

70-3073



KERR-MCGEE CORPORATION

KERR-MCGEE CENTER • OKLAHOMA CITY, OKLAHOMA 73125

ENVIRONMENT AND HEALTH MANAGEMENT DIVISION

October 31, 1991

Mr. Richard L. Bangart, Director
Low-Level Waste Management and Decommissioning
Office of Nuclear Material Safety and Safeguards
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Re: Cushing Site
Docket Nos. 70-712
40-1478

Dear Mr. Bangart:

Kerr-McGee Corporation has continued cleanup activities at the formerly licensed Cushing, Oklahoma refinery site pursuant to the Consent Order with the State of Oklahoma, pending completion of NRC's review of our application for relicensing the site. These activities have resulted in the accumulation of approximately 3000 cubic feet of contaminated material that contains uranium enriched in the U-235 isotope at an average of about 7.6 percent.

As you are aware, contaminated materials from the current Cushing site cleanup activities have been shipped to a licensed low level radioactive waste disposal facility. Although the materials have not been physically taken to the company's Cimarron facility, the shipments have been handled in accordance with conditions contained in the license for the Cimarron facility (Docket 70-925, SNM-928). The Cimarron license requires that uranium solutions or compounds generated during decontamination activities that have a U-235 isotopic content greater than 5 w/o be promptly degraded to below 5 w/o U-235 (8.B, SNM-928).

We can not feasibly degrade the some 3000 cubic feet of Cushing material to less than 5 w/o U-235. However, the physical nature of the material is without question "degraded" and recovery of any SNM material would not be practical. The typical 55-gallon drum when filled would, because of the low concentration of uranium in the materials, contain less than one gram of U-235.

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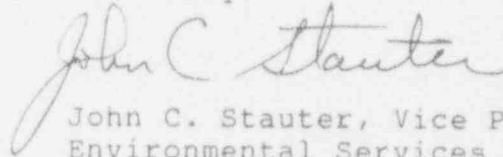
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We need to drum and ship this material promptly to enable further work to be done. We see no issues that would be considered a reason for any potential concern. Although Cushing materials are not under the purview of Region III, this situation has been discussed with Mr. George France of the Region. He agrees shipment of the Cushing material "as is" would not be a concern because of the physical nature of the contamination, the low concentration and the small quantity of contained U-235.

Under these circumstances, we are informing you of our intent to commence promptly to drum the material and to arrange for shipment and request your agreement. Please contact me at 405/270-2623 at your earliest convenience if further information or discussion is indicated.

Sincerely,

A handwritten signature in cursive script that reads "John C. Stauter". The signature is written in dark ink and is positioned above the typed name.

John C. Stauter, Vice President
Environmental Services

ETS:JCS:lld