



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
1600 EAST LAMAR BOULEVARD
ARLINGTON, TEXAS 76011-4511

August 20, 2020

Bill Halliburton, Administrator
Cimarron Environmental Response Trust
c/o Environmental Properties Management, LLC
9400 Ward Parkway
Kansas City, MO 64114

SUBJECT: CIMARRON URANIUM PLANT NRC INSPECTION
REPORT 070-00925/2020-001

Dear Mr. Halliburton:

This letter refers to the routine, announced U.S. Nuclear Regulatory Commission (NRC) inspection conducted onsite from July 20-22, 2020, at the Cimarron Uranium Plant near Crescent, Oklahoma. This inspection examined activities conducted under your license as they relate to public health and safety, the common defense and security, and to confirm compliance with the Commission's rules and regulations and the conditions of your license. Within these areas, the inspection consisted of examination of selected procedures and representative records, observations of activities and facilities, conduct of independent radiation measurements, and interviews with personnel. The inspection findings were discussed with you, Mr. Jeff Lux, Project Manager, and members of Enercon, a contractor for the licensee, at the conclusion of the onsite inspection on July 22, 2020.

Based on the results of this inspection, the NRC has determined that one Severity Level IV violation of NRC requirements occurred. This violation was evaluated in accordance with the NRC Enforcement Policy. The current Enforcement Policy is included on the NRC's Web site at (<http://www.nrc.gov/about-nrc/regulatory/enforcement/enforce-pol.html>). The violation is cited in the enclosed Notice of Violation (Notice) and the circumstances surrounding it are described in detail in the subject inspection report. The violation is being cited in the Notice because it was identified by the NRC during a routine inspection.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice of Violation when preparing your response. If you have additional information that you believe the NRC should consider, you may provide it in your response to the Notice. Your response to the Notice will also determine whether further enforcement action is necessary to ensure compliance with regulatory requirements.

In accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) Part 2.390 of the NRC's "Agency Rules of Practice and Procedure," a copy of this letter, its enclosure, and your response will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <https://www.nrc.gov/reading-rm/adams.html>. To the extent possible, your response should not include any personal privacy or proprietary information so that it can be made available to the Public without redaction.

Should you have any questions concerning this matter, please contact Ms. Marti Poston, Health Physicist, at (817) 200-1181 or the undersigned at (817) 200-1156.

Sincerely,

A handwritten signature in black ink, appearing to read "Heather J. Gepford". The signature is fluid and cursive, with a large loop at the end.

Heather J. Gepford, PhD, CHP, Chief
Materials Licensing & Decommissioning Branch
Division of Nuclear Materials Safety

Docket No.: 070-00925
License No.: SNM-928

Enclosures:

1. Notice of Violation
2. NRC Inspection Report 070-00925/2020-001

cc w/enclosures:
M. Broderick
J. Lux

NOTICE OF VIOLATION

Cimarron Environmental Response Trust
Crescent, Oklahoma

Docket No. 070-00925
License No. SNM-928

During an NRC inspection conducted on July 20-22, 2020, a violation of NRC requirements was identified. In accordance with the NRC Enforcement Policy, the violation is listed below:

License Condition 26 of Radioactive Material License SNM-926, Revision 21, issued February 4, 2011, requires the licensee to conduct a radiation protection program in accordance with Annex A, "Radiation Protection Plan (RPP)," dated September 20, 1996, as supplemented.

Section 1.2 of the RPP states, in part, the purpose of the RPP is to summarize the regulations and...establish radiation protection policies. From these policies, specific procedures are developed to ensure compliance.

Section 15 of the RPP states, in part, that annual environmental sampling will be conducted. The conduct of surface water and groundwater sampling is detailed in sampling procedures, Sampling Procedure (SAP)-13, "Ground Water Sampling," and SAP-14, "Surface Water Sampling." Both SAP-13 and SAP-14 require, in part, that individuals be task qualified by the radiation safety officer (RSO) to conduct the required surveys and task qualified by a subject matter expert (SME) to perform the sampling.

