

CIMARRON CORPORATION

P.O. BOX • CRESCENT, OK 73028

January 26, 2006

Mr. Kenneth Kalman
Office of Nuclear Materials Safety & Safeguards
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Re: Docket No. 70-925; License No. SNM-928
Change of Ownership of Cimarron Corporation

Dear Mr. Kalman:

When License SNM-928 was issued to Cimarron Corporation, the Cimarron Corporation owned the site as a wholly owned subsidiary of Kerr-McGee Corporation (KM). Ownership of the property was transferred to Kerr-McGee Chemical Worldwide LLC several years ago. However, KM maintained control of the license, funding, and other aspects of the project. Earlier this year, KM announced the intent to divest its chemical subsidiary, and in preparation for the divestiture, on September 12, 2005, changed the name of Kerr-McGee Chemical Worldwide LLC, to Tronox Worldwide LLC. Tronox Worldwide LLC is a wholly owned subsidiary of Tronox Incorporated.

On November 22, 2005, Tronox Incorporated became a public company by virtue of an "Initial Public Offering" (IPO) on the New York Stock Exchange. While Kerr-McGee Corporation remains the controlling stockholder of Tronox Incorporated, it is anticipated that it will divest its interest in the coming months. At that point, Tronox Incorporated will be a stand-alone publicly traded company.

On October 18, 2005, we discussed the upcoming divestiture of the chemical unit in a meeting at NRC's Rockville, MD office. Because the license is issued to Cimarron Corporation, a wholly owned subsidiary of Tronox, and not to any particular parent company, we were unsure of the need to submit a license amendment request regarding this change of ownership. At that time, NRC staff said they were going to review the regulations and determine what kind of notification or request for approval would be appropriate for this situation.

However, KM did not receive guidance from NRC regarding how to address this transaction prior to the IPO. Those individuals responsible for the decommissioning of the site, including Mike Logan (Director of Chemical, Nuclear, and Hydrocarbon Environmental Remediation), Jeff Lux (Project Manager), and Karen Morgan (Radiation Safety Officer), have all transitioned to Tronox and retain the same responsibilities related to the Cimarron site.

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Tronox intends to remain fully compliant with all regulatory requirements, and will address this change in ownership as recommended by NRC. As NRC determines the best means to address this situation, Tronox will continue to be administratively responsible for the license. Correspondence should be addressed to me at:

Jeff Lux
Tronox Worldwide, LLC
P.O. Box 268859
Oklahoma City, OK 73126-8859

If you have any questions or comments, please call me at 405-775-5194 (Oklahoma City office) or 405-642-5152 (mobile).

Sincerely,

A handwritten signature in black ink, appearing to read "Jeff Lux", written in a cursive style.

Jeff Lux
Project Manager

Cc: Blair Spitzberg, NRC Region IV