

PDR

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KERR-MCGEE CORPORATION

KERR-MCGEE CENTER • OKLAHOMA CITY, OKLAHOMA 73125

Return to
396-55

ENVIRONMENT AND HEALTH MANAGEMENT DIVISION

August 17 1982



CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. R. G. Page
Uranium Licensing Branch
Division of Fuel Cycle & Mat'l Safety, NMSS
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

RE: License SUB-1010
Docket No. 8027

ATTN: Mr. W. A. Nixon

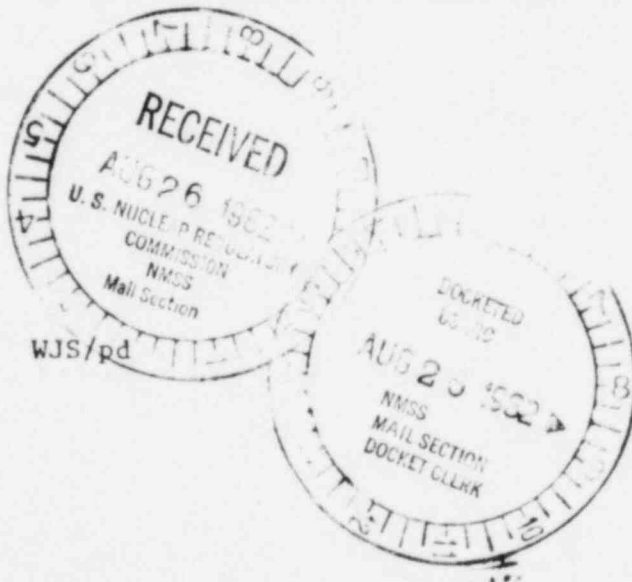
Please refer to your letter of June 30 providing us with the Amendment No. 17 to License SUB-1010.

We believe the limitation on application of trace elements provided in Condition No. 3b is unnecessarily stringent for the part of Oklahoma in which we operate. Therefore, we have asked Dr. Billy Tucker of Oklahoma State University to provide us with his recommendation as to appropriate limits on trace element use on soils of Eastern Oklahoma. In addition, we expect to do additional research on the subject ourselves.

While we do not intend to ask for a hearing on this subject, we note that the amendment did not even provide the usual provision for requesting a hearing. However, we do seek your assurance that if we develop evidence indicating that the trace element limitation is not appropriate, NRC will reconsider Condition No. 3b.

Respectfully

W. J. Shelley, Vice-President
Nuclear Licensing & Regulation



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