Section 2.4 of the RPP states, in part, that training records must be maintained in accordance with the Quality Assurance Program Plan.

Contrary to the above, from July 20-22, 2020, the licensee failed to maintain training records as specified in Section 2.4 of the RPP for individuals conducting groundwater and surface water sampling in accordance with SAP-13 and SAP-14. Specifically, the licensee failed to maintain documentation of the task-specific qualification training presented by the RSO and/or SME to the individuals performing the annual environmental sampling.

This is a Severity Level IV violation (Section 6.3).

Pursuant to the provisions of 10 CFR 2.201, Cimarron Environmental Response Trust is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001, with a copy to the Regional Administrator, Region IV, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). We request you also email a copy of your response to Mary.Muessle@nrc.gov. This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation or severity level; (2) the corrective steps that have been taken and the results achieved; (3) the corrective steps that will be taken; and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued requiring information as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

If you contest this enforcement action, you should also provide a copy of your response, with the basis for your denial, to the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001.

Your response will be made available electronically for public inspection in the NRC Public Document Room or in the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>. To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the public without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.390(b) to support a request for withholding confidential commercial or financial information).

In accordance with 10 CFR 19.11, you may be required to post this Notice within two working days of receipt.

Dated this 20th day of August 2020

**U.S. NUCLEAR REGULATORY COMMISSION
REGION IV**

Docket No.: 070-00925

License No.: SNM-928

Report No.: 070-00925/2020-001

Licensee: Cimarron Environmental Response Trust

Location Inspected: Cimarron Uranium Plant
Crescent, OK

Inspection Dates: July 20-22, 2020

Inspector: Martha R. Poston, Health Physicist
Materials Licensing and Decommissioning Branch
Division of Nuclear Materials Safety

Accompanied by: Heather J. Gepford, PhD, CHP, Chief
Materials Licensing and Decommissioning Branch
Division of Nuclear Materials Safety

Approved by: Heather J. Gepford, PhD, CHP, Chief
Materials Licensing and Decommissioning Branch
Division of Nuclear Materials Safety

Attachment: Supplemental Inspection Information

EXECUTIVE SUMMARY

Cimarron Environmental Response Trust
NRC Inspection Report 070-00925/2020-001

The U.S. Nuclear Regulatory Commission (NRC) performed a routine, announced inspection at the Cimarron facility which included observations of site activities, independent radiation surveys, reviews of records, and interviews with site personnel. In summary, the licensee was conducting decommissioning activities in accordance with regulatory and license requirements, with one exception as described below.

Management Organization and Controls and Training

The organizational structure and staffing levels maintained by the licensee during the inspection period met the requirements specified in the license and were sufficient for the work in progress. The licensee's written safety plan, standard operating procedures, and activity plans were appropriate for the activities in progress, commensurate with the risks associated with the program and in accordance with regulatory and license requirements. A violation was identified related to the licensee's failure to document task-specific qualification training and approval required under the radiation protection plan. (Section 1.2)

Radiation Protection

The licensee implemented a radiation protection program that met the requirements of Title 10 of the *Code of Federal Regulations* Part 20 and the license. The licensee's radiation protection program was commensurate with the risk involved based on licensee activities and included the required program elements. (Section 2.2)

Effluent Control and Environmental Protection

The licensee conducted environmental monitoring in accordance with license and procedural requirements. The licensee reported the results in annual reports to the NRC. (Section 3.2)

Report Details

Site Status

The Cimarron Nuclear Fuel Production Facility was operated by Kerr-McGee from 1967 until 1975 when operations ceased. The site is approximately ½ mile north of the intersection of Oklahoma State Routes 74 and 33. Since closure, Kerr-McGee, and later Tronox, have been decommissioning the site in accordance with NRC Special Nuclear Material License SNM-928. Tronox filed for bankruptcy protection in January 2009, and upon emerging from bankruptcy in February 2011, the license was transferred to the Cimarron Environmental Response Trust. The trust is administered by Environmental Properties Management, LLC, a subsidiary of Burns & McDonnell. The goal of the Cimarron Environmental Response Trust is to remediate the property with the funds available to the point that the site can be released for unrestricted use.

