



**UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II**
245 PEACHTREE CENTER AVENUE NE, SUITE 1200
ATLANTA, GEORGIA 30303-1257

July 30, 2012

Mr. Larry Smith
Plant Manager
Honeywell International Inc.
P.O. Box 430
Metropolis, IL 62960

SUBJECT: ACKNOWLEDGEMENT OF HONEYWELL METROPOLIS WORKS LETTER
DATED JULY 20, 2012

Dear Mr. Smith:

This letter refers to the July 20, 2012, letter you sent to the NRC describing the Honeywell Metropolis Works Facilities' proposed recovery plan for solid UF₆ stored on site. As discussed in NRC Confirmatory Action Letter (Cal) No. 2-2012-002, Honeywell Metropolis Works has agreed to inform the NRC of planned corrective actions and the associated implementation schedule such that NRC has sufficient time to inspect the adequacy of the corrective actions, including reviewing any modifications to the facility as well as Honeywell's Emergency Response Plan (ERP). Based on this inspection and assessment, the NRC will determine the acceptability of conducting operations that exceed the analyzed quantity in the ERP.

During our initial review of the information you provided in your letter dated July 20, 2012, and a subsequent site visit on July 24, 2012, we have determined that your proposal did not contain sufficient information for the NRC staff to conclude that the limited operations you proposed for recovery were sufficiently covered by the existing ERP. Accordingly, additional information is needed for us to determine whether your proposal is adequate. Your proposal should provide additional information to support our inspection of the limited operations you propose as follows:

- (1) An explicit description of the proposed limited operation,
- (2) An explicit description of the credible accident that could occur during the proposed limited operations that produces the maximum source term, its' consequences, and the likelihood of it occurring if relied upon in the proposal,
- (3) An explicit conclusion and the bases for that conclusion regarding whether the proposed operation is within the current ERP analyses,
- (4) If a revision to the ERP is deemed necessary by your staff to support the proposed operation, then you should describe how the ERP would be modified. Again provide the bases for those conclusions (Note: if the proposed change to the ERP is deemed by your staff to contain a reduction in the effectiveness of the ERP, then a license amendment would need to be submitted as required by 10 CFR 40.35(f)),
- (5) A description of the current operating practices to protect the worker and why they are sufficient for the limited operations proposed,

- (6) If your proposal includes mitigation measures to limit the release of UF₆ following a credible event, then provide a complete description of those measures and the bases for their acceptability, and
- (7) Explicitly request that the NRC authorize the limited operations.

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

If you have any questions, or you would like to schedule a meeting with us, please contact Joselito Calle at (404) 997-4418.

Sincerely,

/RA/

Anthony T. Gody, Director
Division of Fuel Facility Inspection

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

cc: (See page 3)

- (8) If your proposal includes mitigation measures to limit the release of UF₆ following a credible event, then provide a complete description of those measures and the bases for their acceptability, and
- (9) Explicitly request that the NRC authorize the limited operations.

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Sincerely,

/RA/

Anthony T. Gody, Director
Division of Fuel Facility Inspection

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cc: (See page 3)

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*see previous concurrence

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DATE	7/30/12	7/30/12	7/ /2012	7/ /2012	7/ /2012	7/ /2012	7/ /2012
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