

CIMARRON CORPORATION

P.O. BOX 25861 • OKLAHOMA CITY, OKLAHOMA 73125

November 15, 1994.

Mr. John H. Austin, Chief
Low-Level Waste Management
and Decommissioning Projects Branch
Office of Nuclear Material Safety
and Safeguards
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Re: Docket No. 70-0925
License SNM-928
Amendment Request

Dear Mr. Austin:

Cimarron Corporation submits the following in support of amending License No. SNM-928. Since the Cimarron Facility is no longer active and we are in the last stages of decommissioning, several documents referred to in the current license are no longer applicable to operations at the Cimarron Facility. Specifically, the License (conditions #10, #13, & #15) contains references to Appendix A of two prior license amendment requests dated September 13, 1976 and September 18, 1979 as well as Appendix A of one prior license renewal request dated March 29, 1982. Condition #12 also contains a reference to Annex A of the license renewal request dated March 29, 1982.

Much of the information contained in Appendix A and Annex A contains numerous references to regulations and regulatory requirements which are now incorrect and/or have been superseded by more recent regulatory requirements. In addition, any of the relevant information previously contained in Appendix A and Annex A has been incorporated into the Cimarron Radiation Protection Program and associated Procedures and the Cimarron Emergency Plan.

In accordance with 10 CFR 70.34, the attached license amendment specifies the respects in which Cimarron Corporation desires to have such license amended and provides the rationale for such amendment. Also, in accordance with 10 CFR 70.21(a)(3), references are provided to previous applications submitted to the NRC by Cimarron Corporation which contained Appendix A and Annex A described above.

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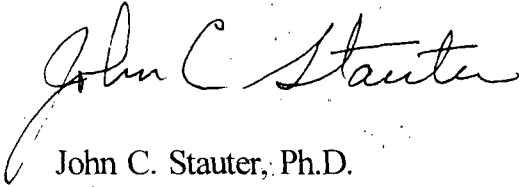
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A SUBSIDIARY OF KERR-MCGEE CORPORATION

NH10 15

Your assistance in the prompt review and approval of this amendment request is greatly appreciated. Please contact me at your earliest convenience if there are any additional questions or concerns.

Sincerely,

A handwritten signature in cursive script, reading "John C. Stauter". The signature is written in dark ink and is positioned above the printed name and title.

John C. Stauter, Ph.D.
Vice-President, Cimarron Corporation

Attachment: SNM-928 License Amendment Request (6)

SNM-928 LICENSE AMENDMENT REQUEST

Listed below are detailed descriptions of the various sections of Appendix A and Annex A for each of the submittal dates referenced in Condition #10 of License SNM-928. Included with the description of each section is the rationale for removing each section of Appendix A and Annex A from License SNM-928 as required by 10 CFR 70.34.

Each of these documents was previously submitted to the NRC. The transmittal letter, the document and the transmittal date is provided below:

September 13, 1976

Appendix A

License Amendment request

Kerr-McGee transmittal letter from Mr. W. J. Shelly to Mr. L. C. Rouse of NRC

September 18, 1979

Appendix A

License Amendment request

Kerr-McGee transmittal letter from Mr. W. J. Shelly to Mr. W. T. Crow of NRC

March 29, 1982

Appendix A

License Renewal request

Kerr-McGee transmittal letter from Mr. W. J. Shelly to Mr. Leland C. Rouse of NRC

March 29, 1982

Annex A

License Renewal request

Kerr-McGee transmittal letter from Mr. W. J. Shelly to Mr. Leland C. Rouse of NRC

Appendix A to License Amendment Request dated September 13, 1976

Section 1.0 Authorized Location

Page 1-1

The current authorized place of use is the Cimarron Facility which is operated by Cimarron Corporation. This item is addressed in the current license SNM-928, Amendment 10, dated November 4, 1994.

Section 1.1 SNM Material Possession Limits
Page 1-1

Section 1.1 lists the quantity of SNM authorized as "1.0 kilogram U-235 not to exceed 5 w/o". The current possession limits are listed in license SNM-928, Amendment 10, dated November 4, 1994.

Section 1.2 Authorized Activities
Page 1-1

Section 1.2 lists the authorized activities for the Uranium Plant during standby. The Cimarron Facility is no longer in a standby condition, but in the final stages of decommissioning. All equipment has been removed and current activities are essentially related to building and soil decontamination or removal. Therefore, all activities on-site consist of actions related specifically to decommissioning and are addressed in the Cimarron Radiation Protection Program and associated Procedures.

