

**Performance Materials and Technologies**

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July 30, 2012

Attention: Document Control Desk  
Director, Office of Nuclear Material Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

- REFERENCES:
- 1) Docket No. 40-3392; License No. SUB-526
  - 2) Letter from Mitch Tillman from Honeywell Specialty Materials Metropolis Works to the NRC, dated July 16, 2009, ADAMS Accession No. ML092040490.
  - 3) US Ecology Idaho, Inc., Honeywell Metropolis Evaluation in Support of Alternative Waste Disposal Procedures for Unimportant Quantities of Source Material, July 16, 2009, ADAMS Accession No. ML092040490
  - 4) Approval of Request to Transfer Scrap Materials under 10 CFR 40.13, "Unimportant Quantities of Source Material," to Resource Conservation and Recovery Act Subtitle C Facility in Grand View, Idaho and Safety Evaluation Report dated November 17, 2009, ADAMS Accession No. ML093030377
  - 5) Revised Safety Evaluation Report for the Approval of Request to Transfer Scrap Materials Under 10 CFR 40.13, "Unimportant Quantities of Source Material," to Resource Conservation and Recovery Act Subtitle C Facility in Grand View, Idaho, dated February 2, 2010, ADAMS Accession No. ML100220407
  - 6) Notification of Transfer of Scrap Materials under 10 CFR 40.13, "Unimportant Quantities of Source Material," to Resource Conservation and Recovery Act Subtitle C Facility in Grand View, Idaho, dated February 4, 2011
  - 7) Approval of Request to Transfer Scrap Materials under Title 10 of the Code of Federal Regulations 40.13, "Unimportant Quantities of Source Material," to Resource Conservation and Recovery Act Subtitle C Facility in Grand View, Idaho, dated April 25, 2011 (TAC No. L32767)

SUBJECT: REVISED HONEYWELL METROPOLIS WORKS NOTIFICATION OF  
TRANSFER OF DEBRIS UNDER 10 CFR 40.13, "UNIMPORTANT  
QUANTITIES OF SOURCE MATERIAL"

This letter is to notify the NRC of Honeywell's intention to transfer annually for disposal over a period of ten years (2012 through 2021) 90,000 cubic feet (ft<sup>3</sup>) of debris contaminated with unimportant quantities of source material to the US Ecology Idaho (USEI) RCRA Subtitle C facility located near Grand View, Idaho. This transfer performed

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in accordance with Title 10, Code of Federal Regulations (10 CFR), Section 40.13, "Unimportant Quantities of Source Material," will establish an annual debris material allowance separate from that of the previously approved annual industrial scrap material allowance.

The Grand View facility permit issued to US Ecology Idaho, Inc. (USEI) by the Idaho Department of Environmental Quality specifically authorizes receipt and disposal of unimportant quantities of source material pursuant to the 10 CFR Part 40.13.

By its letter dated July 16, 2009, Honeywell provided an initial notification to the NRC of intention to transfer 90,000 ft<sup>3</sup> of unimportant quantities of scrap material to this US Ecology Idaho facility for disposal. Additionally, Honeywell presented a comprehensive Evaluation in Support of Alternative Waste Disposal Procedures for Unimportant Quantities of Source Materials. On February 4, 2011, Honeywell submitted notification of another 90,000 ft<sup>3</sup> scrap material allotment intended to be transferred to the same US Ecology Idaho facility for disposal.

As a result of the Commission staff analyses documented in the Safety Evaluation Reports, the NRC found both transfers of 90,000 ft<sup>3</sup> of scrap materials to be acceptable as stated in the NRC approval letters dated February 2, 2010, and April 25, 2011.

The planned debris stream will include paper, plastic, glass, soil or soil-like materials, etc. The material in the proposed debris stream has a nominal density of 0.46 g/cc. This density is less than a third of the 1.5 g/cc density used in conservative estimates for the industrial scrap material transfers and disposals at USEI evaluated in the Safety Evaluation Reports and approved by the NRC on February 2, 2010, and April 25, 2011. Assuming that source material concentration in the newly proposed debris stream is 0.05 percent by weight, a lesser amount of source material is present in 90,000 ft<sup>3</sup> of debris due to its significantly reduced density.

All other aspects of the intended debris shipment and disposal will be unchanged and fully consistent with the assumptions previously used in the Commission analyses performed for the Safety Evaluation Reports. It is apparent that the doses to workers and the public from transportation, handling and disposal at the USEI site, long-term impacts to groundwater – as well as possible impacts if a member of the public inadvertently intruded into the site after closure – will be less than those received from the approved transfer and disposal of the industrial scrap material. Consequently, the dose evaluation performed for scrap material and presented in the Safety Evaluation Reports dated February 2, 2010, and April 25, 2011, may also serve as a conservative estimate for the doses received from debris transfer and disposal. The sum of the annual doses received from each material stream (90,000 ft<sup>3</sup> of industrial scrap plus 90,000 ft<sup>3</sup> of debris per year) will still remain well below all applicable regulatory limits of concern.

Honeywell is planning to begin debris shipments by August 31, 2012. We hope that NRC attention and expedited review of this notification will allow Honeywell to meet its waste disposal goals and shipment schedule.

If you have any questions, require additional information, or wish to discuss this request please contact Mr. Bob Stokes, Regulatory Affairs and Radiation Protection Manager, at (618) 524-6341.

Sincerely,



Larry A. Smith  
Plant Manager

cc: John Sulima, NMSS Project Manager  
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