

Specialty Materials
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40-3392

March 6, 2006

(UPS: 301-415-8147)

B. Jennifer Davis
Chief, Environmental Review Section
c/o Document Control Desk
Mailstop T-7J08
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Dear Ms. Davis:

On February 10, 2006, the USNRC transmitted to the Honeywell Metropolis Works a draft Environmental Assessment (EA) associated with Honeywell's Application for Renewal of Source Material License SUB-526 (Docket # 40-3392). The purpose of this letter is to transmit to you Honeywell's comments on the draft EA. The draft EA was transmitted to Honeywell in pdf format only; therefore, the attached comments are independent of the source document and make reference to the draft EA by section and page number.

If you should have any questions on the enclosed information or other issues associated with the Metropolis Works' license renewal, please contact Mr. James Tortorelli, Regulatory Affairs Manager, at 618-524-6221.

Sincerely,

David B. Edwards by Ronald D. Eick

David B. Edwards
Plant Manager

Add: B Jennifer Davis

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Honeywell MTW Comments on NRC's Environmental Assessment

1. Acronyms/Abbreviations – Correct TVA to Tennessee Valley Authority. Correct USEC to United States Enrichment Corporation.
2. Chemical Ions and Compounds – Correct spelling of sulfur.
3. Page 1, Title – Honeywell Specialty Materials is a division of Honeywell International, Inc.; it is not a separate corporation.
4. Page 1, Section 1.2 – The 2005 Environmental Report carried forward a statement from the 1995 EA regarding site products. However, the site no longer produces carbon monofluoride.
5. Page 2, Section 1.2, Background – At the end of the first partial paragraph, delete the period after “USEC.”
6. Page 3, Section 1.2 – At the end of the first full paragraph on this page, it appears that the second use of the term “industrialized area” should perhaps be “restricted area.” In the following paragraph, there is a discussion of the proposed cooling tower project. As previously discussed, this project is in a conceptual stage; therefore, it may be advisable to refer to these as “planned or proposed modifications.”
7. Page 3, in the second full paragraph, the EPF expansion is listed twice – first in the paragraph and again in the following bullets. The EPF expansion is essentially complete with startup scheduled for April 2006.
8. Page 5, Section 2.1.1, Description of Facility Activities – Under Feed Storage, Sampling, and Preparation, in the first paragraph, the drums are actually weighed before the sampling evolution.
9. Page 9, Section 2.1.1, Industrial Chemical Storage, Table 2.1 – As discussed in Honeywell's response to NRC's RAIs, the figures in the right-hand column were derived from the facility's SARA 312 Report. These quantities are not those controlled by the licensee or limited by the license for safety purposes and the relationship of these quantities to actual storage tank capacities does not depend on any specific and consistent methodology or operation. As a result, the use of these figures may result in some confusion. Therefore, Honeywell recommends that the right-hand column be eliminated from the table.
10. Page 10, Section 2.1.2.1, Gaseous Waste Management – There is a sentence beginning with “Gaseous effluent streams containing nonradioactive pollutants...” that appears in both the first and second full paragraphs on this page. Also, the last paragraph in this section begins with “The four process stacks onsite,” while the second paragraph (on the preceding page) discusses thirteen

process stacks. Honeywell recommends revising the last paragraph of this section to begin, "Four process stacks onsite..."

11. Page 11, Section 2.1.2.2, Low-Level Liquid Waste Streams and Treatment – In the first paragraph on this page, correct "feed material building" to "feed materials building."
12. Page 11, Section 2.1.2.2, The modifications to EPF are not intended to increase production, but will improve the efficiency of the wastewater treatment plant, whereby eliminating our dependency on ponds D and E. Recommend changing "...which will increase the facility's capacity" to "...which will increase the facility's treatment efficiency".
13. Page 11, Table 2.3, Note b. – Honeywell has provided the basis for the "n/a" entry and values for NH₃ emissions in its January 15, 2005 correspondence with the NRC.
14. Page 13, Section 2.1.2.2, Liquid Waste Streams and Treatment – In the second paragraph, replace "...1539 gallons of mixed waste is stored..." with "...1539 gallons of mixed waste are stored...."
15. Page 13, Section 2.1.2.2, Liquid Waste Release Rates – Replace "Liquid effluents from the restricted area is discharged..." with "Liquid effluents from the restricted area are discharged..."
16. Page 14, Section 2.2, Monitoring Programs – The third sentence of this paragraph seems to indicate that the occupational monitoring program provides a basis for evaluation of public health and safety impacts. The occupational monitoring program addresses occupational monitoring only.
17. Page 14, Section 2.2.1.1, Gaseous Release Monitoring - In the first paragraph, replace "35 years of historical data," with "45 years of historical data."
18. Page 15, Section 2.2.1.1, Gaseous Release Monitoring – In the first sentence of the first paragraph, either delete "home of the" or replace "residence" with "residents." Also, there is some inconsistency between the last sentence of the last paragraph of this section, the information provided in Table 2.5, and the text of Section 2.2.2.1, Air Monitoring. Specifically, the last paragraph of Section 2.2.1.1 indicates that "The air samples are composited at each station and analyzed at least monthly for uranium and at least quarterly for Ra-226 and Th-230. Table 2.5 indicates that six onsite air samples are analyzed quarterly for uranium, Ra-226, Th-230, and fluoride and that two offsite air samples are analyzed weekly for the same analytes. The first paragraph of Section 2.2.2.1 indicates that "Cumulative samples are collected weekly and analyzed for uranium and fluoride. A quarterly composite of the 13 weekly samples is analyzed for airborne concentrations of Ra-226 and Th-230." Although Table 2.5

