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April 07, 2004

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U.S. Nuclear Regulatory Commission
Attention: Mr. Mike Raddatz, HQ Project Manager
Fuel Cycle Licensing Branch, Mail Stop T-8A33
Two White Flint N. 11545 Rockville Pike
Rockville, MD 20852-2738

Subject: Revisions to Honeywell Metropolis Works (MTW)
Emergency Response Plan/Radiological Contingency Plan
Docket No. 40-3392, License No. SUB-526

Dear Mr. Raddatz:

Consistent with our telephone conversation on April 6, 2004, Honeywell Metropolis Works (MTW) requests that the NRC amend MTW's Radioactive Material License to include the revised Emergency Response Plan / Radiological Contingency Plan (ERP/RCP) dated March 24, 2004. The revised Plans include a number of enhancements to our processes for classifying emergencies, notifying affected company and government officials, issuing Protective Action Recommendations, and maintaining the Plans' effectiveness. In addition, the Plans are now supplemented by a series of Emergency Plan Implementing Procedures (EIPs), which provide clear, sequential instructions for Plan implementation by the Emergency Response Organization. The revised Plans have undergone extensive review by Honeywell management and State and local emergency management officials to ensure that the revisions do not reduce the Plans' effectiveness.

The revised ERP/RCP and the EIPs establish detailed requirements for periodic Plan and Procedure audits, reviews, and approvals, including critiques of emergency drills and exercises. Both the revised Plans and the EIPs have been reviewed in accordance with MTW's Management of Change (MOC) process. This process is applied to ensure the Plans and procedures receive appropriate management review and approval to ensure that the revisions continue to meet applicable regulatory requirements and guidance and to assure that their effectiveness is not compromised. Any future substantial revisions to the Plans and EIPs will be reviewed in accordance with this process or any approved successor process.

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Honeywell is currently planning to submit another Plan revision simultaneously with its application for license renewal (due in 2005). We expect that this revision will combine the ERP and RCP into a single document to simplify our emergency preparedness and response efforts. We do not expect that any planned changes will reduce the Plan's effectiveness.

We appreciate your prompt attention to the matter.

Sincerely,



Rory J. O'Kane
Plant Manager

cc: D. Mays
M. Ginzel
File

U.S. Nuclear Regulatory Commission (UPS: Ph: 301-415-8147)
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