CIMARRON CORPORATION
P. O. BOX 25861 • OKLAHOMA CITY, OKLAHOMA 73125

July 5, 1995

S. JESS LARSEN
VICE PRESIDENT

Mr. Michael F. Weber
Chief, Low-Level Waste and Decommissioning
Projects Branch
Division of Waste Management
Office of Nuclear Material Safety and Safeguards
United States Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Re: Docket No. 70-0295
License No. SNM-928
South Uranium Yard Decontamination
June 21, 1995 letter from Mr. Jess Larsen to Mr. Michael F. Weber

Dear Mr. Weber:

This letter is in response to the telephone conversation between Mr. Joe Kegin, Cimarron Site Manager, and Mr. Dave Fauver on July 3, 1995, regarding the above referenced letter.

The first concern related to the first equation contained in Comment No. 1, which is described on page 8.7 of NUREG/CR-5849 (section 8.5.2). NUREG/CR-5849 states "Areas of elevated activity between one and three times the guideline value are then tested to assure that the average concentration is less than $(100/A)^{½}$ times the guideline value, where A is the area of the elevated activity in m^2." The guideline value for soils that may be left in-situ is 30 pCi/g. The area of the 38.4 pCi/g hot-spot was determined to be $9m^2$. Application of the above NUREG/CR-5849 statement shows that the hot-spot meets the criteria.

$$\text{Hot-spot average concentration} < (30)\,(100/9)^{½} \quad \text{(or)} \quad 38.4\ \text{pCi/g} < 100\ \text{pCi/g}$$

The second concern related to the concentration of uranium to be used for the average site background. As discussed with Mr. Fauver, Cimarron Corporation agrees to use 4 pCi/g as the average site background concentration for total uranium in soil for all samples analyzed with the on-site soil counter.

Please feel free to contact Mr. Joe Kegin or myself if there are any additional questions or concerns.

Sincerely,

JC Stauter for SJL

Jess Larsen
Vice-President