Section 2.0 Organizational Structure
Page 2-1

Section 2.0 lists the "Cimarron Facility Standby Crew" which is no longer identified by this name. The current Cimarron organization is addressed in the Cimarron Radiation Protection Program and associated Procedures.

Section 3.0 Radiological Protection Program Specification
Page 3-1

Section 3.0 lists the "general program elements" for the health physics program for the Cimarron Uranium Plant. All of these elements as well as more recent regulatory requirements are addressed in the Cimarron Radiation Protection Program and associated Procedures.

Section 3.2.3 Emergency Equipment
Page 3-3

Section 3.2.3 lists general emergency equipment. This information is addressed in the Cimarron Emergency Plan.

Section 3.2.4 Fire Fighting Equipment
Pages 3-3,
3-4, & 3-5

Section 3.2.4 lists general fire fighting equipment. This information is addressed in the Cimarron Emergency Plan.

Section 3.2.5 Specific Health Physics and Industrial Hygiene Equipment

Page 3-5

Section 3.2.5 states only that "Ample instrumentation is provided to perform surveys associated with the control programs." Specific information on such equipment is addressed in the Cimarron Radiation Protection Program and associated Procedures.

Section 3.3 Operational Criteria

Pages 3-5
through 3-14

Section 3.3 addresses the operational program for the "Radiological Protection Program". Specifically, it states that "The operational program includes the evaluation of releases of radioactive effluents and facility environments, the establishment of safety procedures designed to safely control contamination, personnel exposures, waste disposal, and the maintenance and operation of the necessary instrumentation and records to implement the program." Much of this information about the operational program for the "Radiological Protection Program" is no longer correct. All of these issues are completely addressed in the Cimarron Radiation Protection Program and associated Procedures.

Section 3.4 Contamination - Free Articles

Pages 3-14
& 3-15

Section 3.4 defines what contamination-free articles are. Some of this information is no longer correct. All of these issues are completely addressed in the Cimarron Radiation Protection Program and associated Procedures.

Section 3.5 Respiratory Protective Allowance

Pages 3-15
through
3-18.1

Section 3.5 describes the "Allowance for the use of respiratory protective equipment... ." Much of this information about "Respiratory Protective Allowance" is no longer correct. All of these issues are completely addressed in the Cimarron Radiation Protection Program and associated Procedures.

Section 4.0 Nuclear Criticality Control Specifications

Page 4-1

Section 4.0 describes the Nuclear Criticality Control Specifications. This is no longer applicable to the Cimarron Facility. Condition #19 of SNM-928,

Amendment #10 states that "The licensee is exempt from the provisions of 10 CFR 70.24 insofar as this section applies to materials held under this license."

Section 5.0 License Conditions on Packaging SNM for Transport
Pages 5-1 through 5-13

Section 5.0 describes the various SNM shipping containers. These shipping containers are no longer utilized at the Cimarron Facility. This section is no longer applicable to the Cimarron Facility.

Section 6.0 Miscellaneous Items (Equipment & Operations)
Page 6-1

Section 6.0 describes UF6 Container Heels Content and the Storage of Low-Enriched UF6 in the OR-30 Cylinder. This section is no longer applicable to the Cimarron Facility.

Appendix A to License Amendment Request dated September 18, 1979

Appendix A to the License Amendment Request dated September 18, 1979 is identical to the Appendix A revision which was contained in the September 13, 1976 License Amendment Request.

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Appendix A to license Renewal Request dated March 29, 1982

Most of Appendix A in the license Renewal Request dated March 29, 1982 is identical to the two prior license Amendment Requests dated September 13, 1976 and September 18, 1979. There are a few sections which were revised and those sections are detailed below:

Section 1.2 Authorized Activities
Page 1-1

Two additional items were added to this section which were not contained in the 9/13/76 and 9/18/79 revisions to Appendix A and are listed below:

- (d) "Use of facilities approved for the Coal Liquefaction development project.
- (h) "Disposal of settling pond residues via a licensed disposal contractor. Settling ponds elimination."

One item was revised by adding the following to section (g):

- (g) "A decontaminated area, within a contaminated area, that has not been released by NRC for unrestricted use shall be considered a contaminated area and non-nuclear materials stored there shall be surveyed accordingly, prior to removal to unrestricted areas."

The Coal Liquefaction development project has been terminated and the settling pond residues have been disposed of off-site at a licensed disposal facility. The

Coal Liquefaction pilot plant is now used for technology demonstration on a pilot plant scale, the most current was for production of ultrafine TiO₂ pigment. The revision to item (g) above is addressed in the Cimarron Radiation Protection Program and associated Procedures.

