

March 13, 2012

Mr. Larry Smith  
Plant Manager  
Honeywell Metropolis Works  
P.O. Box 430  
2768 North US 45 Road  
Metropolis, IL 62960

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION - EXEMPTION FROM THE  
REQUIREMENTS OF 10 CFR 40.60(b) (3) REPORTING REQUIREMENTS FOR  
UNPLANNED MEDICAL TREATMENT OF CONTAMINATED INDIVIDUALS  
(TAC NO. 32777)

Dear Mr. Smith:

The U.S. Nuclear Regulatory Commission (NRC) continues its review of your request for exemption from the specific requirements of Title 10 of the *Code of Federal Regulations* (10 CFR) 40.60(b)(3) for Honeywell Metropolis Works (Honeywell). In its October 21, 2011, submittal, Honeywell requested an exemption from the reporting requirement in 10 CFR 40.60(b)(3), which requires that Honeywell notify the NRC within 24 hours after the discovery of an event that requires unplanned medical treatment at any medical facility of an individual with spreadable radioactive contamination on the individual's clothing or body. Our review of your request has identified that additional information is needed before final action can be taken on your submittal. The following is the Request for Additional Information:

Provide justification pursuant to 40.14(a) that the implementation of this exemption will not: (1) endanger life or property or the common defense and security, and (2) is otherwise in the public interest.

Honeywell's letter dated October 21, 2011, Request to Grant Exemption (Agencywide Documents Access and Management System [ADAMS] Accession Number ML11301A307) describes how Honeywell currently responds to medical treatment events, but does not specifically address the requirements for granting exemption in 10 CFR 40.14. Additionally, note that the Commission addressed this topic in the final rule Statement of Considerations (56 FR 40762 through 40765). In the responses to Comments 34 and 35, the NRC specifically rejected treating licensee-maintained medical facilities different than other medical facilities, even if the treatment is being provided for superficial wounds. Therefore, for NRC to reach a finding, Honeywell needs to provide information showing that NRC's concerns, as they were documented in the Statement of Considerations, would continue to be addressed if the exemption were granted.

The additional information requested above should be provided within 30 days from the date of this letter.

In accordance with 10 CFR 2.390 of NRC's "Rules of Practice," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records System component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov-rm/adams/html>.

If you have any questions regarding this matter, please contact me at (301) 492-3180 or via e-mail at [John.Sulima@nrc.gov](mailto:John.Sulima@nrc.gov). Please reference the above Technical Assignment Control Number. in future correspondence related to this request.

Sincerely,  
**/RA/**

John H. (Jack) Sulima, Project Manager  
Conversion, Deconversion and Enrichment Branch  
Division of Fuel Cycle Safety  
and Safeguards  
Office of Nuclear Materials Safety  
and Safeguards

Docket No. 40-3392  
License No. SUB-526

cc: Mike Greeno  
Regulatory Affairs Manager  
Honeywell International, Inc.  
P.O. Box 430  
Highway 45 North  
Metropolis, IL 62960

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/RA/

John H. (Jack) Sulima, Project Manager  
Conversion, Deconversion and Enrichment Branch  
Division of Fuel Cycle Safety  
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