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DEC 28 1981

Docket No. 70-1193

Kerr-McGee Nuclear Corporation
ATTN: William J. Shelley, Vice President
Nuclear Licensing and Regulation
Kerr-McGee Center
Oklahoma City Oklahoma 73125



Gentlemen:

We have completed our pre-acceptance review of the radiological contingency plan that you submitted on August 28, 1981. Our review has revealed some deficiencies in content and format in the information submitted. Those are described in the enclosure.

You are requested to send us additional information concerning these matters by January 29, 1982. Please submit the indicated information as properly numbered replacement or additional pages suitable for insertion into your plan. The information should be prepared in accordance with the "Standard Format and Content for Radiological Contingency Plans for Fuel Cycle and Materials Facilities", which was enclosed with our February 11, 1981 Order.

As you noted in your submittal letter of November 4, 1981, no fee is necessary for this amendment request.

Sincerely,

Original Signed by

L. C. Rouse, Chief
Advanced Fuel and Spent Fuel
Licensing Branch
Division of Fuel Cycle and
Material Safety, NMSS

Enclosure: As stated

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Staff Comments from Initial Review of Radiological Contingency Plan
Submitted November 4, 1981, for Kerr-McGee Nuclear Corporation's
Cimarron Plutonium Facility.

GENERAL COMMENTS

None

SECTION-BY-SECTION COMMENTS

1.2. Site and Facility Description

The topographic map provided as Figure 2 is very difficult to read and is too small. Please provide a USGS 7.5' topographic map of your site and the surrounding area. Provide a general map indicating the site and an area of about 10 miles radius surrounding the site. An oil company road map, suitably marked up, is acceptable. Please indicate the presence of any near-site structures and provide estimates of associated populations, full-time and part-time.

1.3 Process Description

Briefly supplement your description of the ventilation system to specify the number of HEPA filter stages, and the presence of redundant fans and to briefly describe measures in place to protect final filters from fires or explosions. Provide a brief description of your processes and methods for dismantling contaminated equipment, clean out of contained plutonium, packaging of wastes for disposal and storage of wastes in your facility. Indicate the approximate current inventories of plutonium in each of the major areas of your plant, including waste storage areas, and provide a rough schedule for its removal from process equipment and process areas and its accumulation as waste in waste storage areas.

2.1.2 Alarm Systems and Release Prevention Ventilation System

Add the continuous stack monitor indicated in Section 2.2.2 to this list of alarms dealing with ventilation system performance.

2.1.3.1.1 Severe Natural Phenomena

Provide six copies of the referenced report dealing with tornado risks, i.e., Appendix E to license application submitted November 4, 1969.

2.1.3.3 Fire and Explosion Resistance and Suppression

Specify the presence of any automatic fire or smoke detectors. Specify which, if any, areas of the plant, particularly those areas where packaged wastes are stored, are sprinkler protected.

- 2 -

2.2.2 Alarm Systems and Release Prevention Capability

Specify sensitivities and alarm set points for continuous air monitors and continuous stack monitors. Indicate the locations of those monitors.

2.2.3.4 Fire Protection

Provide six copies of the referenced materials, viz. Section 8 of the license application for standby operations dated August 7, 1976. Describe in some detail measures provided for protection of filters, particularly final HEPA filter stages, from fire and fire products.

2.2.4 Control Operations

Supply six copies of the referenced materials, viz. Section 6 of the application for renewal of license SNM-1174.

3.2.1 Unusual Event

A developing awareness, by various participating agencies, of the importance of a standard nomenclature in the responses to radiological incidents has made it necessary that the four categories of radiological contingencies promulgated by the NRC and FEMA be adhered to exactly. Hence, your Unusual Event category should be changed to Notification of Unusual Event.

Notification

You should stipulate that NRC Region III and/or Headquarters will be promptly notified whenever the Radiological Contingency Plan is activated--including for events in the Notice of Unusual Events category. Also add stipulation to close out verbally with NRC and any other offsite authorities with written report to follow within 24 hours.

3.2.2 Alert

Stipulate that you will promptly notify NRC Region III or Headquarters of any Alert category event or situation and will close out with verbal report and written report to follow within 8 hours.

3.3 Site Area Emergency Notification

Stipulate that you will close out or recommend reduction in category by briefing of off-site authorities followed by written report within 8 hours.

- 3 -

3.2.4 General Emergency

Stipulate that you will close out or recommend reduction in category by briefing of offsite authorities followed by written report within 8 hours.

8.2 Records of Preparedness Assurance

5. Provide six copies each of agreements with outside support organizations.