

RE: 9407-N

January 28, 1994

Certified Mail Return Receipt Requested

Mr. Robert M. Bernero, Director Office of Nuclear Material Safety and Safeguards U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Subject: License SUB-1010; Docket No. 40-8027

Dear Mi. Bernero:

Enclosed is a copy of the characterization plan for the Sequoyah Fuels Corporation's (SFC) Gore, Oklahoma facility. A draft RCRA Facility Investigation Workplan is being submitted to the EPA concurrently. Together, these two documents provide the plan for complete, site characterization at the Sequoyah Facility. This submittal satisfies the commitment made in a letter dated August 19, 1993, in which SFC notified the NRC that it would submit the Site Characterization Plan (SCP) by January 31, 1994, consistent with the schedule in the EPA Administrative Order on Consent (ACC).

The SCP describes the information to be collected and the plans for collecting such information as required to adequately characterize the site in support of SFC's decommissioning effort. Development of the SCP considered NRC's draft Branch Technical Position on Site Characterization for Decommissioning Sites and NUREG-5849, draft Manual for Conducting Radiological Surveys in Support of License Termination. The SCP focuses on licensed material, including non-radiological constituents other than RCRA materials. The RFI Workplan submitted to the EPA addresses RCRA material exclusively.

It is our intent to coordinate our efforts to satisfy the needs of the NRC and EPA in order to avoid duplication of work and any potential imposition of inconsistent or redundant requirements. The AOC requires that SFC issue the final RFI Workplan within 30 days after receipt of EPA's comments. Further, the AOC requires SFC to complete the field work to complete the investigation within 365 days following approval of the RFI Workplan. Since SFC plans to begin field work as soon as the RFI Workplan is approved,

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PO BOX 610, GURE, OKLAHOMA 74435

(918) 489-5511

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it is our hope that the NRC will coordinate its review of the SCP with EPA and provide comments to SFC within the same timeframe.

Please contact Craig Harlin at (918) 489-3386 or Scott Munson at (918) 489-3272 if you need any additional information or have questions about this document.

Sincerely,

John S. Dietrich Vice Fresident, Technical Services

Enclosure

xc: L. J. Callan, NRC Region IV James C. Shepherd, NRC NMSS/LLDR Maurice Axelrad, Newman & Holtzinger