which interrupt the regional southwestern dips of about 5 degrees. During Van Arsdale's site investigation (1998), he found no surface evidence that the Carlile School Fault extends beyond its mapped trace (Fig. 1 in Van Arsdale, 1998), or that it is continuous with the MCF, as has been previously mapped (Arbenz, 1956).

The fault does not meet any of the criteria for a capable fault. The absence of disruption of Quaternary and Holocene sediments that veneer the fault zone as well as the lack of steep scarps show no evidence of the late Quaternary displacement. The fault is estimated to be older than 2 million years (Van Arsdale, 1998 and SFC, 1996). There is no definitive relationship of macroseismicity to the CF (e.g., earthquake map of OK, 1995). The CF does not appear to be structurally related or connected to the MCF (Chenoweth, 1983, and Van Arsdale, 1998); and the MCF is not a capable fault (Black Fox and Arkansas Nuclear One reports). Therefore, based on this information, there is no evidence that the CF is a capable fault.

The NRC concluded that SFC's belief that the east-west splay of the CF that appeared previously in Figure 9 of SFC (1997b) is a remnant of injection well modeling is reasonable and acceptable (NRC, 1998a). Thus, the east-west splay, the only fault that has been suggested to occur within the site boundary, has little or no basis in fact, and need not be considered in establishing the seismic design basis.

3.2.2 Known Active Faults within 200 Miles of Site

Documented Quaternary faults of tectonic origin located within 200 miles of the site that meet the minimum length requirements for vibratory ground motion include the Meers fault and the

Humboldt fault zone. Two other faults located within 200 miles of the site (the Criner fault and the Washita Valley fault) show no Quatemary tectonic movement (Van Arsdale, Ward, and Cox, 1989; Crone and Wheeler, 2000). The Reelfoot scarp and New Madrid seismic zone is tectonically active, but falls outside the 200-mile range. The Meers fault and Humboldt fault zone are discussed below.

3.2.2.1 Meers Fault

The Meers fault, also referred to as the Thomas fault and the Meers Valley fault, is located in southwestern Oklahoma in the Frontal Wichita fault system that is the boundary between the Anadarko basin and the Wichita Mountains. It is the only significant fault within a 200-mile radius of the site with positive documentation of Quaternary tectonic movement. The fault is approximately 54 km (34 miles) long, with the closest section of the fault approximately 306 km (190 miles) from the site. Paleosiesmic studies of the fault establish the occurrence of two late Holocene events, one between 1,100 to 1,300 years ago, and another between 2,000 and 2,900 years ago. Evidence shows temporal clustering of events, and prior to the Holocene events, no surface faulting events have occurred for 100,000 years or more. A recurrence interval of 600 to 1,700 years is estimated based on the two documented Holocene events. A maximum slip-rate, based on two most recent movements is estimated to be between 0.9 and 4.9 mm/yr, but a value of 0.2 mm/yr probably reflects long-term displacement rates (Crone and Wheeler, 2000). Based on the length of fault, the maximum credible earthquake (MCE) associated with the Meers fault is approximately Richter magnitude 7.2.

3.2.2.2 Humboldt Fault Zone

The Humboldt fault zone is a north-northeasterly trending complex set of faults that bound the eastern margin of the Nemaha uplift in Nebraska, Kansas, and Oklahoma. The fault zone and the adjacent uplift are known based on drill-hole data from the region. Because the faults are only known from subsurface data, details of the fault slip and fault patterns are limited. Although convincing surficial evidence of large, prehistoric earthquakes is absent in the area, a regional seismograph network indicate that the structures are currently tectonically active. Based on the length of the fault segments in the Humboldt fault zone, Steepes and others (1990) suggest that

infrequent magnitude 6 or greater earthquakes could occur. The nearest part of the fault zone to the site is close to Oklahoma City, approximately 140 miles from the site.

3.2.3 Other Faults Between 5 and 200 Miles From Site

Faults meeting the minimum length requirements for vibratory ground motion are shown on Figures 3.3 through 3.7. These figures show known faults, as shown on state geologic maps (Cederstrand 1996, Queen and Green, 1997, Anderson, J.A, 1979) regardless of whether or not the faults are considered capable. It is unlikely that the majority of these faults meet the definition of a capable fault, as defined in Appendix A of 10 CFR 100, III , (g). Faults within the states of Kansas, Texas, and Louisiana have not been considered in this report. In lieu of providing positive evidence that all of the faults shown on Figures 3.3 through 3.7 are inactive, for the purposes of this report, all faults were conservatively considered capable. The MCE associated with the faults were evaluated, along with the impact such an earthquake will have on the site. MCE and seismicity at the site is addressed in Section 4.3.

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Figure 3.1 Geologic Provinces of Oklahoma (From Northcutt and Campbell, 1995)

Figure 3.3. Faults located within 20 miles of site

Figure 3.4. Faults located within 50 miles of site

Figure 3.5. Faults located within 100 miles of site

Figure 3.6. Faults located within 150 miles of site

Figure 3.7. Faults located within 200 miles of site

4.0 SEISMIC ACTIVITY HISTORY

Two approaches were used to quantify the potential seismicity in the site area. The first approach consisted of determining the maximum credible earthquake associated with potentially active faults in the site area. Since many earthquakes are not associated with a surface expression of a fault, the second approach consisted of evaluating the seismic history of a tectonic province, with probabilistic modeling to predict expected future events. Prior to discussing the two approaches, the sources of information and seismic activity are reviewed.

4.1 Sources of Information

Surface tracing of faults, as shown on geologic maps (Arbenz 1956, Marcher 1969, Cederstrand 1996, Queen and Green 1997, Anderson, 1979) were used to quantify length of fault and distance from site. National Earthquake Information Center (NEIC) earthquake database from 1534 to 2003 was searched to document known earthquake events with epicenters within the area of interest. The results were compared with data published by the Oklahoma Geological Survey from 1900 to 1998 compiled in Lawson and others (1979), Lawson and Luza (1983) Luza and Lawson (1993), and subsequent publications.

4.2 Seismic Activity

The site seismicity was reviewed in terms of: (1) general regional data, and (2) site area sitespecific data, as discussed below.

4.2.1 General Seismicity

Based on general seismicity information, the site is within a region of low seismicity. The region is classified as a Zone 1 area in U.S. Army Corps of Engineers (1982), with a recommended seismic coefficient of 0.025 g (where g is the acceleration of gravity). The region is classified as a Zone 1 area in IBCO (1991), with a recommended seismic coefficient of 0.075 g. USGS National Seismic Hazard Mapping Project (1996) show 0.03 g, 0.045 g and 0.09 g as the peak horizontal acceleration with 10 percent, 5 percent, and 2 percent (respectively) probability of exceedance in 50 years.

The probability-of-exceedance contour lines are shown in Appendix A. Assuming the occurrence of independent main events is represented by a Poisson relationship, the probability of exceedance and return period are related by the following equation:

$$
R=1-(1-\frac{1}{T})^n
$$

Where $R = Risk$, or probability of exceedance at least once in an interval $T =$ average return period, in years $n =$ number of years in an interval

Therefore, the USGS accelerations listed above correspond to 475-year, 975-year, and 2,475 year return periods.

4.2.2 Recorded Seismicity

A review of recorded or documented seismic activity within a 300-mile radius of the site was conducted from data compiled by the National Earthquake Information Center (NEIC) of the U.S. Geological Survey. The data were compiled from prior to 1811 through April 2003. The results were compared with data published by the Oklahoma Geological Survey from 1900 to 1998 compiled in Lawson and others (1979), Lawson and Luza (1983) Luza and Lawson (1993), and subsequent publications.

This data shows activity of low magnitude, with epicenters primarily in the central and southcentral portion of the state. The largest recorded events from the NEIC data are summarized in Table 4.1. Because site accelerations are dependent on both magnitude of earthquake, and the distance of epicenter from site, it is important to also look at smaller events that occur close to the site. These events are summarized in Tables 4.2 through 4.4. Events producing the greatest vibratory ground motions at the site based on attenuation models (see Section 4.3) are (1) the New Madrid events of 1811 and 1812, (2) a magnitude 4.2 event in Sequoyah County on June 20, 1926, (3) a magnitude 2.9 event in Muskogee County on March 31, 1975, (4) a magnitude 5.5 event in south-central Oklahoma on October 22, 1882, and (5) a magnitude 3.4 event on October 8, 1915 in Rogers County. A complete record of events within a 300.mile radius of the site is included in Appendix B.1

Table 4.1 Summary of Events With Magnitude 5.0 and Larger

***** Events of Richter Magnitude 5.0 or greater, within 300-mile radius of site.

Table 4.2 Summary of Events Between Magnitude 4.0 and 4.9*

***** Events within 270-km **(I** 68-mile) radius of site with Richter Magnitude between 4.0 and 4.9.

Table 4.3 Summary of Events Between 3.0 and 3.9 Magnitude*

* Events within 200-km (124-mile) radius of site with Richter Magnitude between 3.0 and 3.9.

* Events within 100-km (62-mile) radius of site with Richter Magnitude greater than 2.0

The data summarized in the tables above show more low-magnitude events from recent years. This reflects the fact that seismographs that directly measure ground movement (to calculate the release of energy by the Richter Magnitude scale) came into use in the latter part of the twentieth century. Earlier seismic events (such as those in the nineteenth century) were based on observed damage and correlated with the Modified Mercalli earthquake intensity scale, then converted to Richter Magnitude. It should be noted that seismic events of Richter Magnitude 3.0 or less, which correlate roughly with Modified Mercalli intensity III or less, are generally not noticeable.

The recorded events in Tables 4.1 through 4.4 are used to estimate seismic acceleration at the site as outlined below.

4.3 Capable Faults

Existing faults within a 200-mile radius of the site and of minimum length for vibratory ground motion belong in one of two categories: (1) faults that are known to be capable, which include the Meers fault and Humboldt fault zone; and (2) faults that are not known if they are capable, but for purposes of this study will be assumed to be capable (which include the faults shown in Figures 3.3 through 3.7). Faults that are known not to be capable, which include the Carlile

School Fault, the south fault of the Warner Uplift, and the Marble City fault were not considered further in the seismic analysis.

4.3.1 Maximum **Credible Earthquake**

Several empirical relationships that relate fault parameters to earthquake magnitude have been used to estimate the maximum credible earthquake (MCE) associated with the fault. Relations used in this report are as follows:

 $M_s = 2.012 + 1.142 \log L$ (Slemmons, 1982 for world-wide reverse faults)

 $M_s = 0.809 + 1.341 \log L$ (Slemmons, 1982 for world-wide normal faults)

Where M_s = surface wave magnitude $L =$ rupture length (in meters)

Faults were grouped by distance from the site, with ranges corresponding to those shown on Figures 3.3 through 3.7. For each buffer zone, the most critical (i.e. longest) faults were analyzed. Based on the above equations, the MCE associated with the critical faults were calculated, as shown in Appendix B.6. Data for the faults within the state of Arkansas showed faults as polygon areas, while data for faults in Oklahoma and Missouri were modeled as lines. In order to use the above equations for the faults within Arkansas, the centerline length of the polygon area was measured, and surface wave magnitude based on fault length was used.

4.3.2 Attenuation

Attenuation relationships presented in Campbell (1981) were used to estimate the peak ground motions at the site due to seismic events. Maximum site ground accelerations for the MCE associated with faults shown in Figures 3.3 through 3.7 are shown in Appendix B.6. In addition the most significant estimated peak ground accelerations at the site from historic seismic events is shown in Table 4.5. A complete list of seismic events within a 300-mile radius of the site and the estimated peak ground accelerations at the site is presented in Appendix B.1.

The maximum estimated accelerations at the site from the recorded earthquake events range from 0.006 g to 0.023 g. The estimated site acceleration from the largest recorded earthquake in site area (the New Madrid event) is 0.011 g;

4.4 Random Earthquakes

The random earthquake approach was taken to determine the design event for earthquakes not associated with identifiable faults, as is the case for most U.S. earthquakes east of the Rocky Mountains. In this semi-probabilistic method, tectonic provinces are established to group regions with similar seismological characteristics. It is assumed that the spatial distribution of earthquakes is uniform across the province. Within the province, historical data of earthquake events are evaluated and magnitude-frequency plots are generated. From the magnitudefrequency plots, magnitudes of differing return periods can be extrapolated. These frequency plots show the probability of earthquake events occurring within the study area. To determine the probability that an earthquake event occurs within a certain part of the study area, the magnitude-frequency must be normalized for area. Five different areas were evaluated.

The first study area is a hypothetical province modeled as a circle with radius of 300 miles that surrounds the site. This circle was picked to look at seismic events occurring closest to the site, including the New Madrid events of 1811 and 1812. The second study area is a circle with a 200-mile radius that approximates the Ozark Uplift tectonic province (in which the site is located), but the site not at the center of this circle. In addition, three of the surrounding tectonic provinces were evaluated to determine what impact an earthquake event in an adjacent province will have on the site. The tectonic provinces and the approximated study areas are shown in Figure 4.1. It should be noted that the boundaries of geologic and tectonic provinces vary

between sources. The boundaries in Figure 4.1 show a generalized boundary of the provinces on a national scale, as shown by Central Energy Team. Figure 3.1 shows a more detailed diagram of the provinces in the state of Oklahoma. It is assumed that the state map is more accurate in describing the province boundaries close to the site, and that the site is located in the Ozark Uplift, as documented in previous reports.