Section 1.3 Material Description
Page 1-2

Section 1.3 provides material descriptions which reference license conditions #6, #7, #8, & #17 which were contained in the March 31, 1983 license SNM-928. This section is no longer applicable as some of these conditions have been significantly changed in more recent amendments to license SNM-928. All of these material descriptions are currently listed in the current license SNM-928, dated December 28, 1992.

Section 2.0.1 Standby Organization
Page 2-1

Section 2.0.1 provides a general overview of the Cimarron Standby Organization. The current Cimarron organization is addressed in the Cimarron Radiation Protection Program and associated Procedures.

Section 2.1 Review Responsibility
Page 2-2
through 2-4

Section 2.1 defines the independent review responsibility of the Kerr-McGee Corporation's Environment and Health Management Division. Although there has been a realignment in this division, its environmental auditing staff still conducts routine audits of facility radiological operations. There are no changes in the independent audit function. Independent review of the Cimarron Facility is now addressed under the Cimarron Radiation Protection Program and associated Procedures.

Section Basic Methods of Operation
3.3.1(b)
Page 3-7

The following statements were added to section 3.3 which were not contained in the 9/13/76 and 9/18/79 revisions to Appendix A and are listed below:

"During decontamination and maintenance of the building and equipment, lapel air samplers shall be worn by a minimum of 50% of the personnel involved.

Release of equipment and materials from the plant to off-site or from controlled to uncontrolled areas on-site shall be in accordance with the attached Annex C, dated November, 1976. Records of the contamination survey and the final disposition of any equipment shall be kept for audit by NRC."

These issues are now addressed in the Cimarron Radiation Protection Program and associated Procedures.

Section
3.3.1.3
Page 3-11

Inspections

Section 3.3.1.3 was revised to replace the following titles with different titles:

- "Facility Manager" was changed to "Standby Operations Manager"
- "Health and Safety Coordinator" was changed to "Corporate Staff Health Physicist"
- "Director of Regulations and Control" was changed to "Director of Cimarron Operations"
- "Vice President, Nuclear Manufacturing" was changed to "Vice President, Nuclear Licensing and Regulation"

The title of "Executive Vice President" was also added to the list of individuals who would receive copies of audit findings.

These titles and the associated positions no longer exist at the Cimarron Facility or within Kerr-McGee. Therefore, this section is no longer applicable. The current Cimarron organization is addressed in the Cimarron Radiation Protection Program and associated Procedures.

Section 3.3.2 Emergency Planning Procedures / Manual
Page 3-12 &
3-13

Section 3.3.2 was revised to replace the following titles with different titles:

- "Health and Safety Coordinator" was changed to "Corporate Staff Health Physicist"
- "Cimarron Facility Manager" was changed to "Cimarron Standby Operations Manager"
- "Health Physics and Industrial Safety Supervisor" was changed to "Health Physics and Safety Supervisor"
- "Director, Regulation and Control" was changed to "Director, Cimarron Operations"

- "Vice President, Nuclear Manufacturing" was changed to "Vice President, Nuclear Licensing and Regulation"

The titles of "Executive Vice President Nuclear Corporation" and "President, Nuclear Corporation" were also added to the list of individuals who would approve the Emergency Manual.

These titles and the associated positions no longer exist at the Cimarron Facility or within Kerr-McGee. Therefore, this section is no longer applicable. The current Cimarron Emergency Manual contains all of the current titles and positions with respect to Emergency Planning.

Section 4.0 Standby Nuclear Criticality Control
Page 4-1

The following statements were added to section 4.0 which were not contained in the 9/13/76 and 9/18/79 revisions to Appendix A and are listed below:

"The licensee is also exempted from the provisions of 70.24 that are applicable to the materials held under SNM-928."

Section 4.0 describes the Nuclear Criticality Control Specifications. This is no longer applicable to the Cimarron Facility. Condition #19 of SNM-928, Amendment #10 states that "The licensee is exempt from the provisions of 10 CFR 70.24 insofar as this section applies to materials held under this license."

Annex A to license Renewal Request dated March 29, 1982

Annex A
Page 1

Annex A is a three page document with an attached Environmental Monitoring Procedure (KM-NC-20-2, Revision 3). Annex A sets forth conditions for use of respiratory protective equipment pursuant to paragraphs 20.103(c)(1) and (3) of 10 CFR 20. The introductory paragraph reads as follows:

"The licensee is hereby authorized to make allowance for the use of respiratory equipment in determining whether individuals in restricted areas are exposed to concentrations of airborne radioactive materials in excess of the limits specified in section 20.103 of 10 CFR Part 20, subject to the conditions specified in the attached Annex A."

