



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION IV  
611 RYAN PLAZA DRIVE, SUITE 400  
ARLINGTON, TEXAS 76011-4005

February 6, 2004

MEMORANDUM TO: Docket File 040-08006  
License No. SUB-986  
Kerr McGee Chemical L.L.C (KMCLLC) Technical Center

THROUGH: D. Blair Spitzberg, Ph.D., Chief */RA DBSpitzberg/*  
Fuel Cycle & Decommissioning Branch

FROM: Rachel S. Browder , Health Physicist */RA/*  
Nuclear Materials and Licensing Branch\

SUBJECT: TELEPHONE CONVERSATION RECORD

On January 27, 2004, the NRC held a conference call with Kerr McGee Technical Center licensee and with the licensee's decommissioning contractor representatives. The participants in the call included:

NRC

Rachel Browder, Health Physicist, NMLB

Licensee and Contractors

Russell Jones  
Jo Johnson  
Karen Morgan  
Will Roger  
Steve Marsh  
Harry Newman  
Rick Callahan  
LaVonna Smith

The conference call was held to discuss the NRC review of the licensee's Final Status Survey Report (FSSR) for the outdoor survey units, which was submitted in September 2003. Mrs. Browder initiated the conference call by discussing several questions with regards to the Threshold Comparison Test Report. The licensee satisfactorily answered the questions with regard to the submitted test reports for the soil survey units.

The primary discussion was associated with section 3.6.4 and associated Table 3.7 of the FSSR, which stated that the licensee was using the release criteria for building surfaces for fixed equipment and for embedded or buried piping. Additionally, the licensee submitted protocol in Appendix 6 on hot spot evaluation which addressed contaminated buried piping,

which stated in part, "at a certain level, the RSO will decide whether to: i) Perform isotopic analysis to determine the specific radionuclide contributors and derive a specific release limit for the buried piping, or ii). Remove the contaminated piping.

It was discussed with the licensee that building surfaces criteria approved in the Decommissioning Plan (DP) could not be applied arbitrarily to fixed equipment and embedded piping. Fixed equipment or embedded piping would have to be approved on a case by case basis. NUREG 1757, Volume 2, Section G.1.3 (sewer systems and floor drains) and G.1.5 (embedded piping) states that the dose from those systems do not contribute to the building occupancy scenario and the dose should be calculated using a site-specific scenario. Additionally, it was discussed that the dose may have to be evaluated under a scenario that the buried piping or embedded piping could potentially be dug-up in the future and the pipe contents exposed to the environment.

The DP stated in part that the radioactivity on the interior surfaces of pipes, drain lines or duct work shall be determined by making measurements at all traps and other appropriate access points, provided that contamination at these locations is likely to be representative of contamination on the interior. The licensee would have to take appropriate survey measurements and justify that the measurements obtained were indeed representative of the interior of the respective pipe.

Mr. Harry Newman asked if there was any additional guidance on embedded piping. Mrs. Browder provided an email document to Mr. Russell Jones on February 3, 2004 on NRC Regulatory Issue Summary 2002-02: "Lessons Learned Related to Recently Submitted Decommissioning Plans and License Termination Plans" which contains some information regarding embedded piping.

Several different methods were discussed for addressing the survey report for embedded and buried piping. The regional office does not see any obstacles in approving the FSSR for the outdoor survey units, with the exception of the outdoor buried piping which was addressed in the report. The licensee will subsequently submit the buried and embedded piping at a later date, which will probably be forwarded to Headquarters for review.

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