CIMARRON CORPORATION

P.O. BOX 315 • CRESCENT, OK 73028

August 11, 2005

Mr. Kenneth Kalman
Low-Level Waste & Decommissioning Projects Branch
Division of Waste Management
Office of Nuclear Materials Safety & Safeguards
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

RE: Refined Conceptual Site Model

Dear Mr. Kalman:

Cimarron Corporation (Cimarron) submits herein Conceptual Site Model for NRC and DEQ review and comment. This report presents Cimarron's understanding of the geologic, hydrogeologic, and geochemical characteristics of the Cimarron site. The report focuses on the three areas in which groundwater contains licensed material above license criteria.

Cimarron submitted drafts of certain sections of this report to NRC and DEQ as part of technical exchange discussions. During the preparation of this "final" report, minor revisions were made to previously covered sections. Cimarron believes that this report represents the most consistent and defensible interpretation of lithologic, hydrogeologic, and geochemical information. Under separate cover, Cimarron is also submitting Site-Wide Groundwater Assessment Review. Cimarron believes that these two submittals provide a foundation upon which Cimarron, NRC, and DEQ can agree, and from which plans for groundwater remediation, and ultimately license termination, can be developed.

Cimarron requests a teleconference and a meeting with both NRC and DEQ personnel. The purpose of the teleconference is to provide NRC and DEQ an orientation to these reports and an overview of our understanding of the site. The purpose of the meeting will be to tour the site, conduct a thorough technical discussion of the content of the report, and discuss a path forward. We can schedule these meetings at NRC's and DEQ's convenience.

If you have any questions or comments, please contact me at (405) 642-5152.

Sincerely,

Jeff Lux
Project Manager
Safety & Environmental Affairs Div.

xc: D. Spitzberg, PhD./ NRC Region IV
        David Cates, ODEQ
        Jerry Matthews, ODEQ