The Cimarron site originally consisted of approximately 830 acres of land, with several buildings remaining from licensed operations. Approximately 117 acres west of Highway 74 were released by the NRC for unrestricted use and subsequently purchased by another company in 2015. The site now consists of approximately 500 acres (330 acres of rolling hills and 170 acres of floodplain), with the north property line being defined by the Cimarron River bank.

The original site was divided into 15 subareas; 12 of the 15 subareas have been released by the NRC for unrestricted use. Subareas F, G, and N will remain under the NRC license until groundwater remediation has been completed. These three areas have groundwater concentrations that exceed the site-specific release criteria of 180 picocuries per liter total uranium. The three areas are referred to as Burial Area #1, Western Alluvial Area, and Western Upland Area.

In December 2017, the licensee conducted a pilot test for the treatment of groundwater for Burial Area #1, Uranium Pond #2, Uranium Pond #1, and 1206 Drainage area. The licensee documented the results of the pilot test in a report dated June 19, 2018 (ADAMS Accession Nos. ML18171A300 and ML18171A316). The results of the pilot test prompted changes to the Decommissioning Plan.

Since the previous NRC inspection in November 2018, the licensee has submitted a revised Decommissioning Plan (ADAMS Accession Nos. ML18323A195 and ML20126G343), changes to the radiation protection documents (ADAMS Accession No. ML 200022A090), a Cultural Resources Survey (ADAMS Accession No. ML20196L790), and a license amendment request to redefine the licensed area (ADAMS Accession Nos. ML19330E146, ML20057F594 and ML20087H742). At the time of the inspection, the licensee's proposed Decommissioning Plan, supporting documentation, and license amendment request were under NRC review.

1 Management Organization and Controls (Inspection Procedure [IP] 88005) and Training (IP 88010)

1.1 Inspection Scope

Ensure the licensee has established an organization to administer the technical and safety policies, programs, and procedures necessary to satisfy the license and regulatory requirements, and to perform internal reviews, self-assessments and audits.

1.2 Observations and Findings

a. Organizational Structure

License Condition 26 references the licensee's Radiation Protection Plan (RPP). The organizational requirements are provided in Section 3 of the RPP. The inspectors compared the program in place at the time of the inspection to the organizational structure provided in Figure 3-1, Cimarron Environmental Response Trust Organization, provided in the RPP. The licensee had filled each of the required positions with qualified individuals. Contractors were used as needed to support onsite activities, including the recent groundwater sampling event. Sufficient staff were available to ensure compliance with licensed activities.

b. Activity Plans

The licensee conducted routine operations under standard operating procedures. Non-routine activities were covered under Activity Plans (AP). Section 9 of the RPP provides the requirements for APs. The inspector reviewed the following APs:

AP-2019-003	Vertical Profiling
AP-2020-001	BA1 Redox Evaluation Sampling – 1 st event
AP-2020-002	Cultural Resources Survey
AP-2020-003	BA1 Redox Evaluation Sampling – 2 nd event
AP-2020-004	2020 Annual Environmental Monitoring

Each AP reviewed specified training and qualification requirements for individuals working under the AP. The APs required that personnel performing radiation surveys or sampling must have current radiation worker training and be task qualified for conducting surveys by either the radiation safety officer (RSO), RSO designee, or (for some tasks) a subject matter expert.

c. Audits and Inspections

Title 10 of the *Code of Federal Regulations* (10 CFR) 20.1101(c) requires the licensee to periodically (at least annually) review the radiation protection program content and implementation. The licensee conducted an annual radiation safety audit. Audit requirements are provided in Section 5.2 of the RPP. The inspector reviewed the annual audits for calendar years (CY) 2018, conducted January 24, 2019, and 2019, conducted February 6, 2020. The audits included evaluations of occupational exposures, radiation survey results, public dose, training, and compliance with license and regulatory requirements applicable to the work being performed onsite during the respective years.

