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UNITED STATES

## NUCLEAR REGULATORY COMMISSION

**AEGION IV** 

611 RYAN PLAZA DRIVE, SUITE 400 ARLINGTON, TEXAS 76011-8084

## APR 8 1992

MEMORANDUM FOR: Richard L. Bangart, Director Division of Low Level Waste Management and Decommissioning, NMSS

FROM:

L. J. Callan, Director Division of Radiation Safety and Safeguards Region IV

SUBJECT: KERR-MCGEE CUSHING, OKLAHOMA SITE VISIT BY REGION IV INSPECTOR (DOCKET: 070-3073)

A Region IV inspector, Wesley Holley, visited the Kerr-McGee Cushing site, Cushing, Oklahoma, on March 24-25, 1992, to review the status of the decommissioning activities in progress. This site is an old, abandoned oil refinery where thorium and uranium processing activities were performed during the 1960's.

This memorandum documents the site visit, since an inspection report is not appropriate because an NRC license has not been issued for the site. Kerr-McGee submitted a license application on October 17, 1991, but the application is still under review.

Kerr-McGee has been performing decommissioning and cleanup activities at the Cushing site under a Consent Order C-90-91-H with the State of Oklahoma. The licensee estimates that approximately 5 percent of the cleanup activities will involve radioactivity. The majority of the hazardous material cleanup will be according to the State of Oklahoma/EPA regulations. When the NRC license is issued, it will specify applicable NRC cleanup requirements.

During a tour, the inspector noted that the waste dump disposal area and all pits had chain link fences installed with padlocked gates and appropriate. postings. The rerouting of Skull Creek and the french drain system between Pit 5 and the creek had been completed. The final survey in the upper portion of the uranium process building was in progress. The inspector observed excavations and backfilled locations.

The inspector met with the new Site Coordinator and with the Radiation Safety Officer (RSO), who is also the RSO for the Cimarron site decommissioning activities. Kerr-McGee's organization was reviewed. The organization above the Cushing site Decommissioning Program Manager did not identify the responsible chain-of-command. We understand that this problem will be addressed in the license review process.

Kerr-McGee had determined that the present Cushing site did not contain an appropriate site for waste disposal under Option 2 of the Branch Technical Position, Volume 48, No. 205. Kerr-McGee hopes to acquire property for an appropriate disposal site adjacent to the present site.

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The inspector discussed the following subjects with the Kerr-McGee representatives:

- For the final survey, a 1-meter grid is required instead of the 2-meter grid Kerr-McGee is presently using.
- The final survey must include beta-gamma surveys as well as the alpha surveys that Kerr-McGee is presently performing.
- A procedure for splitting contaminated soil according to the Branch Technical Position criteria must be formalized and documented.
- The environmental sampling program should be on a quarterly schedule instead of the present annual schedule.
- The documentation/records must be complete and maintained at the Cushing site. Presently some records are missing and some are kept in the Oklahoma City corporate offices and at the Cimarron site.

The inspector reviewed the transportation/shipment of radioactive material from Cushing. There had been 1240 55-gallon drums or 9300 cubic feet of waste shipped to Barnwell Waste Management Facility for disposal.

If you have any questions, please contact Wes Holley at FTS 728-8198.

John Shewer

L. J. Callan, Director Division of Radiation Safety and Safeguards

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