

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

618-524-2111
618-524-6239 Fax

February 04, 2005

UPS: 301-415-8147

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: Docket No. 40-3392
License No. SUB-526

Subject: "Reply to a Notice of Violation", NRC letter dated November 22, 2004
Notice of Violation Report No. 04-3392/2004-010

Dear Sirs:

This letter is our second response to the NRC Inspection Report No. 04-3392/2004-010, dated November 22, 2004, "Notice of Violation, Severity Level IV", Violation Number 40-3392/2004-010-01 per your letter of January 7, 2005 stating that our previous response was inadequate. As stated in this letter, we agreed to provide an amended response to the violation to address specific items that were omitted. These items include addressing procedural guidance for inoperative control alarms and instrumentation including requirements to assess the need to take compensatory action to ensure continued safe operation.

Violation No. 40-3392/2004-010-01:

License Condition No.10 of NRC License No. SUB-526, Amendment No. 15, authorizes, in part, the use of licensed materials in accordance with the statements, representations, and conditions in Chapter 1 through 7 of the license application dated January 30, 2003.

Chapter 2, Section 2.6 of the application, dated January 30, 2003, requires that "plant operations shall be conducted in accordance with written Standard Operating Procedure Manuals."

Contrary to the above, as of October 26, 2004, the licensee conducted operations that were not specifically addressed or described in detail with written Standard Operating Procedure Manuals" Specifically, the licensee did not have a written Standard Operating Procedure to address inoperative control room alarms and instrumentation (i.e., low boiler condenser high pressure alarm), including requirements to assess the need to take compensatory action to ensure continued safe operations.

Reason for This Violation:

The licensee has determined the actions taken by the operator were based on a lack of clear procedures and a failure of management to provide clear instructions and expectations.

Corrective Actions:

Procedure MTW-SOP-DIS-9002 has been modified to provide clear instructions to the operators on the actions to take in the event an alarm or instrument associated with process control is determined to be inoperative due to malfunction, process modification, or is disabled. Included is the direction to inform supervision of the loss or malfunction of the alarm or instrument, marking and controlling it as "out of service", supervision making a decision on the necessary mitigative or compensatory actions to allow the continued safe operation of the equipment/system/plant, and taking action to have the alarm or instrument repaired and returned to service. The process includes not only the control room panel mounted alarms and instruments, but those local instruments which are placed in service as the monitored instrument through the mitigative or compensatory actions for the inoperative alarms and/or instruments in the control room. Additionally, provisions were included in the procedure for those alarms and instrumentation that are acknowledged and responded to through the Human Machine Interface (HMI).

The changed procedure has been added to the Required Reading for each section. Shift supervision has discussed the changes with their operators and the Shift Advisors in the Plant will follow up to ensure to the required reading has been completed.

Corrective Actions Taken To Avoid Further Violations:

The generic approach taken by Nuclear Services has been deployed as an overall generic methodology by the licensee to simplify and streamline inoperative alarm and instrumentation response throughout Nuclear Services. The response to these procedures will be monitored and a determination made as to any changes or clarification needed.

These actions will prevent the reoccurrence of these issues in the future. Any additional questions or concerns on this matter please call Mr. D. E. Mays at 618-524-6396 or Mr. M. E. Ginzel at 618-524-6349.

Sincerely,



David B. Edwards
Plant Manager

cc: T. Plunkett (MTO)
D. Mays
M. Ginzel
File

Regional Administrator (UPS: 404-562-4701)
Region II, US Nuclear Regulatory Commission
Sam Nunn Atlanta Federal Center
23 T85, 61 Forsyth Street, S.W.
Atlanta, GA 30303-3415

U.S. Nuclear Regulatory Commission (UPS: 301-415-6334)
Attention: Mr. Michael Raddatz,
Fuel Cycle Licensing Branch, Mail Stop T-8A33
Two White Flint North, 11545 Rockville Pike
Rockville, MD 20852-2738

Region II, US Nuclear Regulatory Commission (UPS: 404-562-4731)
Attention: Mr. Jay L. Henson
Sam Nunn Atlanta Federal Center
23 T85, 61 Forsyth Street, S.W.
Atlanta, GA 30303-3415