

DOCKET NO. 40-8027

REGULATORY FILE CY



KERR-MCGEE CORPORATION

KERR-MCGEE BUILDING • OKLAHOMA CITY, OKLAHOMA 73102

P. S. DUNN

GROUP VICE PRESIDENT

June 30, 1972

Mr. S. H. Smiley, Director
Division of Material Licensing
U. S. Atomic Energy Commission
Washington, D. C. 20545



Dear Mr. Smiley:

In answer to your request of April 12, 1972, we have forwarded 200 copies of the "Environmental Report, USAEC Docket No. 40-8027 Uranium Hexafluoride Plant-Supplementary" today.

We request that Tables VII, VIII and IX be withheld from public disclosure pursuant to Section 2.790(b) of the Commission's Rules of Practice, 10 CFR Part 2. These tables are proprietary information of value to our competitors and are not required in the public interest.

Five (5) copies of these tables are attached for your information and evaluation.

If we can supply additional information, please let us know.

Yours very truly,

P. S. Dunn

PSD:ks

Attachments



3640

8512200192 720630
PDR ADOCK 04008027
C PDR

FROM: Kerr-McGee Corporation Oklahoma City, Oklahoma Mr. P. S. Dunn		DATE OF DOCUMENT: 6-30-72		DATE RECEIVED 7-5-72		NO.: 3640	
TO: Mr. S. H. Smiley		LTR. X		MEMO:		REPORT:	
		ORIG.: 1		CC:		OTHER:	
CLASSIF: Proprietary		POST OFFICE REG. NO.		ACTION NECESSARY <input type="checkbox"/>		CONCURRENCE <input type="checkbox"/>	
DESCRIPTION: (Must Be Unclassified) Ltr. Trans:				NO ACTION NECESSARY <input type="checkbox"/>		COMMENT <input type="checkbox"/>	
		FILE CODE: Docket No. 40-8027		DATE ANSWERED:		BY:	
		REFERRED TO		DATE		RECEIVED BY	
		Buchanan		7-13			
		1 Extra					
		DO NOT REMOVE					
ENCLOSURES:		Distribution					
5 adv. cys. of environmental report		* 1 Reg. File cy.				1 Miles	
with proprietary info. (Tables VII,		1 PDR				1 NSIC	
VIII, and, IX) rec'd. 7-5-72.		1 Local PDR				1 DFIE	
200 additional cys. w/o proprietary		1 RO				1 Catlin	
information, rec'd 7-13-72.		4 Rouse				1 Dube	
		*1 Shafer				*1 Rothflesh	
		1 Cunningham				*1 Buchanan	
		1 Smiley				*1 Swanburg	
		1 Trotter				jb	
REMARKS:						3640	
* Rec'd advanced cys. with the							
proprietary information.							

U.S. ATOMIC ENERGY COMMISSION

MAIL CONTROL FORM FORM AEC-3265 (8-60)

FROM: Kerr-McGee Corporation Oklahoma City, Okla. (W. J. Shelley)		DATE OF DOCUMENT 2-11-72		DATE RECEIVED 2-15-72**		NO.: 1266	
		LTR. <input checked="" type="checkbox"/>		MEMO: <input type="checkbox"/>		REPORT: <input type="checkbox"/>	
		ORIG.: 1		CC: <input type="checkbox"/>		OTHER: <input type="checkbox"/>	
TO: C. Buchanan		ACTION NECESSARY <input type="checkbox"/>		CONCURRENCE <input type="checkbox"/>		DATE ANSWERED: <input type="checkbox"/>	
		NO ACTION NECESSARY <input type="checkbox"/>		COMMENT <input type="checkbox"/>		BY: <input type="checkbox"/>	
CLASSIF.: U		POST OFFICE		FILE CODE: DOCKET: 40-8027			
REG. NO:							
DESCRIPTION: (Must Be Unclassified)		REFERRED TO		DATE		RECEIVED BY	
Ltr. furnishing addtl. information re the fluoride content of vegetation near the Sequoyah Facility.....		Buchanan:		3-10			
		w/2 extras		-- FOR ACTION			
ENCLOSURES:		Distribution:					
		1-reg. file cv.		1-NSIC			
		1-AEC PDR		1-DTIE			
		1-Local Library		1-S. Smiley, DML			
		1-CO (region)					
		4-C. Edwards, DML					
		1-R. Cunningham, DML					
		1-L. Rogers, REP					
		1-J. DiEunno, GM (A-170)					
REMARKS: ** Not need for docketing until 3/10/72; controlled initially by Isotope File Unit							

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U. S. ATOMIC ENERGY COMMISSION

MAIL CONTROL FORM

FORM AEC-322
(8-60)

**KERR-MCGEE CORPORATION**

KERR-MCGEE BUILDING • OKLAHOMA CITY, OKLAHOMA 73102

Regulatory

File Cy.

