

Specialty Materials

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June 28, 2007

U.S. 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

(UPS: 301-415-8147)

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

Subject: HONEYWELL METROPOLIS WORKS (DOCKET NO. 40-3392) –
WITHDRAWAL OF REQUEST FOR CLARIFICATION REGARDING 11e(2)
WASTE CLASSIFICATIONS.

REFERENCES: 1. Letter dated March 7, 2006, from D. Edwards (Honeywell International, Inc.)
to M. Raddatz, Project Manager, Nuclear Regulatory Commission,
regarding classification of waste streams at the Metropolis Works facility.

Dear Mr. Weber:

By letter dated March 7, 2006 (Reference 1), Honeywell International, Inc. (Honeywell) requested that the NRC coordinate with the State of Illinois to clarify that the NRC has the authority to determine that certain waste materials meet the definition of "byproduct" material as provided in Section 11e(2) of the Atomic Energy Act and 10 CFR Part 40. In addition, Honeywell requested that the NRC review and evaluate whether certain waste streams at the Metropolis Works facility meet that definition of 11e(2) byproduct material. The issues addressed in the March 7, 2006 letter are the same in substance as issues first raised by Honeywell in a March 2, 2001 letter to the NRC, as supplemented by a letter dated September 20, 2002.

Subsequent to Honeywell's March 7, 2006 letter to the NRC, the NRC held discussions with the State of Illinois regarding Honeywell's request. On June 18, 2007, a telephone conference call was held with representatives of Honeywell and the NRC. The NRC discussed both Honeywell's request and the outcome of its discussions with the State of Illinois. During the call, the NRC confirmed that the NRC, and not Illinois, has the regulatory authority to make waste classifications for radioactive materials at the Metropolis Works facility. Honeywell agrees with the NRC's assessment in this regard. The NRC indicated that future requests for waste classification of specific waste streams should be submitted in the form of a License Amendment Request and would be processed accordingly. The NRC also stated that a particular waste stream cannot maintain multiple waste classifications simultaneously. Once a waste classification has been made by license amendment, that classification will remain in effect for that waste stream.

Honeywell recognizes that specific waste materials from the MTW have already been evaluated by the NRC and determined to meet 11e(2) criteria. Specifically, in a November 10, 1999 letter from J. Surmeier, NRC, to W. Goranson, Quivira Mining Company, the NRC determined that crushed ore

MMSO 1

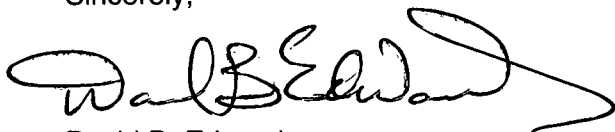
shipment drums and wood chips from crushed/chipped wood pallets from the MTW facility could be classified as 11e(2) material and disposed of at Quivira Mining's Ambrosia Lake facility. Accordingly, no further regulatory action is required for disposal of these materials as 11e(2) waste. However, because no waste disposal facilities are currently licensed to accept 11e(2) waste material, Honeywell is evaluating whether those materials and/or other waste streams can be disposed of as unimportant quantities of source material pursuant to 10 CFR 40.13. Honeywell understands that, if that option is available for specific waste material, no further regulatory action would be necessary to invoke that regulation.

With respect to other waste streams at the MTW and in light of the NRC's preferred regulatory process for classifying material as 11e(2) byproduct material, Honeywell hereby withdraws its March 7, 2006 request for clarification. If, in the future, 11e(2) waste disposal options become available or Honeywell otherwise wishes to seek classification of certain waste streams as 11e(2) byproduct material, Honeywell will submit a license amendment request to the NRC as discussed above.

Honeywell is fully-committed to the safe and proper operation of our Metropolis Works Facility. This is consistent with our corporate commitment to the continued safety of our workers and the public, and the protection of the environment. This letter does not contain any new regulatory commitments.

If you have and questions about this letter, please contact Mr. Larry Parscale, Regulatory Affairs Manager, at (618-524-6221).

Sincerely,



David B. Edwards
Plant Manager

cc: Larry Parscale
Jeffrey Neuman

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