PDR

KERR-McGEE NUCLEAR CORPORATION

KERR-McGEE CENTER • OKLAHOMA CITY, OKLAHOMA 73125

June 26, 1979

U.S. NUCLEAR REGULATORY COMMISSION
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USNRC
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NMSS
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Mr. W. T. Crow - Section Leader
Uranium Fuel Fabrication Section
Division of Fuel Cycle and Material Safety
U.S. Nuclear Regulatory Commission
Washington. D.C. 20555

RE: Docket #40-8027
Sub-1010 - Amendment No. 4

Dear Mr. Crow:

Attached is a copy of a letter to the U.S. Environmental Protection Agency requesting Permit modification of TSS requirements for NPDES permit No. OK0000191, 002 outfall from the 160-acre raffinate test plot. The basis for this request is also outlined in the letter.

If you require any additional information, please contact me

Very truly yours,

W. J. Shelley, Director
Regulation & Control

WJS/jt

Attachment

cc: NRC Inspection & Enforcement Division
Region IV Office
611 Ryan Plaza, Suite 1000
Arlington, Texas 76001

Office of Nuclear Material
Safety and Safeguards
U.S Nuclear Regulatory Commission
Washington, D.C. 20555

FEE EXEMPT
info only

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KERR-McGEE

KERR-McGEE CENTER • OKLAHOMA CITY, OKLAHOMA 73125

June 25, 1979

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Ms. Adlene Harrison
Regional Administrator
U.S. Environmental Protection Agency
Region VI
First International Bank Building
1201 Elm Street
Dallas, Texas 75270

Subject: Request for Permit Modification NPDES Permit No. OK0000191, 002 Outfall

Dear Ms. Harrison:

Please refer to our letters dated 3-26-79, 5-09-79, 6-01-79, 6-06-79, and 6-12-79 regarding noncompliance of total suspended solids permit conditions for our 002 outfall. As stated in our letter of June 1, 1979, runoff from the 160-acre test plot following heavy rainfall is typcial of local agricultural non-point source discharges. Suspended solids levels in these type discharges are not consistent with effluent guidelines normally assigned to discrete industrial point source discharges (i.e. 20 mg/l daily average and 30 mg/l daily maximum).

Table I (attached) lists each day of TSS noncompliance in terms of total kilograms discharged to the local drainage. It should be noted that the TSS limits for our 001 outfall, which discharges to the same receiving waters as 002, are 340 kg/day daily average and 680 kg/day daily maximum. A previous 12-month daily average (April '78 - May '79) for the 001 discharge was 31.3 kg/day TSS. Thus, in essentially all cases of noncompliance for the 002 outfall, the combined total of the suspended solids for both outfalls did not exceed the allowable daily average limit assigned to 001 only, much less the daily maximum. Additionally, a recent sample taken of the receiving water upstream from the discharge point of both outfalls following a period of moderate rainfall showed an instream TSS level of 90 mg/l.

It should be noted that the suspended solids contained in the 002 outfall derive from soil and silt and are not an industrial pollutant related to our process. The raffinate which is distributed over the 160-acre test plot is a by-product of our facility which has been treated to reduce its radioactivity and is applied to the soil as part of a waste disposal program licensed by the USNRC. EPA's cognizance of this program is evidenced by a letter from Mr. H. D. May of EPA to Mr. Ray Cooperstein of NRC dated 10-12-78. Also, please refer to the attachments included in submittal of Short Form C dated 7-19-77 which describes in detail our raffinate disposal program as approved by the NRC.

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In view of the above discussion, Kerr-McGee Nuclear hereby proposes that the existing NPDES permit be modified such that monitoring be required for only those potential pollutants which we are applying to the land in the form of treated raffinate; that is ammonia, nitrate, and radium (soluble and total). This monitoring would then coincide with that required by the Nuclear Regulatory Commission as part of our overall raffinate disposal program. These four parameters are currently part of the 002 outfall monitoring program and we have no quarrel with the existing permit concentration levels for these parameters.

Your prompt consideration of this request would certainly be appreciated. Should you desire additional or more detailed information, please let me know.

Sincerely,

W. J. Shelley, Director
Regulation & Control

WJS:ts

Attachment

TABLE I

TSS Noncompliance - 002 Outfall

Date	Flow, 10^6 gals.	TSS, mg/l	TSS, Kg	(1) 001 & 002 Discharges Combined TSS, Kg
3-20-79	0.029	64.	7.0	38.3
3-21-79	0.029	133.	14.6	45.9
3-22-79	0.036	85.	11.6	42.9
3-23-79	0.036	46.	6.3	37.6
3-24-79	0.010	126.	4.8	36.1
5-03-79	0.132	93.	46.5	77.8
5-04-79	0.087	78.	25.7	57.0
5-05-79	0.015	46.	2.6	33.9
5-07-79	0.003	32.	0.4	31.7
5-28-79	0.087	143.	47.1	78.4
6-02-79	0.200	108.	81.8	113.1
6-03-79	0.065	51.	12.5	43.8
6-04-79	0.012	39.	1.8	33.1
6-07-79	0.595	124.	279.3	310.6
6-09-79	0.576	(2) 284.	619.2	650.5

(1) Includes a twelve month daily average of 31.3 kg/day for the 001 outfall.

(2) As daily samples immediately preceeding and following this sample show TSS levels <30 mg/l, sample contamination associated with mitigation measures (i.e. settling and decantation) is suspected.