Much of the information in Annex A has been superseded by revisions to 10 CFR 20 and thus is no longer applicable. All of these issues are completely addressed in the Cimarron Radiation Protection Program and associated Procedures and are reflective of the most recent revisions to 10 CFR 20.

Attachment 1 of Annex A (Environmental Monitoring Procedure KM-NC-20-1, Revision 3) is no longer applicable. The most recent revision of the Environmental Monitoring Procedure is contained in the Cimarron Radiation Protection Program and associated Procedures.

With this background the following revisions are requested:

NRC license SNM-928

Amendment 10

November 4, 1994

- | | | |
|--|--|--|
| 1. Cimarron Corporation
(Kerr-McGee) | 3. SNM-928 is amended in its
entirety as follows: | |
| 2. Cimarron Uranium Plant
Kerr-McGee Center
Oklahoma City, Okla. | 4. June 30, 1995. | |
| | 5. 070-00925 | |
| 6. A. Uranium enriched to
≤ 5.0 wt. % in U-235 | 7. A. Any Compound | 8* A. 1200 grams of
contained U-235 |
| B. Uranium enriched to >
5.0 wt. % in U-235 | B. Any Compound | B. **100 grams of
contained U-235 |
| C. Natural and depleted
uranium source material | C. Any Compound | C. 2000 kilograms
uranium |
| 9. Authorized Place of Use: The licensee's Cimarron Uranium Plant at Crescent, Oklahoma. | | |

*These possession limits were discussed and agreed upon with W. J. Shelley of Kerr-McGee Nuclear Corporation on August 19, 1982.

**If during the decontamination of the facilities and equipment at the Cimarron Plant, uranium solutions or compounds are generated that have a U-235 isotopic content greater than 5.0 wt. %, prompt action shall be taken to degrade these materials to below 5.0 wt. % U-235.

In accordance with letters dated September 4, 1987, March 21, 1988, June 29, 1988, October 9, 1989, February 1, 1990, May 15, 1990, February 25, 1993, April 19, 1994, May 31, 1994, June 15, 1994, July 20, 1994, July 21, 1994, August 8, 1994, September 21, 1994, and November 3, 1994, license Number SNM-928 is amended as follows:

Condition 10 is amended to read:

10. For use in accordance with statements, representations, and conditions contained in letters dated March 28, 1984, September 28, 1984, October 8, 1984, August 6, 1985, November 19, 1985, March 3, 1986, February 19, 1987, November 17, 1988, November 2, 1989; letters dated September 11, 1991, and June 24, 1992; and letters dated September 4, 1987, March 21, 1988, June 29, 1988, October 9, 1989, February 1, 1990, May 15, 1990, February 25, 1993, April 19, 1994, May 31, 1994, June 15, 1994, July 20, 1994, July 21, 1994, August 8, 1994, September 21, 1994 and November 3, 1994

11. The airborne concentration of radioactivity in the worker's breathing zone shall be continuously monitored during operation and analyzed every shift or after each operation, whichever is shorter in time. If air sample data indicates a measured level greater than 40 DAC-hours, the Health and Safety Supervisor shall conduct an investigation of its cause and take corrective action. Furthermore, the permanently-mounted air sampling equipment used to determine the concentration in the workers' breathing zone shall be evaluated for representativeness at least once every 6 months and whenever the licensed operation change is made.

Conditions 12, and 13 are amended to read:

12. The licensee shall comply with 10 CFR Part 20, Subpart H-"Respiratory Protection and Controls to Restrict Internal Exposure in Restricted Areas".

13. The licensee shall calibrate the radiation survey instruments at least every six months.

14. The licensee shall not allow an individual whose skin or personal clothing is found contaminated above background radiation level to exit a controlled area without prior approval of the Site Manager or Health Physics Supervisor.

Condition 15 is amended to read:

15. Release of facilities, equipment, and material from the plant to offsite for unrestricted use or from a controlled area to an uncontrolled area onsite shall be in accordance with the NRC "Guidelines for Decontamination of Facilities and Equipment Prior to Release for Unrestricted Use or Termination of licenses for Byproduct, Source, or Special Nuclear Material", August 1987. Records of the decontamination survey and final disposition of any equipment shall be kept for inspection by NRC.

16. The licensee shall conduct routine radiological surface surveys of the facility on a monthly basis. Surface contamination in the controlled areas shall not exceed 5,000 dpm/100 cm² (removable alpha).

17. DELETED

18. The licensee shall dispose of the radioactive contaminated solid waste generated by licensed activities at a licensed low-level waste disposal site.

19. The licensee is exempt from the provision of 10 CFR 70.24 insofar as this section applies to materials held under this license.

20. By May 1, 1995, the licensee shall submit a decommissioning plan for the remaining contaminated soil and structures on the Cimarron site.

