

Specialty Chemicals  
Honeywell  
Route 45 north  
P.O. Box 430  
Metropolis, IL 62960

618-524-2111  
618-524-6239 Fax

April 16 2804

**U.S.** Nuclear Regulatory Commission  
Regional Administrator, Region II  
Sam Nunn Federal Center  
61 Forsyth Street SW, Suite 23T85  
Atlanta, Georgia 30303-8931

UPS: 404-562-4731

Re: Restart of Fluorination/Distillation Phase of Uranium Hexafluoride Process at  
Honeywell Metropolis Plant  
License No. SUB-526  
Docket No. 040-03392

Dear Sirs:

In my letter to the USNRC dated March 4, 2004, we described our plans for a phased approach to restart of the uranium hexafluoride process. We also described the readiness assessment that would be conducted prior to restart of each phase. We are nearing completion of the readiness assessment process for Fluorination/Distillation. An in-process audit of closure packages was conducted and documentation will be provided to on-site NRC inspectors upon completion. A Corporate restart assessment has also been conducted. As a result of the in-process audit of closure packages, we have confirmed completion of nearly all Fluorination/Distillation restart items. The remaining open restart items are identified in Attachment 1.

In my March 4, 2004, letter, I indicated that if an individual restart item was not complete and appropriate justification or compensatory measures could be provided, the NRC would be contacted for approval. In my April 12, 2004 letter I indicated one restart item applicable to Fluorination/Distillation was inadvertently included with Green Salt restart items and one restart item applicable to Green Salt was included in the Fluorination/Distillation Plan. We indicated that prior to restart of Fluorination/Distillation we would improve drain and containment for the dust collector scrubber. This item was applicable to Green Salt and was completed prior to restart of Green Salt. We also indicated that the "C" filter fine hopper was a piece of equipment within Fluorination/Distillation, not within Green Salt. Installation of level control on "C" filter fine hopper has been completed.

We also indicated that we would inspect and replace, if needed, rupture discs on cold traps within the distillation system. These rupture discs and holders were replaced with an improved design in October and November of 2003. Since their installation there has been no further indication of leaks. Additionally, we identified a list of nine potentially leaking rupture discs in the fluorination system following the December 22, 2003 event.

These rupture disks have been replaced. **As** a final check, we completed a pressure test of the fluorination and distillation system and repaired identified **Beaks**.

**As** stated in my March 4, 2004, letter, we **will** complete vibration analysis of rotating equipment not currently running after Fluorination/Distillation startup.

We request NRC concurrence **of** our readiness to restart the Fluorination/Distillation phase **of** the uranium hexafluoride process upon verification by the NRC on-site inspectors that the open Distillation/Fluorination restart items are complete.

Sincerely,



Rory J. O'Kane  
Plant Manager

cc: D. Mays

Mr. Douglas Collins  
U.S. Nuclear Regulatory Commission  
Sam Nunn Federal Center  
61 Fonyth Street SW, Suite 23T85  
Atlanta, GA 30303-931

(UPS: 404-562-4708)

Mr. Jay Henson  
U.S. Nuclear Regulatory Commission  
Chief Fuel Facility Inspection Branch 2  
Division of Fuel Facility Inspection, Region II  
Sam Nunn Federal Center  
61 Forsyth Street SW, Suite 23T85  
Atlanta, Georgia 30383-8931

(UPS: 404-562-4731)

US Nuclear Regulatory Commission  
Attention: Mr. John Lusher, Project Manager  
Fuel Cycle Licensing Branch, Mail Stop T-8A33  
Two White Flint North, 11545 Rockville Pike  
Rockville, MD 20852-2738

(UPS: 301-415-7694)

Attachment ■

Remaining Fluorination/Distillation Restart Items

- \_ Ensure Qualification Summary Cards are complete for Fluorination, Distillation and KOH Operators and Assistant Operators prior **to** assuming shift duties. **This** includes completion of **OJTs**, **JPMs**, and Training Matrix.
2. Complete Standing **Order(s)** for identifying startup sequences for Fluorination and **Distillation**.
3. Complete procedure revisions to provide proper valve positioning for protecting low boiler condensers in various configurations.
4. Complete revision to **Fluorination** and Distillation Abnormal Operation Procedures.
5. Ensure that **PMs** are complete on critical safety equipment as described in the materials license.