In order to aid in the search of the NEIC database, the provinces are approximated as circular areas. The Nemaha Uplift, which is long and thin, is not easily approximated in this way and is not analyzed separately. However, the area of the Nemaha Uplift is approximately covered in the circle approximations of the Cherokee Platform and the Anadarko Basin, and its exclusion as an individual province is not expected to significantly affect the results of the random earthquake analysis. Figures 4.2 through 4.6 show the earthquake events in each area. For each area, a logfrequency versus magnitude plot was generated, and a straight line fit to the data. The frequency-magnitude data was then normalized with respect to area as described in Lawson (1985) to be of the form

$$
M = a + b^* \log \frac{A_p}{y^* A}
$$

where $M = M$ agnitude of earthquake $y =$ return period in years A_p = area of province used in earthquake search $A = area of interest$

The Ozark Uplift area produced the greatest magnitude earthquake of 6.7 associated with a 1000 year return period event. Since this province is also the closest to the site (site is within the Ozark Uplift), random earthquakes generated within the Ozark Uplift will govern the seismic design. Typically shallow crustal earthquakes larger than magnitude 6.5 are associated with surface-fault rupture and will not occur randomly. Therefore, events with magnitudes larger than 6.5 are not considered in the random event analysis. Table 4.6 summarizes the earthquake magnitude results for the Ozark Uplift. Frequency versus magnitude graphs for these areas are shown in Appendix B.

Probabilistic Assessment of Random Earthquakes Within the Ozark Uplift* Table 4.6

* Values in Richter Magnitude

Taking the earthquake magnitudes shown in Table 4.6 and applying attenuation equations (assuming the epicenter is located as the mean radius of the circle area), the site accelerations are calculated as shown in Table 4.7.

*Values in fraction of gravitation acceleration (g).

The calculated maximum accelerations from Table 4.7 range from 0.01 to 0.09 g.

Figure 4.1. Tectonic provinces within 200 miles of site

Figure 4.2. Seismic activity within a 300-mile radius of site

Figure 4.3. Seismic activity within Ozark Uplift

Figure 4.4. Seismic activity within the Arkoma Basin

Figure 4.5. Seismic activity within the Cherokee Platform

Figure 4.6. Seismic activity within the Anadarko Basin

And in the

Table 5.1 Peak Accelerations Associated With Seismic Events

These maximum or peak accelerations are listed in Table 5.1.

5.2 Pseudostatic Analyses

If the materials in the structure are not susceptible to liquefaction or loss of shear strength, a pseudostatic analysis of the structure from seismic-induced accelerations is conducted. This consists of a stability analysis under an equivalent constant acceleration (described in Seed, 1979) or an evaluation of seismic-induced deformations (described in Makdisi and Seed, 1978). The equivalent, constant acceleration used in these analyses is the seismic coefficient, which is a fraction of the maximum seismically-induced acceleration anticipated at the site during the design period. The U.S. Department of Energy (1989) recommends that a seismic coefficient of

5.0 INPUT FOR SEISMIC **ANALYSIS**

As discussed in Section 4.3, review of documented seismic events within a 200-mile radius of resulted in an estimated peak acceleration at the site of less than 0.050 g.

Using very conservative evaluation techniques associated with "random" events in the site area

(Section 4.4), the maximum estimated acceleration at the site would be 0.09 g. From review of

all capable faults in the site area (Appendix B.6) the estimated maximum acceleration at the site

would be 0.145 g, based on the very conservative assumption that all capable faults are active.

the site resulted in a maximum acceleration at the site of 0.023 g (Table 4.5). From Appendix B.6, peak accelerations at the site due to a MCE along the Humboldt fault zone is 0.012 g and along the Meers fault is 0.015 g. The seismic analysis review in Appendix C of MPG (2002)

5.1 Seismic Accelerations

two-thirds of the peak acceleration be used to analyze long-term stability. The pseudostatic analyses for the disposal cell were conducted with a seismic coefficient of 0.05 g (MEG, 2002).

5.3 Pseudostatic Analysis Results

The pseudostatic stability analyses (MFG, 2002) used a coefficient of 0.05 g, with resulting factors of safety of 1.8 and higher. These factors of safety are significantly higher than the NRC minimum criterion of 1.1 for pseudo-static analyses.

In order to assess potentially higher seismic accelerations, the disposal cell was re-analyzed by increasing the seismic coefficient until the factor of safety decreased to 1.1. These analyses demonstrate the facility has adequate stability up to a seismic coefficient of 0.19 g. This seismic coefficient corresponds to a peak horizontal acceleration of 0.28 g, which is significantly higher than the conservative peak values in Table 5.1. Outputs from the additional stability analyses are presented in Appendix C.

6.0 GEOMORPHIC STABILITY

6.1 Topographic Setting

The SFC site is located above the east bank of the Illinois River at its confluence with the Arkansas River. The site is on the western end of a broad upland area approximately 100 feet above the normal elevation of the Illinois River (as impounded by the Robert S. Kerr Reservoir). The regional topography is shown in Figure 6.1 (from SFC, 1998a). The drainage basin boundaries for the site area are delineated on the figure.

6.2 Geologic Setting

The SFC site is underlain by a sequence of approximately 400 feet of sedimentary siltstones and sandstones of the Atoka Formation. The Atoka Formation is of the Pennsylvanian geologic period (with these sedimentary rocks formed approximately 280 to 325 million years before present).

The Atoka Formation sedimentary rocks are mantled or covered with alluvial terrace deposits of the Quaternary geologic period. These terrace deposits were placed during the Pleistocene epoch (approximately 10,000 to 1,000,000 years before present) during high-water stages of flow on the Arkansas and Illinois Rivers. These high-water stages were most likely from melting periods of Pleistocene glaciation. Subsequent downcutting of the Illinois and Arkansas Rivers has left these deposits above the current river elevations. More recent alluvial deposits are found along the banks of the Illinois and Arkansas Rivers (SFC, 1998a).

The site is in an area of low seismic activity, with no significant faulting in the area within the last 35 million years (SFC, 1998a). This indicates that seismically-induced features that would be susceptible to erosion are not present.

6.3 Erosional Stability

The topographic and geologic descriptions above indicate that the site is on an upland area of Pennsylvanian-age sedimentary rocks that have been mantled with Pleistocene epoch terrace

deposits and recent alluvial deposits. Erosion during the Quaternary period has been limited to downcutting of the bed of the Arkansas and Illinois Rivers, with no significant erosion of the sedimentary rocks or overlying alluvial deposits at the western end of the upland area.

Figure 1 from ESCI (1996) shows the results of flood analyses conducted by the U.S. Army Corps of Engineers and Sequoyah County. The estimated flood contours from the 500-year event on the Arkansas River are shown on the figure, as well as estimated high water contours from a Tenkiller Ferry Dam breach analysis and a Weber Falls Lock and Dam breach analysis. The maximum water elevation in the site area from these analyses is approximately 500 feet. The site facilities and planned disposal cell are above elevation 540 feet.

6.4 Summary

The SFC site, as well as planned reclaimed features, are hydraulically separate and erosionally stable from extreme flood events on the Illinois and Arkansas Rivers, as summarized below.

- 1. The location of planned reclaimed site features is at an elevation approximately 100 feet above the normal elevations of the Illinois and Arkansas Rivers in the site area. The location of planned site features is at an elevation a minimum of 40 feet above the estimated extreme flood stage of the Illinois and Arkansas Rivers.
- 2. The recent geomorphologic history of the site indicates that the most significant periods of erosion and sediment deposition from rivers in the site area coincided with glacial periods over 10,000 years ago. Estimated extreme flow events (under probable maximum precipitation calculation methods) are significantly lower than the Pleistocene epoch flows that were experienced over sustained periods at the site.
- 3. The Pennsylvanian-age sedimentary rocks that form the foundation for reclaimed features at the SFC site are not susceptible to rapid or significant erosion that would expose the planned reclaimed features at the site.
- 4. The current topography of the Arkansas and Illinois River basins in the site area shows a large area of lower elevation to the west of the site. There is not a constriction of flow or a bend in the bed of either river that would indicate significant flow velocities or a potential for riverbed migration toward the upland area where the site is located.
- *5.* The reclaimed topography of the disposal cell includes diverting runoff away from the drainage to the west. The reclamation plan also provides rock protection

for long-term erosion protection on the side slopes and perimeter apron areas of the disposal **cell.**

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APPENDIX A

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APPENDIX B

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SEISMIC ACTIVITY

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APPENDIX B.1

SEISMIC ACTIVITY WITHIN A 300-MILE RADIUS OF SITE

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APPENDIX B.2

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Locations of Earthquakes- Ozark Uplift

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Ozark Uplift

Best-Fit Line of Semi-log Frequency-Magnitude plot: M=b+mlog(1/y)

Campbell, Kenneth W. (1981) Near-source attenuation of peak horizontal acceleration, Bulletin fo the Seismological Society of Ameraica, Vol. 71, No. 6, pp.2039-2070.

6117/2003 Ozark Uplift NEIC 1534-2003 Probabilities

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APPENDIX B.3

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SEISMIC ACTIVITY WITHIN CHEROKEE BASIN-CENTRAL OKLAHOMA **PLATFORM**

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Cherokee Platform

NEIC: Earthquake Search Results

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Locations of Earthquakes- Cherokee Platform

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SEISMIC ACTIVITY WITHIN ARKOMA BASIN

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NEIC: Earthquake Search Results

U. S. GEOLOGICAL SURVEY

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SEISMIC ACTIVITY WITHIN ANADARKO BASIN

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NEIC: Earthquake Search Results

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Locations of Earthquakes- Anadarko Basin

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APPENDIX B.6

MAXIMUM CREDIBLE EARTHQUAKE AND SITE GROUND VIBRATORY MOTION FOR CRITICAL FAULTS

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Maximum Credible Earthquake and Site Ground Vibratory Motion for Critical Faults

Maximum Credible Earthquake and Site Ground Vibratory Motion for Critical Faults

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Maximum Credible Earthquake and Site Ground Vibratory Motion for Critical Faults

* Shown on Figures 3.3 through 3.7
APPENDIX C

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STABILITY OUTPUT

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Description: Sequoyah Fuels Comments: Disposal Cell - Critical Section 1
File Name: Seq1blockseismicyield.slz Last Saved Date: 6/20/2003 **Analysis Method: Spencer** Slip Surface Option: Block Specified
Seismic Coefficient: Horizontal0.19g

Description: Sequoyah Fuels Comments: Disposal Cell - Critical Section 1 File Name: Seq1blockseismicyield.slz
Last Saved Date: 6/20/2003 Analysis Method: Spencer Slip Surface Option: Block Specified
Seismic Coefficient: Horizontal0.22g

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Description: Sequoyah Fuels Comments: Disposal Cell - Critical Section 1
File Name: Seq1specifyseismicyield.slz Last Saved Date: 6/20/2003 Analysis Method: Spencer
Slip Surface Option: Fully Specified
Seismic Coefficient: Horizontal C $0.23g$

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Description: Sequoyah Fuels Comments: Disposal Cell - Critical Section 2 File Name: Seq2fseismicyield.slz Last Saved Date: 6/20/2003 Analysis Method: Spencer
Slip Surface Option: Fully Specified Seismic Coefficient: Horizontal 0.19_g

Description: Sequoyah Fuels
Comments: Disposal Cell - Critical Section 2 File Name: Seq2fseismicyield.slz Last Saved Date: 6/20/2003 Analysis Method: Spencer
Slip Surface Option: Fully Specified Seismic Coefficient: Horizontal $0.23g$

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Description: Sequoyah Fuels
Comments: Disposal Cell - Critical Section 2
File Name: Seq2blockseismicyield.slz
Last Saved Date: 6/20/2003 Analysis Method: Spencer
Slip Surface Option: Block Specified Seismic Coefficient: Horizontal0.23g

APPENDIX D

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PREVIOUS NRC CORRESPONDENCE

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A, UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, O.Z. 2055-001

April 23, 1997

Mr. John H. Ellis, President Sequoyah Fuels Corporation P.O. Box 610 Gore, Oklahoma 74435

SUBJECT: TRANSMITTAL OF QUESTION RELATED TO SEISMIC CONDITIONS NEAR YOUR SITE

Dear Mr. Ellis:

During the scoping process for the environmental impact statement (EIS) for the remediation of your facility, and in subsequent public meetings, the question of potential for seismic activity in the area was raised. Therefore, as part of the EIS, the Nuclear Regulatory Commission will consider this potential in evaluating remediation alternatives. This is consistent with the opinion expressed by Sequoyah Fuels Corporation (SFC) that the criteria of Appendix A to 10 CFR Part 40 are applicable to the SFC facility because of the similarity between the materials at SFC and those at mill tailing sites. While it is clear that SFC does not have mill tailings as defined in the Atomic Energy Act Section 11 (e)(2), NRC will evaluate the applicability of the technical criteria of Appendix A to SFC in the development of the EIS.

