

May 24, 2019

Mr. Ken Kalman
U.S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852-2738

Mr. Paul Davis
Oklahoma Department of Environmental Quality
707 North Robinson
Oklahoma City, OK 73101

Mr. Robert Evans
U.S. Nuclear Regulatory Commission
1600 East Lamar Blvd; Suite 400
Arlington, TX 76011-4511

Re: Docket No. 70-925; License No. SNM-928
Radiological Surveys of Subsurface Soil

Dear Sirs:

Solely as Trustee for the Cimarron Environmental Response Trust (CERT), Environmental Properties Management LLC (EPM) submitted *Facility Decommissioning Plan – Rev 1*¹ (the DP) to the US Nuclear Regulatory Commission (NRC) and the Oklahoma Department of Environmental Quality (DEQ) on November 2, 2018. The draft *Radiation Protection Plan – Revision 4* (the RPP) was included as Appendix N to the DP.

Section 12.5.1 of the RPP stated, “Soil in certain areas of the site may be disturbed to install injection and extraction trenches, install monitoring wells, etc. These soils have been previously released from license controls. Surveys shall be performed during these activities to determine if soil contamination is encountered. Survey requirements will be consistent with RP procedures and limits specified in associated Activity Plans to ensure compliance with license conditions.”

The NRC contacted EPM to discuss the radiological survey of any subsurface material that may be brought to the surface during excavation or drilling activities. The NRC asserted that neither the DP nor the RPP contained a clear commitment to conduct radiological surveys of all subsurface soil or other material that will be brought to the surface during construction or subsequent operations activities.

EPM agreed that the language in Section 12.5.1 of the RPP could be clarified to include the radiological survey of any subsurface material (including soil, building demolition debris, and

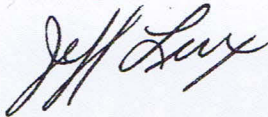
¹ Environmental Properties Management LLC, November 2018

any other solid material). Accordingly, the text in Section 12.5.1 of the RPP will be revised to clarify that subsurface soil or other material that is brought to the surface, will have radiological surveys performed to determine if that material complies with license decommissioning criteria.

Attachment 1 to this letter provides a markup of page 12-47 from the RPP, showing proposed revisions to Section 12.5.1. If the NRC approves these changes, these revisions will be made, along with approved revisions proposed in other requests for information, in the final version of the RPP.

Please call me at (405) 642-5152 or e-mail me at jlux@envpm.com if you have questions or desire clarification. Thank you.

Sincerely,




Jeff Lux, P.E.
Project Manager

Attachment

cc: Michael Broderick, DEQ Land Protection Division (electronic copy only)
NRC Public Document Room (electronic copy only)

ATTACHMENT 1
PROPOSED REVISIONS TO SECTION 12.5.1
RADIATION PROTECTION PLAN – DRAFT REV 4

	Cimarron Environmental Response Trust	
	RADIATION PROTECTION PLAN	
Document No. RPP-001	Rev. 4	Effective date:
Section 12.0	CONTAMINATION CONTROL	Page 12 - 41

- Isolate the area
- Minimize radiation exposure

whenever subsurface material is brought to the surface

Supplementary actions should include the performance of radiological surveys in immediate and adjacent areas, including downwind.

12.5 Contamination Control During Groundwater Processing

Contamination control during groundwater processing involves both process operations and activities necessary to supply groundwater to the processing facility. This section of the RPP is intended to implement contamination control commitments identified in the Decommissioning Plan.

Some of these areas

12.5.1. Soil in certain areas of the site may be disturbed to install injection and extraction trenches, install monitoring wells, etc. ~~These soils~~ have been previously released from license controls. Surveys shall be performed ~~during these activities~~ to determine if soil contamination is encountered. Survey requirements will be consistent with RP procedures and limits specified in associated Activity Plans to ensure compliance with license conditions.

12.5.2. Concentrations of low-enriched uranium will be processed through ion exchange resins that will concentrate the uranium in resins. The concentration of uranium on these resins provides a source of potential contamination. The following contamination control considerations are addressed to ensure that contamination is contained and not spread throughout the processing facilities or across the site.

exceeding release criteria

12.5.3. Influent piping contains low concentrations of uranium with little potential for generating contamination. Routine monitoring is performed during operations to ensure that contamination is controlled and not being spread at well heads where the groundwater is extracted. Connections to the water treatment systems are inspected and monitored to identify and repair leaks.

12.5.4. Engineering controls are included in the design of the groundwater treatment system. Double walled tanks are used to hold the influent groundwater awaiting processing. Ion exchange resins are contained in stainless steel vessels. Spent resins are processed through a wet process that ensures airborne radioactivity is not generated. The spent resin is processed in an enclosed system to contain contamination. Spent resin is packaged as discussed in the Decommissioning Plan. Procedures for contamination monitoring and air sampling are provided to demonstrate the effectiveness of these engineering controls. Protective clothing