February 11, 1972

Mr. C. R. Buchanan
Division of Material Licensing
U.S. Atomic Energy Commission
Washington, D. C. 20545

Dear Mr. Buchanan:

Please refer to our telephone conversations and earlier correspondence on the subject of fluoride content of vegetation near the Sequoyah Facility.

As reported to you on the telephone February 7, we have measured the fluoride content of the off-gas stack from the HF scrubber and find that we are discharging 1.27 pounds per day which gives a concentration at the stack of .75 ppm.

Design calculations were made demonstrating that a .89 pound per day release would result in a concentration of .06 ppb in a sector of an annular area with an ID of 1000 meters from the stack and an OD of 2000 meters from the stack. With these calculations in mind, the measurements shown on Table VIII seem reasonable and nonharmful. VII

As I described in view of the initial vegetation data, additional samples were taken of vegetation in the plant area and the results reported below with the approximate location of the sampling points described in reference to the "Site Plan" included in the Environmental Report:

<u>Sample No.</u>	<u>ppm</u>	<u>Location</u>
2-1	4.7	At fault well numbered 2307
2-2	4.0	Halfway between fault well and sample reported as E-3 (3000 feet east of stack) originally
2-3	4.4	At same location as sample E-3, 3000 feet east of stack
2-4	6.2	Northwest of sample 2-3, approximately 1000 feet in center of area enclosed by 580 foot contour line

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1266

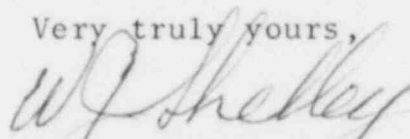
Mr. C. R. Buchanan
February 11, 1972
Page Two

<u>Sample No.</u>	<u>ppm</u>	<u>Location</u>
2-5	4.6	1000 feet north of sample 2-3
2-6	4.3	Approximately 5000 feet east of stack at border of school property
2-7	4.3	East of stack at property boundary corner adjacent to Route 64
2-8	4.0	On northeast corner of property north of Route 64
2-9	1.1	1/4 mile north of Route 64 directly north of stack
2-10	5.3	1/2 mile north of Route 64 directly north of stack
2-11	3.1	On west bank of Arkansas River at Interstate 40 bridge

All samples taken were of forage grasses.

I believe this report completes the data you requested. Please let me know if you need additional information.

Very truly yours,



W. J. Shelley
Director, Regulation &
Control
Nuclear Operations Division

WJS:srj



FROM:

Kerr-McGee Corporation
Oklahoma City, OK
Mr. W. J. Shelley

DATE OF DOCUMENT:

January 31, 1972

DATE RECEIVED

February 3, 1972

NO.:

284

LTR.

MEMO:

REPORT:

OTHER:

X

TO:

C. R. Buchanan
DML

ORIG.:

CC:

OTHER:

1

ACTION NECESSARY ☐NO ACTION NECESSARY ☐CONCURRENCE ☐COMMENT ☐

DATE ANSWERED:

BY:

CLASSIF:

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POST OFFICE

REG. NO.:

FILE CODE:

Docket No. 40-8027

DESCRIPTION: (Must Be Unclassified)

Ltr. supplements data submitted in
ltr. dated 1-21-72 concerning the
"Show Cause" statement for the
Sequoia Plant.....

