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March 10, 2004

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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 Augmented Inspection Team Report Dated February 3, 2004  
License No. SUB-526  
Docket No. 040-03392

Dear Sirs:

Honeywell Metropolis Specialty Chemicals Facility has reviewed the NRC Augmented Inspection Report (the "AIT Report") related to the December 22, 2003, release of uranium hexafluoride (UF<sub>6</sub>) (the "Event") and subsequent Site Area Emergency. We have no significant disagreements with the facts contained in the AIT Report concerning the Event.

However, newly developed information has been obtained by Honeywell subsequent to receipt of the AIT Report that we wish to communicate to NRC. Honeywell initially estimated the quantity of UF<sub>6</sub> released during the Event at around 7 pounds. This initial engineering calculation was based on an analysis of the system parameters that existed at the time of the Event, such as the volume of the system, the pressurization, and concentration of UF<sub>6</sub> gas. The initial calculation, however, was made without the benefit of actual monitoring data.

The AIT report based on monitoring data indicated that the NRC's estimation of the release was approximately 42 pounds of UF<sub>6</sub>. After this monitoring data became available, Honeywell retained an independent consultant to perform release calculations similar to those performed by NRC as referenced in the AIT Report on pages 14-15. Although Honeywell has not yet received the report from its consultant, the preliminary data recently communicated to Honeywell from the modeling calculation in the study indicates that the amount released may have been around 70 pounds of UF<sub>6</sub>. The reasons for the discrepancy between these results and NRC's results are not entirely clear because the specific modeling calculations performed by NRC were not included in the AIT Report.

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Honeywell agrees with NRC's conclusions that "Given the large amount of uncertainty associated with many of the factors which are used to calculate atmospheric dispersion of short-term releases, differences of less than a factor of ten between sample results and model predictions represent good agreement between the two methods." Regardless of the discrepancies between the results of Honeywell's consultant and the NRC's results (both of which appear to be within the range of acceptability for such calculations), both sets of calculations nevertheless result in an estimated amount of material released that is still well below the 440 pound reportable quantity for UF<sub>6</sub>. All calculations, therefore, establish that the release did not pose any risk to human health or the environment.

We will continue to keep the NRC Region II apprised of our progress in implementing our restart actions. Please do not hesitate to call me with any questions or if you wish to discuss this information further.

Sincerely,



Rory J. O'Kane  
Plant Manager  
Honeywell Specialty Chemicals

cc: D. Mays  
M. Ginzel

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US Nuclear Regulatory Commission  
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