



March 18, 2004

Mr. Rory Kane
Manager -- Honeywell
Metropolis Plant
Rt. 45
Metropolis, IL 62960

Nuclear Regulatory Commission
U.S. NRC Region III
801 Warrenville Road
Lisle, Illinois 60532-4351

IEMA
William Burke, Dir.
110 E. Adams
Springfield, IL 62701

RE: City of Metropolis, IL – Public Safety Issues

Dear Sir:

The City of Metropolis takes very seriously its responsibility for providing for the health, safety and welfare of its residents. By statute, the City may extend its powers to protect those residents to territory that lies within one and one half miles of its borders. The Honeywell uranium enrichment plant lies well within that boundary. Accordingly, the accidental release of toxic chemicals by the operator of that plant on December 22, 2003 and the ensuing confused response by Company representatives have caused great concern for those charged with the responsibility of maintaining the public health and safety in the city.

The follow-up response to the release of toxic chemicals has been inadequate in several respects. In fact, the direct communication from Honeywell to this office has raised more questions or issues than it has answered. The City of Metropolis would respectfully request that Honeywell provide written commitments which address the following issues, prior to restarting their operations at the Metropolis plant:

- Honeywell should provide a copy of the proposed Emergency Response Plan to the local ESDA, 911 Board of Directors, Massac County Sheriffs office, Metropolis and Massac County Fire Department, and Metropolis City Police Department prior to approval by the NRC/EPA.
- Honeywell should provide each of the aforesaid agencies with a copy of the Plan as approved together with any and all subsequent updates.
- Honeywell should communicate directly with all emergency response agencies to address their particular issues. This includes Massac Memorial Hospital and the agencies described above.

- Honeywell should either repair the non-functioning warning sirens with components that are compatible with the existing system (the remaining five sirens and control units) or they should replace the entire siren system (8 sirens) with a single system that works on a digital format
- Honeywell should provide a control panel for the siren system not only to the ESDA director's home and office, but also to both of the dispatch control centers, being the Massac County Sheriff's office and the City of Metropolis Police Department
- Honeywell should be required to communicate directly with the 911 Executive Director and the ESDA Director prior to repairing or replacing any disaster warning equipment, including sirens
- Honeywell should clearly and consistently communicate the appropriate response for various types of emergencies. For example, Honeywell has stated it has planned for a worst case disaster such as the rupture of a railroad car containing hexafluoride. Yet, it has communicated to some that "Shelter In Place" is the appropriate response and to others that a 25 mile evacuation would be required
- Honeywell should be required to utilize the Emergency Services List of telephone numbers for providing direct warnings to residents within 1/3 miles of the plant site
- Honeywell should provide Hazardous Material training to at least 4 emergency response personnel employed by the City at a level equivalent to the standards established by the National Fire Protection Association and not the minimal standards required by O S H A
- Honeywell should integrate multiple components within its early warning system. Those components should include the CAN system, the sirens, direct calls to local officials, and prompt notice to media outlets. This will increase the probability of fully notifying all affected residents
- Honeywell should commit to provide proper Hazardous Material equipment and training to local emergency response agencies, including, but not limited to safety equipment, uniforms, air testing equipment, and decontamination equipment.
- Honeywell should directly notify all local emergency response agencies concerning public hearings or training or public education activities related to safety and security. Although some local department heads participated in the recent table top disaster drill, most were not notified of the public hearing on March 18, 2004

- e Honeywell should notify and include the local hospital and ambulance service in all emergency preparedness drills and training sessions
- Honeywell should obtain a written commitment from the railroad that the railroad will not park railcars containing residual amounts of toxic chemicals belonging to Honeywell in the city limits of the City of Metropolis when they are removed from the Honeywell property. The “empty” railcars frequently still contain two to three thousand pounds of Honeywell’s chemicals
- Honeywell should regularly provide quality, meaningful training to local emergency response personnel. The training should be designed to educate and familiarize local emergency response personnel with real life scenarios that they will likely confront, appropriate responses; use of equipment, decontamination techniques, and other relevant information. The training sessions conducted since December 22, 2003 have been generic in nature and focused principally upon the Company’s desire to be perceived as a good neighbor. They have been very ineffective in addressing public safety.
- e Honeywell should clearly define what is the “hot” or dangerous zone in the event of a release of chemicals. It should differentiate this zone from the area or territory to which notice and warning is given so that emergency response units will know what precautions are necessary for particular geographic areas. For example, the water supply for the entire City of Metropolis is located just outside of the 1.3 mile “zone”. The local hospital is located entirely within the 1.3 mile zone. Are these areas within a “hot” or dangerous zone or are they merely within the area to which notice will be given?

The City of Metropolis has several good corporate neighbors who take their commitments to maintaining a healthy and safe environment for area residents very seriously. Honeywell’s commitment to address these issues will be a first step in establishing that same type of relationship.

City representatives will make themselves available to meet and discuss these issues at your convenience.

Sincerely,

CITY OF METROPOLIS



Beth A. Clanahan, Mayor