21. The licensee shall periodically inspect the area for inadvertent intrusion. The outer protected area fence must remain intact whenever a segment of inner area controlled area fence is removed. A temporary barrier consisting of rope, barbed wire, or other suitable materials shall be used to replace the segmented portions of the inner controlled area fence. The inner controlled area fence shall be reconstructed upon completion of the remediation process.

22. This condition deletes the restriction to backfill the two settling ponds (sanitary lagoons) as prohibited by license Condition 17, and authorizes the licensee to proceed with the breaching of the berms and the closure of the two sewage lagoons.

The settling ponds are described as the east and west sanitary lagoons occupying an area of approximately 6,600 square meters located just east of the Plutonium Plant and northeast of the Uranium Plant.

This condition also authorizes the licensee to backfill the former burial ground. The former burial ground occupies approximately 8,600 square meters and is located at the northeast edge of the site. The former burial ground includes four trenches located within a fenced area.

a. In collecting soil for backfill and cover of the lagoons and the former burial trenches, additional measurements will be made, including walkover surveys with a gamma scintillation instrument. An isotopic analysis of soil samples shall also be conducted. Both the lagoons and the burial trenches will be gridded on a 10 meter basis and evaluated for concentrations of uranium not greater than 30 microcuries per gram, and concentrations of thorium not greater than 10 picocuries per gram.

b. The soil used for fill material and cover material shall be compacted to minimize subsidence, and the cover material shall be contoured to the minimum slope that provide adequate drainage consistent with conforming to the original shape of the land.

c. Cimarron Corporation (Kerr-McGee) shall provide to the Oklahoma State Department of Health whatever information is required to satisfy state requirements on the presence/absence of potentially toxic substances or any other nonradioactive constituents of the fill and cover soil.

d. The licensee shall reseed/revegetate the barren soil cover of both remediated sites with vegetation indigenous to the area, in a manner consistent with preventing erosional gulying of the protective cover.

e. The licensee shall insure that all policies and site-specific standards are applied in a manner that is consistent with practices that are ALARA.

Condition 23 is added:

The license is authorized to bury up to 14,000 cubic meters (500,000 cubic feet) of soil contaminated with low-enriched uranium, in the Branch Technical Position Option 2 concentration range, in the location described in the licensee's October 9, 1989, submittal to the NRC. The Branch Technical Position Option 2 concentration range is up to 100 pCi/g, for soluble uranium and up to 250 pCi/g for insoluble uranium.

a. If the average concentration of soil earmarked for disposal is determined to be above 100 pCi/g, the solubility of the uranium compounds in the soil in question must be determined using a method approved by the NRC. The acceptability of the soil for disposal as Option 2 material shall be ascertained by the formula:

Enriched Uranium Limit (pCi/g) = $170 / [(F1)(0.68) + (1-F1)(2.0)]$ where F1 is the insoluble fraction

For cases where the above equation results in a limit that is less than 100 pCi/g (i.e., when the soluble fraction exceeds 75 percent), the limit will be equal to 100 pCi/g.

b. The average concentrations of the thorium and plutonium in the soil earmarked for disposal shall not exceed 10 pCi/g and 1 pCi/g, respectively.

c. A relatively impermeable barrier, such as a clay dam, shall be placed across the access road cut at the northwest corner of the soil disposal cell at project completion.

d. Both the soil placed in the disposal cell and the cover material shall be compacted in lifts not to exceed 0.3 meter (1 foot), to 95 percent of maximum dry density as determined by the Standard Compaction Test, ASTM D698. Density testing shall be performed over the entire lift thickness. The cell cover shall be contoured to the minimum slope that provides adequate drainage consistent with conforming to the original shape of the ridge and, nowhere shall exceed 6 percent slope. A permanent vegetative cover shall be promptly reestablished to help minimize erosion potential. The licensee

shall periodically monitor the disposal area for subsidence, erosion, and status of the vegetative cover for at least 5 years, and promptly repair any problems noted. Any additional measures necessary to prevent recurrence of determined problems shall be undertaken.

e. Notification shall be placed on the land title to declare that uranium-contaminated soil has been buried on the site and to record the volume, average uranium concentration, and exact location of the buried soil. This notification is not to be considered a restriction on the sale or future use of the site. Furthermore, cairns (permanent markers) shall be placed at the corners of the disposal cell when the burial is completed.

f. Licensee shall maintain and implement procedures and engineering controls, to the extent practicable, to achieve occupational doses and doses to members of the public that are as low as reasonably achievable.

FOR THE U.S. NUCLEAR REGULATORY COMMISSION

By: _____

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