Preliminary evaluation of the Marble City and Carlile School faults by NRC staff indicates that we do not have sufficient information to determine the potential for movement of these faults. Therefore, in accordance with the criterion in 10 CFR 40, Appendix A, which addresses seismicity, NRC needs to determine if these faults are capable, as defined in 10 CFR Part 100, Appendix A. To assist us in this determination, we request answers to the enclosed questions. Please provide a response within 90 days of the date of this letter.

If you have any questions on this matter, please contact Jim Shepherd at 301-415-6712.

Sincerely,

John W. N. Hickey, Chief Low-Level Waste and Decommissioning Projects Branch Division of Waste Management Office of Nuclear Material Safety and Safeguards

Docket 4048027 License SUB-1010

Enclosure: As stated

cc: SFC distribution list

NRC QUESTIONS ON FAULTS NEAR THE SEQUOYAH FUELS SITE

- Geologic Stability Issue - Capable Fault

- Question 1. Are any of the faults mapped at or near the site capable faults (e.g.. Carlile, Marble City. South Fault of Warner Uplift. unnamed faults, or their splays or 'parents')? Explain.
- Question 2. Are any of the basement (blind) faults at or near the site capable faults? Explain.
- Question 3. a) Is there any seismic activity associated with these faults? Explain.
	- b) What is the seismic history of the area within 100 km of the site? Explain.
- Geomorphic Stability Issue Mass Movement
	- Question What is the potential for mass movement, such as landslide. earthflow, slumping and the like, to significantly affect erosion- or radon-protection barriers over the next 1000 years? Explain.

The responses should contain all documentation necessary to enable a reviewer to unambiguously determine how the conclusions were reached. Details of the bases for assessments of potential hazards made by SFC that were considered and found to be either significant or of little consequence should be transparent to a reviewer. Investigations and assessments should be conducted to the extent practicable.

The demonstration of whether or not a fault is a capable fault is based on four criteria (10 CFR Part 100. Appendix A). If any of the criteria is present, the fault is a capable fault if it: 1) moved at least once in the last 35.000 years: 2) moved at least twice in last 500,000 years; 3) is structurally related to a known capable fault; and 4) is associated with seismicity (discussed under seismic hazard issue). Generally. a literature search does not yield sufficient direct evidence about the age of movement or structural connectivity of specific faults. Hard evidence must be provided for each candidate active fault. Traditionally. the tools of the trade on

Enclosure

this matter include field or photo observation of outcrops or trench exposures that show faults offsetting or covered by Quaternary deposits: borehole logs correlating dated materials that cover or are offset by faults: seismic reflection surveys across faults; geomorphic evidence of fault activity; alignment of hypocenters of recorded earthquakes; and paleoseismic effects. such as sand boils. NRC staff's preliminary review of available SFC documents did not identify sufficient bases for concluding that the Carlile Fault or other faults near the site are or are not capable faults.

The evaluation of mass movement hazard potential similarly requires hard evidence derived from field and photo observations. NRC staff's identification of a potential mass-movement hazard is based on the significant topographic relief and proximity of head walls of gullies to the proposed facilities on site. Surficial masses of rocks and sediments that are actively moving down slope are generally detectable by direct observation of well-known clues. Rocks and soils subject to such movements in any given region are-well known by local geologists. Such material in and near a site can be tested or monitored. The boundaries of unstable masses or zones that might become unstable in the next 1000 years that are in a position to affect erosion- or radon-protection barriers may be readily mapped.

REFERENCES:

U.S. Code of Federal Regulation, Part 100. Appendix A, Title 10,"Energy."

U. S. Nuclear Regulatory Commission, "Final *Standard* Review Plan for the Review and Remedial Action of Inactive Mill Tailings Sites Under Title I of the Uranium Mill Tailings Radiation Control Act. Revision 1," June 1993.

RE: 9746-N

July 22, 1997

Certified Mail Return Receipt Requested

Mr. John W. N. Hickey, Chief Low-Level Waste and Decommissioning Projects Branch Division of Waste Management Office of Nuclear Material Safety and Safeguards U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Subject: License SUB-1010; Docket No. 40-8027 Response to NRC Questions Related to Seismic Conditions Near The Sequoyah Facility

Dear Mr. Hickey:

Your letter dated April 23, 1997 transmitted NRC Staff questions concerning seismic conditions surrounding the Sequoyah Fuels Corporation (SFC) Facility located near Gore, Oklahoma. You requested that SFC respond to these questions within 90 days. I have enclosed SFC's response to the Staffs questions with this letter.

SFC has submitted information about the structural geology and seismic conditions at its facility on previous occasions as a result of applications for license renewal, a license amendment request, and site characterization for decommissioning. The NRC has access to this information on SFC's docket. Since reference have been made in the enclosed response to additional materials that may not be readily accessible to your staff, I have enclosed those materials as attachments to the response.

Mr. John W. N. Hickey July 22, 1997 Page 2

Should you or your staff have questions with regard to the enclosed response during the course of your review, please contact Kenny Schlag at (918) 489-3307 or Craig Harlin at (918) 489-3386.

Sincerely,

John H. Ellis President, SFC

XC: James C. Shepherd, NRC NMSS1LLDR (without attachments) Alvin Gutterman, Morgan, Lewis & Bockius (without attachments)

Response to NRC Questions Related to Seismic Conditions Near the Sequoyah Facility

Geologic Stability Issue - Capable Fault

Question 1

Are any of the faults mapped at or near the site capable faults (e.g. Carlisle, Marble City, South Fault of Warner Uplift, unnamed faults, or their splays or parents')? Explain.

Response

None of the faults mapped at or near the Facility are believed to be capable faults as described in 10 CFR Part 100, Appendix A.

The Facility geology is discussed in detail in the Draft Site Characterization Report'. In summary, the Facility is located on the southwest flank of a large tectonic feature known as the Ozark Uplift2. Bedrock formations present in the region consist of Pennsylvanian, Mississippian, Devonian, Silurian and Ordovician-aged shale, limestone, siltstone and sandstone formations (>300 million years old). The geological formations regionally dip to the southwest at one to four degrees toward another tectonic feature known as the Arkoma Basin.' The horst and graben type faulting found in the area are normal faults which suggest that tensional forces have been responsible for their formation³.

The planes of the various faults are not exposed at the surface, however, some are visible in highway cuts and others are revealed by low hummocky parallel ridges which stretch across pasture lands. Quatemary-aged terrace deposits and alluvial material cover most all of the Atoka Bedrock in the area except where streams and manmade activity has exposed portions of bedrock. There is no direct evidence that any of the faults mapped near the Facility extend from the bedrock into these Quaternary-aged terrace deposits which suggests any fault movement was prior to the deposition of these terrace deposits (>1 million years).

²J. K. Arbenz, Tectonic Map of Oklahoma Showing Surface Structural Features, 1956. (Attachment 1)

3J. G. Blythe, Atoka Formation On The North Side Of The McAlester Basin, pp 36-37, Oklahoma Geological Survey, Circular 47, 1959. (Attachment 2)

¹Sequoyah Fuels Corporation, Draft Site Characterization Report, February 2, 1996, Docket 40-8027.

Question 2

Are any of the basement (blind) faults at or near the site capable faults? Explain.

Response

None of the basement faults mapped at or near the Facility are believed to be capable faults as described in 10 CFR Part 100, Appendix A.

The known basement faults mapped below the Atoka Formation are in the Arbuckle Formation. Some of these faults were discussed as possible hydrologic barriers in the Class I Injection Well Data Evaluation Report⁴. In fact, some faults mapped in the Arkoma Basin to the south of the Facility which fransect Mississippian and older units apparently do not cut Atoka strata. These basement faults therefore, are a result of movements which occurred in Mississippian and in early Desmoinesian time (>320 million years)⁵. For most recorded seismic activity in the state, the focal depth is unknown. All available evidence indicates that no Oklahoma hypocenters have occurred deeper than 15-20 km6.

Question 3

- a) Is there any seismic activity associated with these faults? Explain.
- b) What is the seismic history of the area within 100 km of the site? Explain.

Response

a) There is no evidence of seismic activity associated with any faults in the Ozark Uplift in Eastern Oklahoma.

The Oklahoma Geological Survey Observatory (OGS) in Leonard, Oklahoma, routinely tracks eleven seismic stations across the state. This data, managed by the Observatory in Leonard, shows no evidence that the observed earthquake hypocenters are in any way connected to the tensional faults mapped in the area. The OGS has concluded in a publication entitled the Oklahoma

⁶J. E. Lawson, Jr. and K. V. Luza, Oklahoma Earthquake Catalog, pp. 17, 18, Oklahoma Geological Survey, 1995. (Attachment 3)

^{&#}x27;RobertslSchomick and Associates, Final Class I Injection Well Data Evaluation Report, Sequoyah Fuels Corporation, April 4, 1995, Docket 40-8027.

⁵J. G. Blythe, Atoka Formation On The North Side Of The McAlester Basin, p. 36, Oklahoma Geological Survey, Circular 47, 1959.

Earthquake Catalog⁷ that there has been little tectonic activity in this area since late Pennsylvanian time. The Earthquake Map of Oklahoma⁸ shows the majority of seismic activity in Oklahoma occurring in the central portion of the state.

b) The seismic history of the area has been documented by the OGS in the Oklahoma Earthquake Catalog which presents the earthquakes that have been felt in Oklahoma from 1882 to 1994. A portion of this historical earthquake data was submitted in response to a similar information request by the NRC in 1983⁹. The NRC reviewed this data and published their conclusions in NUREG 1157¹⁰. A probabilistic acceleration map and seismic risk map are also included in NUREG 1157. Additional information on earthquakes in Oklahoma can be found on the internet (see Internet Sites in the References).

Geomorphic Stability Issue - Mass Movement

Question

What is the potential for mass movement, such as landslide, earthflow, slumping and the like, to significantly affect erosion - or radon protection barriers over the next 1000 years? Explain.

Response

There is very little potential for mass movement of earthen material at the Facility over the next 1000 years.

The Facility is situated on relatively flat lying bedrock. The topographic relief relative to the proposed disposal cell is depicted on Figure **1"** which is attached. The regional

Kerr McGee Nuclear Corporation, Responses to U.S. Nuclear Regulatory Commission Site Visit Information Requests, Questions 38, August **19,** 1983, Docket 40-8027.

¹⁰U. S. Nuclear Regulatory Commission, Environmental Assessment for Renewal of Special Nuclear Material License No. SUB-1010, Sequoyah Fuels Corporation, Docket No. 40-8027, NUREG-1157, August 1985.

"Sequoyah Fuels Corporation, Draft Decommissioning Altematives Study Report, Appendix C, December 17, 1996, Docket 40-8027.

[&]quot;J. E. Lawson, Jr. and K V. Luza, Oklahoma Earthquake Catalog, p. 4, Oklahoma Geological Survey, 1995.

⁸J. E. Lawson, Jr. and K. V. Luza, Earthquake Map of Oklahoma (Map GM-35), Oklahoma Geological Survey, 1995. (Attachment 4)

dip of the bedrock is to the southwest at one to four degrees¹². The natural sandstone and shale sequences appear to be very stable when exposed. There is no visible evidence of natural sloughing or major fracturing at or near the Facility which would indicate a potential for mass movement of the physical structures at the site. In particular, the drainage area which makes the closest approach to the proposed disposal cell, designated as Outfall 005, is heavily vegetated along the entire drainage and shows no signs of mass movement even on the most pronounced relief. This is consistent with the rock and soil structure in this region where surficial masses are not prone to such movements.

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The engineered controls of the Robert S. Kerr Navigational System (Arkansas River) as well as Lake Tenkiller Dam (Illinois River) reduce the risk from major catastrophic flooding which could alter loose, exposed bedrock along the river systems. However, any slope failure due to flooding would be limited to the immediate area along the river banks.

The disposal cell will be designed to avoid the affects on performance due to mass movement such as landslides and earth-type failures of manmade embankments according to published regulatory guidance and industry standards.

¹²Sequoyah Fuels Corporation, Draft Site Characterization Report, February 2, 1996, Docket 40-8027.

Additional References

^I* a

- J. E. Lawson, Jr. and K. V. Luza, Oklahoma Earthquakes, 1995, Oklahoma Geology Notes, Vol. 56, No. 2, April 1996. (Attachment 5)
- J. E. Lawson, Jr., Expected Earthquake Ground-Motion Parameters at the Arcadia, Oklahoma, Dam Site, Special Publication 85-1, 1985. (Attachment 6)
- R. L. DuBois, Seismic Risk in Oklahoma, May 5, 1972, Earth Sciences Division, University of Oklahoma, August 19, 1983, Docket 40-8027.
- Service Testing Laboratory, Report of Atterberg Limits, Shrinkage Limits, Unconfined Compression, and Compression Tests, August 19, 1983, Docket 40-8027.
- US Nuclear Regulatory Commission, Final Environmental Statement related to the Sequoyah Uranium Hexafluoride Plant, NUREG-75/007, February 1975, Docket 40- 8027.
- D. L. Warner, Environmental Assessment Related to Proposed Deep Well Injection of Liquid Raffinate At The Kerr McGee Sequoyah Facility, Oklahoma, March 1983, Docket 40-8027.
- Sequoyah Fuels Corporation, Responses to EPA Comments on the Final Class I Injection Well Report, July 7, 1996, Docket 40-8027.

