



**UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
SAM NUNN ATLANTA FEDERAL CENTER
61 FORSYTH STREET SW SUITE 23T85
ATLANTA, GEORGIA 30303-8931**

March 26, 2004

CAL No. 2-2003-003
NMED No. 031001

Honeywell International, Inc.
ATTN: Mr. Rory J. O'Kane
Plant Manager
P.O. Box 430
Metropolis, IL 62960

**SUBJECT: RESTART OF ORE PROCESSING AT HONEYWELL INTERNATIONAL, INC.
FACILITY IN METROPOLIS, ILLINOIS**

This is in reference to your letter dated March 26, 2004, in which you stated that you had completed nearly all those actions necessary to support the safe restart of ore preparation at your facility. We understand that the remaining items will be complete on March 27, 2004, and our inspectors on site will confirm the completion of these items prior to restart. Based upon our review of your efforts to identify the actions necessary to support the safe restart of ore preparation and on-site assessments and observations of the implementation of these actions, the NRC has no objection to the restart of ore preparation at your facility. Ore preparation includes drum sampling, drum dumping and sodium removal, calcining, blending, agglomeration and drying, and sizing. It does not include any processing of materials to UO₄ (green salt).

On December 22, 2003, the NRC issued a Confirmatory Action Letter (CAL) that documented Honeywell's commitment to discuss the results of your investigation and proposed corrective actions with the NRC prior to restart of the uranium hexafluoride processes. The NRC conducted an Augmented Team Inspection (AIT) at your site from December 22, 2003, to January 6, 2004, to review the facts and circumstances related to the December 22 event. The results of this inspection were documented in a report dated February 3, 2004. On February 11, 2004, Honeywell met with the NRC to discuss the results of your investigation of the event, and to discuss corrective actions resulting from this investigation and other reviews of operations at your facility. The results of that meeting were documented in a letter to you dated February 13, 2004. On March 4, 2004, you provided a letter that outlined your approach to restart of the uranium hexafluoride processes, listing actions to be completed for each phase of restart (ore preparation, green salt, and fluorination/distillation). On March 18, 2004, you again discussed in a meeting with the NRC the status of your corrective and improvement items to support safe restart and operation of your uranium hexafluoride processing.

As a result of the findings of the AIT and your internal reviews, the NRC developed the enclosed Honeywell International Conversion Facility Restart Readiness Oversight Plan that included a table of items to be reviewed and completed by Honeywell and reviewed by the NRC prior to restart. The NRC inspected the items listed in the restart plan to determine the effectiveness of your actions to address issues that resulted in the December 22, release and resultant emergency response. This included review of an emergency drill involving offsite authorities on March 11, 2004.

The NRC staff has completed its inspection and assessment of your actions to support ore preparation operations and has concluded that you have adequately resolved those items as listed in the Oversight Plan to support restart of ore preparation operations. The NRC has reasonable assurance that you can safely restart and operate ore preparation facilities. Therefore, the NRC has no objection to the restart of ore preparation operations. You remain accountable to comply with all requirements in NRC regulations and your license. The NRC will continue to inspect your actions to support restart of the green salt operations and fluorination/distillation and will inform you of our conclusions regarding these operations separately.

In accordance with 10 CFR 2.390 of NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in NRC's Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

/RA/

Luis A. Reyes
Regional Administrator

Docket No. 040-03392
License No. SUB-526

Enclosure: Honeywell International Conversion
Facility Restart Readiness Oversight Plan

cc w/encl:
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Emergency Management Agency
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DATE	03/26/2004	03/26/2004	03/26/2004	03/26/2004	
E-MAIL COPY?	YES NO	YES NO	YES NO	YES NO	YES NO
PUBLIC DOCUMENT					

HONEYWELL INTERNATIONAL CONVERSION FACILITY RESTART READINESS OVERSIGHT PLAN

PURPOSE

1. To establish criteria for the oversight of licensee performance for Honeywell International Uranium Conversion Facility during the period when Honeywell makes safety and emergency response improvements identified as a result of the December 22, 2003 event.
2. To ensure that the NRC communicates a unified and consistent position in a clear and predictable manner to the licensee, public, and other stakeholders.
3. To establish a record of the major regulatory and licensee actions taken and technical issues resolved leading to the NRC expressing no objection to restart of routine processing of uranium and to the eventual return of the plant to the routine fuel facility oversight process.
4. To verify that licensee corrective actions are sufficient prior to restart.
5. To provide assurance that following restart the plant will be operated in a manner that provides adequate protection of public health and safety.

