

CIMARRON CORPORATION

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

S. JESS LARSEN
VICE PRESIDENT

September 2, 1999

Mr. Ken Kalman, Project manager
Facilities Decommissioning Section
Low Level Waste & Decommissioning Projects Branch
Division of Waste Management
Office of Nuclear Material Safety & Safeguards
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555-0001

**RE: Docket No. 70-925; License No. SNM-928
Cimarron Corporation
Amendment to Final Status Survey Report for Phase III, Sub Area "O"**

Dear Mr. Kalman:

Pursuant to our telephone conference of September 1, 1999, we are submitting an amended copy of Table 7-1 on page 20 of the Phase III Sub Area "O" Final Status Survey Report. The amendment was made to clarify the use of the maximum individual sample concentration of 242 pCi/g with the other values listed in Table 7-1. This minor change is being made to mirror Table 2.1 included in Appendix II of the FSSR.

We hope this change alleviates your concerns. If you have any further questions, please feel free to contact us.

Sincerely,


Jess Larsen
Vice President

Attachment

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PDR ADOCK 07000925
C PDR

CIMARRON CORPORATION LETTER OF TRANSMITTAL

DATE: 09/09/99

TO: U.S. Nuclear Regulatory Commission
Washington, DC 20555
Attention: Document Control Desk

FROM: LaVonna Smith, Quality Assurance Coordinator
Cimarron Corporation
P.O. Box 315
Crescent, OK 73028

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| 1 | Sept. 2, 1999 | Page 20, of the Phase III, Sub Area "O" Final Status Survey Report |
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SIGNATURE: *LaVonna Smith*

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Based upon the NRC's volumetric averaging methodology, the soil concentration guideline values required to meet the Option 1 criteria were determined for comparison to the residual uranium concentrations remaining below grade. The guideline values are listed in Table 7-1 (the calculations performed to derive these guidelines are included in Appendix II). It should be noted that the guideline values were determined in 0 to 3 foot, 3 to 6 foot, etc., increments in lieu of meter increments due to the fact that Cimarron historically has collected soil samples in one foot increments. These depth increments (i.e., 0-3 feet) are considered equivalent for discussion and evaluation purposes to one meter intervals and are referenced in this report as one, two, or three meter depth increments. Also, for simplicity of discussion the soil volumes are presented in this report as equivalent cubic meters such as 10's or 100's. The actual and equivalent (for discussion purposes) soil volumes are noted in Table 7-1.

| Table 7-1 Guideline Values for Total Uranium By Soil Depths and Volumes | | | |
|--|---|--|--|
| Soil Location and Depth | Actual Soil Volume (m³) | Equivalent Soil Volume for Discussion (m³) | Average Soil Concentrations (pCi/g) |
| Maximum Individual Sample | .9 | 1 | 242 |
| 5 m x 5 m @ 1 ft | 7.6 | 7.5 | * |
| 10 m x 1 m @ 0 - 3 ft | 9.1 | 10 | 130 |
| 10 m x 10 m @ 0 - 3 ft. | 91.1 | 100 | 94 |
| 10 m x 10 m @ 0 - 6 ft | 182.9 | 200 | 69 |
| 10 m x 10 m @ 0 - 9 ft | 274.3 | 300 | 43 |
| 10 m x 10 m @ 0 - 10 ft. | 304.8 | 300 | 38 |
| Volume from surface to depth "x" | | | 30 |
| 5 m x 5 m x 3 ft | 22.0 | 25 | * |
| 5 m x 5 m x 4 ft | 30.2 | 25 | * |
| 5 m x 5 m @ 0 - 6 ft. | 45.7 | 50 | 102 |
| 5 m x 5 m @ 0 - 9 ft. | 68.6 | 75 | 97 |
| 5 m x 5 m @ 0 - 10 ft. | 76.2 | 75 | 96 |

*No Guideline Values Established