

Specialty Materials

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January 29, 2007

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US Nuclear Regulatory Commission
Director, Office of Nuclear Material Safety & Safeguards
Attention: Document Control Desk
Mail Stop T8A33, Two White Flint N, 11545 Rockville Pike
Rockville, MD 20852-2738

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

RE: "NRC Inspection Report 40-3392/2006-009 dated December 14, 2006"

Dear Sirs:

This letter is our response to the NRC Inspection Report 40-3392/2006-009.

During an NRC inspection conducted to observe Honeywell's annual emergency response exercise on the evening of November 15, 2006, the NRC did not identify any violations. However, the critique process for evaluating the effectiveness of the exercise was determined to be a programmatic weakness. This letter is in response to the NRC request to address and correct that weakness.

The programmatic weakness described by the NRC was a lack of participation during the critique by MTW emergency responders and the failure to discuss weaknesses that occurred at the incident scene during the drill critique. The responders voiced a concern during the critique that they were "trying their best to perform correctly" during the inspection. There were only a few responders that voiced any criticism either positive or negative and the majority of the comments were positive and non-specific.

The NRC inspectors observed several issues during the exercise that would have been expected to be addressed during the critique. The following items are examples of topics that were either not addressed or only lightly covered by emergency responders at the critique:

- communications,
- difficulty with self contained breathing apparatus,
- decontamination station location, and
- patient management.

We recognize that to make quality improvements in our emergency response organization we need to receive frank inputs of shortcomings during the debriefs. During the monthly supervisors meeting in January, it was reinforced with all MTW supervisors that critiques are forums to discuss positive as well as negative aspects of emergency events. To illuminate problems which were encountered during events or exercises are not viewed as being negative but viewed as positive criticism to improve the emergency response organization.

Corrective Action:

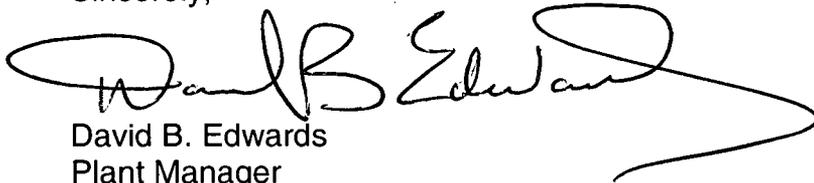
Revise MTW-ERP-PRO-008 – Maintaining Emergency Preparedness – Attachment 9 – Incident/Drill Debrief. The following areas will be covered by the revision:

- A short debrief will be held by each functional area prior to the overall debrief, similar to the one held in the Crisis Management Center. This will include Incident Command, Control Room and Crisis Management. These debriefs will be open and frank and review the performance of each function against the performance expectation. Any issues related to equipment, interface, coordination, personnel resources will be topics for discussion. The Incident Commander, Control Room Officer and Crisis Manager will lead these discussions and involve all participants. After they have completed the discussions, the drill controllers will then discuss any issues that the participants did not cover.
- The overall debrief will be held after the individual debriefs to ensure the interface issues are properly discussed. The strengths and weaknesses in each functional area will be discussed.

Procedure Revision – Completion Date: February 28, 2007

If you have any additional questions, please contact Mr. Larry Parscale, Nuclear Regulatory Affairs Manager, at 618-524-6221.

Sincerely,



David B. Edwards
Plant Manager

cc: L. Parscale

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