OBJECTIVES

1. To ensure that Region II and NMSS are appropriately involved in restart decisions.
2. To establish a process plan for the actions necessary to determine that the NRC has no objection to restart and provide an objective basis to justify return of a plant to the routine oversight program.
3. To provide a mechanism for communicating issues and corrective actions to the public and other external stakeholders.

RESPONSIBILITIES AND AUTHORITIES

Director, Office of Nuclear Materials Safety and Safeguards (NMSS)

1. Approves, in conjunction with the Regional Administrator, the Restart Readiness Plan and any changes to it.
2. Assures that any licensing action in support of restart is appropriately processed.
3. Consults and concurs with the Regional Administrator on the no objection to restart decision.
4. Approves, in concert with the Regional Administrator, termination of heightened oversight of facility after restart based on demonstrated performance.

Enclosure

Regional Administrator

1. Approves, in conjunction with the Director, NMSS, the Restart Readiness Plan and any changes to it.
2. Maintains an ongoing overview of licensee performance while the plant is upgrading programs in preparation for restart and during heightened oversight after restart.
3. Reviews and determines, in conjunction with NMSS, the acceptability of the licensee's corrective action plan for the problems identified as a result of the event.
4. Makes decision when the NRC has no objection to restart of the shutdown plant, following consultation with Director of NMSS.
5. Approves, in concert with the Director, NMSS, termination of heightened oversight of facility after restart based on demonstrated performance.

Director, Division of Fuel Cycle Safety and Safeguards, NMSS

1. Assures that any licensing actions in support of the restart of Honeywell are reviewed and appropriately processed.
2. Assures that any changes to the Radiological Contingency Plan and/or the Emergency Plan are appropriately dispositioned, including coordination with the EPA and State and local authorities as appropriate.
3. Coordinates and implements actions prescribed in the Restart Table that are determined to be NMSS' responsibility. These actions include licensing actions and, where applicable, appropriate NRC office or NMSS division interaction with other Federal agencies (e.g., the Environmental Protection Agency [EPA]).

Director, Fuel Facility Inspection, Region II

1. Reviews information related to the causes of the December 22, 2003 release, the results of the Augmented Team (AIT) and Special Team Inspections, the results of the 1998 AIT, and the results of Honeywell's internal and external evaluations.
2. Develops the Restart Table and modifies as appropriate based in current information and inspection findings.
3. Develops and maintains a comprehensive Communications Plan to ensure effective communication with internal and external stakeholders.
4. Maintains cognizance over the status of the regulatory hold (CAL) and recommends to the Regional Administrator, in consultation with cognizant program office management, any necessary modifications.
5. Maintains an ongoing overview of licensee performance throughout the licensee's pre- and post-restart activities.

6. Determines the inspection (scope and level of effort) necessary to review performance deficiencies and identified risk-significant issues for restart.
7. Assesses the adequacy of the licensee's corrective action and/or improvement program and the ability of the licensee to identify problems.
8. Assesses the physical readiness of the plant for restart.
9. On the basis of satisfactory inspection and assessment of the completion of the pre-startup portion of the licensee's restart program, provides a written recommendation and the basis for the determination that the NRC has no objection to restart to the Regional Administrator and the Director of NMSS.
10. Provides post-restart enhanced oversight of licensee performance until there is a return to the routine inspection program.
11. Provides a written recommendation to the Regional Administrator and the Director of NMSS for the return to the routine oversight process.
12. Ensures a comprehensive record is developed and maintained that documents NRC decisions and actions related to restart activities.

RESTART Table

The table below (Restart Table) contains the items to be completed by Honeywell as part of their improvements supporting restart and the NRC's proposed actions. These were developed from:

1. Evaluation of NRC inspection findings, including recent AIT, SIT in 2003, and AIT in 1998.
2. Evaluation the licensee's performance improvement plan and associated root cause determination, extent-of-condition reviews, and corrective action plans.
3. Evaluation all allegations for the facility.
4. Evaluation of comments from other federal, State and local agencies.

