

April 11, 2003

Mr. Rory J. O'Kane
Plant Manager
Honeywell Specialty Chemicals
P.O. Box 430
Metropolis, IL 62690

SUBJECT: NRC INSPECTION REPORT 04003392/2003-002(DNMS) - HONEYWELL

Dear Mr. O'Kane:

On March 13, 2003, the NRC completed a routine inspection at the Honeywell Specialty Chemicals facility. The purpose of the inspection was to determine whether activities authorized by the license were conducted safely and in accordance with NRC requirements. At the conclusion of the inspection on March 13, 2003, the NRC inspector discussed the findings with members of your staff.

The inspection consisted of an examination of activities conducted under the license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of the license. Areas examined during the routine inspection are identified in the enclosed report. Within these areas, the inspection consisted of a selective examination of procedures and representative records, observations of activities in progress, and interviews with personnel.

Based on the results of this inspection, the NRC did not identify any violations.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

We will gladly discuss any questions you have concerning this inspection.

Sincerely,

/RA/

Kenneth G. O'Brien, Chief
Fuel Cycle Branch

Docket No. 04003392
License No. SUB-526

Enclosure: Inspection Report 04003392/2003-002(DNMS)

cc w/encl: Gary Wright, Illinois Department of Nuclear Safety

DOCUMENT NAME: G:\SEC\HON2003-002.WPD

To receive a copy of this document, indicate in the box: "C" = Copy without enclosure "E" = Copy with enclosure "N" = No copy

OFFICE	RIII		RIII		RIII		
NAME	Hartland		Berg		O'Brien		
DATE	04/11/03		04/11/03		04/11/03		

OFFICIAL RECORD COPY

Distribution w/encl:

Docket File

PUBLIC IE-07

M. Raddatz, NMSS

M. Leach, NMSS

J. Lubinski, NMSS

J. L. Caldwell, RIII

M. L. Dapas, RIII

RIII Enf. Coordinator

R. Bellamy, RI

D. Ayres, RII

D. B. Spitzberg, RIV

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Docket No. 04003392
License No. SUB-526

Report No. 04003392/2003-002(DNMS)

Licensee: Honeywell International, Inc.

Facility: Metropolis Works

Location: P. O. Box 430
Metropolis, IL 62960

Dates: March 10 through 13, 2003

Inspector: David J. Hartland, Senior Resident Inspector
Portsmouth Gaseous Diffusion Plant

Approved by: Kenneth G. O'Brien, Chief
Fuel Cycle Branch
Division of Nuclear Materials Safety

EXECUTIVE SUMMARY
Honeywell International, Inc
NRC Inspection Report 04003392/2003-002(DNMS)

This inspection included aspects of the licensee's maintenance and transportation programs and review of follow-up issues identified during previous inspections.

Maintenance

- The inspector determined that the general maintenance activities, surveillance tests, and calibrations reviewed were conducted in accordance with license requirements and approved procedures. (Section M1.1)

Transportation

- The inspector determined that uranium hexafluoride cylinder shipments were properly secured and that the radiological conditions were within Department of Transportation limits. Shipping manifests were properly maintained, and the vehicles were properly placarded. (Section T1.1)

Report Details

I. Maintenance

M1.1 Conduct of Maintenance

a. Inspection Scope (88025)

The inspector evaluated whether general maintenance activities, surveillance tests, and calibrations were being conducted in accordance with license requirements and approved procedures. Activities observed included:

- Rupture disc and relief valve replacement on the “AB” Hydrogen Fluoride Vaporizer
- Internal inspection and repair of the “B” Coke Box Scrubber
- Calibration of the X-434 Cylinder Beam Scale
- Calibration of a distillation system instrument
- Calibration of a green salt hydrogen analyzer

b. Observations and Findings

The inspector reviewed maintenance department procedures in order to verify that proposed work was properly controlled. In addition, the inspector verified that maintenance procedures controlled special processes and potential fire hazards.

Appropriate administrative controls were in place to control the initiation and completion of work activities. For the rupture disc and relief valve replacement maintenance activities, the inspector verified that the system was properly isolated, that appropriate tag-outs were applied, and that personnel donned adequate protective equipment. For the scrubber internal inspection and repair maintenance activities, the inspector verified that the required health physics surveys had been performed and that the confined space entry permit was reviewed and approved by the appropriate personnel.