License Condition 27.e allows the licensee to make changes to the NRC-approved Decommissioning Plan and RPP without NRC's approval, if these changes are consistent with the As Low As Is Reasonably Achievable (ALARA) principle and the decommissioning process. All changes are to be approved by the Cimarron ALARA Committee. License Condition 27.e(3), requires in part, that the licensee provide in an

annual report to the NRC, a description of all changes, tests, and experiments made or conducted and a summary of the safety and environmental impact of each action. The licensee indicated the report for CY2019 was recently identified as not being submitted to the NRC and was submitted July 20, 2020 (ADAMS Accession No. ML20217L514). Discussions with licensee personnel and a review of the information available indicated there were two License Condition 27.e evaluations performed in CY2019: (1) evaluation of low-risk periodic activities, such as soil sampling and groundwater/surface water sampling; and, (2) Revision 3.2 (interim revision) of the RPP which added a requirement that the site cannot receive or use contaminated equipment or tools. This interim revision to the RPP will remain in effect until RPP Revision 4.0 is approved by the NRC.

The licensee's ALARA committee met quarterly to discuss radiation safety issues. The inspector reviewed the ALARA meeting minutes for all four quarters of CY2019. In addition to the RPP, the license had implemented a Quality Assurance program in accordance with the requirements of NUREG/CR-5849, "Manual for Conducting Radiological Surveys in support of License Termination." Details about the Quality Assurance program are provided in the Cimarron Site Quality Assurance Program Plan QAPP-001, Revision 3. The Quality Assurance Program Plan states that personnel performing quality activities will receive training in the quality assurance program. The licensee provided quality assurance program training to selected site workers in 2019-2020.

d. Training

The inspector reviewed the licensee's training program. The training requirements are provided in Section 2 of the RPP. The inspector reviewed the training records for CY2019 and year-to-date 2020. The licensee provided orientation training for all contractors related to the action plan work activities they were supporting. Radiation worker training was also provided to individuals who may work with radioactive material. In addition, the licensee provided annual refresher training in CY2019 and CY2020 via self-study for workers who previously received site access training. The inspector noted that the safety, health, and environment manual and procedures required stop work authority training for all onsite personnel, but the licensee was unable to produce records or training material to document that stop work authority training was conducted. This observation was discussed with the licensee during the inspection, and the project manager initiated corrective actions while the inspector was onsite.

Section 15 of the RPP requires sampling procedures to be in place. Sampling Procedures (SAP)-13, "Ground Water Sampling," and SAP-14, "Surface Water Sampling," require that individuals are task qualified by either the RSO or a subject matter expert, depending on the tasks. Qualification for tasks associated with the performance of surveys or use of radiation detection instruments is required from the RSO. Qualification for tasks associated with environmental sampling is required from a subject matter expert. The licensee's forms associated with activity plans require the AP leader to verify that individuals are task qualified as part of the AP approval process. The AP leader performs this verification by referring to tables on a SharePoint site for tasks on the AP. The inspector identified that the licensee was unable to provide documentation that supported the completion of qualification training listed in the table. This failure to document task specific qualifications and training as required by procedures implementing the RPP is a violation (VIO 07000925/2020-01-001).

1.3 Conclusions

The organizational structure and staffing levels maintained by the licensee during the inspection period met the requirements specified in the license and were sufficient for the work in progress. The licensee's written safety plan, standard operating procedures, and activity plans were appropriate for the activities in progress, commensurate with the risks associated with the program and in accordance with regulatory and license requirements. A violation was identified related to the licensee's failure to document task-specific qualification training and approval required under the radiation protection plan.

2 Radiation Protection (IP 83822)

2.1 Inspection Scope

Determine whether the licensee's radiation protection program was conducted in accordance with the license and 10 CFR Part 20 requirements. Specifically, verify the performance of the radiation protection program commensurate with the risk involved with licensee activities and the following program elements: (1) occupational exposures; (2) radiation work permits and respiratory protection; (3) radiological surveys; and (4) training.

