

UNITED STATES

NUCLEAR REGULATORY COMMISSION

REGION IV

611 RYAN PLAZA DRIVE, SUITE 1000 ARLINGTON, TEXAS 76011

MAY 2 8 1981

WMUR: 40-8768

MEMORANDUM FOR:

Glen D. Brown, Chief, Technical Inspection Branch

FROM:

Lorenzo Wilborn, Radiation Specialist

SUBJECT:

DRAFT SAFETY EVALUATION REPORTS AND DRAFT LICENSE

CONDITIONS FOR KERR-MCGEE R&D SITU FACILITY

Subject draft has been reviewed and comments are as follows:

- 1. Condition 12, page 35, add: Whenever the word will is used in the above mentioned sections, it shall denote a requirement, notwithstanding the above, the following conditions shall override any conflicting statements contained in the licensee's application and supplements.
- 2. Condition 12, page 35, What about uranium production rate, i.e., pounds or kilograms per day on the average (averaged over one calendar year) of U_3O_8 ?
- 3. Conditions 14.2 and 14.3, page 36, Periodic should be more specific.
- 4. Condition 16.4. pagr 37, Periodically should be more specific.
- 5. Conditions 17.2 and 17.3, page 38 General experience and health physics experience appear redundant. If an individual has the health physics experience as described, hasn't he also the general experience?
- 6. Condition 24, page 45, . . . Uranium Recovery Licensing Branch for approval . . . should be changed to read: . . . Uranium Recovery Licensing Branch for prior approval
- 7. Condition 33, page 49, . . . ANY AREA WITHIN . . . should be changed to read: . . ANY AREA OR ROOM WITHIN
- 8. Shall eating only be allowed in administrative offices, control rooms, and enclosed lunch areas?

9. Shall the licensee dispose of only liquid wastes into the evaporation pond? Shall solid wastes, such as contaminated coveralls, be placed in containers for disposal off-site at a commercial low level disposal site or an approved licensed uranium tailings impoundment?

Shall all effluents, including sink and shower discharges, and laundry wastes from the process plant and change or shower rooms, with exception of sanitary wastes, be returned to the process circuit or discharged to the evaporation pond?

What about the establishment of a leak detection system beneath the evaporation pond? At what frequency should the leak detection system be sampled and for what constituents? Should the NRC be notified immediately if the concentrations of any of these constituents is found to be appreaching or above EPA or other applicable drinking water standards? What shall be done in case of a leak? Must the licensee file a report to the NRC? When should it be sent and what should it include? What if the licensee does not believe there is need to take any action (i.e., there is no leak)? Shall the licensee submit a report to NRC justifying its decision? Within what period of time? What about the licensee submitting to the NRC a contingency plan describing the corrective actions to be taken in the case of a major leak from either cell of the pond or where either cell has been determined to be incapable of effectively containing the wastes?

> Lorenzo Wilborn Radiation Specialist

Enclosure: As stated

The above comments were considered and covered by Dennis M. Sollenberger 6/3/81