REFERRED TO

DATE

RECEIVED BY

DATE

Buchanan:

2-3

w/2 cys--FOR ACTION

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ENCLOSURES:

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1-S. Smiley, DML

1-L. Rogers, REP

1-J. DiMunno, GM(A-170)

1-C. Miles, PI(C-479)

1-NSIC

1-DTAE

284

df

REMARKS:

U.S. ATOMIC ENERGY COMMISSION

MAIL CONTROL FORM FORM AEC-3265

(8-60)

DOCKET NO. 40-8027

0284

**KERR-MCGEE CORPORATION**

KERR-MCGEE BUILDING • OKLAHOMA CITY, OKLAHOMA 73102

January 31, 1972



Mr. C. R. Buchanan
 Division of Material Licensing
 U.S. Atomic Energy Commission
 Washington, D. C. 20545

Dear Mr. Buchanan:

This information supplements data previously submitted in my letter dated January 21, 1972, and is in regard to the "Show Cause" statement for our Sequoyah Plant.

- As you requested on January 14, vegetation samples were collected at 1000 foot intervals from the plant in the same direction and starting at the air sampling stations located 1000 feet from the plant fence. Duplicate samples collected at these locations, along with two (2) single samples at the plant security fence line, were analyzed for fluoride by two independent commercial laboratories designated as Lab A and Lab B, hereafter. Results reported on January 21 were from Lab A. Results from Lab B were reported by telephone on January 24 and all results received to date are reported below:

	<u>Lab A</u>	<u>Lab B</u>
West No. 1	14.3 ppm	19.8 ppm
No. 2	4.0 ppm	10.5 ppm
North No. 1	5.4 ppm	<1.0 ppm
No. 2	8.3 ppm	8.1 ppm
South No. 1	5.5 ppm	4.2 ppm
No. 2	4.4 ppm	6.6 ppm
No. 3	8.7 ppm	12.9 ppm
East No. 1	8.8 ppm	11.1 ppm
No. 2	10.3 ppm	9.0 ppm
No. 3	83.7 ppm	<1.0 ppm
No. 4	18.9 ppm	14.4 ppm
Fence Line		
North		6.4 ppm
South		3.6 ppm



~~850731009971pp~~

Mr. C. R. Buchanan
January 31, 1972
Page Two

All results are on the basis of micrograms of fluoride per gram of dried sample. We have concluded that sample No. 3 East analyzed by Lab A was contaminated and, therefore, should not cause undue concern. To confirm this, additional vegetation samples have been collected at the location and in the immediate vicinity. They are being analyzed for fluoride content by Lab B and will be reported when received.

Livestock are grazed adjacent to the Sequoyah Plant on an intermittent basis. Based upon comparison of the level of fluoride shown in the data listed above and recent references, it is concluded that no threat to grazing cattle results from measured fluoride levels surrounding the Sequoyah Plant. Safe fluoride levels for forage for the State of Washington have been established by the Department of Ecology, Chapter 18-48 WAC, "Fluoride Standards", effective February 4, 1971, and discussed in "AIR POLLUTION, Second Edition, Arthur C. Stern, Academic Press, New York, 1968," pages 528-530. These references state that 40 ppm fluoride ion is acceptable for total ration of all types of foraging livestock.

2. NO₂ effluent, reported as being measured at 24.1 lbs/hour in my letter of January 21, is calculated to be 170 ppm at the stack discharge, 150 feet above ground level. Based upon a volume of 25,000 cfm, the current engineering estimate of stack discharge with two boilers operating, estimates of ground level concentration have been made and are attached as Appendix A. We have used this calculation of volume rather than those included in our license application which were made from design calculations prior to installation. When a sampling system for the stack has been designed and installed, we will determine this exact number.

As shown on Table 1 of Appendix A, calculated NO₂ concentrations range from 0.009 to 0.041 ppm with varying distances and conditions from the stack. In seeking recognized reference data to which this evaluation can be compared, we find nothing reported at levels this low. Study of the "Air Quality Criteria for Nitrogen Oxides", published by the Environmental Protection Agency, January, 1971, revealed that the average levels of NO₂ over the entire continent may be .004 ppm (4 ppb). Peak urban concentrations vary with


Mr. C. R. Buchanan
January 31, 1972
Page Three

presence of carbon and photosynthesis but generally measure less than .5 ppm. Initial effects on vegetation are not measured until .25 ppm. No irreversible symptom of poisoning has resulted in animals or man from exposures up to .5 ppm. Stern (see reference above) reports visibility at .25 ppm in a horizontal layer above geographical areas and California has adopted this level as an air quality standard. Further, Stern reports odor detection at .5-3 ppm and detectable symptoms at 20 ppm with no plant damage below .25 ppm.

From comparisons of the calculated data to these references, we conclude that the NO₂ levels resulting from operation of the Sequoyah Plant do not pose an environmental hazard.