Internet Sites

gopher://wealaka.okgeosurvey1.gov/, Oklahoma Geological Survey gopher server

www.ou.edu/special/ogs-pttc, Oklahoma Geological Survey web site

http:l/geology.cr.usgs.gov/, US Geological Survey web site for the central region

UNITED STATES **NUCLEAR REGULATORY COMMISSION WASHINGTON, D.C. 20555-0001**

Mr. John H. Ellis, President Sequoyah Fuels Corporation P. 0. Box 610 Gore, Oklahoma 74435

SUBJECT: NUCLEAR REGULATORY COMMISSION STAFF'S EVALUATIONS OF SEQUOYAH FUEL CORPORATION'S RESPONSE TO NRC'S QUESTIONS RELATED TO SEISMIC CONDITIONS NEAR THE SEQUOYAH FACILITY

Dear Mr. Ellis:

The staff has reviewed your response of July 22, 1997. to Nuclear Regulatory Commission's (NRC's) questions on seismic conditions in the vicinity of the Gore, Oklahoma site. Following the requirements in Part 40, the staff found that Sequoyah Fuel Corporation (SFC) staff did not provide sufficient information about the tectonic characteristics of the site. In order to fully evaluate the potential for activity along the faults near the site and to ensure that related issues of geologic stability and seismicity required by Part 40 will be met, the licensee needs to provide a complete evaluation of the tectonic setting and seismicity of the site. Specific questions and comments are in the enclosure.

Based on staff experience with similar concerns for geologic and seismicity issues, the SFC site characterization effort required would be routine. We recommend that SFC staff meet with NRC staff to discuss and plan a program of investigation and ensure that the planned program will be adequate and the information collected will be appropriate for complete characterization of the site.

If you have any questions, please contact Jim Shepherd of my staff at (301)415-6712.

Sincerely,

John W. N. Hickey, Chief Low-Level Waste and Decommissioning Projects Branch Division of Waste Management Office of Nuclear Material Safety and Safeguards

Docket 40-8027 License SUB-1010

Enclosures: As stated

Enclosure

NRC STAFF COMMENTS ON SEQUOYAH FUEL CORPORATION RESPONSE TO APRIL 23, 1997, QUESTIONS RELATED TO SEISMIC CONDITIONS

Reference: "Response to NRC Questions Related to Seismic Conditions Near the Sequoyah Facility - License SUB01010; Docket No. 40-8027" from J.H. Ellis, Sequoyah Fuel Corporation (SFC), to J.W.N. Hickey, NRC, dated July 22, 1997

BACKGROUND

STAFF PRELIMINARY ANALYSIS OF SEISMICITY AT THE SEQUOYAH FUEL CORPORATION FACILITY

NRC staff has performed a preliminary review of the seismic activities at the Sequoyah site. On the basis of this review, the staff concludes that the Sequoyah area appears to have a lower level of historical seismicity than the central area of Oklahoma around El Reno, and, therefore, the seismic hazard at Sequoyah is likely to be less than that at central Oklahoma. Earthquakes detected and located by the Oklahoma Geological Survey (OGS), during the period 1882 to 1994, are listed in the Oklahoma Earthquake Catalog (Lawson and Luza, 1995). A plot of the earthquakes from 1897 to 1995 is shown in Figure 1. This figure shows that, in an area of 50 km radius centered around SFC, the seismic activity is low.

The largest event in Oklahoma occurred on April 9, 1952, in north central Oklahoma and has a magnitude of 5.5. The earthquake activities around this area appear to be concentrated in a zone 40 km wide by 145 km long that extends northeast from El Reno. This zone is about 275 km from SFC. Another concentration of earthquake sources in the Anadarko basin has occurred within a 135 km long by 40 km wide zone situated between Canadian County and the south edge of Garvin County. Earthquake activity along the Amarillo-Wichita uplift and the associated fault zone seems to be very quiet compared to those at El Reno and Garvin County. in the Arkoma basin and Ozark Uplift, earthquake data produce a broad pattern of epicenter locations.

On September 6, 1997, an earthquake of magnitude 4.4 was recorded 1.5 km north of Topelo, Oklahoma. The earthquake was felt in the Ada area, Norman, and Oklahoma City. The earthquake epicenter is located about 80 km from the SFC site. If this earthquake is not associated with a tectonic feature, it should be considered as a floating earthquake and the ground motion acceleration should be estimated at the SFC site.

On June 20, 1926, an earthquake of magnitude 4.3 occurred in Sequoyah County; the resulting ground motion acceleration from this earthquake should be estimated and provided by SFC.

The staff preliminarily concludes, after examining the earthquake history in the area, talking with Dr. James Lawson, Jr., of OGS, examining the Oklahoma earthquake maps on the Intemet (1997), and assuming no capable faults exist within the site area, that the site area of the SFC

could be considered as a low-seismic activity area. Meanwhile, a large ground motion acceleration could be generated if any of the following faults is a capable fault: Carlile Fault, the Marble City Fault, or the South Fault of Warner Uplift.

Question **I**

Are any of the faults mapped at or near **the site capable faults (e.g., Carlile, Marble City, South Fault of** Warner **Uplift,** unnamed **faults, or their slays or parents)? Explain.**

Comment on SFC's Response

The basis provided by SFC to support its key response statement, 'There is no direct evidence that any of the faults mapped near the Facility extend from the bedrock into these Quatemaryaged terrace deposits which suggests any fault movement was prior to the deposition of these terrace deposits (>1 million years).', is inadequate for the staff to reach a conclusion that none of the faults is a capable fault.

Basis **for** Comment

- (a) One criterion for identification of a capable fault is the observation that it moved once in the last 35,000 years or more than once **in** the last 500.000 years (10 CFR Part 100, Appendix A). SFC has not described any site investigation that bears on this criterion. For example, SFC has not provided evidence that the Quatemary (the last 2,000,000 years) deposits that cover the faults are known to not have been disturbed by movement on the faults. More precisely, SFC has not provided evidence of the age of the terrace deposits, for example, at locations on or adjacent to the site, sufficient to determine whether or not such sediments have been undisturbed by faulting for the last 35,000 years or for whatever period of time their age represents.
- (b) SFC has suggested that macroseismicity does not appear to be associated with the mapped faults on or near the site (SFC's response to Question 3a). This suggests that the faults may not be capable faults. However, the evidence presented, the sparse historical record in and of itself, is insufficient to assert categorically that the faults are not capable faults (see NRC comments in response to Question 3a).
- (c) SFC has not presented evidence to the effect that the faults under consideration are or are not structurally related to faults known to be capable faults. Such evidence would be relevant to a determination of capable fault as discussed in 10 CFR Part 100, Appendix A.
- (d) There appear to be faults known to exist beneath the site and near the site, some of which appear to be structurally connected (i.e., Carlile and unnamed E-W splay); there may be undetected additional buried or blind faults beneath the site [e.g., the buried channel identified in the Site Characterization Report (SCR)(1996), Fig. 14, could reflect an eroded bedrock fault or fracture zone]; at least one of the known faults has been utilized in subsurface groundwater tests (i.e., Carlile Fault); a scarp that could be a fault

scarp underlain by the Carlile Fault is veneered by Quaternary deposits (SCR, 1996, Fig. 10); and at least one of the faults that is mapped on the site (i.e., unnamed E-W splay along the southern site boundary) has not been shown on any site cross sections. [Point of clarification: What is the location of the Carlile Fault with respect to well #2332? See discrepant locations in SCR, Figs. 9 and 11, cf. 10, 15 and others.]

Recommendations

1) SFC should conduct additional geologic characterization of the faults to the necessary extent discussed in NRC's Standard Review Plan (1993), and DOE's Technical Approach Document (1989).

The purpose of the additional information is to provide an adequate basis for SFC to demonstrate, and for NRC to determine, that the faults are, or are not, capable faults. In addition, the location and geometry of the faults and splays on or adjacent to the site are of potential significance in understanding groundwater travel time and flow pathways.

2) SFC should consider meeting with staff to discuss SFC's plans to conduct necessary fault investigations prior to implementing its plans.

The purpose of such a meeting would be for staff to provide SFC with early feedback on the adequacy and sufficiency of the plans.

Question 2

Are any of the basement (blind) faults at or near the site capable faults'? Explain.

Comment on SFC's Response

The basis provided by SFC to support its key statement, *None of the basement faults mapped at or near the Facility are believed to be capable faults as described in 10 CFR Part 100, Appendix A.', is inadequate for staff to reach a conclusion that none of the faults is a capable fault.

Basis for Comment

- (a) SFC reasoned that some faults in the Arkoma Basin, south of the site, cut rocks older than the Atoka but do not cut the Atoka, and, therefore, some deep (basement) faults are much older than 320 million years and could not be capable faults. By implication, SFC suggested that at least some of the basement faults in and near the site are not capable faults. However, SFC has indicated that the Carlile Fault and the South Fault of Warner Uplift (SCR, 1996, Fig. 11) cut both the Atoka and some of the Arbuckle strata. Thus, these faults have not been precluded from consideration as capable faults.
- (b) SFC has stated that "...no Oklahoma hypocenters have occurred deeper than 15- 20 km,..." and, "...(Oor most recorded seismic activity in the state, the focal depth is unknown." It is not clear how these observations support a conclusion that basement

faults at or near the site are not capable faults.

(c) SFC has submitted evidence that geologic structures, (e.g., individual faults, fault systems, tilted fault blocks, regional unconformity of Paleozoic on Precambrian granitic rocks, and a regional synclinal fold) occur within 10 kms of the site and beneath the site (SCP, 1996, Fig. 11; Tectonic Map of Oklahoma, 1956). However, SFC documents do not tie such features to a tectonic model that might support its view that the faults are not capable faults. Also, some of the tectonic features are not shown on site maps, in particular, the E-W trending splay of the Carlile Fault is not shown on hydrologic maps. SFC indicates in its structural cross section (ibid., Fig 11) that the Carlile and South Fork of Warner Uplift Faults are not rooted in the granitic basement. The origin and history of activity of these faults is not clear.

Recommendations

1) SFC should examine whether or not the surface faults are structurally connected to granitic basement and clearly describe their geological relationship and history of their activity.

The purpose of this information on potential relationship of the known faults to deep basement features is to support a determination of whether or not the faults are capable faults, and a determination of the size of the earthquake that could be generated if they are capable faults.

(2) SFC should consider meeting with staff to discuss SFC's plans to assess the seismic potential of the known faults (i.e., are they capable faults).

The purpose of such a meeting is for staff to provide early feedback to SFC on the adequacy and sufficiency of its plans.

Question 3

a) Is there any seismic activity associated with these faults? Explain.

SFC's Response

The applicant responded to NRC's question stating that, "There is no evidence of seismic activity associated with any faults in the Ozark Uplift in Eastern Oklahoma.' Examining the data managed by OGS, the applicant concluded that the observed earthquakes are not connected to the mapped faults in the area, and there has been little seismic activity in the Sequoyah area since late Pennsylvanian time.

Comments on SFC's Response

The staff examined the seismicity map around Sequoyah and found that the seismic activity in the area produced a broad pattern of epicenter locations, and there is no clear indication of alignment of seismic activity along the Carlile Fault, the Marble City Fault, or the South Fault of Warner Uplift. The lack of recent seismic activity along these faults is not conclusive evidence

that they are not capable faults. Also, it should be noted that the seismic history of the area is very short and the seismic instrumentations in the area have been installed recently.

Recommendation

The number and amount of slips and recurrence rate on the potentially capable faults within the site vicinity should be determined, if the faults are capable.

The purpose of this information is to estimate the earthquake magnitude which may be used to design the facility.

(b) What Is the seismic history of the area within 100 km of the site? Explain.

SFC's Response

The applicant responded to this question by referring the staff to information submitted in 1983 and to probabilistic acceleration maps published in 1976 and 1990.

Comments on SFC's Response

The staff expected the applicant to provide recent information on the seismic activity in the area and discuss new seismic hazard maps. For example, the U.S. Geological Survey recently published new seismic hazard maps (National Seismic Hazard Mapping Project, 1997)--the applicant should update its information. Also, since the issuance of SFC's' response, there was an earthquake on September 6, 1997, which was felt at several locations in Oklahoma. What is the resulting acceleration from this earthquake at the site? Also, the applicant did not provide adequate information on the June 26, 1926, event that occurred in Sequoyah County and its resulting acceleration at the site.

In a response to a question from NRC staff regarding the ground motion design acceleration for the disposal cell, SFC (1996) refers the staff to a probabilistic seismic hazard map in the Draft Decommissioning Alternative Study Report (December 17, 1996) showing the horizontal acceleration at the site, with 90 percent probability of not exceeded in 50 years, is less than 5 percent of gravity. Meanwhile, in the Conceptual Design Report (December 6, 1996), the applicant uses a probabilistic seismic hazard map showing the horizontal acceleration at the site with 90 percent probability of not exceeded in 250 years. is 9 percent of gravity.

In 10 CFR Part 40, Appendix A, it is stated that the facility must control radiological hazard for 1000 years, to the extent reasonably achievable, and, in any case, for at least 200 years.

