

Performance Polymers

Honeywell

15801 Woods Edge Road

Colonial Heights, VA 23834

September 21, 2000

U. S. Nuclear Regulatory Commission
Document Control Desk
Washington D.C. 20555

Re: August 25, 2000 Notice of Violation for
NRC License No. 45-06454-01, Docket No. 0303-0657

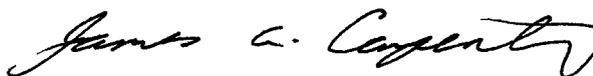
This letter is submitted in response to the above referenced Notice of Violation for failing to comply with conditions stated in 10 CFR § 30.34(b).

(1) As noted in the NOV, 10 CFR § 30.34(b) requires NRC's consent to the transfer of a license issued by the NRC. In December 1999, AlliedSignal Inc., the corporate entity named in License No. 45-06454-01 and the owner/operator of the Churchill facility simply changed its name to Honeywell International, Inc. without transferring any of its assets, including License No. 45-06454-01, to any other facility. Consequently, no transfer of the Churchill facility's license ever occurred, and the requirements of 10 CFR § 30.34(b) were never triggered. Accordingly, Honeywell believes that no violation of 10 CFR § 30.34(b) has occurred.

Insofar as the current status of License No. 45-06454-01 is concerned, and as previously explained to Mr. Wade Loo of NRC Region II, the Churchill facility ceased operations on July 15, 2000. As part of the closure activities, the facility had its licensed nuclear sources leak tested, removed, and title and ownership transferred to Nuclear Instrument Services Co.(NISCO) in San Diego, California on or about August 24, 2000. A letter requesting termination of NRC License 45-06454-01, Form 314, leak test results, transfer papers, and a receipt of materials by NISCO was sent to Ms. Dana Heim of NRC Region II on September 12, 2000.

Honeywell regrets any confusion that may have been created as a consequence of the change in name described above. If you should need any additional information, please do not hesitate to contact me.

Sincerely,



James A. Carpenter
Health, Safety, and Environmental Leader
Spectra Performance Fibers
Honeywell International, Inc.

C: Director, Office of Enforcement, USNRC
Regional Administrator, Region II ✓