

PDR

40-8027



KERR-MCGEE CORPORATION

KERR-McGEE CENTER • OKLAHOMA CITY, OKLAHOMA 73125

Return to:
396-55

ENVIRONMENT AND HEALTH MANAGEMENT DIVISION

August 31, 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. 40-8027

ATTN: Mr. W. A. Nixon:

Please refer to the draft permit issued by the Oklahoma State Department of Health, Industrial Waste Management Division for the use of the deep disposal well at the Sequoyah Facility (transmitted to you August 26, 1982).

Attached find Kerr-McGee's initial comments on the draft permit and request to correct the Nitrogen limit. The State has corrected the nitrogen limit and issued a replacement page one to the Draft permit. Please insert this new page (also attached) into the copies of the draft permit transmitted to you August 26, 1982.

The dates for public notice and comment period remain unchanged.

Very truly yours,

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

WJS/pd

Enc.

cc: Bill Crow, USNRC



SEE EXEMPT

info

8210260576 820831
PDR ADOCK 04008027
C PDR

2/235



KERR-MCGEE CORPORATION

KERR-MCGEE CENTER • OKLAHOMA CITY, OKLAHOMA 73125

ENVIRONMENT AND HEALTH MANAGEMENT DIVISION

CERTIFIED MAIL RETURN RECEIPT REQUESTED

August 30, 1982

Mr. Don Hensch
Oklahoma State Department of Health
10th & Stonewall
Oklahoma City, Oklahoma 73152

Dear Mr. Hensch:

Please refer to the Draft Permit developed by your agency for operation of an "Other Industrial Waste" Injection well at the Kerr-McGee Nuclear Sequoyah Facility. Kerr-McGee offers the following comments:

Pg. 1 paragraph 1 (typo):

The injection well is located in Section 21 (not Section 3) Township 12 North Range 21 East of Sequoyah County Oklahoma.

Pg. 1 Item 3 states:

"The concentrations and radioactivity levels of the waste constituents, in particular that of the Nitrates and Radium, shall not exceed 45 mg/l and 10 pCi/l respectively. The levels of the injected raffinate shall not exceed 20% of the level of activity naturally occurring in the receiving information.

Comment: The levels for nitrogen (total) in treated raffinate have been previously supplied to your department as: 36.5 gms/l 1980 average (Page 15, July 17, 1981 submittal) and 28.7 gms/l 1973-1975 analysis (page 6, December 22, 1981 submittal). With construction and subsequent storage of treated raffinate in surface holding ponds, the average 1980 value (36.5 gms/l) reflects the dilution of treated raffinate stored in the holding ponds by rainfall. Thus, Kerr-McGee requests that if a level is established for nitrogen (or a nitrogen fraction) that the following limits be used in order that as produced treated raffinate can be injected:

$$\begin{aligned} \text{Total Nitrogen} &= 60 \text{ gms/l} \quad \text{OR} \\ \text{NO}_3 \text{ as N} &= 30 \text{ gms/l} \times \frac{62}{14} = 133 \text{ gms/l NO}_3 \\ \text{NH}_4 \text{ as N} &= 30 \text{ gms/l} \times \frac{18}{14} = 39 \text{ gms/l NH}_4 \end{aligned}$$

Please advise us as to your decision and correction of these matters.

Very truly yours,

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

ALD/ba

DRAFT
PERMIT

for an
"OTHER INDUSTRIAL WASTE" INJECTION WELL

PERMIT NUMBER

Kerr-McGee Nuclear
Facility

DATE August, 1982

EXPIRATION DATE: August, 1987

having complied with the requirements of the law is hereby granted permission to operate, monitor and maintain an Other Industrial Waste injection disposal well located 3094 feet from the South line and 1482 feet from the East line of Section 21, Township 12 North, Range 21 East of Sequoyah County, Oklahoma.

This site shall be subject to the following provisions:

1. The permittee shall operate and maintain the facility in accordance with the Oklahoma Controlled Industrial Waste Disposal Act, the Rules and Regulations for Industrial Waste Management, and the application for permit and addenda as approved by the Oklahoma State Department of Health.
2. Injection into the disposal well is strictly limited to that of the treated raffinate from the processing facility at Gore.
3. The concentrations and radioactivity levels of the waste constituents, in particular that of the total nitrogen and Radium, shall not exceed 60 gms/l and 10 pci/l respectively. The levels of the injected raffinate shall not exceed 20% of the level of activity naturally occurring in the receiving formation.
4. The injection of five million gallons (5×10^6) per year within sixty (60) days each year shall be permitted. The same injection rate will be maintained throughout the permit duration.

(Continued)

Chief, Industrial & Solid Waste Service

Deputy Commissioner for
Environmental Health Services

Commissioner of Health