



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
611 RYAN PLAZA DRIVE, SUITE 1000
ARLINGTON, TEXAS 76011

October 13, 1978

License No. SUB-1010

5
24
Release in
Entirety

Kerr-McGee Nuclear Corporation
ATTN: Mr. W. J. Shelley, Director
Regulation and Control
Kerr-McGee Building
Oklahoma City, Oklahoma 73102

Gentlemen:

Thank you for your letter of September 22, 1978, in response to our letter and the attached Notice of Violation, dated August 31, 1978.

As a result of our review, we find that additional information as discussed with Mr. Shelley by telephone on October 10, 1978, is needed. Relative to Item 1 of the Notice of Violation you stated in your letter that retraining sessions had been held to inform current employees of proper irritant smoke testing requirements and proper half-mask head strap use. Please indicate to us actions which you plan to avoid further similar items of noncompliance relating to other employees. Specifically describe your program for assuring that employees who are later assigned to use this equipment have completed the designated training.

Relative to Items 5 and 6 of the Notice of Violation you stated in your letter that soil and bottom sediment sampling will be accomplished in accordance with License Conditions 12 and 15. Please indicate to us actions which you plan in order to avoid further similar acts of non-compliance.

Relative to Item 4(a) you stated in your letter that six months would be required to achieve contamination control under levels of 2,000 dpm/100 cm² by wipe test. Since this control level was originally stated by you in your license application, we assume that you were confident that such control could readily be achieved. A six-month compliance schedule therefore appears incongruous. Please submit a revised, shortened schedule for attaining compliance in this area.

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

~~10-13-78~~

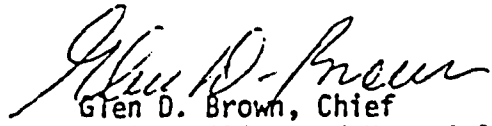
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You requested that Items 4 and 6 be reclassified in the category of "deficiencies" rather than "infractions." A "deficiency" is defined as an item of noncompliance in which no undue expenditure of time or resources to implement corrective action is required. Examples would include such items as noncompliance with records, posting, or labeling requirements which are not serious enough to amount to infractions. Since you indicated in your letter that corrective actions for Items 4 and 6 will be (or have been) completed only after a substantial period, reclassification is unjustified.

You should submit the above requested information within ten (10) days of your receipt of this letter so that we can continue our review of this matter.

Sincerely,


Glen D. Brown, Chief
Fuel Facility and Material
Safety Branch