Recommendations

- (1) Provide updated seismic information within 100 km of SFC, including recent events and recent seismic hazard maps.
- (2) Identify the tectonic provinces surrounding the Sequoyah site and the associated maximum credible earthquake (floating earthquake) associated with each province and

estimate the corresponding acceleration at the site [Technical Approach Documents (TAD), Revision 11, 1989]..

- (3) Capable faults within 50 km radius of the SFC facility should be identified, and the associated magnitude and acceleration at the site should be estimated (TAD, Revision 11, 1989).
- (4) For the purpose of the seismic hazard evaluation, a 1000-year design life should be adopted (TAD, Revision II, 1989); and the applicant should state and provide the ground motion acceleration that will be used for the seismic design of the cell and the bases for choosing this value.
- (5) The applicant needs to perform a new slope stability analysis based on the appropriate horizontal earthquake coefficient (EQC), ground motion acceleration (A), and the projected years of performance of the cell. In the Conceptual Design Report, the applicant equates EQC to A. It is believed that EQC = $2/3$ A (Standard Review Plan, 1993).

The purpose of this information is to determine the ground motion acceleration needed for the design of the facility.

Question on Geomorphic Stability Issue - Mass Movement

What is the potential for mass movement, such as landslide, earthflow, slumping and the like, to significantly affect erosion - or radon protection barriers over the next 1000 years? Explain.

Comments on SFC's Response

The basis provided by SFC to support a key statement, 'There is very little potential for mass movement of earthen material at the Facility over the next 1000 years." is inadequate for staff to reach a conclusion about the potential locations and rates of mass movements to affect the proposed disposal cell.

Additionally, another key statement, "The disposal cell will be designed to avoid the affects on performance due to mass movement such as landslides..." cannot be evaluated at this time because SFC has not identified what affects on performance due to mass movement it is considering for design.

Basis for Comments

(a) SFC has made pertinent and important observations, such as, 'There is no visible evidence of natural sloughing or major fracturing at or near the Facility which would indicate a potential for mass movement..." and "...the drainage area which makes the closest approach to the proposed disposal cell...' is heavily vegetated along the entire drainage and shows no signs of mass movement...". However, no supporting documentation was provided with the response.

- (b) The statement that the natural sandstone and shale sequences appear to be very stable when exposed is not documented.
- (c) The statement that in the site region surficial masses are not prone to mass movements is not documented.
- (d) SFC's statements regarding the reduced risk of flooding by engineered controls and slope failure being limited to the immediate area along the river banks appear to be based on the assumption that the controls will be in effect and effective over the next 1000 years. The basis for this was not discussed.

Recommendations

(1) SFC should document its observations, measurements, and the supporting bases for its conclusion that there-is very little potential for mass movement at the Facility over the next 1000 years. In particular, quantification of magnitude and rates at specific locations of heads-of-valleys with potential for encroachment on the facility's side slopes (for example, headward erosion by mass movement) are needed to support the conclusion. In this case, photographs, annotated maps, topographic profiles, or similar representations of observations/measurements and appropriate calculations would be appropriate. The general standard for adequate documentation would be that a knowledgeable reviewer would be able to reach the same or similar conclusions about the potential for mass movement over the next 1000 years.

The purpose of this recommendation is to provide staff the technical bases with which to resolve the issue.

(2) SFC should consider meeting with staff to discuss SFC's plans to address this request for documentation of data sufficient to resolve the issue.

The purpose of such a meeting is for staff to provide early feedback to SFC on the adequacy and sufficiency of its plans, i.e., to facilitate resolution of the issue.

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J.H. Ellis, Sequoyah Fuel Corporation, "Decommissioning Alternative Study Report," letter to J.W. Hickey, U.S. Nuclear Regulatory Commission, October 18, 1996.

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"Technical Approach Document, Revision II, ULTRA-DOEI AL 050425.0002. December 1989.

RE: 9823-N

April 8, 1998

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Certified Mail Receipt No. Z **107 892 434 Return Receipt Requested**

Mr. James C. Shepherd, Project Manager Low-Level Waste and Decommissioning Projects Branch Division of Waste Management Office of Nuclear Material Safety and Safeguards U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Subject: License SUB-1010; Docket No. 40-8027 Seismic Conditions Near the Sequoyah Facility

Reference: Letter from John W. N. Hickey to John H. Ellis dated December 15, 1997

Dear Mr. Shepherd:

In response to the referenced letter, SFC met with **the** NRC staff and toured the area surrounding the Sequoyah Facility. SFC has since completed several tasks identified at the meeting. I have enclosed two documents which describe the results of these tasks for your review.

The first task was to clear up some discrepancies in the geological maps submitted to NRC as part of the Site Characterization Report. The second task focused on determining whether the local faults are capable. SFC conducted a field study with the assistance of Dr. Roy Van Arsdale to determine if the Carlile School fault is a capable fault, and to recommend a course of action for SFC to pursue based on his findings.

In addition, SFC has met with or contacted the Corps of Engineers Tulsa District, the Oklahoma Department of Transportation, the Oklahoma Geological Survey, geologists who had worked at the Facility previously, petroleum geologists familiar with the area. seismic brokers, and a licensed geotechnical engineer to determine if any additions! work had been done that might be useful. Useful data would have included reports cr

Letter No. 9823-N April 8, 1998 Page 2 of 2

papers prepared during dam construction, bridge or highway construction, siting studies or petroleum related activities such as seismic reflection lines in the area. No information was found that would aid in understanding the seismic conditions at the Facility. However, SFC's review did locate seismic information contained within reports submitted to the NRC on Black Fox and Arkansas Nuclear One reactor sites that is relevant to the Sequoyah Facility which lies within the study area for both of these reactor sites. No capable faults were found in the Webber Falls area during these siting studies.

Once you and the NRC staff have had a chance to review this material, I would recommend that we hold a teleconference to discuss our findings. Please contact me at (918) 489-3386 to establish for such a meeting.

Sincerely,

Craig Harlin, Directo Regulatory Affairs

XC: Philip Justus, NRC NMSS/DWMIENGB Abou-Bakr Ibrahim, NRC NMSS/DWMIENGB Alvin Gutterman, Morgan, Lewis & Bockius

Regional **Geology** Relating **to** Seismic **Conditions** at the Sequoyah Facility

Introduction

In April 1997, Sequoyah Fuels Corporation (SFC) received a request for information related to the seismic conditions near the Sequoyah Facility. More specifically, SFC was asked to provide information needed to determine whether any of the faults mapped at or near the facility are capable faults (ie: the Carlile School fault and the Marble City fault). SFC responded in July 1997 by providing published literature, maps and references to previous NRC safety evaluations. Follow up questions from NRC resulted in a site tour by the reviewers and discussion of NRC's additional data requests including the resolution of inconsistencies between geological maps within the draft Site Characterization Report (SCR). On the seismic issue, the concern centers on whether the Carlile School fault is a capable fault or is connected to a capable fault. SFC subsequently retained Dr. Roy Van Arsdale, a specialist in neotectonics and paleoseismicity with field experience in Oklahoma, to respond to this concern (resume enclosed). SFC has also evaluated the various maps and associated databases and it is the purpose of this document to resolve questions about inconsistencies between the various geologic maps.

Discussion

Hugh Miser of the U.S. Geological Survey mapped the State of Oklahoma in 1954. Miser referenced a University of Oklahoma master's thesis written by Lyle W. Stewart as a basis for his interpretation of the southwestern portion of Sequoyah County. We were unable to locate this thesis to confirm how the faults in the area were originally mapped. The University of Oklahoma main library and geologic library were searched and no record exists that this thesis was ever completed or even conducted. Furthermore, no record of enrollment could be found for a Lyle W. Stewart at Oklahoma University, Oklahoma State University, or at Tulsa University.

The Oklahoma Geological Survey (OGS) subsequently published the Hydrologic Atlas 1 map (HAl) in 1969. The HAl utilized Hugh Miser's State Geological Map (1954) for the geological interpretation of the area surrounding SFC, but there is no record of field verification of the faults. Both the State Geologic Map and HAl depict a continuous fault extending from the vicinity of the SFC facility toward the northeast for approximately 20 miles. This fault is not named on either of the maps, but is believed to have been named the Marble City fault during work performed by Kerr McGee for the Sequoyah Facility. As portrayed on the state maps, the northern end of the Carlile School fault merges with the Marble City fault. SFC believes that details of the State Geologic Map and its derivative HAI, in the vicinity of SFC are incorrect.

The Webber Falls Area geology was initially studied for the purpose of plant siting by Kerr McGee geologists in the late 1960s. Maps and drawings prepared by Kerr McGee prior to construction of the Sequoyah Facility were found dating back as far as 1967. This information included depth to bedrock maps and subsurface mapping based on historical gas well records. The majority of the geological maps and reports were prepared for a proposed deep injection disposal well. This work, along with the early siting studies, was performed by different geologists with different objectives, resulting in inconsistencies with the interpretation of regional structures. For example, a structure contour map of the Viola Formation was constructed. This map was made from very few wells and so any faults, interpreted from the top of the Viola (at depth of approx. 2000 feet), were projected to the surface resulting in the interpreted merging of the Carlile School fault and the Marble City fault. However, there are no surface geologic data to support this interpretation.

Dr. Phillip A. Chencwith conducted surface geologic mapping of the Webber Falls Area for Kerr McGee between 1973 and 1984 as indicated from internal memos and preliminary reports. A map produced by Chenowith (Webber Falls Area Geologic Map, 1983) tased upon his field work depicted the Marble City Fault and the Carlile School

Fault as two separate faults. This is the only geologic map that can be documented as being based upon field investigation.

As part of the Facility Environmental Investigation (FEI) conducted in 1990, SFC described the site and regional geology. While site geology was developed from hundreds of borehole data collected over a relatively small area (200 acres), the majority of the information collected for regional geology was from historical records and documents submitted as part of SFC's licensed activities since 1969. The regional geologic map presented in the FEI (Figure 44) was taken from the State map HA1.

In April, 1995 SFC submitted the Class I Injection Well Data Evaluation Report to the EPA as part of a RCRA Facility Investigation, and responded to comments from the EPA in July 1995. During the preparation of that report, additional geologic information and maps of the area were found and incorporated into the regional geology description for the Facility. Early injection tests designed to quantify the reservoir available for the injection well were conducted by Kerr McGee and its consultants. The injection tests suggested that the reservoir was limited in extent. The consultants performing this test hypothesized that a hydraulic boundary existed south of the Facility and drew an east/west splay off the Carlile School Fault as the southern boundary. The NRC rejected these early test results and studies performed years later did not identify or adopt the earlier interpretation of the bounding fault hypothesis. Although this fault was never identified in the field, it was included on the updated regional map submitted to the NRC in 1996 as part of the Draft Site Characterization Report (SCR).

In February, 1998, Dr. Roy Van Arsdale reviewed the local geologic literature, including various maps, and conducted a field investigation of the Cariile School fault. His work was reported to SFC in a report dated March 6, 1998 and is included as an attachment -to this report. During the field investigation of the Carlile School fault, Dr. Van Arsdale looked for evidence as to whether the Carille School fauit merges with the Marble City

fault as depicted on the State Geologic Map. As discussed in the Van Arsdale report there is no indication that the Carlile School fault merges with the Marble City fault.

Conclusions

As described and mapped in the Van Arsdale Report (1998) the Carlile School fault does not connect with the Marble City fault. The Van Arsdale Report is consistent with the Chenowith map produced in 1983, which was also based on field investigation. In addition, no evidence for an east/west splay wa§ found during the Van Arsdale Study, nor does it appear on the Chenowith map. This splay is thought to be an artifact of the modeling used to explain early injection well test results which did not withstand peer review. Based on the above discussion, SFC feels justified in using the Chenowith map for the regional geology setting at the SFC Facility.

Van Arsdale concluded that the Carlile School fault, the closest known fault, is not a capable fault and shows no signs of movement during the Quartemary period. This is consistent with conclusions from recent regional work conducted at the Black Fox and Arkansas Nuclear One reactor sites. Both of these power plants demonstrated that there are no capable faults within 150 to 200 mile radius of those facilities. Those radii include the area of the SFC Facility. In conclusion, SFC believes that there are no capable faults in the area and the seismic acceleration value for the purpose of disposal cell design at the Sequoyah Facility should be determined according to the "Technical Approach Documpent, December 1 989.
3-6-98

Mr. Kenneth Schlag Sequoyah Fuels I-40 and Highway 10 Gore, Oklahoma 74435

Dear Mr. Schlag,

Enclosed please find two copies of the final report prepared for the paleoseismological analysis of the Carlile fault. This report paleoseismological analysis of the Carlile fault. represents the conclusions reached based on a field study that I conducted at your site from February 26 through March 2, 1998. I have also enclosed a copy of my resume for your records.

Please send a copy of the attached materials that may accompany my report to the NRC. Please call me if you have any questions.

Sincerely,

Roy Van Aredal

Dr. Roy Van Arsdale.