The Restart Table contains: (1) a brief description of each restart issue, (2) who has the lead (both NRC and licensee), (3) corrective action status, and (4) closure completion date and the corresponding inspection report number.

The criteria for determining which issues are added to the Restart Table are as follows:

1. The issue involves a licensee or NRC finding or condition that is to correct a violation of NRC requirements.

2. A licensing action is necessary to address a performance issue prior to plant restart.
3. The issue results in a condition in which the NRC lacks assurance that the licensee can or will conduct its activities without undue risk to public health and safety or the environment.
4. The issue represents a failure of licensee management controls to effectively address previous significant concerns to prevent their recurrence.

The issues were generated through the following process:

1. Review and evaluation of Honeywell-generated restart issues to determine completeness, including assurance that the list contains all NRC-identified restart issues.
2. Evaluation the Honeywell's plan for resolving restart issues.

Additional issues that are identified during the plant shutdown may be added to the Restart Table as appropriate based on NRC or Honeywell findings.

Closeout Actions

As Honeywell completes actions to resolve the restart issues, the NRC will conduct closeout activities to independently verify that corrective actions required before restart are complete and that the plant is physically ready for restart. As part of this review the Region will:

1. Evaluate the licensee's restart readiness self-assessments.
2. Conduct appropriate NRC restart readiness review inspections.
3. Conduct restart coverage inspections.
4. Determine that all conditions of the CAL are satisfied.
5. Verify that the items on the Restart Table are complete.
6. Conduct a meeting with the licensee to discuss restart readiness.
7. Prepare the restart recommendation memorandum to the Regional Administrator and the letter to the licensee informing them that the NRC has no objection to restart and establishing the basis for restart.
8. Determine that there are no restart objections from the Region, NMSS, the State, or EPA.
9. Obtain approval of the Regional Administrator and the Director, NMSS for informing Honeywell of no NRC objection to restart.
10. Inform Honeywell that the NRC has no objection to restart.

POST-RESTART ACTIVITIES

The length of time of post-restart enhanced NRC oversight will depend on Honeywell's performance and resolution of identified problems. The heightened oversight will be based on Licensee Performance Review (LPR) results. It is anticipated that there will be a shortened LPR period for at least one cycle.

The licensee plans to implement its restart in three phases, Ore Preparation, Green Salt Production, and Fluorination/Distillation Operations. After the restart in each area, an implementation inspection will be conducted which will cover plant operations for the first forty-eight hours. Upon completion of the restart implementation inspection for each phase, any lessons learned regarding the implementation of this plan that should be addressed prior to the restart of the following phase shall be documented and resolved. Once the restart is complete for all phases, and their respective implementation inspections are complete, a retrospective review of this plan will be conducted to determine if the plan was comprehensive and contained the correct elements to ensure a safe restart of licensed activities.

Additional post-restart inspections would be scheduled approximately six weeks after the start of operations in the fluorination/distillation areas and approximately six weeks after the completion of that initial post-restart inspection. The program areas to be inspected during these two inspections includes Plant Operations, Chemical Safety, Maintenance/Surveillance, Emergency Preparedness, Management Organization and Controls, and Operator Training. Other program areas that are due at that time as listed in the Master Inspection Plan would also be completed during these inspections (e.g., Transportation, Waste Management, etc.). If the results of these inspections indicate improved licensee performance (e.g., no significant violations and no repeats of violations associated with December 22, 2003 event), then the next inspection would be scheduled for approximately three months after the second post-restart inspection. If the results of these inspections indicate licensee performance has not improved, then additional inspections would be scheduled on a more frequent basis (e.g., every six to twelve weeks) until licensee performance is considered acceptable. If the licensee's performance has improved, and this same conclusion is drawn based upon the three month inspection, then the NRC will consider whether the licensee should be returned to the routine inspection frequency. When it is determined that the licensee will be returned to the normal inspection frequency, a review of the implementation of this plan will be conducted to identify any lessons learned that may apply to similar, future endeavors, and to ensure that the plan did provide for a safe restart of licensed activities.

