

To DCS 11/9/82  
Return to L Jipon 396-55

NOV 05 1982

Oklahoma State Department of Health  
ATTN: Donald A. Hensch  
Director, Industrial Waste Division  
P.O. Box 53551  
Oklahoma City, OK 73125

Dear Mr. Hensch:

As you are aware, the Kerr-McGee Sequoyah Facility (K-M) near Gore, Oklahoma, possesses Source Material License No. SUB-1010 issued by the U. S. Nuclear Regulatory Commission (NRC) for the possession and use of natural uranium. On July 29, 1982, K-M requested a license amendment to permit the disposal of treated raffinate in the No. 1 Sequoyah waste injection well. A similar application for amendment to SUB-1010 was submitted to the NRC by K-M in the early 1970's; however, in 1974 authorization to use the well was denied by the Atomic Safety and Licensing Board (ASLB). A copy of the ASLB's decision is enclosed for your information.

Before the NRC can approve K-M's current request to use the No. 1 Sequoyah waste injection well, a finding that substantiates a reversal of the ASLB's decision must be made. The Industrial Waste Division's recent evaluation of the K-M application for an "Other Industrial Waste Injection Well," resulting in the issuance of Permit No. IW68006, could provide a valuable reference for the NRC staff in its review of the K-M amendment application.

Although we have copies of the correspondence between K-M and your office during your application review process, we would appreciate it if you could provide us with a brief document summarizing the technical opinions leading to Permit No. IW68006. Particular emphasis on the following concerns would be helpful:

1. The surrounding faults (particularly the "South" fault to the southwest of the injection well and other possible faults not clearly mapped): the certainty of their existence, their possible lubrication, and the boundaries they impose on the well reservoir.
2. The homogeneous and isotropic nature of the Arbuckle's five disposal zones as well as their uniformity in thickness, porosity, and permeability. How well are these features understood?

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- 3. The proposed monitoring wells (300 feet North and 5000 feet East of the injection well): their purpose and adequacy to detect groundwater problems.

If there are any questions concerning this request, please do not hesitate to call me or S. D. Wyngarden of my staff at (301) 427-4510.

Sincerely,

Original signed by:  
W. T. Crow

W. T. Crow, Section Leader  
Uranium Process Licensing Section  
Uranium Fuel Licensing Branch  
Division of Fuel Cycle and  
Material Safety

Enclosure: As stated

Distribution:

Docket File 40-8027

PDR

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