2.2 Observations and Findings

License Condition 26 requires, in part, that the licensee conduct a radiation protection program in accordance with the RPP. At the time of the inspection, the licensee was implementing Revision 3.2 of the RPP.

License Condition 27.e allows the licensee to make changes to the RPP under certain conditions without NRC approval. The licensee revised the RPP in 2019 using the license condition. The inspector reviewed the change and concluded that the change did not require prior NRC approval. Specifically, the change to add a requirement that precludes the site from receiving and/or using potentially contaminated tools or equipment was consistent with ALARA principles and the decommissioning process in place at the site.

The inspector reviewed the licensee's occupational monitoring program. The licensee discontinued occupational monitoring in 2006, as allowed by 10 CFR 20.1502, but continued to conduct area monitoring to validate the 2006 decision. The inspector reviewed the licensee's 2019-2020 area monitoring records, which confirmed that no individual was likely to receive greater than 100 millirem per year, the public dose limit specified in 10 CFR 20.1301(a). Doses recorded for CY2019 and year-to-date for 2020 ranged between background and 33 mrem annually. The inspector noted that in the fourth quarter of CY2019 the licensee added 11 environmental dosimeters in the area of the proposed Western Area Treatment Facility and six environmental dosimeters in Burial Area #1.

The inspector reviewed the licensee's routine survey and contamination control programs. The licensee conducted routine surveys in its office and in any restricted areas that were routinely occupied. There were no restricted areas at the time of the onsite inspection. The licensee also conducted monthly surveys, or upon entry if entries

were greater than monthly, in the radioactive material areas. The records for CY2019 and year-to-date 2020 indicate that there were no contamination control issues.

The inspector noted inconsistencies in the detector efficiency and calibration data recorded on the survey sheets. The inspector determined that the licensee staff had a version control problem with their survey sheets. The licensee generated and maintained survey and contamination control sheets electronically for use by the radiation safety technicians (RST). These survey sheets (Form RP-30) had revision numbers, but the revision numbers were not updated when the efficiencies and calibration due dates for the survey meters were updated by the health physics staff. The information related to detector efficiency and calibration due date of the electronic form are locked so that the RSTs cannot change them; therefore, selecting the correct version of the form is necessary to ensure correct survey information is documented. The health physics staff is not controlling access to form to make ensure that only the most recent version of the sheet is used. The inspector identified multiple examples of use of the wrong version of Form RP-30 by the RSTs. Because the survey result values were low, a recalculation using the correct efficiency demonstrated that there were no releases of material or equipment from the site in excess of the release criteria. The inspector also noted that surveys of personnel prior to departure from the site at the end of the day were not documented on an Form RP-30. These surveys were documented in the RST daily log and were not tied to individual personnel or a specific activity plan; rather, the RST notes that all personnel were surveyed at the end of the day and no contamination was identified. Both of these observations were discussed with the RSO and health physics staff during the exit.

The licensee implemented a corrective action program that included documentation of deficiencies. The corrective action program was found to be effective in implementing appropriate corrective actions to address licensee identified deficiencies.

The inspector conducted a site tour to observe site conditions, including postings and access controls. There were five radioactive material areas and no radiation areas within the licensee controlled area. All radioactive material areas were posted as required by 10 CFR 20.1902. The licensee controlled physical access to the site with fences and gates. The inspector conducted an independent survey of the radioactive material storage area in the office trailer. The highest measured dose rate near the drums and carboy stored in the area was 14 $\mu\text{R/hr}$, with a background of 7 $\mu\text{R/hr}$. Measurements of the dose rate on the exterior wall of the building were indistinguishable from background. All measurements were made using a Ludlum 19 survey meter (Serial Number 15546, calibration due date December 9, 2020). The licensee indicated the intent to continue storing this material in its current location until they had generated a sufficient quantity of low-level waste to make a shipment for offsite disposal.