RECORDS

Information on NRC and licensee actions related to plant restart should be attached to or included in NRC inspection reports. At a minimum, the records developed for the shutdown and the restart process shall consist of the following:

1. The licensee's docketed correspondence concerning plant performance.
2. The CAL issued to Honeywell.
3. This Restart Readiness Oversight Plan including any revisions.

4. Meeting summaries from meetings between the NRC and Honeywell.
5. Inspection reports and related correspondence.
6. Pertinent licensing actions completed by the NRC.
7. Other agency and government actions communicated to the NRC.
8. The basis for determining that the NRC has no objection to restart.
9. LPRs.

March 26, 2004 (5:26PM)

ISSUE	LEAD	STATUS	CLOSURE
1. Develop restart list in table	Henson to review conclusions of inspections and licensee reviews to assure complete	Reviewed week of 2/23. Letter from Honeywell sent 3/5. Restart list now in table. Undergoing Office Director approval 3/6. Plan approved 3/23/04.	3/23/04
ORE PREP RESTART ITEMS			
EMERGENCY RESPONSE PLAN			
2. Issue final, amended Emergency Response Plan/Radiological Control Plan	NMSS/Gooden	Incomplete as of 3/25/04; expect completion by COB 3/26/04; Plan completed 3/27/04.	3/26/04
3. Amendments include: a. clarification of responsibilities and response actions b. definitions for Emergency Action Levels and Shelter-in-Place protocol c. Plan coordinated with local and state planners	NMSS/Gooden	Incomplete as of 3/25/04; expect completion by COB 3/26/04; Plan completed 3/27/04. Amendments included a, b and c.	3/26/04
4. Public notification systems selected and installation/repairs of sirens	Gooden	CAN has been selected and purchase order has been issued. Based on contractor recommendations, two new sirens will be installed on Honeywell property that will reach the required population. Plan is to have sirens installed and tested before restart of green salt.	3/24/04

ISSUE	LEAD	STATUS	CLOSURE
5. Dedicated phone number for communication with outside emergency responders	Gooden	Unlisted phone number has been provided to local emergency responders which will ring on a phone in the Feed Materials Control Building and the security desk. This number was tested during the table-top drill.	3/11/04
6. Provide training for (1) local emergency groups, (2) Honeywell ER team/HAZMAT responders, and (3) Wackenhut Security Guards	Gooden	Incomplete as of 3/26/04 (Security guards have not been trained); scheduled for completion by COB 3/26/04. Based on 3/26/04 letter, licensee will complete before restart; inspectors will confirm.	TBD
7. Establish public awareness and education initiatives	Gooden	Identified topics to be provided to public. Currently developing format to publish and deliver information (as of 3/24/04).	3/24/04
8. Publish initial Community Bulletin	Gooden	Bulletin completed and mailed out to over 5000 addresses.	3/1/04
9. Conduct table top drill, critique and resolve critique issues	Gooden	Drill conducted 3/11. Critique items have been placed in corrective actions tracking system and scheduled for resolution.	3/24/04
10. Public meeting with NRC	Gooden	Conducted 3/18.	3/18/04
POLICIES & PROCEDURES			
11. Assess licensee decision that no new or amended policies required.	Hartland	Current policies adequate for low risk operations in ore preparation.	3/24/04

ISSUE	LEAD	STATUS	CLOSURE
12. Assess licensee decision that now new or amended administrative procedure required	Hartland	Current administrative procedures adequate for low risk operations in ore preparation.	3/24/04
13. Review procedural gap analysis and determine if proposed procedure amendments and new procedures adequate	Hartland	Gap analysis reviewed and it was determined that the proposed procedure amendments and new procedures were adequate.	3/24/04
14. Revise/amend following technical procedures: a. Ore Preparation System Startup and Operation Procedure b. Ore Preparation System Shut Down Procedure c. Ore Preparation Abnormal Operations Procedure d. Ore Preparation Emergency Operation Procedure e. Confirm no alarm response procedure applicable.	Hartland	a. through d. - these procedures have been rewritten in new format. No deficiencies have been identified in these procedures. e. No separate procedure for alarm response, but an alarm response procedure was included in Ore Operation Procedure as an attachment. Procedures continue to be subject to revision, but final version will be reviewed as is before ore preparation restart. Final versions reviewed and considered adequate.	3/26/04
15. Implement procedure for situations where specific procedures may not exist	Hartland	No available as of 3/26/04, but expect before COB. Based on licensee's 3/26/04 letter, this will be complete before restart; inspectors to confirm.	TBD

