

March 23, 1982

Kerr McGee Corporation
ATTN: W. J. Shelley
Vice President, Nuclear
Licensing and Regulation
Kerr McGee Center
Oklahoma City, OK 73125

License No. STA-583

Gentlemen:

Thank you for your letter of March 3, 1982 in which you comment on our recent inspection report (04002061/82-01). Consistent with NRC practice, the findings in that report were based on interviews with licensee personnel, review of records, inspector observations, and independent measurements by the inspector. With regard to the specific points you raise, we have the following comments.

1) Section 3, Building Demolition:

Perhaps it would have been more descriptive to have said that much of the rubble had been segregated into piles on the concrete pad where it fell. Nevertheless, our report described what the inspectors observed during their site visits; both loose and banded rubble remained on the concrete pad of Building 3 in the general area where walls and rooms had been collapsed. The report also described precautions taken to control dust, and it did not describe haphazard work.

2) Section 3, Building Demolition:

According to site licensee representatives' statements and inspectors' observations, wall surfaces are cleaned to remove loose contamination; that contamination which cannot be removed (i.e., that which is fixed) is further sealed onto surfaces by spray painting in an effort to minimize dislodgment during wall collapse and/or dismantling. This practice is in accordance with the stabilization plan, Section 4.4.2, Radiation Survey (b) and (d). During a September 14, 1981 discussion with a site representative, the inspector was told that surfaces greater than 200 dpm fixed were spray painted.

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3) Section 5, Liquid Releases:

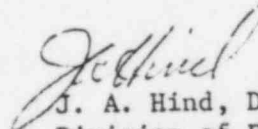
We acknowledge approximately weekly sampling of the Building 14 sump since May 27, 1981. The biweekly sampling frequency stated in the report was based on discussions with site personnel and may have been applicable to a period prior to this inspection period. However, our record of this review indicates lapses from the weekly frequency only for June 23 - July 13 (20 days); July 15-24 (9 days); August 14-25 (11 days); October 5-14 (9 days); October 21 - November 4 (14 days); and November 4-13, 1981, (9 days). This report is in error regarding the number of surface water sample stations; a total of thirteen not twelve stations are sampled.

4) Section 8, Perimeter Fence Integrity:

As stated in the report, the perimeter fence was inspected and gashes/gaps noted of less than 12 inches were reported to site representatives. Of the few noted on that day, most were less than 6 inches; one was greater. The onsite health physicist stated weekly perimeter fence inspections were conducted by site personnel. We do not believe the report is in conflict with point 4 of your letter.

We agree that points raised are minor. The most significant appears to be the matter of spray painting of surfaces before demolition. If our understanding is incorrect, decommissioning/dismantling procedures should be re-evaluated to ensure that potential offsite migration of radiological contaminants is minimized.

Sincerely,



J. A. Hind, Director
Division of Emergency Preparedness
and Operational Support

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