

Specialty Materials  
Honeywell  
P.O. Box 430  
Highway 45 North  
Metropolis, IL 62960  
618 524-2111  
618 524-6239 Fax

August 14, 2006

(UPS: 301-415-6334)

Mr. Michael G. Raddatz, Sr. Project Manager  
U.S. Nuclear Regulatory Commission  
Uranium Processing Section, Div. of Fuel Cycle Safety and Safeguards  
Fuel Cycle Facilities Branch, Mail Stop T-8A33  
Office of Nuclear Material Safety and Safeguards  
Two White Flint North, 11545 Rockville Pike  
Rockville, MD 20852-2738

Dear Mr. Raddatz,

Honeywell Metropolis Works (MTW) has submitted an application for renewal of USNRC Source Material License SUB-526 and anticipates issuance of a renewed license in the near future. The renewed license is expected to require significant changes to the facility's existing configuration control processes in order to satisfy the intent of the application's supporting documents, including the Safety Demonstration Report and the Integrated Safety Analysis. As implementation will involve the development of numerous new policies and procedures, additional training for site personnel will also be necessary.

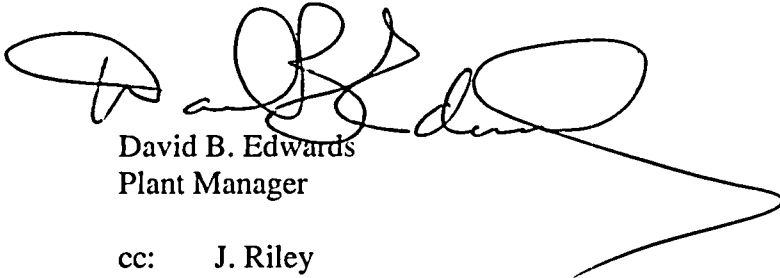
To ensure successful implementation of the renewed license, Honeywell has developed the attached Project Management Plan and Schedule (Proprietary Information). Honeywell, as the owner of this information, is requesting withholding of these attachments from public disclosure. The affidavit accompanying this letter sets forth the bases on which this information may be withheld from public disclosure by the Commission and addresses with specificity the considerations listed in 10 C.F.R. § 2.390(b)(4).

The enclosed Schedule shows a start date of August 7th, but will be adjusted to reflect the actual date of issuance of the renewed license. Consistent with the Project Management Plan and Schedule, MTW requests a 180-day implementation period for the renewed license. This will permit completion of the items listed in the Project Management Plan and Schedule and assure a smooth transition to the renewed license.

Honeywell is fully-committed to the safe and proper operation of our Metropolis Works Facility, including timely implementation of the renewed license. This is consistent with

our corporate commitment to the continued safety of our workers and the public, and the protection of the environment. This letter does not contain any new regulatory commitments.

Sincerely,

A handwritten signature in black ink, appearing to read 'David B. Edwards', with a long, sweeping horizontal line extending to the right.

David B. Edwards  
Plant Manager

cc: J. Riley  
D. Mays

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WITHHOLD FROM PUBLIC DISCLOSURE  
UNDER 10 CFR § 2.390(a)(4)

**AFFIDAVIT OF DAVID EDWARDS**

(a) I am the Plant Manager at Honeywell Metropolis Works, and as such have the responsibility of reviewing the proprietary information sought to be withheld from public disclosure in connection with source material licensing. I am authorized to apply for the withholding of such proprietary information from public disclosure on behalf of Honeywell.

(b) I am making this affidavit in conformance with the provisions of 10 C.F.R. § 2.390 of the regulations of the Nuclear Regulatory Commission ("NRC"), and in conjunction with Honeywell's application for withholding which accompanies this affidavit.

(c) I have knowledge of the criteria used by Honeywell in designating information as proprietary or confidential.

(d) By this submittal, Honeywell seeks to protect from disclosure certain proprietary information contained in the following documents:

*Project Implementation Plan for Honeywell Metropolis Source Material License*

*Implementation Schedule for NRC Source Material License SUB-526*

This information is being provided to the NRC in support of Honeywell's request for a 180-day implementation period for its renewed source material license.

(e) Pursuant to the provisions of 10 C.F.R. § 2.390(b)(4), the following is furnished for consideration by the NRC in determining whether the proprietary information sought to be protected should be withheld from public disclosure.

- (i) The information for which protection from disclosure is sought has been held in confidence by Honeywell. This information is proprietary to Honeywell, and Honeywell seeks to protect it as such. The information proprietary to Honeywell is found in the documents listed in paragraph (d), above. Honeywell has determined that it is not practicable to separate the proprietary information from non-proprietary information in these documents. Therefore, Honeywell seeks to protect these documents from public disclosure in their entirety.
- (ii) The information sought to be withheld is of a type that would customarily be held in confidence by Honeywell. The information consists of commercial

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information and schedules that provide a competitive advantage to Honeywell.

- (iii) The information sought to be withheld is being provided to the NRC in confidence, and, under the provisions of 10 C.F.R. § 2.390, it is to be received in confidence by the NRC.
- (iv) The information sought to be withheld is not available in public sources, to the best of Honeywell's knowledge and belief.
- (v) Public disclosure of the proprietary information Honeywell seeks to protect is likely to cause substantial harm to Honeywell's competitive position within the meaning of 10 C.F.R. § 2.390(b)(4)(v). The proprietary information has substantial commercial value to Honeywell.

For all of the reasons discussed above, Honeywell requests that this proprietary information be withheld from public disclosure in its entirety.

I declare under penalty of perjury that the foregoing is true and correct

Executed on August \_\_, 2006

A handwritten signature in black ink, appearing to read 'David B. Edwards', is written over a horizontal line.

David B. Edwards  
Plant Manager  
Metropolis Plant  
2768 N. Highway 45  
Metropolis, IL 62960