



SGML:CWE
70-1193

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555
SEP 22 1980

OPR

Kerr-McGee Nuclear Corporation
ATTN: Mr. W. J. Shelley, Director
Regulation and Control
Kerr-McGee Building
Oklahoma City, Oklahoma 73125

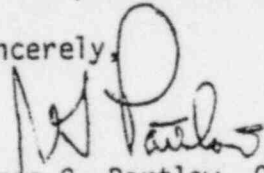
Gentlemen:

This is in response to your letter dated January 8, 1980 which transmitted "Termination Plans Parts IV, V, and VI," an application to complete decommissioning of the Cimarron Plutonium Plant. We have reviewed this application and discussed specific details with members of your staff by telephone and during a recent site visit. We have also re-reviewed the accountability section of the Part III Plan dated November 29, 1978 in connection with your proposal to apply the same accountability program to Parts IV, V, and VI activities.

Based on the reviews and discussions referenced above, we have determined that your accountability program needs to be strengthened in certain respects. Accordingly, the new conditions listed in Enclosure I to this letter are being added to your license. These new conditions were discussed with Mr. Norwood of your staff on September 11, 1980 and consensual agreement concerning their acceptability and wording was reached. In order to consolidate these conditions, incorporate portions of the Termination Plans and delete or modify obsolete conditions, we are hereby revising Sections 1.0 through 8.0 of Amendment MPP-3 to your License No. SNM-1174, effective immediately, as set forth in Enclosure II.

We have determined that your "Termination Plans Parts IV, V, and VI" transmitted with your letter dated January 8, 1980 contain information of a type specified in 10 CFR 2.790(d). Accordingly, pursuant to Section 2.790(d)(1), such information is deemed to be commercial or financial information within the meaning of 10 CFR 9.5(a)(4) and shall be subject to disclosure only in accordance with the provisions of 10 CFR 9.12.

Sincerely,


James G. Partlow, Chief
Material Control and Accountability
Licensing Branch

Enclosures:
As stated

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Enclosure I

New License Conditions

4.0 MEASUREMENT CONTROL

- 4.1 All measurement systems shall be calibrated over the range of operation. Results outside the range shall not be used for material control and accounting purposes.
- 4.2 An ongoing measurement control program covering all SSNM measurements shall be maintained. The program shall include a minimum of two measurements per week of representative standards during any week a measurement system is employed.
- 4.3 The licensee shall determine measurement biases and systematic errors from the standards program and random errors from the replicate sampling and measurement of process materials. For bulk measurements and NDA, random errors can be determined from standards measurements. Estimates of random and systematic errors shall be updated every material balance period and shall be used to estimate the limits of error associated with shipments and final reconciliation of individual Task accounts.

6.0 RECORDS AND REPORTS

- 6.1 The licensee shall maintain separate ledgers for Tasks 2 through 8 as defined in the SNM-1174 Termination Plans-Parts IV, V, and VI dated January 8, 1980. The licensee's established values as specified in the description of each task shall be recorded as the initial inventory entry. In addition to the bimonthly reconciliation as specified in the Plans in Condition 2.1, the licensee shall reconcile each ledger with the total plutonium record no later than thirty (30) days after the dismantling and removal process has been completed.

7.0 INTERNAL CONTROL

- 7.4 For tamper-safing containers or vaults, the licensee shall use only seals acceptable to the NRC as defined in Regulatory Guide 5.15, Section C.

Enclosure II

Revision of Sections 1.0 Through 8.0
In Their Entirety to Materials and Plant Protection
Amendment MPP-3 to License No. SNM-1174

1.0 FACILITY ORGANIZATION

Currently there are no license conditions in this section. The necessary information has been incorporated into the approved Plans.

2.0 FACILITY OPERATION

- 2.1 The licensee shall follow Sections 4.0, 10.0 and paragraph 11.1 of Section 11.0 of the SNM-1174 Termination Plan-Part III dated November 29, 1978 for all operations involved with gloveboxes 27A and 27B and for the Tasks defined in SNM-1174 Termination Plans, Parts IV, V, and VI dated January 8, 1980; and as revised in accordance with the provisions of 10 CFR 70.32(c).

3.0 MEASUREMENTS

- 3.1 The licensee or his designated agent shall measure, except as specified in Condition 3.1.1, the uranium, plutonium, and U-235 content of special nuclear material receipts, shipments, waste discards, and material inventoried except as specified in the Plans in Condition 2.1.
- 3.1.1 Measurements are not required on sealed PuBe sources, and those samples intended for analysis and testing which have been determined by other means to contain less than ten grams U-235 or Pu each.

4.0 MEASUREMENT CONTROL

- 4.1 All measurement systems shall be calibrated over the range of operation. Results outside the range shall not be used for material control and accounting purposes.
- 4.2 An ongoing measurement control program covering all SSNM measurements shall be maintained. The program shall include a minimum of two measurements per week of representative standards during any week a measurement system is employed.
- 4.3 The licensee shall determine measurement biases and systematic errors from the standards program and random errors from the replicate sampling and measurement of process materials. For bulk measurements and NDA, random errors can be determined from standards measurements. Estimates of random and systematic errors shall be updated every material balance period and shall be used to estimate the limits of error associated with shipments and final reconciliation of individual Task accounts.

5.0 PHYSICAL INVENTORY

- 5.1 All special nuclear material shall be measured at the time of physical inventory except those items previously measured whose integrity has been maintained by tamper-safing, items exempted by Condition 3.1.1 and the SSNM contained in gloveboxes undergoing active decommissioning. Each item shall be checked for verification of its physical presence in its assigned location and for verification of intact tamper-indicating devices.

6.0 RECORDS AND REPORTS

- 6.1 The licensee shall maintain separate ledgers for Tasks 2 through 8 as defined in the SNM-1174 Termination Plans-Parts IV, V, and VI dated January 8, 1980. The licensee's established values as specified in the description of each task shall be recorded as the initial inventory entry. In addition to the bimonthly reconciliation as specified in the Plans in Condition 2.1, the licensee shall reconcile each ledger with the total plutonium record no later than thirty (30) days after the dismantling and removal process has been completed.
- 6.2 The licensee shall maintain a ledger solely for the removal of the solvent extraction system in gloveboxes 27A and 27B. The licensee's established value of 1592 grams plutonium shall be recorded as the initial inventory entry. In addition to the bimonthly reconciliation as specified in the Plans in Condition 2.1, the licensee shall reconcile this ledger with the total facility plutonium record no later than thirty (30) days after the dismantling and removal process has been completed.

7.0 INTERNAL CONTROL

- 7.1 Two individuals shall attest to the contents of containers or vaults prior to tamper-safing. Seals shall be applied at the time the container is filled or sampled.
- 7.2 Accurate records shall be established and maintained which provide on a daily basis knowledge of the identity, location, and quantity of all SNM within the plant in discrete items and containers.

7.3 Each plutonium bearing item or glovebox not undergoing active decommissioning operations shall be inspected at intervals not to exceed two (2) calendar months to assure the integrity of the contained plutonium. Discrepancies in integrity shall be resolved by re-measurement. A written report of inspection findings, discrepancies in integrity and specific corrective actions shall be submitted to the appropriate Regional Office of the Nuclear Regulatory Commission within fifteen (15) calendar days after completion of each inspection cycle.

7.4 For tamper-safing containers or vaults, the licensee shall use only seals acceptable to the NRC as defined in Regulatory Guide 5.15, Section C.

8.0 MANAGEMENT

Currently there are no license conditions in this section. The necessary information has been incorporated into the approved Plans.