Paleoseismologic Analysis of the Carlile Fault in Sequoyah County, Oklahoma

Dr. Roy Van Arsdale Professor of Geology Department of Geological Sciences and Center for Earthquake Research and Information University of Memphis Memphis, Tennessee

During the time period of February 26 through March 2, 1998, I studied the Carlile fault in Sequoyah County, Oklahoma, to determine if the fault has been active during the Quaternary Period (past 2 million years). The Carlile fault was walked and studied along its total surface trace and for a half mile to the northeast and southwest along its projected trace (Fig. 1).

The Carlile fault (also called the Carlile School fault) lies within the transition zone between the Ozark uplift and the Arkoma Basin. Within this area the regional strike and dip of the surface Pennsylvanian Atoka Formation strata is N65W. 5SW. The Carlile

fault is mapped as a northeast striking, down-to-the-southeast normal fault with less than 100 feet of displacement (Sequoyah Fuels, 1996). At the surface, the fault can be traced as a narrow zone of tilted Pennsylvanian Atoka Formation strata. Within the fault zone the strata are oriented approximately N30E, 20SE. The strike of N30E is essentially parallel to the northeast-striking Carlile fault. The Carlile fault can be traced at the surface from 600 feet north of Highway 64 southwest for 4,600 feet; giving the fault a length of nearly one mile. The northeastern and southwestern ends of the fault were inspected and there is no surface evidence that the Carlile fault extends beyond its mapped trace (Fig. 1) or that it is continuous with the Marble City fault as has been previously mapped (Arbenz, 1956).

The Carlile fault zone for much of its length is a low ridge, 200 feet wide by 20 feet high, that is also locally a drainage divide between unnamed tributaries of the Salt Branch creek (Figs. 1, 2A, and 2C). However, the fault zone is not everywhere a ridge (Fig. 2B); the central portion of the fault zone trends obliquely across a ridge. The fault ridge is truncated at its northeastern and southwestern ends, and is breached in its central portion by streams that flow west across the fault zone. The fault ridge has a rounded crest with margins that slope less than 8 degrees. Locally, the ridge has small mounds of rock apparently put there by ranchers who removed rocks from the adjacent fields and dumped them on the ridge.

The Carlile fault was walked along its full length to determine if there is any evidence that the Paleozoic fault has been active during the Quaternary. Specifically, the fault zone was inspected for evidence of a fault scarp like that expressed along the Meers Fault of central Oklahoma (Crone and Luza, 1990). Folds and fractures in the Carlile fault zone reflect dip slip drag folding. Thus, if Quaternary faulting had occurred, it would result in the formation of a- fault scarp. No fault scarp exists along the Carlile fault. Similarly, the flood plains along the streams that truncate the ridge at both ends-and the stream that flows across the center of the ridge do not have fault scarps on their surfaces (Figs. 3 and 4). Furthermore, inspection of cut banks in those streams did not reveal any faults.

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Another line of evidence indicates the Carlile fault has not been active during the Quaternary. If dip-slip movement had occurred during the Quaternary, then the topography on one side of the fault should be higher than on the other. As illustrated in the three topographic profiles constructed perpendicular to the fault, elevations are higher on the southeast along profiles $A-A'$ and $C-$ C', but higher on the northwest along $E - 3'$ (Fig. 2). I believe the Carlile fault ridge is an erosional ridge, not a tectonic ridge. Apparently, the different orientation of the strata or perhaps greater cementation of the fault zone has made *it* more resistant to erosion and resulted in a ridge morphology over most of the fault zone length.

In summary, this field study has revealed that the Carlile fault is less than one mile long, has no surface evidence that it connects with any other faults, has not been active in the Quaternary, and thus is not a seismically capable fault.

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Figure 3. Photograph taken at location 1 of figure 1 looking southwest at the northeastern termination of the Carlile fault ridge. The fault ridge is in the background with buildings on top. No fault scarp exists on the flood plain visible in the middle or foreground of the photograph.

Figure 4. Photograph taken at location 2 of figure 1 looking northeast at the southwestern termination of the Carlile fault ridge. The Carlile fault ridge is the high ground in the background. No fault scarp exists on the flood plain in the middle or foreground of the photograph.

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STUDENT ADVISING/MENTORING

Currently on 4 Masters and 2 Doctoral committees.

RESEARCH/SCHOLARSHIP/CREATIVE ACTIVITIES

PUBLICATIONS

Refereed Journal PublIcations

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SUPPORT

External

Funded Faculty Research Grant $$4000$ 1995

SERVICE

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Department Graduate Advisor Faculty Search Committee Graduate Council Dean's Faculty Advisory Committee

Professional Society Memberships

American Geophysical Union American Association of Petroleum Geologists Geological Society of America Seismological Society of America

Professional Consultation Activities

Reviewer for National Science Foundation research grants Reviewer for United States Geological Survey research grants Reviewer for Geological Society of America Bulletin Reviewer for Quaternary Research Reviewer for Geophysical Research Letters Reviewer for Seismological Research Letters Consulting for Army Corps of Engineers Consulting for Risk Engineering Guest Editor of Engineering Geology

APPENDIX B

Chairman Role Master Theses

Wilson, J.K., 1981, Investigation of late Tertiary to recent movement along the east bounding fault of the Shearer Graben within the Kentucky River fault system in southern Clark County. Kentucky, 128 p.

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Ward, C.C., 1989, Post-Pennsylvanian reactivation along the Washita Valley fault, southern Oklahoma, 64 p.

Scherer, G.G., 1991, High resolution seismic reflection study along the northern segment of Crowley's Ridge, northeast Arkansas, 66 p.

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Lumsden, C.H., 1995, The northern extension of the Reelfoot scarp into Kentucky and Missouri, 56 p.

Axford, P.W., 1996, A structural interpretation of the topography of the Reelfoot scarp and Lake County uplift, 64 p.

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,>PA **UNITED STATES** pX ^a**NUCLEAR REGULATORY COMMISSION** A d WASHINGTON, D.C. **2055-4000**

December 18, 1998

Mr. John H. Ellis, President Sequoyah Fuels Corporation P.O. Box 610 Gore. Oklahoma 74435

SUBJECT: TRANSMITTAL OF NRC'S RESPONSE TO EVALUATION OF SEISMIC CONDITIONS NEAR YOUR SITE

Dear Mr. Ellis:

The U.S. Nuclear Regulatory Commission has completed its review of the information related to seismic conditions in the vicinity of your site. This review demonstrated that none of the known faults near your site are capable faults, as defined in Section III of Appendix A to Title 10 Code of Federal Regulations Part 100. A copy of the review is included for your information.

If you have any questions on this matter, please contact Jim Shepherd at $301-415-6712$.

Sincerely

John W. N. Hickey, Chief Low-Level Waste and Decommissioning Projects Branch Division of Waste Management Office of Nuclear Material Safety and Safeguards

Docket 40-8027 License SUB- 1010

Enclosure: As stated

cc: SFC distribution list

Sequoyah Fuels Corporation Letter dated: 12/18/98

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cc: Alvin Gutterman, Esq. Craig Harlin JoKay Dowell Pat Gwin Michael Broderick Michael Hebert, P.E. Dr. Loren Mason Kathy Peter Charles Scott Merritt Youngdeer Troy Poteete President. S.A.F.E.S.T Jeannine Hale, Esq.

UNITED STATES ; **2.** ad **NUCLEAR REGULATORY COMMISSION WASHINGTON, D.C. 20555-0001**

December 03, 1998

NOTE TO: James Shepherd, Project Manager Sequoyah Fuels Corporation LLDP/DWM1NMSS

FROM: Philip **S.** Justus, Senior Geologist **ENGB/DWM/NMSS**

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SUBJECT: SEQUOYAH FUELS CORPORATION (SFC) EVALUATION OF FAULTS AND FAULTING: INPUT TO SAFETY EVALUATION REPORT

BACKGROUND AND CONCLUSIONS:

This report documents my evaluation of the faults that have been mapped, assumed to be present, or otherwise mentioned in reports, letters, and maps concerning faults in and around the **SFC** site near Gore, Oklahoma. In particular, this report is in response to materials submitted by C.H. Harlin of SFC to you dated April 8, 1998, with the subject, "License SUB-1010; Docket No. 40-8027 - Seismic Conditions Near the Sequoyah Facility." Based on the information that I have reviewed and the field observations that. I made, I do not consider that the known faults are capable faults according to the definition of 10 CFR Part 100, Appendix A. Therefore, these faults need not be considered as seismic sources for the purposes of determining the seismic design basis. This note may be used as input to a Safety Evaluation Report. The bases for my conclusions are described in the sections below.

At your request, I performed a preliminary evaluation of **SFC** submittals for the purposes of determining whether or not faults that were indicated to occur on or near the site are capable faults, and whether or not other geologic hazards might exist and would need to be considered in design. The information available to me was insufficient to make definitive findings on the above issues. A request for additional information from SFC, along with the reasons for requesting each bit of information, was prepared and sent to SFC.

SFC responses were evaluated and found to be inadequate for reaching regulatory conclusions. Constructive comments and guidance intended to lead **SFC** to develop supporting bases for its conclusions on each issue were prepared, discussed by teleconference, and sent to SFC. A site visit for NRC staff was arranged and made (participants included Dr. Ibrahim and myself). In addition, Dr. Ibrahim and I visited the offices of the State Geologist, the State Seismologist, interviewed various geoscientists, obtained written reports and discussed several issues regarding the site with them.

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SFC's April 8, 1998, report and additional reports were reviewed (e.g., relevant parts of Black Fox and Arkansas Nuclear One reactor safety evaluation reports). The combination of the above materials and results of investigations provided a sufficient basis for determining that none of the known faults near the SFC site are capable faults.

FAULTS ON AND AROUND SFC SITE:

The faults on and around the SFC site that are candidates for capable faults include: (1) faults associated with the South Fault of Warner Uplift (near dam a few miles upriver from Webbers Falls, OK); (2) Carlile School Fault and an E-W splay from the Carlile Fault (=Carlile School Fault) near the southern boundary of the SFC property; and (3) Marble City Fault and its splay. These are all shown in the SFC Site Characterization Report (SCR) of 2/2/96, Figure 9; Attachment 1.

The Carlile Fault, the closest fault to the site, is shown to intersect the Marble City Fault (MCF) on one map, but not on another. Both maps were submitted by SFC. Also, a cross section showed that parts of the South Fault of Warner Uplift (SFWU) and the Carlile fault (CF) were a few thousand feet deep and did not penetrate the granite basement rocks (SCR, Figure 11, attachment 2). The fault lengths, fault-zone widths, depth, and connectivity of the faults on the SFC maps and cross sections are not well constrained, and vary from map to map. This is due to a dearth of data that may only be derived from better exposures, borehole penetrations and geophysical surveys. These and other discrepancies have been satisfactorily explained in the April 8, 1998, letter.

Other map sources of fault information submitted by SFC or consulted by me include the tectonic map of OK (Arbenz, 1956), Hydrologic Atlas map HA-1 (Marcher, 1969), geologic map of Webber Falls area (Chenoweth, 1983), and trace map of the Carlile Fault (Van Arsdale, 1998, in subject document). Of the faults on these maps, the Chenoweth map and others submitted by SFC based on its own or its consultants' investigations are most relevant to the capable fault issue. The SFC-sponsored maps have some bases to support them, whereas, the smaller scale state maps do not appear to have bases traceable to observations of the geology made in the vicinity of the SFC site. Therefore, I am relying much more heavily on the observations and interpretations of local geology and local features of faults in the SFC reports and maps than on abstractions of them made from the state reports and maps.

ASSESSMENT OF SELECTED FAULTS DISCUSSED IN SFC'S "REGIONAL GEOLOGY RELATING TO **SEISMIC CONDITIONS AT THE SEQUOYAH FACILITY" SUBMITTED** APRIL 8,1998, AND IN OTHER DOCUMENTS:

I. Marble City Fault (MCF). The trace of the MCF near the SFC site has not been located consistently by **SFC** (e.g., Chenoweth, 1983; SCR, 1996; Van Arsdale, 1998). For example, the location of the MCF with regard to the Carlile Fault (CF) is near the northern terminus of the CF and the MCF does not intersect the CF at the surface (Chenoweth, Attachment 3; and Van

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Arsdale, Attachment 4 show the CF to be 1 mile long), whereas the location of the MCF is near the southern terminus of the CF in the SCR (the CF is shown to be 4 mi long; Attachment 1).

The MCF is not a capable fault (10 CFR Part 100, Appendix A) because it does not appear to meet any of the criteria for being a capable fault (i.e., (i) there was no single displacement on it in the last 35,000 years or two displacements in the last 500,000 years (e.g., Black Fox and Arkansas Nuclear One-SERs); (ii) there is no macroseismicity associated with it (e.g., Earthquake Map of OK, 1995, and updates and interviews with Kenneth Luza); and (iii) it is not structurally related to a known capable fault (e.g., Black Fox and Arkansas Nuclear One SERs). Therefore, the location of the MCF and its relationship to other faults near the SFC site do not need to be pinpointed for the purpose of ascertaining seismic design basis at the site.

II. South Fault of Warner Uplift (SFWU). The SFWU is tectonically similar to the MCF, in that it is one of a series of northeast-trending normal faults that are arrayed on the southwestern flank of the Ozark dome. The SFWU is seismotectonically similar to the MCF in that it does not meet any of the criteria for capable faults (e.g., reasons similar to that for MCF in 1, above). Therefore, I do not consider the SFWU to be a capable fault.