We believe that we have complied with your request. However, if you have additional questions, please call.

Very truly yours,



W. J. Shelley
Director, Regulation and
Control
Nuclear Operations Division

WJS:srj
Attachment

APPENDIX A

ESTIMATES OF NO₂ STACK CONCENTRATIONS AND MAXIMUM DOWNWIND NO₂ CONCENTRATIONS

1. Stack Concentration: The NO₂ concentration in ppm was determined by calculating the fraction of NO₂ in the total stack gas stream:

$$C_s = \frac{Q}{V} \quad \text{Given: } Q = 24.1 \text{ lbs/hr} \\ V = 2.5 \times 10^4 \text{ cfm}$$

- a. To get R in units of M³/sec:

$$Q = \frac{24.1 \left(\frac{\text{lbs}}{\text{hr}} \right) \times 453 \left(\frac{\text{gm-mole}}{\text{lb-mole}} \right) \times 2.24 \times 10^{-2} \left(\frac{\text{M}^3}{\text{gm-mole}} \right)}{3.6 \times 10^3 \left(\frac{\text{sec}}{\text{hr}} \right) \times 46 \left(\frac{\text{lbs}}{\text{lb-mole}} \right)} = 1.4 \times 10^{-3} \frac{\text{M}_{\text{NO}_2}^3}{\text{sec}}$$

- b. To get V in units of M³/sec:

$$V = 2.5 \times 10^4 \left(\frac{\text{ft}^3}{\text{min}} \right) \times 2 \times 10^{-2} \left(\frac{\text{M}^3}{\text{ft}^3} \right) \times \frac{1}{60} \left(\frac{\text{min}}{\text{sec}} \right) = .83 \times 10 = 8.3 \text{ M}^3/\text{sec}$$

- c. NO₂ concentration at point of discharge

$$C_s = \frac{R}{U} = \frac{1.4 \times 10^{-3} \left(\frac{\text{M}_{\text{NO}_2}^3}{\text{sec}} \right)}{8.3 \left(\frac{\text{M}_T^3}{\text{sec}} \right)} \times 17 \times 10^{-3} = 1.7 \times 10^{-4} \frac{\text{M}_{\text{NO}_2}^3}{\text{M}_T^3}$$

$$\text{or } C_s = 1.7 \times 10^{-4} \times 10^6 = 170 \text{ ppm}$$

2. Maximum Downwind Concentration: Using dispersion estimates suggested by Pasquill (1961) and modified by Gifford (1961) and data presented in a U.S. Public Health Service Publication No. 999-AP-26, dated 1969 and titled, "Workbook of Atmospheric Dispersion Estimates," maximum downwind concentrations are estimated for six (6) different stability conditions and nominal wind speeds.

Given: Effective Stack Height (H) = 150 ft (no plume rise)

$$\text{NO}_2 \text{ Emission Rate (Q)} = 24.1 \frac{\text{lbs}}{\text{hr}} = 1.4 \times 10^{-3} \frac{\text{M}_{\text{NO}_2}^3}{\text{sec}}$$

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U.S. ATOMIC ENERGY COMM.
REGULATORY
MAIL SECTION

Appendix A
Page Two

$$X(x,y,o;H) = \frac{Q}{\pi \sigma_y \sigma_z} \exp \left[-\frac{1}{2} \left(\frac{y}{\sigma_y} \right)^2 \right] \exp \left[-\frac{1}{2} \left(\frac{H}{\sigma_z} \right)^2 \right]$$

where X = concentration $\left(\text{g/M}^3 \text{ or } \text{M}_{\text{NO}_2}^3 / \text{M}_{\text{T}}^3 \right)$

Q = emission rate $\left(\text{M}_{\text{NO}_2}^3 / \text{sec} \right)$

H = discharge height (M)

y = distance downwind (M)

$\sigma_y \sigma_z$ = dispersion coefficients

Using these data and Figures 3-5 (A-F) of the referenced document, maximum downwind concentration locations were determined along with dispersion values. These are listed in the righthand column of Table 1.

