

SEP 3 1985

Honeywell, Inc.
ATTN: Mr. Paul G. Johnson
Principle Materials Engineer
Military Avionics Division MN17-3636
2600 Ridgeway Parkway
P.O. Box 312
Minneapolis, MN 55440

License No. 22-19422-02G

Gentlemen:

We have reviewed your letter dated November 15, 1984 requesting an amendment to your NRC License Number 22-19422-02G and find that we will need additional information as follows:

We believe your request may be processed under the provisions of 10 CFR 32.15⁵¹(c) regarding removal and installation of the devices, however, we cannot authorize redistribution of devices from the Boeing Corp. Uninstalled devices may not be transferred by Boeing Corp. for installation by Boeing aircraft owners or operators. Devices installed in aircraft may be transferred only by sale of the aircraft. Boeing Corp. is not operating under NRC jurisdiction but does operate under compatible Agreement State general license requirements established by the State of Washington. It is not appropriate for the NRC to act on your request to exempt all Honeywell customers from Agreement State requirements as this would undermine the regulatory authority of Agreement States.

If you wish to pursue an amendment authorizing installation and removal of the devices by Boeing aircraft owners or operators you should submit detailed written instructions to be followed by the general licensees. These instructions should include, but not be limited to:

- a. a clear statement informing the general licensees that devices must be received directly from and returned directly to Honeywell
- b. step-by-step procedures for the mechanics who will remove and install the devices
- c. step-by-step procedures for shipping and receiving the devices from and to the installation site.

We will continue our review of your application upon receipt of this information. Please reply in duplicate, within 30 days, and refer to Control Number 77823.

Sincerely,

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REG3 LIC30
22-19422-02G PDR

Original Signed By
William J. Adam, Ph.D.
Materials Licensing Section

RIII
WJA
Adam/cm
08/28/85



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

PRIORITY ROUTING	
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FILE *[Signature]*

AUG 13 1985 *Axelson*

MEMORANDUM FOR: William Axelson, Chief
Nuclear Materials, Safety and Safeguards Branch, RIII

FROM: Vandy L. Miller, Chief
Material Licensing Branch
Division of Fuel Cycle and Material Safety

SUBJECT: REQUEST FOR TECHNICAL ASSISTANCE: HONEYWELL INC.,
LICENSE NO. 22-19422-02G

Our review of your request dated April 11, 1985, has been completed. The applicant's request may be processed under the provisions of 10 CFR 32.51(c) regarding removal and installation of the devices, but not redistribution. Devices received directly from Honeywell could be installed by aircraft owners or operators. Uninstalled devices may not be transferred by Boeing for installation by Boeing aircraft owners or operators. Installed devices may be transferred only by sale of the aircraft.

If the devices are directly obtained from Honeywell, we could consider allowing Boeing's customers, Boeing aircraft owners or operators to remove the devices from an aircraft, provided the devices are returned directly to Honeywell. Mr. Hickey's letter dated March 29, 1984, was intended to address only removal of devices by the general licensee and not transfer of the devices to Boeing or other general licensees.

If Boeing wants to stock replacement devices for installation on Boeing aircraft by owners or operators, Boeing must obtain a license from the State of Washington. Please note that previous conversations with Boeing on this matter have given us the impression that Boeing, a Washington licensee, does not want to deal with Washington State for some reason.

We suggest that your letter to Honeywell point out that general licensees in non-Agreement States are under NRC jurisdiction. Boeing is not operating under NRC requirements, but operates under compatible Agreement State general license requirements established by Washington. Honeywell should be informed that it is not appropriate for us to act on their request to exempt all Honeywell customers from Agreement State requirements, as this would undermine the regulatory authority of the Agreement States.


AUG 16 1985

If Honeywell wishes to pursue an amendment authorizing installation and removal of the devices by Boeing aircraft owners or operators, we suggest that their present removal and installation instructions be carefully reviewed. The instructions should clearly state that the devices must be received directly from and returned directly to Honeywell. Honeywell should commit to an understanding that Boeing will not transfer uninstalled devices.

Our specific comments and suggestions are as follows:

1. Honeywell's application should discuss their experience with the devices including the number of devices installed, their leak test experience, and their exchange frequency.
2. The applicant should supply information about the instructions for exchanging the devices to be provided to the mechanics who will remove and install the devices. The instructions should be clear, concise, step by step, written instructions on the exchange procedure.
3. The licensee should supply a clear, step by step, outline of their proposed shipping and receiving procedures to be used when a device is shipped to and returned from an installation site.

We would appreciate being informed of any significant development regarding this application.


Vandy L. Miller, Chief
Material Licensing Branch
Division of Fuel Cycle and
Material Safety

Enclosure:
RIII request for assistance
dtd 4/11/85