Ill. Carlile Fault, or Carlile School Fault (CF). The trace of the CF is marked by a rubbly vegetated ridge up to about 12 feet in relief and up to one mile long. The fault has a northeast strike, displacement of about 100 feet down to the southeast and a moderate dip to the southeast (Attachments 1, 2). Van Arsdale (attachment to the subject report) indicates that the fault zone is characterized by rock strata with dips up to 17 degrees southeast which interrupt the regional southwestern dips of about 5 degrees. The fault does not meet any of the criteria for a capable fault. On the criterion of youthful displacement: the absence of disruption of Quaternary and Holocene sediments that veneer the fault zone (Van Arsdale, ibid; and SCR, Figure 10) and the lack of steep scarps militates against displacements in the Late Quaternary Period. On the criterion of macroseismicity: there is no definitive relationship of macroseismicity to the CF (e.g., Earthquake Map of OK, 1995). On the criterion of structural relationship to a capable fault: the CF does not appear to be connected to the MCF (Chenoweth; and Van Arsdale, ibid.); and the MCF is not a capable fault (e.g., Black Fox and Arkansas Nuclear One reports). Therefore, based on available information, there is no evidence that the CF is a capable fault. The CF need not be investigated in further detail for the purpose of ascertaining the seismic design basis.

SFC's explanation for the E-W splay of the CF that appears in attachment 1 (dashed line) is reasonable and acceptable (April 8, 1998 letter). Thus, the E-W splay, the only fault that has been suggested to occur within the site boundary, has little or no basis in fact, and need not be considered in establishing the seismic design basis.

The faults mentioned in I, II, and III, above, in particular, the CF and the E-W splay of the CF, may need to be considered for purposes other than as potential contributors to seismic design

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basis. For example, if the faults or features they represent have a significant effect on groundwater flow, they may need to be characterized for purposes of understanding or constraining attributes of groundwater flow and contaminant transport.

CONCLUSION REGARDING CAPABLE FAULTS IN THE SFC SITE VICINITY:

As described above, based on the results of reviews of faults and fault investigations relevant to the identification and investigation of faults near the SFC site that may be capable faults according to the definition of 10 CFR Part 100, Appendix A, the staff finds no evidence to support a conclusion that such capable faults exist on or near the SFC site. Specifically, the CF, MCF, and SFWU described above are not considered to be capable faults.

cc: Bill Reamer David Brooks Bakr Ibrahim

Attachments:

- 1. Structural Features and Wells, Fig. 9, SFC Site Characterization Report, 2/2/96
- 2. Regional Geological Cross Section, Fig. 11, ibid.
- 3. Portion of Geologic Map of Webber(sic) Falls Area, by P.A. Chenoweth, July 1983
- 4. Location of Carlile fault zone, Fig. 1, Paleoseismological Analysis of the Carlile Fault in Sequoyah County, OK, by R. Van Arsdale, undated attachment to the subject report.

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ENCLOSURE 3 Sequoyah Fuels Corporation Reclamation Plan Acceptance-Review Request for Additional Information

Assessment of Non-11e.(2) Materials for Disposal in The Cell August 8, 2003

APPENDIX A

Assessment of Non-11e.(2) Materials for Disposal in The Cell

Compliance With Interim **Guidance on Disposal of Non-Atomic Energy Act of 1954, Section i1e.(2) Byproduct** Material in **Tailings** Impoundments

NRC Regulatory Information Summary 2000-23 (November 30, 2000) provides guidance on disposal of wastes that are not 11 e.(2) byproduct material in tailings impoundments. The policy identifies eight considerations. The discussion below addresses each of these considerations and shows that they are consistent with SFC's disposal in the disposal cell of the non-11e.(2) byproduct material wastes described above.

RIS 2000-23 Criterion 1. In reviewing licensee requests for the disposal of wastes that have radiological characteristics comparable to those of Atomic Energy Act of 1954, Section 11e.(2) byproduct material [hereafter designated as "11e.(2) byproduct material"] in tailings impoundments, the Nuclear Regulatory Commission staff will follow the guidance set forth below. Since mill tailings impoundments are already regulated under 10 CFR Part 40, licensing of the receipt and disposal of such material [hereafter designated as "non-11e.(2) byproduct material" should also be done under 10 CFR Part 40.

SFC Response: The SFC non-1 Ie.(2) byproduct materials have radiological characteristics comparable to those of 11e.(2) byproduct material. These materials are comprised of soil, demolition debris, and calcium fluoride (CaF) sludge, all pf which are contaminated with low levels of source material, primarily natural uranium. The first two types of material are typical of a uranium mill operation and are similar to the 11e.(2) material that SFC also plans to place in the disposal cell. The third type of material, CaF sludge, is not found at a typical uranium mill, but it has radiological characteristics comparable to I Ie.(2) byproduct material. These non-1 Ie.(2) materials are depicted on Figure A-1, and described in more detail in Attachment 1.

The radiological contaminants in all three types of non-11e.(2) byproduct material are U_{nat}, Th₂₃₀ and Ra₂₂₆. These radiological contaminants are also the radiological contaminants in typical uranium mill tailings, including the SFC II e.(2) byproduct material. The maximum concentrations of U_{nat} , Th₂₃₀ and Ra₂₂₆ in SFC's non-11e.(2) byproduct material are lower than respective the maximum concentrations in the SFC 11e.(2) byproduct material. In addition, the average concentrations also are lower in the non-11e.(2) byproduct material. The concentrations of these radiological contaminants in the SFC non-11e.(2) byproduct material are comparable to the concentrations in I1 e.(2) byproduct material at typical conventional uranium mills. Table I provides. estimated average and maximum concentrations of U_{nat} , Th₂₃₀ and Ra₂₂₆ in the three classes of non-11e.(2) wastes along with comparable concentrations in the SFC 11e.(2) materials and in 11e.(2) materials at typical conventional uranium mills.

RIS 2000-23 Criterion 2. Special nuclear material and Section 1 Ie.(1) byproduct material waste should not be considered as candidates for disposal in a tailings impoundment, without compelling reasons to the contrary. If staff believes that such

Reclamation Plan, Appendix A Page 1 of 6 Revision 0 Re *Sequoyah Facility January 2003* material should be disposed of in a tailings impoundment in a specific instance, a request for Commission approval should be prepared.

SFC Response: The SFC non-11e.(2) byproduct materials do not contain any special nuclear material or Section 1 Ie.(I) byproduct material.

RIS 2000-23 Criterion 3. The 11e. (2) licensee must provide documentation showing necessary approvals of other affected regulators (e.g., the U.S. Environmental Protection Agency or State) for material containing listed hazardous wastes or any other material regulated by another Federal agency or State because of-environmental or safety considerations.

SFC Response: There are no necessary approvals of other regulators because the non-1 Ie.(2) materials do not contain any wastes that are listed as hazardous under the Resource Conservation and Recovery Act (RCRA), and there is no other Federal agency or State that regulates the land disposal of any of the constituents of the non-I1 e(2) byproduct material because of environmental considerations. Although the site is subject to an Administrative Order issued by the U.S. Environmental Protection Agency (EPA) under RCRA (the principal contaminant of concern being arsenic in groundwater), the EPA's concerns are not with any of the non-11e.(2) wastes that SFC wants to place in the disposal cell.

As discussed above, the non-11e.(2) byproduct material consists of three types of material: soils, demolition debris and CaF sludge. The soils are very similar to the SFC soils that are 11e(2) byproduct material and do not contain any hazardous wastes.

The demolition debris will consist of the materials resulting from demolition of buildings and equipment. The debris from buildings/equipment that were not used in the front end of the SFC process is non-11e.(2) byproduct material. Demolition debris that is non-11e.(2) byproduct material is very similar to the demolition debris that is 11e.(2) byproduct material. Like typical older uranium mill tailings sites, some of the SFC buildings and equipment contain asbestos bearing materials. About half of the asbestos is 11e.(2) material, the other half is not. Asbestos is not a listed hazardous waste under RCRA. Asbestos is regulated under the Clean Air Act, and therefore is incorporated by reference as a hazardous substance in the Comprehensive Environmental Resource and Liability Act (CERCLA), but it will not migrate in the subsurface and would not present any environmental risk when buried in the cell. No approvals from EPA or the State are required for the land disposal of asbestos.

The CaF sludge was generated by using lime (CaO) to neutralize the acidic wastewater from the conversion process fluorine scrubber systems. Excess lime was used during the neutralization step and the pH was then adjusted to near neutral using sulfuric acid. As a result, the sludge is primarily composed of CaF, CaO and CaS. The sludge also contains about 45% water and an average of about 700 ppm natural uranium.

Attachment 2 provides the results of a detailed chemical analysis of the CaF sludge that was performed as part of the EPA RCRA Facility Investigation completed in 1996. It shows that the sludge samples did not contain RCRA hazardous waste. Attachment 3 provides the results of TCLP leachability analysis on the CaF sludge, demonstrating that it is not a RCRA Hazardous Waste due to Toxic Characteristics.

There is some buried CaF sludge at the site that has not been tested. SFC plans to excavate this sludge during reclamation, test it for chemical constituents and dispose of it accordingly. If it has similar characteristics to the previously tested CaF sludge, it will be included in the disposal cell as non-1 Ie.(2) byproduct material.

Since no listed or characteristically hazardous materials are included in the non-I Ie.(2) byproduct material, no approval from other Federal or State regulators is required for disposal of these materials in the disposal cell.

RIS 2000-23 Criterion 4. The I Ie.(2) licensee must demonstrate that there will be no significant environmental impact from disposing of this material.

SFC Response: No significant environmental impact will result from disposing of the non-11e.(2) byproduct material in the disposal cell. The non-11e.(2) byproduct material that consists of soil and demolition debris is chemically and physically very similar to the soil and demolition debris that is classified as 11e.(2) byproduct material. While the CaF sludge is chemically different from the 11e.(2) byproduct materials, no adverse chemical reaction with other materials in the cell is anticipated. Testing has shown that uranium is less leachable from the CaF sludge than from most of the 11e.(2) materials that will be placed in the cell. Reduction of the water content, which is planned prior to placement in the cell, will result in a structurally acceptable material that will not contribute to cell subsidence. Consequently, including the non-11e.(2) byproduct materials in the disposal cell will not have a significant affect on the ability of the disposal cell to assure that the contaminants in the disposal cell remain isolated from the environment, or to have any other significant environmental impact.

Thus, the only environmental impact of disposal of this non-11e.(2) byproduct material in the disposal cell will be an increase of approximately 20% in the volume of material for disposal in the cell. Any decision not to place the non-11 e.(2) byproduct material in the disposal cell would result in a need for separate disposal of this material. If two disposal cells are required, the amount of land dedicated to disposal would be greater due to the need for a buffer area around each cell. Consequently, placing the 11e.(2) and non-11e.(2) byproduct material in the same cell will minimize the total area devoted to disposal of these materials, and minimize the environmental impact of disposal of the non-I Ie.(2) byproduct material.

RIS 2000-23 Criterion 5. The 11e. (2) licensee must demonstrate that the proposed disposal will not compromise the reclamation of the tailings impoundment by demonstrating compliance with the reclamation and closure criteria of Appendix A of 10 CFR Part 40.

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SFC Response: Sections 3 and 4 of this Reclamation Plan demonstrates how disposal of both the 1 1e.(2) byproduct material and the non-I Ie.(2) byproduct material will comply with the reclamation and closure criteria of Appendix A of 10 CFR Part 40. It shows that including the non-11e.(2) material in the disposal cell will not compromise compliance with the reclamation and closure criteria.

RIS 2000-23 Criterion 6. The 11e.(2) licensee must provide documentation showing approval by the Regional Low-Level Waste Compact in whose jurisdiction the waste originates as well as approval by the Compact in whose jurisdiction the disposal site is located, for material which otherwise would fall under Compact jurisdiction.

SFC Response: This criterion is not applicable because SFC's non-11e.(2) byproduct material is not "material which otherwise would fall under Compact jurisdiction". The relevant regional low level compact - the Central Interstate Low-Level Radioactive Waste Compact (CILLRWC)- does not require approval for a generator of radioactive waste to dispose of that waste on its own site.

Oklahoma is a member of the CILLRWC, 42 U.S.C 2021d. The CILLRWC provides, in part:

ARTICLE VI-OTHER LAWS AND REGULATIONS

* * *

a. Nothing in this compact shall be construed to:

3. prohibit or otherwise restrict the management and waste on the site where it is generated if such is otherwise lawful;

While the quoted sentence uses the phrase "management and waste," it was apparently intended to read "management of waste." ARTICLE Il-DEFINITIONS of the CILLRWC states that "As used in this compact, unless the context clearly requires a different construction: $* * * h$. "management of waste" means the storage, treatment or disposal of waste" (emphasis added). This definition makes clear that SFC's disposal of waste on the SFC site does not fall under CILLRWC jurisdiction. The same conclusion would be reached even if the phrase 'management and waste" is not corrected, since the word "management" should be interpreted in light of the definition of "management of waste," and therefore understood to mean that the CILLRWC does not restrict the right of a generator to dispose of its own waste on its own site.