ISSUE	LEAD	STATUS	CLOSURE
TRAINING			
16. Identify trainers for restart	Gooden	Awaiting closure package; expect by COB 3/26/04 Closure package provided and this item was adequate.	3/26/04
17. Provide training on instructional techniques	Gooden	Awaiting closure package; awaiting closure package to confirm; expect by COB 3/26/04 One incomplete item regarding records of training that training was complete; licensee plans to complete before restart; inspectors will confirm.	TBD
18. Training on technical procedures; include procedural adherence expectation for operators and supervisors	Gooden	Some training observed and did include expectation on procedural adherence. Awaiting closure package; expect by COB 3/26/04. One incomplete item regarding records of training that training was complete; licensee plans to complete before restart; inspectors will confirm.	TBD
19. Establish JPMs; include abnormal events for operations and maintenance	Gooden	In progress; expect completion by COB 3/26/04; item completed and reviewed by inspectors; deemed adequate	3/26/04

ISSUE	LEAD	STATUS	CLOSURE
20. Train operators and supervisors on JPMs	Gooden	In progress; expect completion by 3/26/04 One incomplete item regarding records of training that training was complete; licensee plans to complete before restart; inspectors will confirm.	TBD
MANAGEMENT OF CHANGE			
21. Require management of change procedure be applied for all process changes	Baker	Closure package reviewed and confirmed procedure applied for all process changes.	3/24/04
22. Revise process change form (PT-101) to clarify responsibilities	Baker	Closure package reviewed and confirmed responsibilities clarified.	3/24/04
23. Create or revise a PSSR checklist to be used before all changes are implemented	Baker	Closure package reviewed and PSSR checklist established.	3/24/04
MECHANICAL INTEGRITY			
24. Confirm no items applicable for restart of Ore Prep	Baker	Confirmed based on review of Failure Modes and Effects Analysis and ore preparation area.	3/12/04
ENGINEERING CONTROLS			
25. Confirm no items applicable for restart of Ore Prep.	Baker	Confirmed based on review of Failure Modes and Effects Analysis and ore preparation area.	3/12/04
CORRECTIVE ACTIONS PROGRAM & AUDITS			

ISSUE	LEAD	STATUS	CLOSURE
26. Establish on-shift auditors	Hartland	Reviewed closure package and confirmed auditors trained and established (contract auditors).	3/24/04
27. Establish on-shift audit procedures to include: - areas to be audited - audit standards - reporting of findings - response to findings	Hartland	Reviewed closure package and audit procedures include listed topics.	3/24/04
28. Implement web-based corrective action tracking system	Hartland	E-CATS system established and legacy issues entered in system. Awaiting closure package. Expect by COB 3/26/04; Package provided 3/26/04, reviewed and deemed adequate.	3/26/04
29. Assess corrective action program	Hartland	This was not required for ore preparation. Required completion before start-up of fluorination/distillation.	3/24/04
GREEN SALT RESTART ITEMS			
EMERGENCY RESPONSE			
30. Siren notification system functioning	Gooden		
31. Pre-recorded messages for shelter-in-place notification and recovery available at local radio stations	Gooden		
32. Informational bulletin mailed to public with instructions for shelter-in-place	Gooden		

ISSUE	LEAD	STATUS	CLOSURE
POLICIES AND PROCEDURES			
33. Revise or establish policies for: <ol style="list-style-type: none"> 1. Stop work authority 2. Policy to define requirement for work scheduling/planning 3. Procedure for procedural use by operators 4. Management and supervisory oversight for restart defined 	Hartland		
34. Administrative procedures and actions: <ol style="list-style-type: none"> 1. Procedure development guide 2. Reporting deficient plant conditions procedure 3. Procedure defining requirements for pre-job briefs 4. Training matrix for operator qualifications 	Hartland		

