



## METROPOLIS WORKS

UF<sub>6</sub> Conversion

**Honeywell**

# Honeywell Metropolis

- Introduction
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    - Dates
    - Key elements of licensing documents
  - Timing and status of renewal activities
- Regulatory Framework
  - Part 40 – what is “it”?
  - Part 70 – what is “it”?
- Side by side comparison of part 40 vs. part 70 vs. MTW
- Management measures in place at MTW
- What are the key elements of confusion and discussion
  - ISA Summary and it’s place in licensing documents
- How to reconcile and path forward
- Brief discussion of term of license renewal

# Introduction

- Current Status of MTW License
  - MTW license = SUB-526
  - Current Amendment is #11; date = 11 August, 2014
  - MTW license expires – May 11, 2017
- Key elements of MTW licensing documents
  - License Application (per RG 3.55)
  - “Safety Demonstration Report” (SDR)
  - Environmental Report (per NUREG 1748)
  - Emergency Response Plan
  - Decommissioning Funding Plan / Decommissioning Cost Estimate
  - Integrated Safety Analysis (ISA) Summary
- Timing and status of renewal activities
  - MTW team formed, schedule developed for review and revision
  - Begin detailed, line-by-line review and revision of licensing documents
  - Target 1Q2017 for submittal to NRC

# Regulatory Framework for MTW

- 10 CFR Part 40 = *Domestic Licensing of Source Material*
  - What is Source Material = 10 CFR 40.4: (1) Uranium or thorium, or any combination thereof, in any physical or chemical form or (2) ore which contain by weight one-twentieth of one percent (0.05%) or more of: (i) Uranium, (ii) thorium or (iii) any combination thereof. **Source material does not include special nuclear material** (emphasis added)
- 10 CFR Part 70 = *Domestic Licensing of Special Nuclear Material*
  - What is Special Nuclear Material = 10 CFR 70.4: (1) plutonium, uranium 233, uranium enriched in the isotope 233 or in the isotope 235, and any other material which the Commission, pursuant to the provisions of section 51 of the act, determines to be special nuclear material; or (2) any material artificially enriched by any of the foregoing **but does not include source material** (emphasis added)
- Additional requirements (not all inclusive)
  - 10 CFR Part 19 = *Notices, Instructions, and reports to workers: Inspections and Investigations*
  - 10 CFR Part 20 = *Standards for Protection Against Radiation*
  - 10 CFR Part 21 = *Reporting of Defects and Noncompliance (LIMITED SCOPE)*
  - 10 CFR Part 30 = *Rules of General Applicability to Domestic Licensing of Byproduct Material*
  - 10 CFR Part 51 = *Environmental Protection*
  - 10 CFR Part 71 = *Packaging and Transportation of Radioactive Material*



# Regulatory Framework for MTW

- 10 CFR 40.31 = Application for Specific Licenses
  - 40.31 (f) – includes reference to UF6 production
  - 40.31 (i) – requirements for financial assurance for decommissioning
  - 40.31 (j)(1) – exposure limits and emergency response plan
  - 40.31 (j)(2)(ii) – facility design or engineered safety features in the facility would reduce the amount of the release
  - 40.31 (j)(3) – emergency response plan (multiple specific requirements)
  - 40.31 (k) – environmental report per 10 CFR 51 subpart A
  - 40.31 (l) – liability insurance
  - 40.31 (m) – protection of safeguards information