RIS 2000-23 Criterion 7. The U.S. Department of Energy (DOE) and the State in which the tailings impoundment is located, should be informed of the U.S. Nuclear Regulatory Commission findings and proposed action, with a request to concur within 120 days. A concurrence and commitment from either DOE or the State to take title to the tailings impoundment after closure must be received before granting the license amendment to the $11e(2)$ licensee.
SFC Response: SFC understands that the NRC will contact the DOE and the State. In anticipation of this, SFC sent a letter to the DOE on 1118/02 requesting concurrence with the proposed disposal. SFC also sent a copy of its letter to the NRC and the attorney for the State of Oklahoma.

RIS 2000-23 Criterion 8: The mechanism to authorize the disposal of non-1 Ie.(2) byproduct material in a tailings impoundment is an amendment to the mill license under 10 CFR Part 40, authorizing the receipt of the material and its disposal. Additionally, an exemption to the requirements of 10 CFR Part 61, under the authority of 10 CFR 61.6, must be granted, if the material would otherwise be regulated under Part 61. (If the tailings impoundment is located in an Agreement State with low-level waste licensing authority, the State must take appropriate action to exempt the non-11e.(2) byproduct material from regulation as low-level waste.). The license amendment and the 10 CFR 61.6 exemption should be supported with a staff analysis addressing the issues discussed in this guidance.

SFC Response: SFC's request for an amendment to authorize decommissioning of the SFC facility in accordance with this Reclamation Plan includes a request for authorization to dispose of the non-11e.(2) material in the disposal cell.

An exemption from 10. CFR Part 61 is not required in this case because Part 61 is not applicable to SFC's disposal of its own waste materials. The scope of the Part 61 is stated in 10 CFR Section 61.1, which states in pertinent part,

(a) the regulations in this part establish, for land disposal of radioactive waste, the procedures, criteria, and terms and conditions upon which the Commission issues licenses for the disposal of radioactive wastes containing byproduct, source and special nuclear material received from other persons. Disposal of waste by an individual licensee is set forth in part 20 of this chapter. Applicability of the requirements in this part to Commission licenses for waste disposal facilities in effect on the effective date of this rule will be determined on a case-by-case basis and implemented through terms and conditions of the license or by orders issues by the Commission.

(emphasis added). Since SFC does not propose to receive any waste for any other person, Part 61 is not applicable, and no exemption from it Is required. This contrasts with the usual circumstance in which the Commission is asked to authorize disposal of non-11e.(2) byproduct materials in a mill tailings pile. In the typical mill tailings case, all of the wastes at the mill are, by definition, 11e.(2) byproduct material, and the requests for authorization to dispose of non-11e.(2) byproduct material do relate to material the licensee intends to receive from a third party for disposal.

Similarly, no exemption is required from the state of Oklahoma. Although the State does have regulatory authority over land disposal of byproduct, source and special nuclear material, the agreement between the NRC and the State of Oklahoma only provides that Oklahoma shall have authority to regulate land disposal of waste material received from other persons. 65 Fed. Reg. 60695, 60696 (October 12, 2000). In

addition, the Oklahoma Radiation Management rules and regulations incorporate by reference 10 CFR § 61.1. (See Oklahoma Administrative Code Section 252:410-10- 61 (a)(1)(A)). Since SFC will not be receiving any wastes from other persons, the State does not have jurisdiction over SFC's onsite disposal of its non- 1Ie.(2) byproduct material.

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Table 1: Characteristics of 11e.(2) and Non-11e.(2) Materials

^a Results obtained during SFC Site Characterization and RCRA Facility Investigation activities, and reported in the subsequent results reports.

^b Results obtained during SFC Site Characterization For Units 1, 23, and 29, and reported in the subsequent results report.

C Results based on one sample of CaF Sludge taken from Unit 14.

^d Data provided for the average inactive mill tailings column represent the range in average concentrations measured at each of 19 tailings piles. Thorium-230 activity concentration is assumed to be the same as radium-226 activity concentration. Data from Table 3-2 and EPA-520/4-82-013-1, 'Final Environmental Impact Statement for Remedial Action Standards for Inactive Uranium Processing Sites (40CFRI92)', Volume 1, (Final Report), Office of Radiation Programs, Washington D.C., October, 1982.

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Attachment I Summary of **SFC** Non-11e.(2) Material

Non-1 Ie.(2) byproduct material proposed for disposal in the cell includes the soils; buildings, equipment and concrete; scrap metal; solid waste burials; drummed contaminated trash; Emergency Basin sediment and soils; North Ditch sediment and soils; the Interim Soil Storage Cell; and Calcium Fluoride sludge and basin liners. Locations of non-11e.(2) materials are identified on Figure A-1.

Soils

Approximately 10% of the soil identified for disposal in the cell is contaminated with non-11e.(2) byproduct material. This soil is primarily located under the eastern portion of the Main Process Building, 1986 Incident Soils Storage Area, the DUF4 Building, and the Cylinder Storage Pad. These areas are designated as Units 1, 23, 29 and 30 respectively in the SFC Site Characterization Report (SCR). Chemical and radiological analyses for these areas were included in the SCR, and include:

Unit 1

Soil samples have been collected from fifty-seven (57) locations in and around this unit. Sample depths ranged from the surface to seventy-nine (79) feet deep. Of the 851 uranium analyses, 758 (89.1%) were less than 35 pCi/g and 784 (92.1%) were less than 110 pCig. The maximum uranium concentration observed was approximately 7,100.

Unit 23

Soil samples have been collected from forty-seven (47) locations in and around this unit. Sample depths ranged from the surface to fifty-two (52) feet deep. Of the 239 uranium analyses, 238 (99.6%) were less than 35 pCi/g and 239 (100%) were less than 110 pCi/g. The maximum uranium concentration observed was approximately 36.6 pCi/g.

Unit 29

Soil samples have been collected from seventeen (17) locations in and around this unit. Sample depths ranged from the surface to forty-five (45) feet deep. Of the 103 uranium analyses, 101 (98.1%) were less than 35 pCi/g and 103 (100%) were less than 110 pCi/g. The maximum uranium concentration observed was approximately 68 pCi/g.

Unit 30

Soil samples have been collected from thirteen (13) locations in and around this unit. Sample depths ranged from the surface to forty-six (46) feet deep. Of the 171 uranium analyses, 162 (94.7%) were less than 35 pCi/g and 165 (96.5%) were less than 110 pCig. The maximum uranium concentration observed was approximately 650 pCilg.

Buildings, Equipment, Concrete

Approximately 50% of the buildings, equipment and concrete identified for disposal in the cell is contaminated with non-11e.(2) byproduct material. There is an estimated 216,091,000 pounds (1,080,455 cubic feet) of building and equipment debris, with a total uranium concentration of 0.025%, for a total uranium content of 24,556 kgs. Total Ra-226 and Th-230 contamination are each estimated to be less than 0.01 Ci.

Scrao Metal,

Approximately 50% of the scrap metal identified for disposal in the cell is contaminated with non-11e.(2) byproduct material. Most of this scrap metal is currently stored on the Yellowcake Storage Pad. Scrap metal includes pipe, beams and siding. The total estimated scrap metal is 20,000,000 pounds (100,000 cubic feet), with a total uranium concentration of 0.002%, for a total uranium content of 227 kgs. Ra-226 and Th-230 contamination is negligible.

Solid Waste Burials

Approximately 50% of the materials in the Solid Waste Burials is estimated to be contaminated with non-11e.(2) byproduct material. This material is buried in Solid Waste Burial Area #1, designated as Unit 5 in the SFC SCR. As stated in the SCR, buried materials include contaminated equipment, scrap metal, lab sample bottles, defective 55-gallon yellowcake drums, Insulation, combustible trash, pipe containing calcium sulfate deposits, UF_4 ash, yellowcake, incinerator ash, and miscellaneous material from spill cleanups. Due to the physical nature of the burial area contents, SFC concluded that it is not possible to obtain representative samples without full exhumation. Since the burial area may include containers such as drums, there also is a concern that sampling may cause the spread of contamination by disturbing or penetrating the drums with-a sampling device. Therefore, the burial area was not characterized by direct sampling during site characterization.

Drummed Contaminated Trash

Approximately 50% of the drummed contaminated trash is estimated to be contaminated with non 11e.(2) byproduct material. Most of this drummed trash is currently stored in the Cell Rooms (southeast comer) of the Main Process Building. There is an estimated 165,300 pounds (6,250 cubic feet) of drummed contaminated waste, with a total uranium concentration of 0.029%, for a total uranium content of 22 kgs. Ra-226 and Th-230 contamination is negligible.

Emergency Basin Sediment and Soil

An estimated 75% contamination In the Emergency Basin sediment and soil is non-11e.(2) byproduct material.

The Emergency Basin Is designated as Unit 6 in the SFC SCR. Source samples were collected from eight (8) locations from the Emergency Basin. Sample depths ranged from the surface to one-half foot. Uranium concentrations ranged from approximately 1,600 to 6,000 pCi/g, nitrate from 3.8 to 210 μ g/g and fluoride from 1,800 to 9,900 μ g/g.

Twelve locations were probed during 1995 characterization activities to determine the depth of the sediment. The sediment depth varied from a maximum of 8 inches to a minimum of 1 inch.

Soil samples have been collected from nineteen (19) locations around the Emergency Basin. Sample depths ranged from the surface to four and a half (4.5) feet deep. Of the 75 uranium analyses, 50 (66.7%) were less than 35 pCi/g and 66 (88%) were less than 110 pCi/g. The maximum uranium concentration observed was approximately 3,500 *pCVg.*

North Ditch Sediment and Soil

An estimated 75% contamination in the North Ditch sediment and soil is non-11e.(2) byproduct material. The North Ditch is designated as Unit 9 in the SFC SCR.

Sediment samples have been collected from seven (7) locations from the North Ditch. Uranium concentrations ranged from approximately 0.1 to 22,000 pCi/g, nitrate from 2.5 to 930 μ g/g and fluoride from 810 to 15,000 μ g/g.

Ten locations were probed during 1995 characterization activities to determine the depth of the sediment. The sediment depth varied from a high of 40 inches to a low of 10 inches, averaging 19.1 inches.

Soil samples have been collected from fourteen (14) locations around the North Ditch. Sample depths ranged from the surface to five (5) feet deep. Of the 62 uranium analyses, 37 (59.7%) were less than 35 pCi/g and 48 (77.4%) were less than 110 pCi/g. The maximum uranium concentration observed was approximately 510 pCig.

Interim Soils Storage Cell

Approximately 50% of the contaminated material in the Interim Soils Storage Cell is estimated to be contaminated with non-1Ie.(2) byproduct material.

Three primary sources of uranium-contaminated soils were initially placed Into the Interim Storage Cell. These sources were the soil (sod) contaminated by the 1986 cylinder rupture (non-1 1e.(2) byproduct material); limestone gravel associated with a former hydrofluoric acid neutralization area; and soils from various excavation activities around the solvent extraction building which were temporarily stored on the yellowcake storage pad. The volume and uranium concentration of each of these units of contaminated soils are provided In the following table.

Soils Stored In the Interim Soil Storage **Cell**

Additional soils from other areas have also been placed in the cell. The respective volumes and concentrations, however, are small compared to the four primary units described above.

Calcium Fluoride Sludge and Basin Liners

The contamination of the calcium fluoride sludge and basin liners is considered to be 100% non-Ile.(2) byproduct material. This material is currently located in the Fluoride Holding Basin #1, Fluoride Holding Basin #2 and the Fluoride Sludge Burial Areas. There is approximately 48,459,200 pounds (625,289 cubic feet) of calcium fluoride sludge, with an estimated uranium concentration of 0.032 wt %, for a total of 6,975 pounds (4.7 Ci) of uranium. Ra-226 contamination is estimated at 1.0 pCi/g for a total of 0.009 Ci Ra-226. Th-230 contamination is estimated at 188.0 pCi/g for a total of 1.80 Ci Th-230. Chemical analysis of the fluoride sludge is included in Attachment I of the Reclamation Plan.

Table 15: Study Area 1 Source Sampling Results

**Attachment 2
Chemical Analysis of Calclum Fluoride Sludge**

SD013 - Calcium Fluoride Studge (S.W. Area) SD016 - Calcium Fluoride Studge Basin No. 1 (North)

Table 16: Summary Of Organics And Mercury Analysis Positive Values Greater Than Or Equal To The Detection Limit Are Reported:

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Source Investigation Samples:

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Acetone PQL=O.1 mg/kg

mercury
PQL=0.01 mg/kg
PQL=0.1 mg/kg

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Result=0.02 mg/kg Result=0.2 mg/kg

Final RFI

Attachment 3 TCLP Leachability¹ Analysis On CaF Sludge

NOTES:

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(1) The term "leachable" as used here means the sample was extracted utilizing methodology associated with the RCRA TCLP procedure.

Only a partial list of parameters are Included here.

(3) In the table the term "NA" means "not available".

(4) A composite sample from each Impoundment which stores

the sludge was cormbined Into a single composite sample and analyzed.

Preliminary Report, Description of Current Conditions and Investigations