



**KERR-McGEE CORPORATION**

KERR-McGEE CENTER • OKLAHOMA CITY, OKLAHOMA 73125

ENVIRONMENT AND HEALTH MANAGEMENT DIVISION

EDWIN T. STILL, DVM  
VICE PRESIDENT AND DIRECTOR

February 25, 1993

Mr. Jerry J. Swift, Section Leader  
Advanced Fuel and Special Facilities Section  
Fuel Cycle Safety Branch  
Division of Industrial and Medical Nuclear Safety  
and Safety Safeguards  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Re: Docket No. 70-0925  
License No: SNM-928  
Amendment Request, Onsite Disposition of Soils

Dear Mr. Swift:

Cimarron Corporation addresses herein the items you requested in your January 8, 1993 letter to enable completion of the 10 CFR 20.302 onsite disposal review.

Subsidence

Subsidence will be precluded by the nature of the materials placed in the disposal trench and the application of sound construction practices in placing those materials in the trench and in covering the materials with backfill.

The material for disposal consists primarily of native soil and rock, with lesser amounts of dense construction-type rubble such as concrete and brick. Organic material content, if any, with the potential to decay over time and produce significant voids within the disposal area, is incidental.

Cimarron will employ sound construction practices to assure the disposed material is placed so that voids are not produced and adequate consolidation is achieved. The material will be placed in lifts of one foot nominal thickness and compacted with an appropriate type of heavy equipment, such as a roller or sheep's foot.

The cover material of clean native soil will also be placed in nominal one foot thickness lifts and consolidated by the heavy equipment traversing the lifts.

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Because of the material characteristics and placement techniques, any subsidence likely to ever occur will occur in a short period. Cimarron will periodically monitor the disposal area for subsidence for at least five years and repair promptly any subsidence noted.

#### Wind and Water Erosion

Wind and water erosion in the disposal area will be controlled by employing sound soil conservation practices in the completion of the disposal area and the establishment of a native permanent vegetation cover.

The final cover will be placed and contoured to conform with the area topography, maintaining a gentle grade of a nominal 4%. At locations and intervals consistent with Agricultural Extension Service recommendations, terracing to control precipitation runoff from the contoured disposal area will be constructed as necessary.

Appropriate soil amendments will be used in recommended amounts based on soil analyses for promoting the prompt reestablishment of a vegetative cover. The growing season at time of completion will determine whether a temporary or non-permanent type of vegetation such as wheat or rye grass is seeded initially, or whether the permanent cover such as bermuda or another native grass is established, or a combination.

Cimarron will for at least five years periodically monitor the disposal area for evidence of erosion and status of vegetation. Any detrimental erosion will be promptly restored and appropriate further soil conservation measures applied to prevent reoccurrence.

#### Deed Notice and Location Markers

Cimarron Corporation will place in the property deed a description of the burial area. The description will conform to county practices and will be filed with the County Recorder.

The corners of the disposal area will be permanently marked by affixing a brass plate of nominal four to six-inch diameter to a concrete shaft of a similar diameter and a length extending a nominal two feet below the freeze line. The concrete shaft will be poured in place and will be level with the surface of the ground. The brass markers will be engraved with the coordinates of the corners of the disposal area as determined by a registered land surveyor, the words "Radioactive Disposal Area" and a line diagram indicating the relation of the disposal area to the marker.

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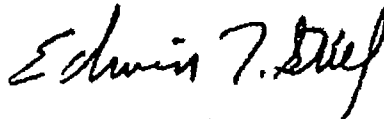
Commitment

Cimarron Corporation assures the Nuclear Regulatory Commission that the practices and measures described above will be fully carried out and that Cimarron remains committed to completing the decontamination and decommissioning of the facility in accordance with license conditions.

Cimarron will in subsequent correspondence address the remaining items in your January 8 letter, namely the characterization of the remainder of the site to include the previously closed lagoons and the decommissioning plan for unrestricted release of the entire site. Cimarron currently is collecting additional site data to allow these items to be addressed.

We are available at your convenience to provide any additional information you may require. Please call me at 405/270-2934 if you have questions.

Sincerely,



Edwin T. Still  
Vice President and Director  
Environment and Health Management Division

ETS:lld

copy: G. Comfort - NMSS, Headquarters, Washington, D.C.  
Region Office - Glen Ellyn, Illinois

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bcc: James L. Grant  
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