



KERR-McGEE CORPORATION

KERR-McGEE CENTER • OKLAHOMA CITY, OKLAHOMA 73125

November 6, 1998

Mr. Stewart Brown
Low-Level Waste & Decommissioning Projects Branch
Division of Waste Management
Office of Nuclear Materials Safety & Safeguards
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Re: Docket No. 70-3073
License No. SNM-1999

Dear Mr. Brown:

On August 12, 1998, Kerr-McGee Corporation (KMC) submitted a map to NRC identifying those portions of the Cushing refinery site that would remain under license if the unaffected areas and the haul road corridor were released from license SNM-1999. In subsequent conversations with NRC, you indicated that NRC is not willing to release the entirety of these areas due to uncertainties related to subsurface groundwater conditions. Consequently, Kerr-McGee Corporation requests the release of only portions of the unaffected areas and haul road corridor from license SNM-1999. KMC submits herein a map showing in white those portions of the site NRC is willing to release. This includes: Unaffected Area 1, portions of Unaffected Areas 2 - 4 that are south of Skull Creek, and a portion of the haul road corridor partially surrounded by Unaffected Areas 2 - 4.

As we discussed, portions of Blocks 116, 117, 125, and 126 that are south of Skull Creek were part of Unaffected Area 2. In June, 1997, KMC placed sediment from Skull Creek in a sediment pond occupying the junction of these four blocks. KMC therefore removed these blocks from the area to be released until that sediment pond can be surveyed for final release.

Finally, a ditch in Blocks 132, 133, and 140 was filled with rubble from refinery demolition. Concrete from the Thorium processing building slab was placed in that ditch. Only concrete that yielded less than 500 dpm/100 cm² direct alpha contamination was released for burial in that ditch. KMC believes this survey justified the unrestricted release of this material, and its presence in this portion of the haul road corridor should not impact the release of these areas.

KMC therefore requests the release of the areas shown in white from license SNM-1999. Only radioactive materials areas (yellow) and the rest of the site shown in stippling will remain under license.

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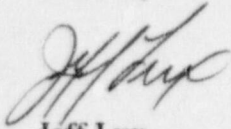
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In addition, you requested copies of groundwater analytical data reports on samples collected from several groundwater monitor wells. These wells were sampled in accordance with the environmental monitoring provisions of our radiation safety program. The historical data you requested is enclosed.

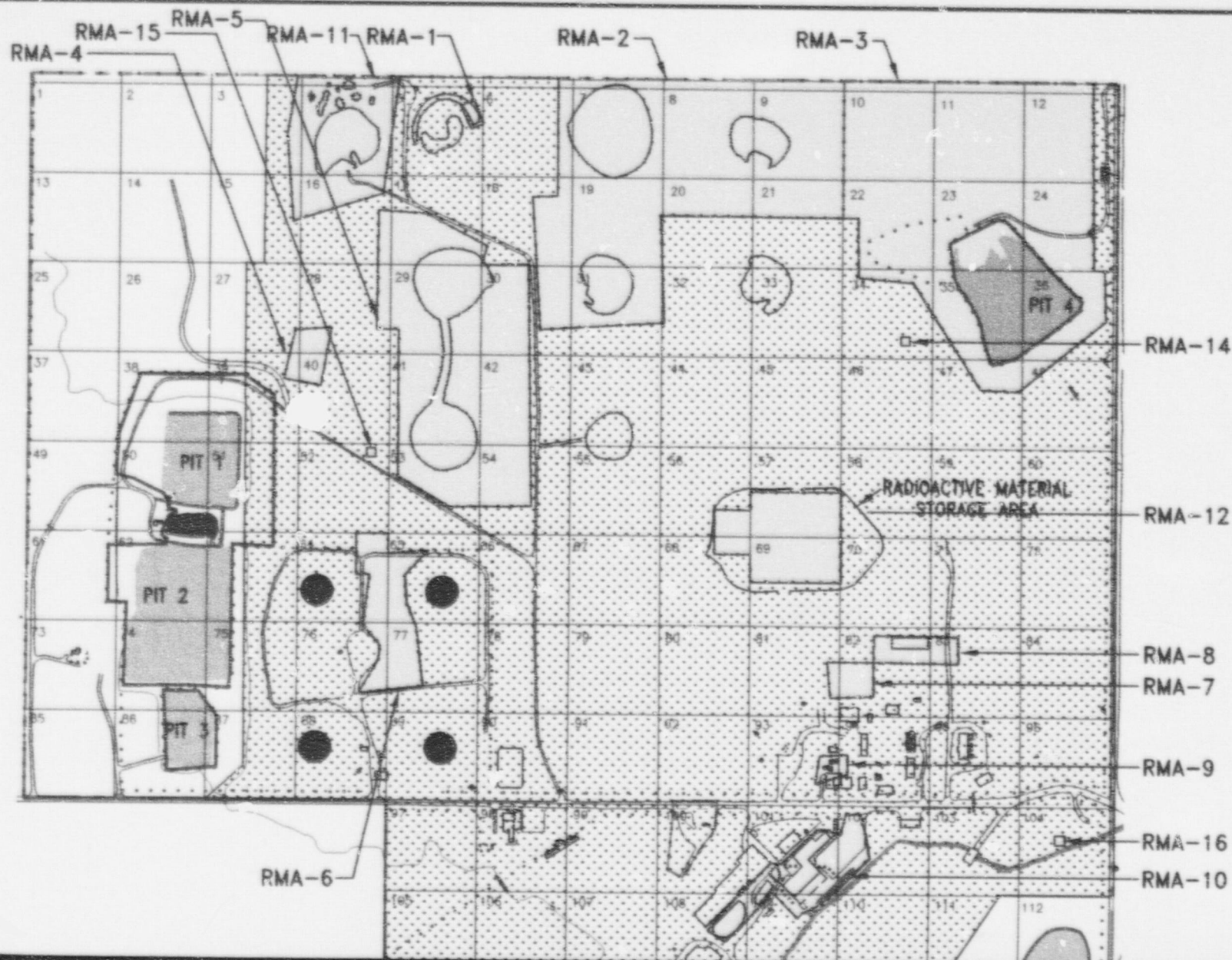
If you have any questions or comments, please call me at (405) 270-2694.