The inspector reviewed a random sampling of records and verified that the licensee was meeting the required frequency for surveillance tests and calibrations for those systems specified in the license requirements. In addition, the inspector verified that the calibrations listed above were performed using properly approved procedures which met the license requirements.

c. Conclusions

The inspector determined that the general maintenance activities, surveillance tests, and calibrations reviewed were conducted in accordance with license requirements and approved procedures.

II. Plant Support

T1.1 Conduct of Transportation

a. Inspection Scope (86740)

The inspector evaluated the licensee staff's preparation and shipment of several 14-ton uranium hexafluoride (UF₆) cylinders, bound for Russia, to verify that the shipments were made in accordance with Department of Transportation (DOT) requirements.

b. Observations and Findings

The inspector observed the plant staff prepare truck shipments of several 14-ton UF₆ cylinders. The cylinders were designated for final shipment to Russia. The inspector observed the movement of various UF₆ cylinders from the dock onto the trucks and then offsite. The operators properly transported and secured the cylinders, and the shipments were appropriately labeled and placarded in accordance with DOT requirements. The inspector also reviewed shipping manifests and verified that the information required by the DOT was available in the shipping documentation and that the documents were readily available to the vehicle driver.

c. Conclusions

The inspector determined that uranium hexafluoride cylinder shipments were properly secured and that the radiological conditions were within Department of Transportation limits. Shipping manifests were properly maintained, and the vehicles were properly placarded.

R8 Miscellaneous Plant Support Issues

R8.1 (Open) URI 04003392/2003001-01: Inspector review of the effectiveness of the As-Low-As-Reasonably-Achievable (ALARA) Committee in identifying and reversing an apparent adverse trend regarding personnel whole body exposure. The plant staff provided additional information to the inspector that indicated an adverse trend did not exist. The inspector determined that the apparent increase in personnel whole body exposure was a result of a step increase in the recorded whole body exposure values that occurred in 1994 due to a revision in the requirements of 10 CFR Part 20. The revised requirements directed that any recorded internal exposure be included in the calculation of whole body exposure. The ALARA Committee minutes for the meeting conducted in 1994 documented an evaluation of the increase in the calculated whole body exposure. The inspector determined that plant records, since 1994, documented that the calculated whole body exposure had remained constant. As a further application of the ALARA principle, the health physics (HP) staff planned to correlate exposure with job classification, evaluate possible ALARA techniques for those individuals receiving the higher doses, and present recommendations to the ALARA Committee. This item will remain open pending the completion of the HP staff's evaluation.

R8.2 (Open) URI 04003392/2003001-02: Review of the licensee's calibration methodology for radiation survey instruments relative to industry standards. Following a further review of the finding, the HP staff implemented a plan to have the survey instruments,

used by personnel to monitor for contamination, calibrated in accordance with applicable standards. The HP staff also planned to evaluate whether their current methodology for other survey instruments should be revised. This item will remain open pending completion of the HP staff's evaluation and plan implementation.

III. Management Meeting

X. Exit Meeting Summary

The inspector presented the inspection results to members of the plant staff and management at the conclusion of the inspection on March 13, 2003. The inspector asked the plant staff whether any materials examined during the inspection should be considered proprietary. No proprietary information was identified.

PARTIAL LIST OF PERSONS CONTACTED

Honeywell Specialty Chemicals

- R. O'Kane, Plant Manager
- * W. Becht, Maintenance Manager
- * M. Ginzel, Health Physics Supervisor
- M. Shepherd, Environmental and Regulatory Affairs Manager

* Denotes those present at the exit meeting on March 13, 2003.

INSPECTION PROCEDURES USED

- IP 86740 Inspection of Transportation Activities
- IP 88025 Maintenance and Surveillance Activities

ITEMS OPENED, CLOSED, AND DISCUSSED

Opened:

None

Closed:

None

Discussed:

- 04003392/2003001-01 URI Inspector review of the effectiveness of the ALARA Committee in identifying and reversing an apparent adverse trend regarding personnel whole body exposure.
- 04003392/2003001-02 URI Review of the licensee's calibration methodology of radiation survey instruments relative to industry standards.

LIST OF ACRONYMS USED

ADAMS	Agency Document Access and Management System
ALARA	As Low As Reasonably Achievable
CFR	Code of Federal Regulations
DNMS	Division of Nuclear Material Safety
DOT	Department of Transportation
HP	Health Physics
IP	Inspection Procedure
NRC	Nuclear Regulatory Commission
PARS	Publicly Available Records
UF ₆	Uranium Hexafluoride
URI	Unresolved Item