would appear to be consistent with the information provided in Table 5-16 of Honeywell's Safety Demonstration Report, the text of Section 2.2.2.1 would appear to be consistent with both Section 4.2.1 of Honeywell's License Renewal Application and current practice. Therefore, Section 2.2.1.1 and Table 2.5 should be revised accordingly.

To be consistent with the text of Section 2.2.1.2, the dissolved solids in table 2.5 of the EA should be removed for they are no longer a requirement of the NPDES Permit. The ER will be revised to reflect the change.

Also, the fourth sentence of the first paragraph on page 15 indicates that the presence of airborne radioactivity at the action level of $3E-14$ $\mu\text{Ci/ml}$ would result in an annual dose of 10 mrem to an individual continuously present at the fence line. Honeywell suggests that this sentence be rephrased to "This action level has been developed to ensure compliance with the member of the public dose limits provided in 40 CFR 190." The actual calculated dose would depend on a variety of factors, including the solubilities of the materials released.

19. Page 17, Section 2.2.1.2 – In the third paragraph, first sentence, insert "and" before "biological oxygen demand (BOD)."
20. Page 18, Table 2.4, Table is missing the pH range for 2001. The information has been provided to NRC in previous RAI.
21. Page 18, Table 2.4, NPDES Limits column reflects a daily maximum flow of 3.40, however Honeywell has no flow limitation in our NPDES Permit.
22. Page 20, Section 2.2.2.1 – In the first full paragraph, correct "10 CFR 20, Table 2" to "10 CFR 20, Appendix B, Table 2."
23. Page 24, Section 2.2.2.4, Groundwater Monitoring – In the first paragraph, last sentence, replace "satisfy" with "satisfies."
24. Page 25, Section 2.2.2.4, Groundwater Monitoring – Correct "These monitoring..."
25. Page 27, Section 3.2.2, Winds, Tornados, and Storms – In the first sentence, correct "...the predominant wind direction to be.."
26. Page 30, Section 3.3, Demography and Socioeconomic Profile – In the first paragraph on this page, correct "United States Enrichment Company" to "United States Enrichment Corporation." In the third sentence of the second paragraph on this page, it is not clear what area in or near Paducah is being referred to as "Massac." In the next to last paragraph in this section, correct "Based on an state labor statistics..." In the last paragraph in the section, correct "Massac, Kentucky" (perhaps Paducah, Kentucky).

27. Page 30, Section 3.4.1, Site Area – Correct the last sentence of the first paragraph to indicate that the natural gas transmission line crosses the property approximately 500 feet north of the Administration Building.
28. Page 39, Section 3.8, Occupational Health and Safety – In the first full paragraph, correct “sources of chemical exposures includes...” to “sources of chemical exposures include...” In the next paragraph, replace “radiation protection plan...” with “radiation protection program...” Also in that paragraph, the third sentence indicates workers are unlikely to receive more than 500 mrem per year. However, the fifth sentence indicates that 80% of workers received greater than 500 mrem. In the fourth sentence, correct “highter” to “higher.”
29. Page 39, Section 3.9, Transportation – In the first sentence, change the site location from west of Metropolis to northwest of Metropolis for consistency with Section 1.2.
30. Page 40, Section 3.10, Waste – Throughout this section, correct waste measurements from area units (e.g., ft²) to volume units (e.g., ft³).
31. Page 44, Section 4.1.1.1, Nonradiological, Threatened and Endangered Species – At the end of the first paragraph, correct “ise” to “is.”
32. Page 46, Section 4.1.2, Evaluation of Potential Accidents – In the third sentence of the second paragraph, note that the licensee is not subject to the requirements of 10 CFR 70. Therefore, this sentence should indicate that, “Honeywell has conducted an integrated safety analysis (ISA) similar to that required under 10 CFR 70 for facilities handling special nuclear materials.”