TABLE 1

MAXIMUM CONCENTRATION DATA

<u>Condition</u>	<u>Distance to Max. Conc. (KM)</u>	<u>Dispersion Factor X_u/Q (M^{-2})</u>	<u>Nominal Windspeed M (M/sec)</u>	<u>Calculated Max. NO₂ Conc. (ppm)</u>
A	.25	5.8×10^{-5}	2	.041
B	.38	5.4×10^{-5}	3	.025
C	.60	4.5×10^{-5}	5	.013
D	1.10	4.4×10^{-5}	6	.010
E	2.00	3.2×10^{-5}	5	.009
F	3.50	2.6×10^{-5}	3	.012

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1972 FEB 3 AM 9 00

U. S. AIR FORCE COMM.
REGULATORY
MAIL SECTION

FROM: Kerr-McGee Corporation Oklahoma City, OK Mr. W. J. Shelley		DATE OF DOCUMENT: January 21, 1972		DATE RECEIVED January 25, 1972		NO.: 453	
TO: C. R. Buchanan DML		LTR. <input checked="" type="checkbox"/> MEMO: <input type="checkbox"/> REPORT: <input type="checkbox"/> OTHER: <input type="checkbox"/>		ORIG.: 1 CC: <input type="checkbox"/> OTHER: <input type="checkbox"/>		ACTION NECESSARY <input type="checkbox"/> CONCURRENCE <input type="checkbox"/> DATE ANSWERED: <input type="checkbox"/>	
CLASSIF: U POST OFFICE: <input type="checkbox"/> REG. NO.: <input type="checkbox"/>		NO ACTION NECESSARY <input type="checkbox"/> COMMENT <input type="checkbox"/>		FILE CODE: Docket No. 40-8027		BY: <input type="checkbox"/>	
DESCRIPTION: (Must Be Unclassified) Ltr. responds to request ltr. of 1-14-72 for additional information concerning the "Show Cause" statement submitted in November of 1971.		REFERRED TO		DATE		RECEIVED BY	
ENCLOSURES:		Buchanan:		1-25		DO NOT REMOVE	
		w/2 cys--FOR ACTION					
REMARKS:		Distribution					
		1-reg. file cy				1-J. DiManno, CM(A-170)	
		1-AEC PDR				1-J. Felton, DR	
		1-Local Library				1-C. Miles, PI(C-179)	
		1-Compliance				1-NEIC	
		1-C. Henderson				1-DUE	
		1-Shaper, OGC (P-506B)					
		4-C. Edwards, DML					
		1-S. Smiley, DML					
		1-L. Rogers, REP					
						453	
						df	

U.S. ATOMIC ENERGY COMMISSION

MAIL CONTROL FORM FORM AEC-3265 (6-60)

**KERR-McGEE CORPORATION**

KERR-McGEE BUILDING • OKLAHOMA CITY, OKLAHOMA 73102

January 21, 1972

Regulatory

File Cy.



Mr. C. R. Buchanan
Division of Materials Licensing
U. S. Atomic Energy Commission
Washington, D. C.

Dear Mr. Buchanan:

Please refer to your request of January 14, 1972 for additional information in regard to the "Show Cause" statement submitted in November of 1971.

1. In accordance with your request samples were taken at 1000 foot intervals from the Sequoyah Plant in the same direction as the sampling stations. The first sample in each sequence is at the sampling station.

West	No. 1	14.3 ppm
	No. 2	4.0
North	No. 1	5.4
	No. 2	8.3
South	No. 1	5.5
	No. 2	4.4
	No. 3	8.7
East	No. 1	8.8
	No. 2	10.3
	No. 3	83.7
	No. 4	18.9

All data are on the basis of micrograms per gram of dried sample. The on site samples were misplaced and their results will be reported when completed.

While we were examining the problem it was realized that the units given for fluoride results on Table 10 in the "Applicant's Environmental Report" is in error. These reports are in micrograms per gram of dry weight. We plan to take additional samples to further examine the apparent anomaly shown by the above samples.

