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June 26, 2002

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U.S. Nuclear Regulatory Commission
Director, Office of Nuclear Material Safety & Safeguards
Attention: Document Control Desk
Mail Stop T-8A33, Two White Flint N, 11545 Rockville Pike
Rockville, MD 20852-2738

Re: Reply to NRC, letter dated June 6, 2002
"Notice of Violation" Report No. 0400392/2002-003 (DNMS)

Dear Sirs:

This letter is our response to the NRC Inspection Report No. 0400392/2002-003 (DNMS), dated June 6, 2002, "Notice of Violation, Severity Level IV", Violation Number 2002-003-01.

Violation No. 2002-003-01:

Chapter 5, Section 5.4 of the license, "Chemical Safety Plan", requires, in part, that plant operations comply with the Chemical Safety Plan as described in Chapter 13.4 of the license application. Chapter 13, Section 13.4.4.3 states, in part, "...each of the operating manuals (including the process containing HF, NH₃, UF₆, or LPG) address upper and lower operational limits for all pertinent process parameters, i.e., temperature, pressure, flow rates, concentration, composition, etc." Page 44 of the Distillation Manual, dated April 11, 2002, stated that the safe operating limit for the UF₆ Vaporizer weight was less than 12,000 pounds.

Contrary to the above on May 9, 2002, the inspector observed the UF₆ Vaporizer weight indicate 12,000 pounds in violation of the Distillation Manual.

Reason for This Violation:

This violation occurred via a start-up anomaly. During a routine filling of the Distillation System, preceding a normal start-up, excessive heat was applied to the High Boiler Column and Reboiler resulting in a vapor-lock. In a normal start-up sequence, system temperature is critical to maintain a balance of liquid and vapor. If the system becomes too cool, flooding takes place and, if too much heat is applied, a vapor-lock can form. In classical distillation both flooding and vapor-locking can be common. No external problems occur; the system just loses its balance and the product remains out of specification.

The above-mentioned extra heat vapor-locked the High Boiler System. While operating personnel were attending to the High Boiler, the up-stream vaporizer continued to fill. The impending deviation of the "safe operating limit" was not noticed until pointed out by NRC personnel. (The alarm activated when the vaporizer reached 12,000 lbs.) At this time, the feed to the vaporizer was immediately closed and said vessel quickly began to lose weight. It is important to point out that the vaporizer will not become

liquid full until it contains more than 14,000 lbs. Also, neither the pressure relief system, which was set at 150psig, nor the steam supply shut off, which was set at 90psig, were activated during this entire event.

Corrective Actions:

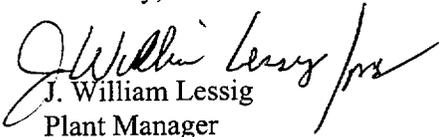
1. PT-101, number 408 has been issued to obtain management approval to change the wording in all the operating manuals from "Safe Operating Limits" to Normal Operating Limits".
2. Notification / communication instructions will be provided to all operations personnel to ensure that production personnel understand the changes to the operating manuals. As an example the Distillation Operating Manual will state the Normal Operating Limit for the UF₆ Vaporizer is less than 12,000 pounds. If conditions exceed the normal operating limits, then operations must take immediate steps to bring the conditions back to the normal operating range as outlined in the operating manual. If the UF₆ Vaporizer exceeds 11,000 pounds for more than 30 minutes then supervision must be notified immediately.
3. Operations personnel will be required to obtain a temporary emergency PT-101 (Process Modification) if there is a valid reason to exceed a Normal Operating Limit, for an extended period of time, as listed in the unit-operating manual.

Completion Dates:

1. The PT-101 approval will be completed prior to **July 15, 2002**. The wording change in all the operating manuals will be completed prior to **July 22, 2002**.
2. Operations notification/communication instructions will be completed prior to **July 31, 2002**.
3. Information on the requirements for obtaining a temporary emergency PT-101 will be included in the notification/communication instructions, which will be completed prior to **July 31, 2002**.

Any additional questions or concerns please call Mr. M. L. Shepherd at 618-524-6238 or Mr. H. C. Roberts at 618-524-6349.

Sincerely,


J. William Lessig
Plant Manager

JWL/sm

cc: M. Shepherd
H. Roberts

US Nuclear Regulatory Commission (UPS: Ph: 301-415-8147)
Attention: Chief Operations Branch
Division of Fuel Cycle Safety & Safeguards, NMSS
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US NRC, Region III
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US NRC
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