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UPS/Next Day Air

ATTN: Document Control Desk
Director, Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852

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

RE: Honeywell Metropolis Works Triennial Update to Decommissioning Funding Plan

In a letter dated June 6, 2022 the NRC submitted a letter requesting additional information to the March 24, 2022 submittal of the DCE. MTW submitted the responses to the RAIs on July 19, 2022. After a review of the July 19, 2022 MTW responses, the NRC issued additional RAIs on September 20, 2022. MTW submitted responses to the additional RAIs on October 7, 2022. In an email dated October 31, 2022, NRC approved the additional RAI responses and requested a revision to the DCE. MTW updated the DCE (Revision 2) based on the RAI responses. The revised document is included as Enclosure 1 to this letter. Other enclosures include the DCE Figures (no changes but these are still classified as non-public under 10 CFR 2.390).

Pursuant to License Condition 18A – License Application and 10 CFR 40.36(d), Honeywell International Inc. (Honeywell) previously submitted an updated Decommissioning Funding Plan (DFP) on January 5, 2022. This revised DFP includes the attached Decommissioning Cost Estimate for the required decommissioning activities at Honeywell's conversion facility in Metropolis, Illinois. The revised Decommissioning Cost Estimate updates the previous DFP, which was originally submitted to the NRC on January 5, 2022 and again on March 24, 2022. The current Decommissioning Cost Estimate reflects consideration of the items listed in 10 CFR § 40.36(d)(1)(i)-(ii).

Honeywell's current NRC-approved decommissioning funding plan utilizes letters of credit as the mechanism to provide decommissioning financial assurance. Honeywell intends to rely on one or more letters of credit or surety bonds as the financial assurance mechanism for the updated cost estimate. Honeywell will submit revised financial instruments to reflect the updated Decommissioning Cost Estimate amount after resolution of any NRC comments and within 30 days of the NRC approval date of the DCE.

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In accordance with 10 CFR 40.36(d)(1)(v), Honeywell is not providing a copy of the letters of credit documentation because the previously submitted and accepted letters of credit remain in place.

In accordance with 10 CFR 40.36(d)(1)(iv), Honeywell has submitted a certification of financial assurance for decommissioning in the March 24, 2022 version of the DCE in the amount of the currently approved decommissioning cost estimate, and so it is not included with this submittal.

The Decommissioning Cost Estimate contains security-related sensitive information that should be withheld from public disclosure under 10 CFR 2.390, "Public inspections, exemptions, requests for withholding." Specifically, each page of the Figures and Drawings section contains security-related sensitive information. Accordingly, the Figures and Drawings section is being provided in a separate attachment that is marked for withholding from public disclosure.

Should you have any questions on the enclosed information, please contact Sean Patterson, Regulatory Affairs Manager, at 618-524-6341

Sincerely



Brian Hunt
Director Chemical Plant Operations

Enclosures:

1. Revised Decommissioning Cost Estimate (w/o Figures and Drawing section) (PUBLIC)
2. Figures and Drawing section (NON-PUBLIC)

Cc: Osiris Surano-Perez – Project Manager
Fuel Facilities Licensing Branch
Division of Fuel Management
Office of Nuclear Material Safety and Safeguards