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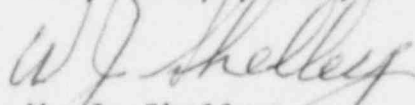
~~8507310105-2PP.~~

Mr. C. R. Buchanan
January 21, 1972
Page Two

2. Samples were taken by removing forage vegetation with scissors at ground level exercising care not to include any soil with the sample. All samples had approximately the same appearance of typical forage grasses at this season, a light tan in color showing no green, and extremely dry.
3. In regard to Table No. 4 in the Environmental Report, wells 1, 2 and 4 show an anomaly of nitrate content due to the run off of fertilizers at ground level entering the monitor well head. In later months these wells were pumped down and seepage allowed to take place prior to sampling. We have since capped all wells so only underground seepage will be represented and such an anomaly will not again appear.
4. We have studied the off gas from the NOX absorber and, as a result of sampling the stack five times, find average results from this absorber as follows: the absorber effluent is composed of 823 lbs. per hour of water vapor and 15 lbs. per hour of NO. We assume since the temperature of the discharge stack is high enough to cause a reaction, the NO is oxidized further to the NO2 in the stack and is discharged as 24.1 lbs. of NO2 per hour. We are investigating the possibility of installing in the exhaust stack a sampler to measure these emissions.

I believe all of the questions you asked are answered. Please call me in the event you need additional information.

Very truly yours,



W. J. Shelley
Director, Regulation and
Control
Nuclear Division

WJS:cp

FROM: Kerr-McGee Corporation Oklahoma City, Okla. (W. J. Shelley)		DATE OF DOCUMENT: 11-24-71		DATE RECEIVED: 12-12-71		NO.: 5344	
		LTR. X		MEMO:		REPORT:	
		ORIG.:		CC:		OTHER:	
TO: L. Muntzing		(400 reproduced cys. rec'd)					
		ACTION NECESSARY <input type="checkbox"/>		CONCURRENCE <input type="checkbox"/>		DATE ANSWERED:	
		NO ACTION NECESSARY <input type="checkbox"/>		COMMENT <input type="checkbox"/>		BY:	
CLASSIF: U		POST OFFICE		FILE CODE:			
REG. NO.:		DOCKETS: 70-1193 <u>40-8027</u>					
DESCRIPTION: (Must Be Unclassified) Ltr. trans. the following which completely revises the reports submitted earlier for Licenses SUB-1010 and SNM-1174: ENCLOSURES: (200 copies ea rec'd)		REFERRED TO		DATE		RECEIVED BY	
		Eusebaumer:		12-13			
		w/2 cys. -- (70-1193)		FOR ACTION			
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		w/2 cys. -- (40-8027)		FOR ACTION			
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		1-Shapar (P-506B)				1-L. Rogers, REP	
						1-DiNunno (A-170)	
						1-Totter (B-201)	
REMARKS: <div style="text-align: center; border: 1px solid black; padding: 5px;"> DO NOT REMOVE ACKNOWLEDGED </div>							

U.S. ATOMIC ENERGY COMMISSION

MAIL CONTROL FORM FORM AEC-3265 (8-60)

DOCKET NO.

70-1193

40-8027

**KERR-McGEE CORPORATION**

KERR-McGEE BUILDING • OKLAHOMA CITY, OKLAHOMA 73102

Regulatory

File Cy.

November 24, 1971



Mr. L. M. Muntzing
Director of Regulations
United States Atomic Energy Commission
Washington, D. C. 20545

Dear Mr. Muntzing:

Please refer to our submissions dated November 8 and 9 transmitting the "Environmental Report" for our licenses SUB-1010, Docket No. 40-8027, and SNM-1174, Docket No. 70-1193, required by Revised Appendix D of 10CFR50.

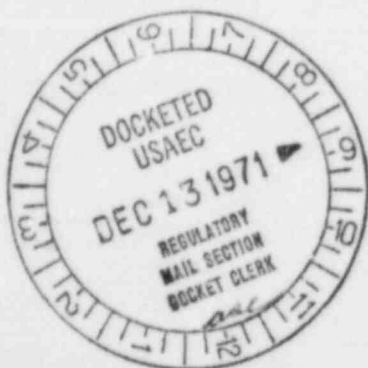
Upon more complete review and examination of other documents submitted by others to fulfill this requirement, we have concluded that our submissions referred to above are incomplete. After review we have concluded that complete resubmissions would be the most appropriate correction of this deficiency. Consequently, we are shipping 200 copies each of "Environmental Report-Revised" for the subject licenses. This "revised" submission has been significantly changed in content to meet what we believe to be your requirements more adequately.

We would appreciate your replacing the previous submission with these "revised" copies and your willingness to use it in your considerations. We would be happy to discuss all or part of these reports at your convenience.

Sincerely,

W. J. Shelley
Director, Regulation and
Control

WJS:srj



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