ISSUE	LEAD	STATUS	CLOSURE
35. Technical procedures established: <ol style="list-style-type: none"> 1. Green salt operations 2. Green salt startup sequence 3. Reductor startup 4. Hydrofluorinator startup 5. Green salt shut down/cool down 6. Green salt maintenance support 7. Green salt alarm response procedure 8. Green slat abnormal operations procedure 9. Green salt emergency operations procedure 	Hartland		
TRAINING			
36. Trainers <ol style="list-style-type: none"> 1. Identify trainers 2. Complete train-the-trainer training 	Hartland		
37. Training for restart <ol style="list-style-type: none"> a. all policy training completed b. all administrative procedure training completed c. all technical procedure training completed 	Hartland		

ISSUE	LEAD	STATUS	CLOSURE
38. Demonstration of Operations experience a. Job performance measures developed b. Operators and supervisors trained on JPMs	Hartland		
39. Remedial training a. remedial training requirements defined b. remedial training conducted as required	Hartland		
MANAGEMENT OF CHANGE			
40. Confirm all items completed	Baker		
MECHANICAL INTEGRITY			
41. Actions completed include: a. Preventative maintenance and inspection requirements for critical equipment b. Vibration testing for pumps and other rotating equipment in Green Salt and repair equipment out of specification, except for items that are not currently running or that operate below 1800 rpm c. Vibration analysis of rotating equipment after Green Salt startup	Baker		
ENGINEERING CONTROLS			

ISSUE	LEAD	STATUS	CLOSURE
42. Complete the following: a. Upgrade controls, alarms, and interlocks for HF tank car unloading b. Install level control on "C" filter fine hopper c. Install emergency relief valve tank	Baker		
CORRECTIVE ACTIONS AND AUDITING			
43. Confirm licensee restart audit complete and no additional items for green salt.	Hartland		
RESTART PLAN FOR FLUORINATION AND DISTILLATION			
EMERGENCY RESPONSE			
44. Procedure for ERP copy control included as part of ERP/RCP	Gooden		
POLICIES AND PROCEDURES			
45. Confirm no additional revised/new policies required	Hartland		
46. Confirm no additional revised/new procedures required	Hartland		

ISSUE	LEAD	STATUS	CLOSURE
47. Confirm technical procedures identified as required are implemented	Hartland		
TRAINING			
48. Trainers identified and trained on instructional techniques.	Gooden		
49. Training on new/revised policies and administrative and technical procedures completed	Gooden		
50. Job Performance Measures established and operators and supervisors trained	Gooden		
51. Remedial training requirements defined and conducted as required	Gooden		
MANAGEMENT OF CHANGE			
52. Confirm no additional program changes required.	Hartland		
MECHANICAL INTEGRITY			
53. Complete all preventative maintenance and inspection requirements on critical equipment as a result of gap analysis	Baker		

ISSUE	LEAD	STATUS	CLOSURE
54. Complete vibration testing for pumps and other rotating equipment and repair equipment out of specification, except equipment not currently running or operating below 1800 rpm	Baker		
55. Pressure test fluorination and distillation system and repair any leaks identified.	Baker		
56. Inspect and replace, if needed rupture discs on cold traps within the distillation system	Baker		
57. Establish procedures for leak testing expansion joints during operations	Baker		
58. Complete vibration analysis of rotating equipment after startup	Baker		
ENGINEERING CONTROLS			
59. Validate relief valve system design for cold traps and low boiler condensers	Baker		
60. Improve controls for fluidizing air addition to fluorinators	Baker		
61. High pressure alarms and/or interlocks to fluorinators and cold traps	Baker		

ISSUE	LEAD	STATUS	CLOSURE
62. Upgrade controls and alarms for KOH scrubbers	Baker		
63. Improve drain and containment for dust collector scrubber	Baker		
CORRECTIVE ACTIONS AND AUDITING			
64. Confirm licensee restart audit complete and no additional program changes required.	Hartland		

March 26, 2004 (5:26PM)