During excavation activities for the pilot test in Uranium Pond #1, the licensee's contractors identified a concrete slab with fixed radiological contamination. The slab was moved, covered with a tarp, and posted as a radioactive materials area in accordance with 10 CFR 20.1902(e). During site tours, the inspector noted that the slab remained covered and posted as a radioactive materials area pending future disposal.

2.3 Conclusions

The licensee implemented a radiation protection program that met the requirements of 10 CFR Part 20 and the license. The licensee's radiation protection program was commensurate with the risk involved based on licensee activities and included the required program elements.

3 Effluent Control and Environmental Protection (IP 88045)

3.1 Inspection Scope

Determine if the environmental and effluent monitoring programs are adequate to monitor the impacts of site activities on the local environment. Specifically, determine if the effluent control and environmental monitoring programs were being conducted in accordance with the license and procedural requirements and in a manner that supports the principles of ALARA.

3.2 Observations and Findings

License Condition 26 requires the licensee to conduct the radiation protection program in accordance with the RPP. Section 15 of the RPP requires the licensee to collect 25 ground water samples, seven surface water samples, and 11 soil samples, with sampling frequencies that vary by location and type as detailed in Table 15-1 of the RPP. Sampling was being performed the week the inspection was conducted. The inspector observed the groundwater and surface water sample collection process and verified that sampling was performed in accordance with the requirements of SAP-13, "Groundwater Sampling," and SAP-14, "Surface Water Sampling." Sample collection and radiation surveys were conducted in accordance with the requirements of the sampling procedures identified. Samples are analyzed for uranium, fluoride, nitrate (NO₃) gross beta, and gross alpha. The results of the annual environmental monitoring are submitted to the NRC via annual environmental reports and reviewed by program office staff.

Optically stimulated luminescence dosimeters were posted at 14 locations onsite in accordance with the requirements of the RPP. These environmental dosimeters were exchanged quarterly and any result greater than or equal to 20 millirem above background results in immediate notification of the RSO. A review of environmental dosimeter records for CY2019 identified no dosimeter results at or above the action level.

3.3 Conclusions

The licensee conducted environmental monitoring in accordance with license and procedural requirements. The licensee reported the results in annual reports to the NRC.

4 Exit Meeting Summary

The NRC inspector presented the inspection findings to the licensee's representatives at the conclusion of the onsite inspection on July 22, 2020. During the inspection, the licensee did not identify any information reviewed by the inspector as proprietary.

SUPPLEMENTAL INSPECTION INFORMATION

Partial List Of Persons Contacted

Licensee Personnel

Jeff Lux, P.E., Project Manager, Environmental Properties Management, LLC
Bill Halliburton, Trustee, CERT
Jay Maisler, CHP, Radiation Safety Officer, Enercon (via video)
Chuck Beatty, Quality Coordinator, Enercon (via video)
Dane Kaiser, Radiation Protection Technician, Enercon

Inspection Procedures (IP) Used

IP83822	Radiation Protection
IP88005	Management Organization and Controls
IP88045	Effluent Control and Environmental Protection
IP88010	Training

Items Opened, Closed and Discussed

Opened

07000925/2020001-01	VIO	Failure to document task specific qualifications in accordance with the requirements of the Radiation Protection Plan as required by License Condition 26
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Closed

None

Discussed

None

List of Acronyms

ADAMS	Agencywide Documents Access and Management System
ALARA	As Low As is Reasonably Achievable
AP	Activity Plan
CFR	<i>Code of Federal Regulations</i>
CY	Calendar Year
IP	NRC Inspection Procedure
μR/hr	microrentgen per hour
NRC	U.S. Nuclear Regulatory Commission
RPP	Radiation Protection Plan
RSO	Radiation Safety Officer
SAP	Sampling Procedure

CIMARRON URANIUM PLANT NRC INSPECTION REPORT 070-00925/2020-001 DATED - AUGUST 20, 2020

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