Sincerely,

A handwritten signature in dark ink, appearing to read "Jeff Lux", written in a cursive style.

Jeff Lux
Project Manager

xc: C. L. Cain, NRC Region IV
Rick Reiley, Cushing Citizens' Oversight Committee
Earlon Shirley, ODEQ
Darrell Shults, ODEQ

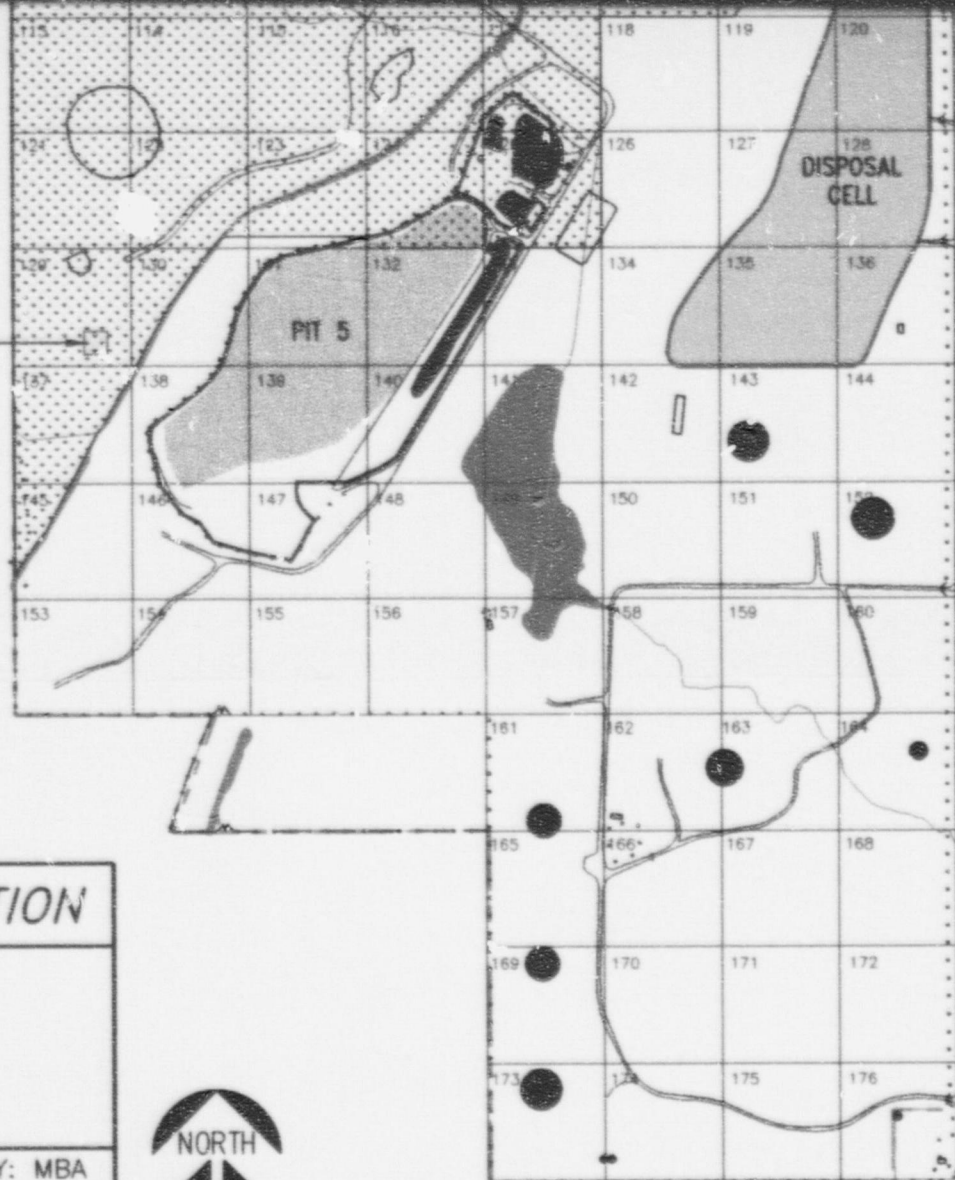


NOTE: THE LICENSED SITE CONSISTS OF BOTH RADIOACTIVE MATERIALS AREAS AND UNDESIGNATED AREAS.

LEGEND

- PROPERTY BOUNDARY
- FENCES
- ROADS
- ACID SLUDGE PIT
- RADIOACTIVE MATERIAL AREAS
- ░ UNDESIGNATED AREAS
- PETROLEUM STORAGE TANKS

RMA-13



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DOCUMENT TITLE:

Figure 1
CUSHING SITE MAP SHOWING
LICENSED SITE AREA

PREPARED BY: JL

DWN BY: JE/REVISED BY: MBA

DRAWING NO. UARMASU_LSA

DATE: 12/2/97 REVISED: 10/27/98



9903080166-07

1997
Groundwater Data